

SUSTAINABILITY
REPORT 2025



This is Aviapartner's fifth sustainability report, demonstrating our continued commitment to responsible business practices and transparency. In line with our support for the UN Global Compact, we share our Communication on Progress (COP) as part of our broader sustainability journey.

This edition covers the period from January 2025 to December 2025, highlighting key initiatives, progress, and performance across our operations.

Imprint

Publisher: Aviapartner Holding NV

Year of Publication: 2026

Aviapartner Holding NV

Luchthaven Brussel Nationaal

1930 Zaventem

Belgium

www.aviapartner.aero

TABLE OF CONTENTS

1. MESSAGE FROM THE CHAIRMAN	5
2. GENERAL DISCLOSURES (ESRS 2)	7
2.1. Basis for preparation	8
2.2. Governance	13
2.3. Strategy	29
2.4. Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)	54
2.5. Disclosure Requirements in the ESRS covered by the undertaking's sustainability statement (IRO-2)	61
3. ENVIRONMENTAL INFORMATION – CLIMATE CHANGE (E1)	63
3.1. Transition plan for climate change mitigation (E1-1)	64
3.2. Management of impacts, risks and opportunities related to climate change mitigation and energy	65
3.3. Management of impacts, risks and opportunities related to climate change adaptation	83
4. SOCIAL INFORMATION (S1)	87
4.1. Human rights	88
4.2. Management of impacts, risks and opportunities related to working conditions and general processes in relation to own workforce	93
4.3. Management of impacts, risks and opportunities related to health & safety	111
4.4. Management of impacts, risks and opportunities related to diversity	123
4.5. Management of impacts, risks and opportunities related to training and career development	138
4.6. Additional metrics related to own workforce	144
5. GOVERNANCE – BUSINESS CONDUCT (G1)	149
5.1. Management of impacts, risks and opportunities related to business ethics	150
5.2. Management of impacts, risks and opportunities related to cybersecurity and data privacy	162
6. APPENDIX	167
6.1. List of entities covered by the sustainability statement	168
6.2. Disclosure requirements complied with in its sustainability statements (ESRS 2 IRO-2)	170
6.3. List of certification coverage	183
6.4. Limited assurance report of the statutory auditor on the consolidated sustainability statement of Aviapartner	184



1. MESSAGE FROM THE CHAIRMAN

We are committed to being a source for good and contributing to sustainable travel for generations. Over the years, our commitment has grown stronger as we understand the positive impact we can make.

In the last year, we have achieved several milestones that we are proud to share with you in this sustainability statement. At the same time, we remain transparent about the challenges and stumbling blocks we encountered along the way. We recognise that there is still much work to be done, and we are committed to continuing our efforts with determination and focus.

We're focusing on making a difference and contributing with actions that are meaningful for our stakeholders. Our sustainability efforts have centred on key priorities for our company and our stakeholders: ensuring the safety of our people, advancing our commitment to decarbonising our activities, fostering constructive dialogue with our workforce and listening to their concerns, providing opportunities for training and career development to our staff, caring about diversity and inclusion, safeguarding data and tackling cybersecurity risks, as well as protecting our values, business ethics and market credibility.

The priorities above reflect our belief that putting people first is inseparable from our responsibility to care for the environment. Quality, safe, secure, and sustainable ground handling services continue to be our main goal.

However, we cannot achieve this vision alone. Collaboration across our entire value chain and active engagement with all stakeholders are crucial to our success.

The following pages illustrate our continued commitment to the ten principles of the United Nations Global Compact (UNGC), which we have endorsed since 2021. In this statement, we share our implemented measures and relevant Performance Indicators in progressive alignment with the European Sustainability Reporting Standard for 2025.

We welcome feedback from all stakeholders on this report and encourage you to reach out with any questions, comments, or suggestions for improvement. Your collaboration, along with the support of our entire ecosystem, are vital to achieving our goals.



Laurent Levaux
Aviapartner Chairman



2. GENERAL DISCLOSURES (ESRS 2)



2.1. BASIS FOR PREPARATION

2.1.1. General basis for preparation of the sustainability statement (BP-1)

Aviapartner **seeks to align with the European Sustainability Reporting Standards (ESRS)**, as published in the European Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023, and the future requirements of the Corporate Sustainability Reporting Directive (CSRD), as amended by Directive (EU) 2026/470 of the European Parliament and of the Council of 24 February 2026. The 2025 reporting exercise has been conducted on a voluntary basis and is intended as a preparatory step towards future compliance.

SCOPE OF THE REPORT

This sustainability statement has been prepared on a **partially consolidated basis**. The scope of consolidation for the sustainability statement does not fully align with the financial statements. While most operational entities are included, joint ventures that are not fully consolidated are not considered in the sustainability statement. In addition, due to the expansion of Aviapartner's international activities in 2025, the company is working on integrating newly opened entities that are therefore not yet included in this 2025 sustainability statement. The company will ensure that it is implementing processes and procedures to identify, collect and process data for subsequent reporting exercises. Efforts are in progress to align these scopes more closely to ensure consistency in entity coverage for both financial and sustainability disclosures. This results in a scope that focuses on the company's major European activities.

A table in appendix 6.1 *List of entities covered by the sustainability statement* provides a detailed list of the entities that have been included in the sustainability statement.

Particular attention must be paid to disclosures from the German entities. Due to the closure of the main activities in Germany, Aviapartner could only collect some of the information. Throughout the report, in order to guarantee full transparency and comparability, any exception or lack of data from one country of operation will be mentioned in the respective tables and texts.

Aviapartner's sustainability statement does not fully cover its value chain at the moment. The company aims to increasingly cover both upstream and downstream value chain information, reflecting ongoing efforts to achieve comprehensive coverage and transparency.

In the **upstream value chain**, Aviapartner engages where possible with suppliers with stringent standards, requiring suppliers that are of critical importance for the delivery of services to adhere to its Supplier Code of Conduct. These suppliers participate in regular audits and assessments spread over a three-year cycle to align with environmental, social, and governance goals. In the **downstream value chain**, meanwhile, the company's commitment is reflected in its customer engagement and efforts to reduce its environmental impact.

Further efforts in quantitative tracking are required for full compliance with regulatory standards. Although a complete GHG emissions inventory, including upstream and downstream (scope 3) emissions, is still under construction, Aviapartner is working to improve the measurement and understanding of its value-chain emissions. The resulting insights will support the identification of future emissions reduction opportunities and resource efficiency improvements across the business and its value chain.

INFORMATION OMITTED

Aviapartner has not exercised the option to omit specific information corresponding to intellectual property, know-how or the results of innovation. However, the company has exercised the option provided by Member State legislation to omit certain disclosures relating to impending developments or matters in the course of negotiation. This option has been applied selectively and on a case-by-case basis.

The decision to omit specific information is based on the following distinct considerations:

- > **Forward-looking uncertainty:** Certain disclosures relate to future developments that remain highly uncertain and subject to internal decision-making. At this stage, some strategic considerations are not sufficiently stable, and disclosure could therefore create a misleading representation of the company's expected performance or position.
- > **Methodological limitations and data comparability:** Some indicators are not yet fully aligned across current local calculation practices and ESRS requirements. As a result, the data is not published as it does not yet meet the principles of faithful representation, comparability, and understandability.
- > **Immaturity of data, methodologies, and processes:** Several disclosures depend on methodologies, data collection systems, or analytical frameworks that are still being developed or harmonised at Group level. In their current state, these do not yet support sufficiently robust, consistent, or reliable reporting.

The relevance and availability of the omitted information will be reassessed in future reporting periods. Aviapartner intends to progressively reduce the scope of omitted disclosures as data collection processes, methodologies, and internal reporting systems mature, with the objective of meeting applicable ESRS reporting requirements when they become mandatory.

Based on the considerations above, the main omissions in the current reporting period relate to:

- > The current and anticipated financial effects of material sustainability-related risks and opportunities on the company's financial position, due to a high degree of uncertainty.
- > Information on the resilience of the company's strategy and business model, including underlying analyses of physical and transition risks, which are still under development.
- > The company's climate targets, climate transition plan, and the associated allocation of financial resources, which have not yet been defined.
- > Information on carbon sinks and projected carbon credit needs, which will be determined once the transition plan is established. Currently, the company does not use greenhouse gas removals or storage, does not rely on carbon credits or offsets, and does not make claims of carbon or GHG neutrality.
- > Remuneration ratio, gender pay gap and adequate wage benchmarks, due to internal data constraints and the need for methodological alignment in the various jurisdictions where the company is active.
- > The current and future resources required to implement sustainability-related action plans across all material topics, as the related calculation methodologies are still under development at group level.

2.1.2. Disclosures in relation to specific circumstances (BP-2)

PRESENTATION OF SUSTAINABILITY INFORMATION

The most notable change in the preparation and presentation of sustainability information is the progressive **alignment with the European Sustainability Reporting Standards (ESRS)**, replacing the previously used Global Reporting Initiative (GRI) standards. The reasoning behind these changes stems from a commitment to responsible business practices, ensuring future compliance with applicable regulations, transparency, stakeholder engagement, and alignment with applicable standards. Aviapartner aims to deliver comprehensive and actionable sustainability insights to stakeholders, enhancing visibility on corporate responsibility and meeting evolving regulatory demands.

To avoid any confusion or misstatement, **no comparative figures** are presented in the 2025 sustainability statement, as changes in the scope and standard used may affect comparability.

Aviapartner is also a signatory to the United Nations Global Compact, reports yearly on sustainability in its Communication of Progress, and participates in external sustainability assessments such as EcoVadis. While certain data points were collected to ensure consistency with these initiatives, **they did not result in the application of additional reporting standards, frameworks, or entity-specific disclosure requirements** beyond the European Sustainability Reporting Standards (ESRS). The sustainability statement has therefore been prepared **exclusively in accordance with the ESRS**, and with the caveats mentioned in *2.1.1 General basis for preparation of the sustainability statement (BP-1)*. Any additional entity-specific metrics included serve solely to support communicating targeted information to these other reporting or assessment processes and ratings.

The company is subject to national sustainability reporting requirements in certain jurisdictions. In particular, in Spain, sustainability disclosures are governed by the Estado de Información No Financiera (EINF), which mandates the publication of non-financial information in accordance with national legislation. The Spanish regulatory framework allows companies to prepare their non-financial information using recognised international or European reporting standards, including the ESRS, provided that such standards ensure compliance with the content requirements set out in EINF legislation. In this context, using the ESRS ensures consistency and alignment with future European regulatory requirements applicable to Aviapartner under the CSRD, as well as applicable national legislation in Spain.

For this first report following the ESRS framework, no information has been incorporated by reference in the consolidated report.

ESTIMATION AND UNCERTAINTY MANAGEMENT

Unless stated otherwise, Aviapartner adheres to the definitions provided by the ESRS for the different time horizons. These are the following:

- > **Short-term time horizon:** the current financial year aligned with financial statements;
- > **Medium-term time horizon:** from the end of the reporting period up to five years; and
- > **Long-term time horizon:** more than five years.

Aviapartner has not included estimated data using indirect sources from its value chain. Its commitment to start tracking indirect Scope 3 emissions demonstrates Aviapartner's best effort towards expanding value chain data coverage and improving future disclosures. Aviapartner is thereby also committed to improving the accuracy of its value chain data metrics through enhanced stakeholder collaboration with suppliers, business partners, and regulatory bodies.

As a general principle, priority is always given to the most recent and highest quality data. Data quality for each quantitative metric published in this report is accompanied by a note on its methodology and assumptions. In case estimations are needed, calculations follow a conservative approach to ensure results are not overstated, following a precautionary approach despite inherent uncertainties.

The main uncertainties in this statement stem from several areas:

- > **Fuel consumption:** Data is primarily collected from supplier invoices. While controls are in place at both country and headquarter level, the timely availability of invoices may vary across locations, and manual data entry is required, introducing a risk of transcription errors, which is mitigated by the introduction of further transparency in the consolidation of data. Where exact physical consumption data is not available, estimates are derived based on average fuel consumption per flight within the same entity, or in exceptional cases based on cost data, which introduces estimation uncertainty. In addition, for newly added small stations in 2025 (e.g. Tenerife Norte, Vitoria, and Las Palmas within Aviapartner Aviavip Spain s.a.), no fuel data is currently available. Given the very low level of activity at these stations, fuel consumption is expected to be marginal, and therefore it does not have a material impact on the Group total.
- > **Electricity consumption:** Where primary metered data is not available, electricity consumption is estimated using landlord-provided information or proxies based on comparable activities within the Group, taking into account operational characteristics such as functionality and floor area. These estimation methods introduce inherent uncertainties.
- > **Fugitive emissions:** Fugitive emissions from refrigeration and air-conditioning equipment are currently not included in Scope 1 calculations. Most Aviapartner facilities are located in airport premises leased from third parties, and the relevant equipment is often maintained by airport operators, limiting access to the data required for comprehensive reporting. In 2024-2025, Aviapartner initiated a Group-wide inventory of cooling and air-conditioning equipment with 40 stations. Available data indicates limited reported leakage at most locations, while the highest identified leakage was reported at Brussels Cargo. As data collection is still ongoing and coverage remains incomplete, the total impact of fugitive emissions on Aviapartner's GHG inventory cannot yet be quantified with sufficient confidence.
- > **Health and safety data comparability:** For health and safety indicators, differences may arise between Group-reported figures and those reported to local authorities or insurers. These differences are not due to estimation and uncertainty but reflect variations in national reporting requirements and definitions of reportable incidents. At Group level, a more conservative and harmonised approach is applied, whereby all incidents are reported to ensure greater consistency and comparability across entities.

Each step of the calculation process, including assumptions and estimates, is recorded and verified to ensure transparency and allow updates as data quality improves over time. Internal validation procedures such as spot checks help reduce uncertainties, while ongoing efforts focus on automating data collection to further enhance accuracy and consistency.

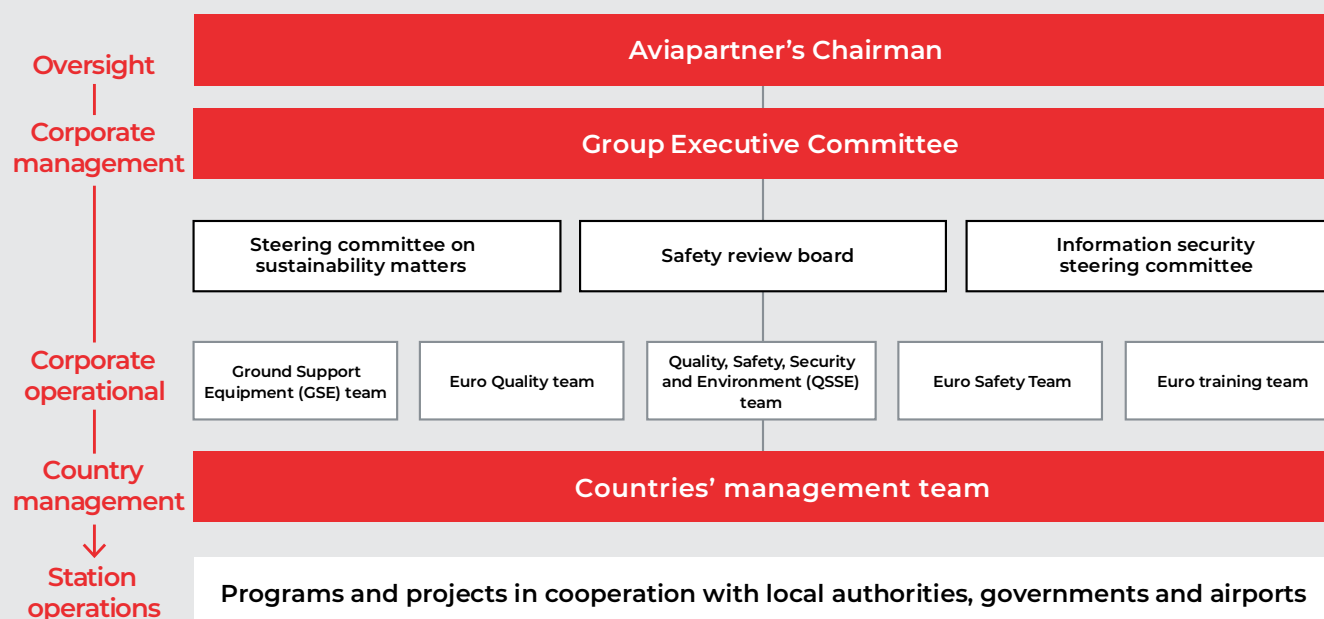
Aviapartner is also strengthening the reliability and coverage of its data collection across all countries and stations by improving data systems and processes. This is supported by expanded verification through third-party audits and the further deployment of its Quality, Safety, Security, and Environment (QSSE) Management System, enhancing overall transparency and traceability.



2.2. GOVERNANCE

2.2.1. The role of the administrative, management and supervisory bodies (GOV-1)

Aviapartner's governance framework defines responsibilities for the roles and teams managing, monitoring, and overseeing impacts, risks, and opportunities which are core to the strategy.



COMPOSITION AND DIVERSITY OF THE MEMBERS OF THE BOARD

As a private organisation, Laurent Levaux, the company owner and Executive Chairman, holds overall responsibility over the corporate strategy.

As the only member of the holding company's Board, which covers the whole Aviapartner Group, he is an executive member, and there is no independent member.

Table 1: Gender diversity of the board

GENDER DIVERSITY OF THE BOARD	2025
Female	0%
Male	100%
Not reported	N/A
Other	N/A

As the only board member is currently a male individual, the board gender diversity ratio¹ in 2025 is zero.

1. The board gender diversity ratio is calculated as the average ratio of female to male board members.

EXECUTIVE MANAGEMENT

On the other hand, the executive team, also referred to as governance bodies in this document, has a gender diversity ratio of 0.11.

Table 2: Composition and diversity of executive management and governance bodies

GENDER DIVERSITY OF EXECUTIVE MANAGEMENT AND GOVERNANCE BODIES	2025
Female	10%
Male	90%
Not reported	N/A
Other	N/A

Aviapartner's governance structures benefit from extensive experience in aviation across the various activities of ground handling, cargo, private aviation (FBO) and passenger lounges, in different geographic locations across Europe and Africa. Governance bodies include support functions such as the Vice President of Safety and Occupational Health, Vice President of Quality and Environment, General Counsel, Group IT Director, VP Treasury, Controlling and Accounting, who possess expertise in their respective domains to support the strategy. The following table presents Aviapartner's 2025 governance bodies and its members' experience relevant to sectors, products, and geographic locations as at December 31st, 2025:

NAME	COUNTRY	TITLE	FUNCTION
Board			
Laurent Levaux 	HQ	Chairman	Laurent Levaux has more than 47 years of executive experience across logistics, engineering, and services, including senior leadership roles at ABX Logistics and CMI Group. He is Chairman of Aviapartner Group, with extensive expertise in corporate governance, strategy, and business transformation.
Corporate management			
Richard Prince 	HQ	CEO	Richard Prince has over 25 years of professional experience in aviation and services, including senior executive roles at Etihad Airport Services and Swissport UK. He is currently CEO of Aviapartner Group, bringing strong expertise in strategic leadership, transformation, and large international operations.
Eva Vanallemeersch 	HQ	VP Quality & Environment	Eva Vanallemeersch has 36 years in ground handling, including 23 years of professional experience in quality, environment, safety, and sustainability within the aviation services sector. She is VP Quality & Environment at Aviapartner, and Sustainability Lead, with strong expertise in different certification programmes and group wide sustainability and compliance oversight.

Mike Ballet 	HQ	VP Treasury	Mike Ballet has built up solid financial experience as a banker (corporate banking/aircraft finance/dealing room) with different international banks. Before joining the Aviapartner Group in 2008, he was Treasurer in a global engineering company. Nowadays he is Vice President, responsible for Group Treasury and Credit Management.
Bruno Coppé 	HQ	Head of Ground Support Equipment	Bruno Coppé holds a senior corporate role at Aviapartner as Head of Ground Support Equipment, leading the GSE Managers. He also contributes to group level activities related to tenders, technical documentation, and corporate submissions. He is regularly involved in the preparation, coordination, and validation of official group materials used for major airport tenders and regulatory processes.
Sebastien de Liedekerke 	HQ	VP Controlling	Sébastien de Liedekerke holds a senior finance leadership role within Aviapartner Group as VP Controlling, supporting group level financial oversight, performance monitoring, and governance. He contributes to corporate decision making through expertise in controlling, financial analysis, and risk related processes.
Dominiek Derhore 	HQ	IT Director	With 20+ years in IT at Aviapartner, Dominiek Derhore holds a senior group level role at Aviapartner as Group IT Director since 2020. He contributes to group governance through oversight of IT strategy, information systems, and information security across the organisation.
Jérôme Ferasin 	HQ	Chief Sales & Strategy Officer AviaVIP	Jérôme is a senior Business Aviation commercial leader with 25+ years' experience across major airport management companies, business jet operators, and Airbus. Throughout his professional tenure, he has overseen international sales teams and led negotiations with senior executives from Forbes 500 companies, individuals of substantial net worth, and government representatives. He currently leads Business Aviation for Aviapartner Group, overseeing private aviation and handling activities across multiple airports.
Lars Helsen 	HQ	General Counsel	Lars Helsen has 24 years of legal experience. He started his career as a corporate and commercial bar lawyer and thereafter worked as a legal consultant in a variety of sectors, ranging from the real estate, telecom and diamond sectors to the aviation sector. He started his career at Aviapartner in 2013 and is currently the General Counsel of the Aviapartner Group. He oversees the legal affairs of the Group and has a thorough knowledge of the legal aviation framework, mainly focused on ground handling activities.

Eric Laforest 	HQ	VP Accounting Aviapartner Group, Finance and Administration Director France	Eric Laforest has more than 34 years of experience in finance and accounting within Aviapartner. He is currently VP Accounting for the Group and Finance and Administration Director France, providing strong expertise in financial governance and control.
Damian Atkins 	HQ	VP Safety & Occupational Health	With more than 20 years of experience in aviation and logistics, Damian Atkins joined Aviapartner in 2019 as Quality, Safety, Security and Environment Director Spain. During the reporting period until December 31 st , 2025, he held the position of VP Safety & Occupational Health, contributing to group governance through oversight of safety and occupational health matters across the organisation.
National management			
Sebastiaan Spijkers 	Belgium	Managing Director Aviapartner Belgium	Sebastiaan Spijkers is Managing Director of Aviapartner Belgium. He has built extensive experience in airport ground handling through progressively senior management roles, with a strong track record in operational leadership, regulatory compliance, and stakeholder management. His professional background supports the effective integration of sustainability, safety, and quality principles into governance and day-to-day decision-making.
Bertrand Vanden Broeck 	Belgium	Commercial Director Belgium	Bertrand Vanden Broeck has over 30 years of experience in the aviation industry. Throughout this career, Bertrand has held roles in Belgium and internationally, working with a wide range of airlines and ground handling companies.
Stephan Denner 	France	Managing Director France	Stephan Denner has over 33 years of professional experience in finance and general management across industrial and aviation services groups. He is Managing Director France and a member of the Aviapartner Group Executive Committee, contributing strong governance, restructuring, and financial leadership expertise.
Cedric Migeon 	France	Managing Partner – AirPlans AG	As an external consultant, Cedric has 28 years of experience in aviation, including senior leadership roles with large aircraft operators and service providers in Europe and the Middle East. Since 2012, he is the founder and managing partner of AirPlans, a management consulting firm specialised in aviation, with a focus on aircraft operations, maintenance and completion, as well as ground support services. His expertise provides valuable support to the private aviation team France.

Sami Khedaier 	France	Director of Transformation and Innovation France	Sami Khedaier has over 31 years of professional experience in aviation and operations, including senior leadership roles at Aviapartner France as Director of Operations, and currently Director of Transformation and Innovation France and station director Toulouse. His background combines operational governance, process optimisation, and large-scale organisational transformation.
Alexandre Monnier 	France	Operations Director France	Alexandre Monnier has close to 30 years of experience in airport ground handling operations across France and Switzerland. He is Operations Director France since 2022 and Station Director Aviapartner Nantes, with strong expertise in operational governance and large-scale airport operations.
Frédéric Ordener 	France	HR Director and Internal Communication France	Frédéric Ordener has close to 30 years of professional experience in human resources and social management. He is HR Director and Internal Communication France at Aviapartner, contributing to group governance through oversight of HR strategy, social relations, and internal communication in France
Jorge Silva 	France	Commercial Director France	Jorge Silva has over 31 years of experience in commercial, marketing, and communication roles within aviation and media. He is Commercial Director France at Aviapartner, bringing extensive expertise in commercial strategy and customer relations.
Roger Scheifele 	Germany	Country Manager Germany	Roger Scheifele holds a senior country level leadership role at Aviapartner as Country Manager Germany since 2025. He contributes to group governance through oversight of country operations and participation in group safety and management forums.
Blake Sclanders 	Germany	Commercial Director	With over 20 years of experience in ground handling at different ground handlers, Blake Sclanders has held a senior country level leadership role since 2015 at Aviapartner as Country Manager Germany and Commercial Director. He contributes to group governance through oversight of commercial performance and country operations within the aviation services sector.
Tiziana Augliera 	Italy	Commercial Director Italy	Tiziana Augliera has more than 30 years of operational and commercial leadership experience in the aviation sector, combining deep expertise in ground handling operations, strategic commercial development, and customer relations to drive sustainable new business growth while strengthening partnerships with major customers across the aviation industry.

Federico Bucci 	Italy	CFO Italy	Senior CFO with over 25 years of executive leadership experience, specialised in financial strategy, management control, structured finance, and Mergers and Acquisitions to drive sustainable value creation. A trusted business partner with a strong track record in leading financial transformations, strengthening governance, and supporting growth in international environments.
Matteo Festuccia 	Italy	General Manager and Business Development Director	Matteo Festuccia is an engineer with extensive experience in executive positions and international projects. For more than 25 years, he held senior leadership roles with a proven track record across the dynamic and competitive telecom and air transport industries, combining strategic leadership, commercial development, and operational oversight to drive sustainable growth, strengthen market positioning and build long-term partnerships with key stakeholders. He is currently General Manager and Business Development Director for VIP lounges (Prima Vista) and VIP services.
Alberto Gaudino 	Italy	Managing Director Italy	Alberto Gaudino holds a senior executive role within Aviapartner Group as Managing Director Italy, overseeing national operations and performance. Alberto has about 40 years of executive experience across Airlines, Airports, TLC and Tourism. As the Managing Director of all the Italian entities of the Group, he is leading the relevant growth of Aviapartner Stations and Turn Over gained in Italy in last years. He contributes to group governance through strong leadership in operational management and country level execution within the aviation services sector.
David Boutillier 	South Africa	Managing Director Africa	David Boutillier is a Senior Executive with over 25 years of experience in the airport, logistics, and transport industries, with leadership roles at Aviapartner, Presstalis, and FedEx. Recognised for strong expertise in P&L management, large-scale team leadership, operational excellence, service quality, business development, and the management of complex social and labour relations environments.
Tiago Gaspar 	Spain	Commercial Director Spain	Tiago Gaspar is a senior executive with over 20 years of experience across travel agencies, airlines, and ground handling industries, holding various leadership positions throughout his career. He currently serves as Commercial Director for Spain at Aviapartner, where he has contributed to the company's growth and success for the past decade.

Tais Iglesias Arauzo 	Spain	Director of HR, Corporate & Social Responsibility Spain	Tais Iglesias Arauzo is a senior executive with extensive experience in human resources, corporate governance, and organisational transformation. She is Director at Aviapartner Spain, where she is responsible for People, Corporate Services, ESG, and Communications. Her expertise includes labour relations, talent development, compliance, and strategic change management within complex, multi-site organisations.
Miguel Salido 	Spain	Managing Director Aviapartner Spain	Miguel Salido has over 25 years of experience in aviation and ground handling. Within Aviapartner Spain, he has held several functions since 2015 as station manager and Operations Director Spain. Since 2019 he has been Managing Director Aviapartner Spain.
Erik De Goeij 	The Netherlands	Managing Director the Netherlands	Erik De Goeij possesses over 35 years of senior executive experience in logistics, production, and distribution. He held successive leadership positions at Vopak and Univar, where he was responsible for large-scale operational management and directed mergers and acquisitions, including the strategic integration of acquired entities. Over the past two decades, Mr. de Goeij has established a distinguished career in the airline industry, with comprehensive executive responsibility across passenger and cargo handling operations.

The Chairman and CEO, as the highest members of governance, as well as key management, continuously enhance their expertise through participation in industry forums, such as the IATA International Ground Handling Conferences and Ground Handling International conferences, where operational sustainability and decarbonisation strategies are among the topics discussed.

ROLES AND RESPONSIBILITIES OF ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

Aviapartner's governance framework defines responsibilities for the roles and teams managing, monitoring, and overseeing impacts, risks, and opportunities which are core to the strategy. The Chairman delegates responsibilities to the Chief Executive Officer (CEO) and governance bodies to shape the sustainability strategy and integrate it across departments and countries.

At Aviapartner, oversight of impacts, risks, and opportunities at group level is primarily managed by the Chief Executive Officer and senior executive members through specific committees. The CEO is formally accountable for sustainability and ESG strategy, although this accountability is not yet set out in mandates or governance documents. The CEO maintains oversight of the various committees and individuals to whom responsibilities for material impacts, risks and opportunities have been delegated, by actively participating in the respective steering committees, ensuring alignment with the organisation's overall strategy.

- > The CEO maintains oversight of the sustainability strategy through the **Steering Committee on Sustainability Matters**. The VP Quality & Environment, the Spain HR and CSR Director, the VP Accounting and the VP Controlling are part of the Steering Committee on Sustainability Matters. Through its participants, the Committee on Sustainability Matters liaises with the VP of Safety & Occupational Health, the General Counsel, the Group IT Director and Managing Directors for the different activities and countries which play a significant role in managing company-wide impacts, risks and opportunities. The responsibilities of the Steering Committee on Sustainability Matters are defined in reference documentation.
- > **The Safety Review Board**, comprising the Chief Executive Officer, the VP Safety & Occupational Health, and VP Quality & Environment together with the Managing Directors. The Safety Review Board's responsibilities for safety and risk management are set out in the Safety Management System Manual.
- > **The Information Security Steering Committee**, comprising the Chief Executive Officer, the Group IT Director, IT Programme Manager, the Information Security Officer, the General Counsel and VP Quality & Environment.

The specific committees described above prepare and review targets, monitor progress, review compliance with internal policies and standards, and oversee corrective actions. The Chief Executive Officer (CEO) decides and approves strategic targets in consultation with the respective Vice Presidents and relevant committees, which have the skills and expertise to oversee sustainability matters for their respective domains. In this way, administrative, management and supervisory bodies oversee the setting of targets related to material impacts, risks, and opportunities.

In addition, the responsibilities of the VP Quality & Environment, the VP Safety & Occupational Health, the Information Security Officer and the Managing Directors and other relevant functions are clearly defined in formal job descriptions.

DELEGATION OF RESPONSIBILITIES AND REPORTING LINES TO MANAGEMENT

At local level, Managing Directors further delegate responsibility for the management of impacts, risks, and opportunities to the Management Team and HR Directors in their respective countries. These teams vary per country but consist at a minimum of Operational Management, a Country Health & Safety and Operational Safety Manager, a Security Manager, a Quality & Environment Manager, a Financial Controller, a Head of GSE, and a Training Manager.

In particular, responsibilities concerning working conditions, diversity, training, skills and career development are managed by **Human Resources at country level** and overseen by the respective **Managing Directors**, who report to the CEO during monthly operational meetings.

In addition, for group-wide trainings, the Network Learning Management Coordinator works closely with the **"Euro Training Team"**, which consists of expert Training Managers in each country, as well as the VP Safety & Occupational Health and VP Quality & Environment. This team manages the training plan, monitors compliance with training standards, and organises the standardisation of training material.

DEDICATED CONTROLS AND PROCEDURES INTEGRATED WITH OTHER INTERNAL FUNCTIONS

Aviapartner applies dedicated controls and procedures for managing impacts, risks, and opportunities through its integrated management system, including quality, safety, operational and information security, and environmental management systems aligned with international standards (including but not limited to ISO9001, ISO14001, ISO45001, ISO27001). These controls are embedded in daily operations and supported by mandatory training.

Coordination across operations, safety and the environment, including human resources and training, is ensured through the integrated management system based on shared systems with shared procedures, monitoring and reporting, quality, safety, security and environment (QSSE) management reviews and joint meetings and committees. The Vice Presidents with their different committees maintain oversight through regular internal audits in their respective fields, deliberately overlapping where needed to remain complementary and avoid duplication.

SKILLS AND EXPERTISE TO OVERSEE SUSTAINABILITY MATTERS

Aviapartner's governance bodies include **members with specific subject matter expertise** that lead ESG initiatives. Members of these bodies include executives with specialised backgrounds in quality, safety, environment, and corporate social responsibility, such as the Vice President of Quality & Environment and the Vice President of Safety and Occupational Health, the IT Director, and the Spanish HR and CSR Director, who provide subject matter expertise on sustainability-related topics. They are supported by the General Counsel, with expertise on business ethics and data privacy through external experts.

They have access to a broad range of sustainability-related expertise, both directly and through internal and external resources.

Externally, they have access to **subject-matter experts, participate in industry conferences, and engage in continuous professional development**. The CEO and key management regularly attend customer airline meetings on sustainability to exchange knowledge on stakeholder expectations, industry developments, and innovation. These forums aim to discuss innovation and industry developments in general. Through these industry conferences, management engages with external experts and benefits from continuous professional development.

In addition, governance bodies strengthen their expertise through **formal training and collaboration**. In 2025, members participated in targeted awareness training to further develop and update sustainability-related knowledge, ensuring alignment with Aviapartner's material impacts, risks, and opportunities.

Based on available expertise—as well as insights from internal safety and environmental audits, the outcome of external certification audits and sustainability assessments, along with SWOT analysis—management determines the necessary human resources and training required across the organisation. Trainings are either developed in-house or provided by external providers.

FOCUS ON BUSINESS CONDUCT

Aviapartner's administrative, management, and supervisory bodies play a central role in overseeing and implementing ethical business conduct practices, which are underpinned by the **Code of Business Conduct and Ethics**. This code addresses essential policies such as anti-corruption, transparency, and accountability. The responsibilities of these bodies include conducting regular risk reviews, approving sensitive transactions, and ensuring that above-threshold gifts receive CEO consent. For further information on business conduct-related policies and processes, consult section 5.1 *Management of impacts, risks and opportunities related to business ethics*.

Aviapartner's administrative, management and supervisory bodies share responsibility on business conduct matters. Within this group, several functions stand out with more specific expertise.

- > The **General Counsel**, who leads the Legal Department, interprets regulations, translates them into policies, and provides training to the administrative, management and supervisory bodies and guidance for e-learning on Business Ethics, Human Respect, and Antitrust and Competition Law Compliance Training. Changes in regulatory requirements are continuously monitored by keeping close contact with expert lawyers and business conduct advisors, monitoring the media and attending seminars.
- > As business conduct failures often manifest in financial metrics or transactions, the **VP Accounting**, who oversees Finance for the group, has exceptional visibility on financial flows and business conduct and enforces strict financial controls.
- > The **VP Controlling**, who leads the team of controllers in the Aviapartner Group, has demonstrated transparency in budgeting and forecasting for many years.
- > The **VP Quality & Environment** coordinates the quality management systems and monitors market trends in professionalised business conduct management, in line with its sustainability commitments and assessments.

These roles are reserved for senior management with more than 10 years of experience and relevant academic degrees in their field.

EMPLOYEE REPRESENTATION

Employee representation is supported by collective agreements, including a European Works Council. Employees are encouraged to partake actively in dialogues related to labour issues, supported by the strategic goals of participation and structured interaction at all organisational levels.

Participation from non-employee workers such as agency staff or consultants is negligible as of December 31, 2025, but is considerably higher during the summer-peak in Europe, where some countries (mostly Belgium and the Netherlands) rely on the use of agency staff to cover activity peaks.

For further information on employee representation, see chapter 4 *Social information*, section 4.2 *Management of impacts, risks and opportunities related to working conditions and general processes in relation to own workforce*.

2.2.2. Information provided to, and sustainability matters addressed by, the undertaking's administrative, management and supervisory bodies (GOV-2)

At Aviapartner, governance bodies take decisions on material impacts, risks, and opportunities, as well as the implementation and effectiveness of due diligence and related policies, during management conferences with governance bodies, as well as during monthly Operational Committee meetings with management in the countries where the company is present.

During **management conferences** organised by the CEO, the governance bodies are informed on strategic topics, which are discussed together to determine strategy. Board packs are communicated with regular intervals, at minimum **yearly**, including KPIs and progress.

At **Senior Management meetings**, group priorities are shared, and topics such as innovation, sustainability, targets, profitability, and industry challenges are discussed. These meetings provide input to country strategic meetings. **Bi-annual strategy** update meetings are organised to follow up on and review what was agreed upon during the strategic meeting.

During **monthly Operational Committee meetings (OPSCom)**, Managing Directors, Finance, General Counsel, CEO and the Chairman ensure that performance is evaluated in line with plans, and corrective actions are taken where needed to reach company goals. This is then consolidated in the annual strategy and budget setting process in the fourth quarter.

Specific committees provide additional oversight during meetings prepared by the respective Vice Presidents together with their subject matter experts to inform the relevant governance bodies. They contribute to the preparation of decisions by reviewing targets, monitoring progress, reviewing compliance with internal policies and standards, and overseeing corrective actions.

At operational level, Company-wide organised teams (such as the Euro Safety Team, the Euro Quality Team, the Euro Training Team, the GSE Team, etc.) report to the respective VPs, such as the VP Safety & Occupational Health, the VP Quality & Environment, the VP Controlling, etc.

- > The Steering Committee on Sustainability Matters meets at least every quarter to review progress on sustainability activities and alignment with organisational goals.
- > Health and safety matters, including all related impacts, risks and opportunities, are addressed through the **Euro Safety Team**, which reports to the **Safety Review Board** chaired by the CEO and operating under the responsibility of the Vice President for Safety & Occupational Health. The Safety Review Board convenes at minimum three times per year to review safety performance, risks and the effectiveness of safety policies and actions.
- > Data and cybersecurity issues are managed and monitored by the Information Security Officer, with oversight provided by the **Information Security Steering Committee**, which includes the CEO and is led by the Group IT Director. The Information Security Steering Committee meets quarterly to discuss data and cybersecurity related risks, opportunities, and actions.

Technical innovation is managed, monitored, and overseen by the **Ground Support Equipment (GSE) Steering Committee**, reporting to the CEO and following up on technical advancements with external stakeholders, such as Ground Support Equipment renting companies, equipment manufacturers, and suppliers of IT Technology that support fleet-related developments to improve environmental efficiency.

Environmental impacts are discussed in the context of regulatory developments, operational constraints in the aviation ground handling sector, and the company's transition ambitions, including opportunities linked to the electrification of ground support equipment and improvements in environmental efficiency.

Social matters focus on occupational health and safety, employee well-being, diversity and inclusion, employee relation, and respect for human rights. Particular attention is given to maintaining a safe working environment across operations, strengthening cooperation between safety and health functions, and ensuring consistency of social practices across countries and stations.

Governance matters include business ethics, anti-corruption, regulatory compliance, data protection, and information security, as well as alignment with ESG-related regulatory requirements and international sustainability standards.

To ensure risks are addressed when overseeing the strategy and in decision-making, Aviapartner applies a **systematic risk management process** to identify, assess and control risks across its operations, including safety, security, environmental and operational risks. Risks are identified proactively and reactively and assessed at network, country, or station level, taking into account local exposure and operational context.

Risk assessment is based on the identification of hazards, the evaluation of severity and likelihood using a risk matrix, and the determination of appropriate mitigation measures. For safety-related risks, the approach is embedded in the Safety Management System and supported by bowtie analysis, which provides a structured visualisation of hazards, trigger events, potential consequences, and preventive and recovery controls.

Risks are reassessed after mitigation actions are defined, where residual risks are accepted at the appropriate management level. All risk assessments are documented, reviewed periodically, and linked to corrective and preventive actions to support continuous improvement. For instance, a formal Information Security risk mapping was organised in 2025.

Impact assessment follows largely the same process as the risk management process, while **opportunity identification** is generally discussed at the strategic meetings described above.

Finally, management ensures that **stakeholder feedback and audit results are incorporated into decision-making**, and that continuous improvement is driven by regular performance assessments, management reviews, reporting, and external certifications.

2.2.3. Integration of sustainability-related performance in incentive schemes (GOV-3)

Aviapartner does not include sustainability-related criteria and performance KPIs in management incentive schemes.



2.2.4. Statement on due diligence (GOV-4)

Aviapartner ensures that it is exercising its due diligence by identifying the potential or proven impacts of its activities within its value chain, taking into account their severity, magnitude and degree of irremediability, as well as the means of action it has to act upon them.

Table 3: References to core elements of due diligence in this report

CORE ELEMENTS OF DUE DILIGENCE	PARAGRAPHS
a) Embedding due diligence in governance, strategy and business model	2.2.2 Information provided to, and sustainability matters addressed by, the undertaking's administrative, management and supervisory bodies (GOV-2) 2.3.3 Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (SBM-3) 4.1 Human rights
b) Engaging with affected stakeholders in all key steps of the due diligence	2.3.2 Interests and views of stakeholders (SBM-2) 2.3.3 Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (SBM-3) 2.4 Description of the process to identify and assess material impacts, risks and opportunities (IRO-1) 4.2.2 Processes for engaging with own workers and workers' representatives about impacts (S1-2 & S1-5) 5.1.1 Business conduct policies and corporate culture (G1-1)
c) Identifying and assessing adverse impacts	2.3.3 Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (SBM-3) 2.4 Description of the process to identify and assess material impacts, risks and opportunities (IRO-1) 4.2.3 Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)
d) Taking action to address those adverse impacts	3.2.4 Taking action on climate change mitigation and energy (E1-3) 3.3.3 Taking action on climate change adaptation (E1-3) 4.2.6 Taking action on working conditions (S1-4) 4.3.4 Taking action on health & safety (S1-4) 4.4.4 Taking action on diversity (S1-4) 4.5.4 Taking action on training and career development (S1-4) 5.1.5 Taking action on business conduct 5.2.4 Taking action on cybersecurity and data privacy
e) Tracking the effectiveness of these efforts and communicating	2.2.2 Information provided to, and sustainability matters addressed by, the undertaking's administrative, management and supervisory bodies (GOV-2) 3.2.2 Targets related to climate change mitigation and energy (E1-4) 3.2.3.1 Energy consumption and mix (E1-5) 3.2.3.2 Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6) 4.1.2 Incidents, complaints and severe human rights impacts (S1-17) 4.3.2 Targets related to health & safety (S1-5) 4.3.3 Health & Safety Metrics (S1-14) 4.2.4 Targets related to working conditions (S1-5) 4.2.5.1 Collective bargaining coverage and social dialogue (S1-8) 4.2.5.2 Social protection (S1-11) 4.2.5.3 Work-life balance (S1-15) 4.5.2 Targets related to training and career development (S1-5) 4.5.3 Training and skills development metrics (S1-13) 4.4.2 Targets related to diversity (S1-5) Targets related to diversity (S1-5) 4.4.3.1 Diversity of employees (S1-9) 4.4.3.2 Persons with disabilities (S1-12) 4.4.3.3 Incidents of discrimination (S1-17) 4.4.3.4 Diversity of origin (entity-specific) 5.1.3 Targets related to business conduct 5.1.2 Prevention and detection of corruption and bribery (G1-3) 5.1.4 Business ethics metrics and incidents of corruption or bribery (G1-4) 5.2.2 Targets related to cybersecurity and data privacy 5.2.3 Metrics related to cybersecurity and data privacy

2.2.5. Risk management and internal controls over sustainability reporting (GOV-5)

For the purpose of producing this first sustainability statement under the European Sustainability Reporting Standards (ESRS), a multi-level validation process has been set in place. The sustainability reporting process is supported by a structured validation framework that ensures the quality, traceability, and consistency of quantitative and qualitative information across all reporting entities.

Quantitative data is collected at operational level within each country, and at station level for environmental data, as there is a local responsibility for ensuring traceability through the provision of supporting evidence.

Validation then progresses through successive review layers.

- > A first review is performed at country level by focal points that examine the consistency of figures, the correct application of methodologies mandated by the Aviapartner headquarters, and the overall credibility of the information. Particular attention is paid to identifying potential data gaps, estimates, or deviations, and ensuring that any required clarification or adjustment is resolved before consolidation. Beyond numerical integrity, the control system also assesses whether qualitative disclosures are fact-based and representative of local realities. Qualitative information presented in the sustainability statement, such as strategy, policies and procedures, and general descriptions are prepared based on existing internal documentation and complemented at country level where relevant. Group-level consolidation integrates all validated data into a single document for reporting.
- > A final internal review at headquarter level confirms methodological consistency, scrutinises relevance to ESRS expectations, and validates the overall reliability of the sustainability information before it is submitted for external assurance. This second verification provides an additional safeguard and reinforces confidence in the disclosures provided.

This approach is designed to be iterative. Each reporting cycle will generate learnings that are used to strengthen procedures, documentation, and internal controls, supporting ongoing improvement in the quality and governance of sustainability reporting.

The main risks identified within the sustainability reporting process and their mitigation strategies are the following:

- > **Inconsistencies with financial reporting:** The VP accounting provides financial information and validates the scope of the sustainability statement to ensure consistency with financial reporting and that any discrepancies are clearly justified. A list of entities within the scope of this report and motivation for exclusions is validated by the management in coordination with the external auditors. Further information is provided inside this report where quantitative data was not available from one entity covered by the scope of this sustainability statement.
- > **Lack of data availability and data quality:** This risk is linked to the ability to produce information with the expected quality. Not all information is prepared in an automated manner, giving rise to the risk of manual errors. Proxies and estimations have been designed and used to bridge the information gap. Disclosures of these limitations have been included in the relevant chapters. Additional controls have been introduced to mitigate this, including standardised data collection, detailed instructions, four-eyes controls, and enhanced logical and analytical controls. After these efforts, and whenever quantitative data is not of sufficient quality to be representative, decisions to not report such KPIs are documented and clearly explained in this report.

- > **Risk of misstatement of information:** Disclosures and statements included in this report have been prepared by the responsible points of contact in each country based on existing policies, procedures, and processes to mitigate the risk of misrepresentation of the information.
- > **Regulatory evolutions:** The CSRD-implementation project team is monitoring evolutions related to the simplification process at European level to understand and anticipate where possible the evolving reporting framework.

For this first sustainability reporting cycle, an RACI matrix identifying roles and responsibilities related to the production of the present sustainability statement has been defined per function, and oversight of the internal control and risk assessment process has been ensured through regular reporting to the Steering Committee on Sustainability Matters. This body includes the CEO and senior leaders from key functions such as Finance and Sustainability, which enables timely decision-making and direct alignment with strategic priorities. Throughout the reporting period, progress updates, validation outcomes, and emerging issues were discussed to secure consistency in the application of methodologies and to address risks that could affect the quality of the disclosures.

Given that this represents the first implementation of ESRS requirements, the governance structure and reporting routines remain in the development phase. The Group intends to further formalise the periodic escalation of findings into existing operational and internal control processes, as well as to strengthen the documentation of oversight by management and supervisory bodies in future reporting cycles. These changes will ensure that sustainability reporting controls are fully embedded into the broader governance and risk management framework over time.

To monitor the risks related to the production of this report, Aviapartner follows the same risk management approach as described in section 2.2.2 *Information provided to, and sustainability matters addressed by, the undertaking's administrative, management and supervisory bodies (GOV-2)*.



2.3. STRATEGY

2.3.1. Strategy, business model and value chain (SBM-1)

2.3.1.1. Description of major products and services

Aviapartner is a large multinational company with 9,349 employees on payroll and group total net revenues amounting to approximately €747M at the end of 2025. The company provides a portfolio of ground handling and airport services at airports across Europe and Africa, reflecting the company's broad geographic footprint and customer reach. These services facilitate the handling of more than one hundred million passengers per year.

Its activities are organised into four main service domains:

- > **Ground Handling:** This includes the full spectrum of aircraft and passenger ground operations delivered on behalf of airlines, such as flight coordination, passenger check-in and boarding services, assistance to passengers with reduced mobility, baggage and ramp handling, aircraft pushback and towing, and essential aircraft services including cabin cleaning, water and toilet services and waste removal. These services are essential to achieve punctual aircraft turnaround, regulatory compliance, and smooth passenger journeys.
- > **Cargo Handling:** Aviapartner delivers cargo logistics operations at airports, from documentation and customs coordination to warehouse handling, security checks, and transport services. For cargo aircraft operations, ramp handling support also ensures safe loading and unloading. These services connect freight forwarders, shippers, and airlines efficiently while maintaining the integrity and security of goods.
- > **Private Aviation (FBO Services):** Through its FBO activities, Aviapartner provides tailored support to business aviation customers. Services include passenger reception and concierge support, aircraft parking and servicing at dedicated facilities, and coordination of ground operations such as fuelling and waste handling to ensure a seamless premium experience for private and VIP flights.
- > **Passenger Lounges:** Aviapartner operates airport lounges offering hospitality services to airline and airport customers. These include reception, comfort amenities, food and beverage services, and dedicated passenger support. Lounges enhance the travel experience for premium passengers while supporting airline brand positioning.

Aviapartner does not offer distinct sustainability-focused services; rather, sustainability considerations are embedded across its entire service portfolio. The company has assessed its core ground handling services and determined that their primary value drivers remain operational safety, service quality, punctuality, and reliability.

At the same time, the core services listed here are progressively aligned with sustainability-related goals. In particular, Aviapartner integrates environmental considerations into service delivery, with a key focus on reducing emissions. The most significant initiative in this regard is the transition to electric ground support equipment, supporting the shift toward low-carbon operations where infrastructure and operational conditions allow. In addition, Aviapartner does not have any products or services banned in certain markets.

This approach reflects how Aviapartner's existing services, as well as its key markets and airline customer groups, are evolving in response to increasing sustainability expectations, rather than through the development of separate "green" service lines.

Its primary customer groups include:

- > **Commercial airlines** and their passengers, including major airline alliances and low-cost carriers;
- > **Private jet operators** and passengers with private planes;
- > **Freight operators and cargo carriers.**

While Aviapartner is not directly involved in fossil fuel extraction or production, its service offerings connect to the fossil fuel sector to handle the provision of fossil fuels and fuelling coordination within air transportation in private aviation (Aviapartner Fueling Partner SAS). This activity, accounting for €2.5M at the end of 2025, represents 0.3% of total group revenues.

In short, Aviapartner's sustainability-related goals focus on integrating environmental, social, and governance considerations across its services, customer relationships, geographical operations, and stakeholder engagement. Aviapartner maintains a strong commitment to delivering timely and high-quality services across all customer and partner interactions.

2.3.1.2. Elements of the general strategy relating to sustainability and objectives regarding stakeholder relations

Aviapartner's strategy integrates sustainability considerations across environmental, social, and governance dimensions, reflecting its commitment to the ten principles of the United Nations Global Compact (UN GC), which the company has supported since 2021.²

OPERATIONAL EXCELLENCE AND SOCIAL RESPONSIBILITY

High-quality, safe, secure, and sustainable ground handling services remain central to the company's strategy. Aviapartner considers the current and future needs of its employees, recognising that their safety, personal development, and well-being are fundamental to operational performance. Labour and human rights issues arising from suppliers' and subcontractors' operations or products are integrated into the company's upstream stakeholder management.

ENVIRONMENTAL STRATEGY

Decarbonising the company's portion of the aviation supply chain is identified as the top sustainability priority. Climate action is recognised as essential for the future of the business, the industry, and the environment. Environmental issues within the supply chain, including impacts caused by suppliers and subcontractors' operations and products, are increasingly integrated.

GOVERNANCE

Aviapartner sets an emphasis on abstaining from practices that prevent fair competition, such as price manipulation, monopolies, and violations of intellectual property rights. Preventing all forms of corruption, including extortion, bribery, conflicts of interest, fraud, and money laundering, are also core to the company's values. In addition, protection of data and privacy rights is increasingly important.

2. Further information can be found here: <https://unglobalcompact.org/what-is-gc/participants/143109-Aviapartner>.

STAKEHOLDER MANAGEMENT AND SOCIETAL RESPONSIBILITY

Sustainability initiatives are aligned with the expectations of Aviapartner's diverse customer base, including commercial airlines, private jet operators, and cargo carriers. The company seeks to foster long-term relationships based on transparency, ethical conduct, and shared sustainability objectives. Aviapartner also actively engages a wide range of stakeholders, including employees, suppliers, unions, and airport authorities, to ensure that its sustainability strategy is informed, collaborative, and responsive to stakeholder expectations.

Six core company values are embedded in the company's approach to doing business:

- > Customer and passenger focus;
- > Creativity;
- > Competitiveness;
- > Quality & Safety;
- > People's business;
- > Environmental sustainability.

For further information on these values, consult section *5.1.1 Business conduct policies and corporate culture (G1-1)*.

2.3.1.3. Aviapartner's business model and value chain

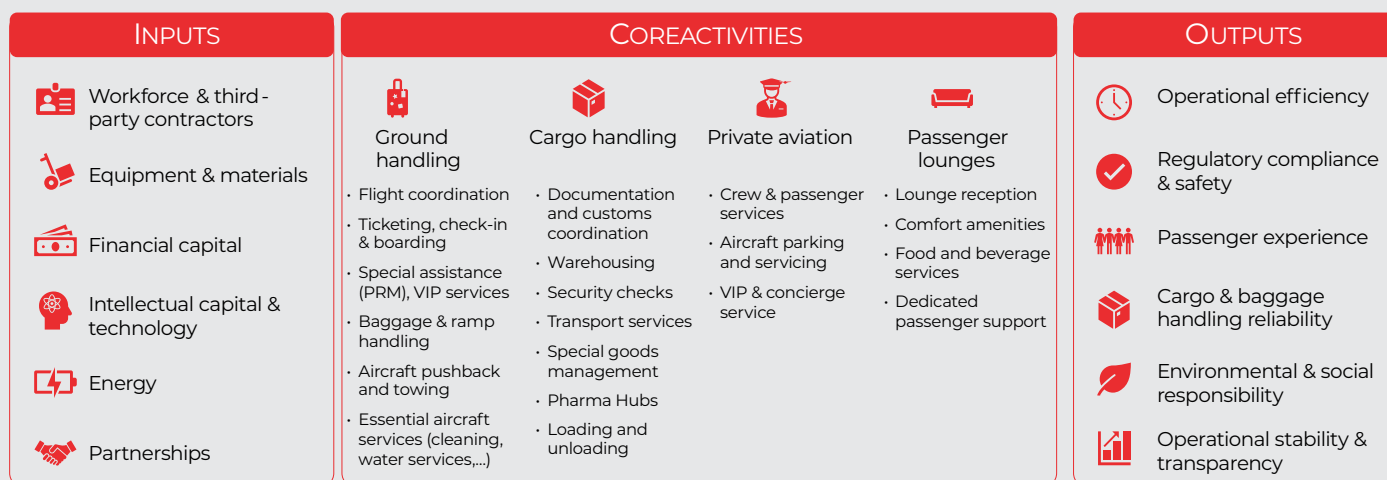
Aviapartner operates a ground handling business model in the aviation sector, where the value chain is characterised by a comprehensive integration of upstream, core, and downstream components:

- > Aviapartner's **upstream** activities involve procuring ground support equipment, IT systems, consumables, uniforms, de-icing materials, and office supplies, as well as contracting services such as aircraft cabin cleaning and interim staffing. Compliance with regulatory frameworks, airport licenses, and safety standards is a precondition for all operations.
- > **Core activities** transform upstream inputs into operational services across ground handling, passenger handling, cargo, private aviation, and lounge services, supporting passenger flows, cargo management, and air transport operational continuity.
- > **Downstream**, Aviapartner delivers services to airlines, cargo operators, private aviation, and commercial passengers, aiming to enhance airport and airline efficiency, passenger experience, and cargo reliability. Services are provided under long-term contracts and guided by sustainability objectives including carbon reduction and alignment with international frameworks and regulations.

The model is designed to transform operational inputs into value for airlines, airports, passengers, and other stakeholders by ensuring efficient, reliable, and compliant service delivery across its geographic footprint in Europe, South Africa, and Angola. The business model aims to build the capacity to adapt to fluctuating passenger volumes, seasonal cargo demand, regulatory requirements, and evolving sustainability standards.

The business model links upstream capabilities (such as trained personnel, operational procedures, and technological systems) with downstream outcomes, contributing to airport efficiency, airline performance, cargo reliability, and passenger experience, including specialised services for private aviation passengers, VIPs, and passengers with reduced mobility. This integration positions Aviapartner as a critical intermediary within the aviation value chain, transforming operational resources into measurable service outcomes, while maintaining adaptability to market and environmental changes.

LICENSES & COMPLIANCE



A precondition for any activity to start relates to licenses granted to Aviapartner to operate in certain airports.

Aviapartner secures inputs for resources and materials, energy, workforce, financial capital, and intellectual property. Workforce development is achieved through continuous training, skills enhancement, and stakeholder engagement to maintain operational competence. Financial capital is managed through strategic planning and operational reviews at corporate, country, and station levels. Technological inputs ensure operational efficiency and long-term competitiveness. Energy management focuses on decarbonisation, energy audits, and renewable energy integration in collaboration with airports that are providing the necessary infrastructure and access to renewables. Procurement follows sustainable sourcing policies, supplier assessments, and audits aligned with the Supplier Code of Conduct to reduce social, environmental, and ethical risks.

Aviapartner's outputs are closely linked to its core services, namely ground handling, cargo, private aviation, and lounge services. For airlines and airports, these include improved operational efficiency, timely departures, regulatory compliance, passenger satisfaction, cargo, and baggage handling reliability. For passengers, services provide smooth journeys, VIP assistance, and accessibility support. For investors, operational stability and transparency support reputation, risk management, and long-term value creation. Other stakeholders, including employees and local communities, benefit from initiatives promoting safety, human rights, diversity, fair labour practices, and environmental responsibility. Across all stakeholder groups, outputs contribute to operational reliability, service quality, and long-term performance.

2.3.2. Interests and views of stakeholders (SBM-2)

RELATIONSHIP WITH STAKEHOLDERS

Aviapartner's operations depend on continuous collaboration with a diverse set of stakeholders across the aviation value chain including employees, regulators, suppliers, customers, and community organisations. Each group plays a distinct role and holds specific interests linked to the company's operational, social, and environmental performance:

- > **Employees and trade unions** form the foundation of Aviapartner's service delivery. Their interests lie in safe working conditions, fair employment practices, stable social dialogue, and access to training and development opportunities. Maintaining trust and engagement with employees is critical to operational reliability and service quality.
- > **Airlines and airport authorities** are the company's principal customers and operational partners. Their main expectations relate to safety, punctuality, regulatory compliance, and the quality and efficiency of ground handling and passenger services. They also increasingly expect transparency on sustainability performance and alignment with their own ESG commitments.
- > **Passengers and charter brokers** are indirect beneficiaries of Aviapartner's services. Their main interests are smooth and secure airport experiences, timely baggage handling, and quality customer care.
- > **Suppliers and subcontractors**, including providers of ground support equipment, maintenance, transportation, cleaning, and catering services, are essential to Aviapartner's operational continuity. Their interests focus on fair contractual relationships, timely payments, and long-term collaboration, while Aviapartner expects them to comply with safety, environmental, and ethical standards. Their collaboration ensures continuity in critical operational inputs and efficient coordination on the airport platform.
- > **Regulatory and oversight bodies**, such as civil aviation authorities, customs, and airport security agencies, define the framework within which Aviapartner operates. Their interest lies in strict adherence to safety, security, and environmental regulations, as well as transparent and timely reporting.

Aviapartner engages with its stakeholders through activities conducted at varying frequencies depending on the stakeholder group and context. The purpose of these engagements is to maintain working relationships, understand stakeholder expectations regarding sustainability, and ensure regulatory compliance. Engagement methods include direct meetings, works councils, and structured dialogue processes to enhance transparency and strengthen partnerships.

Aviapartner maintains ongoing dialogue with its main stakeholder groups as part of daily operations, compliance processes, and continuous improvement initiatives. Ongoing engagement activities focus on stakeholders who are continuously involved in or affected by Aviapartner's operations:

- > **Employees and trade unions** are engaged through regular communication channels, employee surveys, and participation in health and safety committees and social dialogue structures. Continuous exchange supports a safe, fair, and motivating work environment.
- > **Airlines and airport authorities** are engaged through operational reviews, customer satisfaction assessments, and joint improvement initiatives to strengthen service quality, safety, and environmental performance.
- > **Suppliers and subcontractors** are engaged through supplier meetings, assessments and audits that promote compliance with Aviapartner's ethical, environmental, and quality standards.
- > **Regulatory authorities** interact with Aviapartner through inspections, audits, and structured reporting, ensuring transparency and compliance with national and international aviation requirements.

Aviapartner's lean organisational structure facilitates direct communication between operational teams, management, and executive leadership. This proximity enables swift integration of internal stakeholder insights into both operational and strategic decision-making. Management is also informed about the sustainability expectations of affected stakeholders through tender requirements and customer airline and industry meetings.

The Vice Presidents for Occupational Health & Safety and Quality & Environment coordinate many sustainability initiatives and report directly to the CEO, ensuring that all stakeholders' perspectives on sustainability-related impacts are considered at the highest management level.

The Steering Committee on Sustainability Matters and the Safety Review provide a formal platform to consolidate and communicate the outcomes of stakeholder engagement, particularly those gathered through the double materiality assessment. Through structured meetings and periodic reporting, these committees channel relevant findings and recommendations to governance bodies, supporting informed decision-making on sustainability priorities and strategic direction.

ENGAGEMENT WITH STAKEHOLDERS FOR THE DOUBLE MATERIALITY EXERCISE

A specific and structured engagement process was carried out as part of Aviapartner's double materiality assessment, involving both internal and external stakeholders, to capture stakeholders' perspectives on environment, social and governance impacts, risks and opportunities. Stakeholders were asked to score these topics using a semi-quantitative methodology inspired by European Financial Reporting Advisory Group (EFRAG) guidance.

For the stakeholder engagement part of this exercise in particular, the company focused on:

- > **Internal stakeholders**, including strategic leadership, the financial team, a selection of employees representing major business areas and countries, and trade union representatives. They participated in workshops addressing operational impacts, risks, and opportunities.
- > **Customers and end users**, notably airlines and airport operators, were engaged through direct interviews exploring downstream impacts and expectations related to service quality, emissions, and operational efficiency. Passengers' perspectives were indirectly reflected through airline representatives.
- > **Suppliers and subcontractors**, including providers of ground support equipment, cleaning, catering, and logistics, were consulted through surveys on upstream environmental and social impacts, risks, and opportunities where they directly affect the service delivery of Aviapartner.
- > **Other external stakeholders**, such as labour authorities and industry bodies, were consulted through targeted interviews to capture a regulatory and institutional viewpoint on material sustainability topics.

The results of their assessment were aggregated and weighted to determine materiality from both impact and financial perspectives. These findings serve as an input to the company's sustainability approach and informs the alignment of business models and strategic priorities with stakeholder expectations.

Qualitative information collected through interviews was used to complement the results of the assessment by providing additional context on stakeholder perspectives and expectations. This qualitative input supported the interpretation of the scoring outcomes.

The combined outcomes of the stakeholder engagement process informed the prioritisation of material sustainability matters and the structure and focus of the sustainability statement. Topics identified as material through this process are reflected in the sustainability statement and serve as key areas of focus for management oversight.

This twofold engagement structure ensures that Aviapartner's sustainability reporting and strategic priorities are informed both by the continuous relationships that underpin daily operations and by periodic, in-depth stakeholder consultations in line with the ERS double materiality process.

These perspectives reinforce the company's understanding that operational excellence, employee well-being, and sustainability performance are central to maintaining long-term partnerships and competitiveness in the aviation sector. As a service company operating in a highly competitive and regulated environment, Aviapartner's business model is inherently shaped by the expectations of airlines, airports, employees, and regulators. Their ongoing feedback continuously informs the company's priorities, operational practices, and investment decisions, ensuring alignment between stakeholder interests and business objectives.

While no direct amendments to Aviapartner's strategy or business model resulted from the double materiality engagement, several strategic evolutions have been implemented in recent years in response to stakeholder expectations and broader sustainability commitments.

Key areas of strategic adaptation include:

- > **Decarbonisation and environmental performance management:** Progressive electrification and the introduction of biofuels for ground support equipment (GSE) and vehicle fleets, together with improvements in building efficiency to reduce environmental footprint, with the objective of moving towards low-carbon operations in line with airport sustainability goals and customer requirements.
- > **Governance and safety:** Reinforcement of management systems through the implementation of IATA and ISO 45001 standards on occupational health and safety management systems, ISO14001 on environmental management systems, ISO27001 on information security and SA8000 on social accountability, ensuring high standards of safety, environmental performance, information security and accountability³.
- > **Digitalisation:** Deployment of integrated digital tools for operational monitoring and reporting, as well as enhanced communication with stakeholders across the network.

Aviapartner has set several strategic goals for the near future to enhance sustainability and compliance efforts. Further information on forward-looking ambitions and targets can be found in the following chapters depending on the topic addressed.

3. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

Planned initiatives aim to strengthen Aviapartner's position as a reliable and forward-looking partner within the aviation ecosystem. The company seeks to deepen trust with customers, employees, and authorities. These actions are expected to gradually reshape how stakeholders perceive Aviapartner, moving from an operational service provider to a sustainability-oriented strategic partner. The overarching goal is to remain competitive, resilient, and a partner of choice in a fast-evolving aviation sector.

2.3.3. Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (SBM-3)

No structured resilience analysis has yet been conducted to assess the capacity of the strategy and business model to address material non-financial impacts, risks, or opportunities. The company recognises that such an analysis would be a next step to evaluate how its operations can respond to material sustainability-related risks and opportunities in a structured and comprehensive manner.

The current and anticipated financial effects of material impacts, risks, and opportunities have not yet been quantified in detail. A preliminary assessment was conducted to estimate the share of the Group's turnover potentially affected by these factors currently, serving as a first step toward a more robust quantification framework, but would need further validation before publication.

While this initial analysis supports internal awareness and prioritisation, further refinement is planned in the coming years to better integrate financial impact estimations into strategic planning and risk management. This ongoing effort will strengthen the company's ability to anticipate sustainability-related challenges, assess potential financial exposure, and align decision-making with long-term resilience objectives.

All material impacts, risks or opportunities are related to ESRS sustainability-related topics. However, entity-specific KPI disclosures on diversity address additional quantitative data points that are specific to the organisation and are not explicitly covered by ESRS (e.g. disability within management, diversity of origin, etc.), to better reflect its strategy.

2.3.3.1. Overview of Aviapartner's environmental material Impacts, Risks and Opportunities

CLIMATE CHANGE MITIGATION AND ENERGY MANAGEMENT

Based on the double materiality assessment that was conducted, no material impact, risk or opportunity has been identified regarding **climate change adaptation** for Aviapartner. The company has not identified any material physical risks at the moment. However, the company recognises that extreme weather events such as heatwaves, storms, and flooding threaten infrastructure, disrupt operations, and have financial implications that may become material in the future. Therefore, this section only focuses on climate mitigation.

Aviapartner has not yet conducted a structured resilience analysis or scenario analysis in line with regulatory transition pathways to a low-carbon economy. Therefore, Aviapartner has not yet performed a dedicated assessment of its strategic and business model resilience to climate change's effects. The company acknowledges the need to further integrate climate-related considerations into its strategic planning and risk management processes. While no formal plan is yet in place, Aviapartner is committed to continuously monitoring evolving regulatory, technological, and operational conditions related to climate change. This ongoing monitoring will serve as the foundation for future scenario analyses and for identifying potential strategic adjustments to strengthen long-term business resilience.

With regards to **climate change mitigation**, the following impacts, risks and opportunities have been identified as material:

IRO	TYPE OF IRO	TIME HORIZON	IMPACT ON VALUE CHAIN
Contribution to global warming due to the production of greenhouse gases	Actual negative impact	Ⓔ	Ⓐ Ⓑ Ⓒ Relevant for all activities but a bit less for lounges and cargo downstream
Large investments required in adapting equipment and infrastructure to energy-efficient alternatives	Transition risk	Ⓔ Ⓜ Ⓐ	Ⓐ Ⓑ Ⓒ Not applicable for lounges and cargo
Technical innovations for more environmental efficiency	Opportunity	Ⓐ	Ⓐ Ⓑ Ⓒ
Obtaining and renewing operating licenses and airline contracts thanks to environmental management efforts	Opportunity	Ⓔ Ⓜ	Ⓐ Ⓑ Ⓒ For all activities, except cargo and private aviation (FBO) downstream where less relevant

Ⓔ short-term, Ⓜ medium-term, Ⓐ long-term, Ⓐ upstream, Ⓑ own operations, Ⓒ downstream

Impact on global warming due to the production of greenhouse gases

The company has a material impact on global warming due to greenhouse gas emissions generated by the use of fuels in its ground handling activities, including the operation of ground support equipment (GSE), vehicles and energy consumption at airport facilities. These emissions contribute to climate change and cause adverse effects on the environment and on people, including increased climaterelated risks such as extreme weather events and degraded air quality related to fine particles. At the same time, actions to reduce emissions can generate positive impacts by supporting climate mitigation, improving local environmental conditions, and contributing to broader societal climate objectives.

The impact arises directly from the company's core strategy and business model, which rely on energyintensive ground handling services at airports. Its scale depends on traffic volumes, operational efficiency and the technologies used, which may vary from one station to another. The company is involved in this impact through its own operations as well as through business relationships across the aviation value chain, including airports, airlines, subcontractors and suppliers of fuel and energy, equipment manufacturers and maintenance partners.

This impact affects the company's business model and value chain due to its exposure to increasingly stringent climaterelated regulations, airport and customer decarbonisation requirements, and energy cost fluctuations, thereby creating transition risks. It also influences strategic and operational decisionmaking, including fleet renewal, energy sourcing, and infrastructure investments.



Risk of facing large investments in adapting equipment or infrastructure to energy-efficient alternatives

The double materiality exercise highlights a transition risk arising from the progressive shift to a low-carbon operation, requiring significant investment in adapting equipment to alternative energy sources (e.g. electrification, use of biofuel (HVO100), and possibly hydrogen in the future) and responding to regulatory changes.

This risk arises from the undertaking's dependence on sectoral actors, including airports, airlines and fuel suppliers, which are themselves undergoing decarbonisation transitions driven by regulatory requirements, market expectations, and climate targets. As these stakeholders accelerate the adoption of low-carbon solutions, Aviapartner is required to adapt or replace existing ground handling equipment and supporting infrastructure (e.g. refuelling systems, ground support equipment, maintenance facilities) to remain operationally compatible and contractually compliant. This could result in significant unplanned capital expenditure, increased operating costs, and potential asset obsolescence if adaptations are not aligned with the pace or direction of sectoral transition.

Failure to adapt in a timely manner may reduce Aviapartner's competitiveness, limit access to certain airports or airline contracts, and negatively affect long-term revenue generation.

Opportunity linked to technical innovation for more environmental efficiency

Aviapartner sees a strategic and operational opportunity linked to the deployment of technical innovations that enhance environmental efficiency across ground handling operations. This opportunity arises from the ongoing transformation of the aviation ecosystem towards decarbonisation, digitalisation, and resource efficiency, and from the increasing availability of innovative technological solutions.

Relevant solutions could include, but are not limited to:

- Participation in hydrogen ecosystems, including offtake arrangements and associated operational readiness;
- Deployment of smart building solutions, smart metering, and advanced data management systems to optimise energy and resource consumption;
- Use of predictive and optimisation tools to anticipate and manage operational disruptions, improve planning, and enable more efficient equipment allocation and sharing;
- Application of artificial intelligence (AI) and automation solutions, for example to improve waste sorting, reduce material losses and increase recycling rates.

The realisation of this opportunity depends on Aviapartner's ability to establish and maintain trust-based and innovative partnerships with airports, airlines, technology providers, energy suppliers, and other ecosystem actors in each country.

The opportunity may positively affect the undertaking's business model by improving operational efficiency, reducing energy and resource consumption, and lowering environmental footprint per handled flight. Enhanced environmental performance may strengthen the undertaking's value proposition towards airlines and airports, which are increasingly integrating sustainability criteria into procurement and contract awards.

Along the value chain, digital and technical innovations can enable closer collaboration with partners, improved data exchange, and more integrated operational planning, contributing to system-wide efficiency gains.

Opportunity to obtain or renew operating licenses and airline contracts thanks to environmental management efforts

Aviapartner is exposed to a strategic and commercial opportunity to obtain or renew operating licences, airport authorisations, and airline contracts, as well as an opportunity to enhance its competitive positioning as a result of its environmental management efforts and performance.

This opportunity arises from the increasing focus of airports on emissions reduction and environmental performance, notably through participation in carbon accreditation schemes and broader sustainability frameworks, and reinforces Aviapartner's ability to operate at key airports and maintain long-term contractual relationships with airlines. As part of these initiatives, airports and airlines increasingly integrate environmental data disclosure, carbon performance assessments and management system and certification requirements into partner selection, tendering and licence renewal processes.

Aviapartner's direct impact on the environment, particularly in terms of energy use, emissions, waste generation and local environmental effects, and its active management of these impacts through structured environmental management processes, position it to meet stakeholder expectations but also create the need for reliable environmental data and performance to ensure consistent and auditable environmental information.

2.3.3.2. Overview of Aviapartner's social material Impacts, Risks and Opportunities

Aviapartner's double materiality assessment **includes all employees** who can be materially impacted by the company's activities within the scope of disclosure. This exercise includes the interests of employees and non-employees, such as temporary and agency workers across all operational sites.

However, given that **reporting on non-employees⁴** is currently voluntary or in a phase-in stage, and considering the variability and limited quality of data across countries, Aviapartner has decided not to disclose quantitative information on non-employees in this first reporting cycle to ensure accurate and reliable reporting.

As a result of the materiality assessment, it has been found that Aviapartner's business model generates some **positive impacts and opportunities** for its own workforce, including both employees and, where relevant, contractors and interim staff. These arise through products, services, and business relationships. There are also several **material negative impacts and risks** connected to its workforce, reflecting both its dependency on skilled personnel and the potential impacts of working conditions on operational continuity. All of these will be detailed in the table below and later in the report.

Other **non-material social impacts**, risks and opportunities on the workforce **may arise from initiatives aimed at reducing environmental impacts** (such as the adoption of electric vehicles, increased use of renewable energy, and sectoral shifts toward low-carbon fuels). For instance, these impacts may require reskilling and upskilling to ensure employees are equipped to operate new technologies adopted by Aviapartner or its business partners and to meet evolving operational requirements. In some cases, additional trainings might be needed. Further detailed analysis of the impact of the transition plan on social matters will be needed once formalised.

4. Non-employees are understood as people with contracts with the undertaking to supply labour ('self-employed people') or people provided by undertakings primarily engaged in 'employment activities'.

Aviapartner's understanding of **workforce groups potentially at greater risk of harm** is built on an internal analysis and engagement with the workforce's representatives.

This includes evaluating certain specific groups of employees with higher operational exposure, which are more relevant for some material risks and opportunities arising from impacts and dependencies on its workforce. For example:

- > Operational staff (e.g., ramp agents, cargo handlers, maintenance personnel) may face higher exposure to occupational hazards, requiring targeted health and safety measures, training, and protective equipment.
- > Employees in shift-based or high-pressure roles may experience elevated risks related to fatigue and work-life balance challenges, presenting opportunities for improved scheduling, well-being programmes, and retention initiatives.
- > Groups vulnerable to discrimination based on gender, origin, disability, or age may be at greater risk of unequal treatment or exclusion, highlighting opportunities to reinforce diversity, equity, and inclusion policies, training, and reporting mechanisms.

Health and safety monitoring, incident reporting mechanisms, policies and measures promoting non-discrimination and respectful workplace behaviour, and awareness training on human rights and inclusion support this process, ensuring that potential risks are proactively identified and addressed.

HUMAN RIGHTS

The company has not identified any specific category of operation within its own activities as being at significant **risk of forced, compulsory, or child labour**. This assessment reflects the fact that the majority of its operations are located in Europe, where child labour legislation is stringent and enforcement mechanisms are well established. Nevertheless, the company recognises that certain activities may require increased vigilance going forward, particularly those involving subcontractors, suppliers operating in less regulated environments, or workforces that may include lowskilled, outsourced, or migrant workers.

Aviapartner adheres to internationally recognised labour standards and implements targeted monitoring and engagement measures with its business partners to prevent, identify, and address potential risks. These measures include age verification processes, the application of the Supplier Code of Conduct, supplier self-assessments, and the inclusion of all materially impacted individuals within the scope of disclosure. The company conducts risk monitoring for critical suppliers and applies a zero-tolerance approach to forced and child labour. Supplier self-assessments and compliance reviews are used to evaluate and mitigate identified risks, ensuring alignment with international standards. Regular assessments and updates to relevant policies are undertaken, alongside enhanced oversight of high-risk areas particularly those involving subcontracted activities.

Within its value chain, Aviapartner identified the following human rights impacts:

IRO	TYPE	TIME HORIZON	IMPACT ON VALUE CHAIN
Negative impact on human trafficking	Actual negative impact	Ⓢ Ⓜ	Ⓢ Ⓜ Mostly relevant for the downstream, and a little bit for own operations, and part of the value chain in all activities, except lounges and cargo where this is less relevant
Contribution to preventing human trafficking	Actual positive impact	Ⓢ Ⓜ	Ⓢ Mostly relevant for the downstream portion of the value chain in all activities, except lounges and cargo where this is less relevant

Ⓢ short-term, Ⓜ medium-term, Ⓢ long-term, Ⓢ upstream, Ⓢ own operations, Ⓢ downstream

Negative impact on human trafficking

Aviapartner has a potential negative impact on people in relation to human trafficking due to its frontline, passengerfacing ground handling activities. Even though no confirmed cases have been reported, some employees, through direct and frequent interactions with passengers during checkin, boarding, and gate operations, may be in positions where signs of human trafficking could be observed. If employees lack adequate awareness, training, and clear procedures, there is a risk that indicators are not recognised or appropriately reported, which may indirectly contribute to the continuation of a serious human rights violation such as exploitation, coercion, abuse, and restricted freedom of movement affecting vulnerable individuals, particularly minors. Aviapartner recognises the need to strengthen staff awareness to reduce the likelihood of such negative impacts and to contribute positively to sectorwide efforts against human trafficking.

This impact influences Aviapartner's approach to managing its passengerfacing operations and its role within the aviation value chain. It shapes decisions related to human rights policies, employee training, escalation procedures, and cooperation with airlines, airports, and competent authorities, supporting consistent service delivery aligned with human rights expectations embedded in operational standards, and reinforcing Aviapartner's role as a responsible service provider.

Contribution to preventing human trafficking

In the same way, Aviapartner's frontline presence enables the company to play an active role in preventing human trafficking. With appropriate training, awareness initiatives, and cooperation with airlines, airports, and authorities, staff gain greater confidence and capability to respond to critical situations, identify suspicious behaviours, report potential cases, and support early victim protection. This creates a positive societal impact, positions Aviapartner as a contributor to international human rights standards, strengthens stakeholder trust, and aligns the company with evolving expectations across the aviation sector.

Aviapartner's ability to contribute to antitrafficking efforts reinforces customer confidence and supports contractual compliance with airlines and airports that include human rights clauses, strengthening longterm partnerships and enhancing the company's reputation. Because the company's business model relies on direct passenger interaction and operational oversight during checkin, boarding, and ground operations, employees are uniquely positioned to observe indicators of trafficking. This creates a strategic opportunity to contribute to human rights protection, and the company's commitment to responsible operations and alignment with international aviation standards integrates these considerations into its training frameworks.

WORKING CONDITIONS

For Aviapartner, working conditions is a cross-cutting topic, reflecting the central role of its workforce in enabling all operational services. The following impacts, risks and opportunities have been defined as material:

IRO	TYPE	TIME HORIZON	IMPACT ON VALUE CHAIN
Employee satisfaction and motivation due to working conditions	Actual negative impact	Ⓢ Ⓜ	Ⓤ Ⓢ Ⓣ Relevant across all activities and the whole value chain, but mostly in own operations
Social tensions arising from working conditions	Risk	Ⓢ Ⓜ	Ⓤ Ⓢ Ⓣ Relevant across all activities and the whole value chain, but mostly in own operations
Cooperating with unions to foster a positive social climate	Opportunity	Ⓢ Ⓜ	Ⓤ Ⓢ Ⓣ Relevant across all activities and the whole value chain, but mostly in own operations

Ⓢ short-term, Ⓜ medium-term, Ⓣ long-term, Ⓤ upstream, Ⓢ own operations, Ⓣ downstream

Negative impact on employee satisfaction and motivation due to working conditions

Aviapartner has a material negative impact on employee satisfaction and motivation linked to working conditions such as physically demanding tasks, time pressure, irregular schedules, and limited predictability of workloads. These factors may affect employees' perception of job quality, fairness, recognition, and long-term career attractiveness. This impact arises from the operational flexibility required by Aviapartner's ground handling activities and the need to respond quickly to airline and airport demands, which can limit predictability and employee autonomy.

Reduced satisfaction and motivation may lead to lower engagement, diminished sense of job fulfilment, and reduced commitment to the organisation. Over time, this can negatively affect morale, teamwork, and employees' willingness to remain with the company. This impact affects productivity, service quality, employee turnover, and recruitment costs. It influences management decisions regarding employee engagement initiatives, compensation and benefits structures, career development opportunities, communication practices, and continuous improvement programmes.

Risk of social tensions arising from working conditions

Aviapartner is exposed to a material social and operational risk related to working conditions and employee satisfaction, stemming from its strong dependency on staff availability to ensure operational continuity. This risk directly relates to Aviapartner's impact on employee well-being and satisfaction and its ability to maintain constructive labour relations.

Unfavourable working conditions, such as physically demanding tasks, shift work, time pressure, perceived lack of work-life balance or limited employee engagement, may lead to social tensions, including labour disputes, strikes or other collective actions, which can in turn disrupt day-to-day operations, reduce service reliability and affect Aviapartner's ability to meet contractual service levels. Operational disruptions may lead to financial losses, contractual penalties and reputational damage with airlines, airports, and other stakeholders. These tensions may arise if employee expectations are not adequately addressed through dialogue, fair employment practices, and effective management of working conditions. Persistent tensions may also exacerbate employee turnover, increase absenteeism, and undermine workforce engagement, further affecting productivity and operational resilience.

Opportunity to cooperate with unions to foster a positive social climate

Aviapartner is exposed to a material social and operational opportunity to foster a positive social climate by proactively cooperating with trade unions and employees' representatives. Given Aviapartner's dependency on staff availability and engagement, constructive labour relations are a key enabler of operational continuity and performance.

By engaging in transparent, regular, and good-faith social dialogue, Aviapartner can build mutual trust with employee representatives, anticipate concerns related to working conditions and organisational change, and address potential sources of social tension at an early stage. Effective cooperation with unions and employee representatives can improve employee morale, stability and productivity, reducing staff turnover, absenteeism, and the likelihood of labour actions. A stable social climate supports uninterrupted operations, consistent service quality and stronger relationships with airline and airport customers. In addition, constructive social dialogue may reduce costs associated with recruitment, operational disruption, and conflict resolution, thereby positively affecting financial performance.

This opportunity is directly linked to the mitigation of risks related to labour disputes, strikes and workforce dissatisfaction.



HEALTH & SAFETY

Health & Safety sits at the heart of Aviapartner's ground-handling operations. Because operational performance depends on safe working practices, this topic is highly material to the company's overall strategy:

IRO	TYPE	TIME HORIZON	IMPACT ON VALUE CHAIN
Effect on workforce's health & safety related to working conditions	Actual negative impact	Ⓐ Ⓑ Ⓒ	Ⓐ Ⓑ Ⓒ Relevant for all activities across the whole value chain, but less for lounges
Effect on workforce's well-being related to working conditions	Potential negative impact	Ⓐ Ⓑ Ⓒ	Ⓐ Ⓑ Ⓒ Mostly relevant for core operations across all activities
Risk for health and safety of workers	Risk	Ⓑ Ⓒ	Ⓐ Ⓑ Ⓒ Relevant for all activities across the whole value chain, but particularly for core operations in ground handling, private aviation, and cargo, where downstream is also relevant

Ⓐ short-term, Ⓑ medium-term, Ⓒ long-term, Ⓐ upstream, Ⓑ own operations, Ⓒ downstream

Negative impact on workforce's health & safety related to working conditions

Aviapartner has an actual negative material impact on workforce health and safety due to the inherent risks of ground handling operations, which include workrelated injuries, accidents, musculoskeletal disorders, and longerterm health effects linked to noise exposure, physical strain, or repeated stress. These activities involve physically demanding tasks, the handling of cargo and baggage, the operation of specialised ground support equipment, exposure to airside traffic and aircraft movements, elevated noise levels, adverse weather conditions, and timecritical operational constraints. Moreover, certain operational tasks in the airport environment, particularly those in close vicinity to aircraft and ground support equipment, lead to measurable exposure to particulate matter and chemical emissions among employees. Such working conditions increase the likelihood of occupational accidents, injuries, and workrelated health issues for employees and temporary staff. Serious incidents may affect not only individual workers but also colleagues operating in the same environment.

This impact originates directly from Aviapartner's core business model, which relies on labourintensive, safetycritical ground handling services performed in a highrisk operational environment, making it intrinsic to the company's main activities and far less relevant for ancillary or nonairside activities such as lounge operations.

Robust health and safety practices, preventive measures, personal protective equipment, and assistive devices can significantly reduce harm, improve working conditions, and protect workers' physical integrity.



Negative impact on workforce's well-being related to working conditions

Aviapartner has a potential material negative impact on workforce well-being due to the inherent characteristics of ground handling operations, including irregular and night working hours, shift work, workload fluctuations, operational pressure, and exposure to physically and mentally demanding environments.

This impact can affect employees' physical and mental health over time, which can then influence absenteeism, occupational health outcomes, safety performance, and overall workforce availability, which are critical to operational continuity.

Appropriate and flexible working time arrangements, rest periods, and health and well-being measures can mitigate these impacts and support long-term employee health.

Risk for health & safety of the staff

Aviapartner is exposed to a material operational and compliance risk related to its impact on employee health and safety. Ground handling activities involve physically demanding tasks, the handling of cargo and baggage, the operation of specialised equipment, time pressure and exposure to noise, weather conditions, and hazardous substances, which increase the likelihood of work-related injuries and occupational illnesses.

This risk directly stems from Aviapartner's operational activities and its responsibility to prevent and mitigate adverse impacts on employee health and safety. Health and safety incidents may result from inadequate risk prevention measures, insufficient training, equipment failure, human error or non-compliance with applicable occupational health and safety regulations.

In turn, this risk can disrupt operations through employee absence, reduced workforce availability, and operational delays. In addition, accidents and work-related illnesses may result in increased insurance premiums, higher medical and compensation costs, and increased expenditure on corrective measures.



DIVERSITY, EQUITY AND INCLUSION

The topic of diversity and inclusion plays a central role at Aviapartner. By fostering a workforce with varied backgrounds and perspectives, the company strengthens its operational capabilities and supports the implementation of its broader strategy:

IRO	TYPE	TIME HORIZON	IMPACT ON VALUE CHAIN
Increasing gender diversity	Actual positive impact	Ⓢ Ⓜ	Ⓤ Ⓢ Ⓣ This impact is relevant across the whole value chain, in all activities, except for lounges, where this is less relevant

Ⓢ short-term, Ⓜ medium-term, Ⓤ long-term, Ⓤ upstream, Ⓢ own operations, Ⓣ downstream

Increasing gender diversity

Aviapartner contributes positively to gender diversity in a sector historically characterised by low female representation, particularly in airside operations and in leadership roles. By adopting clear commitments and measurable targets on gender representation, supported by participation in the IATA 25by2025 initiative, the company creates opportunities to enhance equity, inclusion, and representation across all levels. This strengthens organisational culture, reputation, and workforce resilience.

Increased gender diversity improves representation, fairness and equal access to employment and career progression, as well as talent attraction, employee engagement, leadership quality, and decision-making effectiveness. It supports stronger relationships with customers, regulators, and industry partners, who increasingly expect demonstrable progress on diversity.

Aviapartner integrates diversity targets into strategic HR and workforce planning, monitors progress through KPIs, and implements inclusive recruitment, promotion, and leadership development processes. Decision-making aims to incorporate diversity considerations when designing succession plans, staffing strategies, and management development programmes.

TRAINING AND CAREER DEVELOPMENT

Training and career development is a strategically material topic for Aviapartner, ensuring that the organisation has the skilled resources required to operate effectively while supporting the deployment of its broader strategy:

IRO	TYPE	TIME HORIZON	IMPACT ON VALUE CHAIN
Fostering career possibilities and employability of employees	Actual positive impact	Ⓢ Ⓜ	Ⓤ Ⓢ Relevant for all activities, for upstream and core operations
Increasing employability of non-employees	Actual positive impact	Ⓢ Ⓜ	Ⓤ Ⓢ Relevant for all activities, for upstream and core operations
Risk of not possessing the right skills and capabilities to perform the work	Risk	Ⓢ Ⓜ	Ⓤ Ⓢ Relevant for all activities, for upstream and core operations
Training employees and offering them career development possibilities	Opportunity	Ⓢ Ⓜ	Ⓤ Ⓢ Most relevant for the company's core operations. It may still be relevant upstream and downstream

Ⓢ short-term, Ⓜ medium-term, Ⓤ long-term, Ⓤ upstream, Ⓢ own operations, Ⓢ downstream

Fostering career possibilities and employability of employees

The company has a positive impact on employees' career possibilities and employability by providing job-specific training, certifications, enhanced professional skills, recognised qualifications, and operational experience in aviation ground handling.

The impact is connected to the company's strategy to maintain a skilled and competent workforce to meet operational and safety requirements and support workforce capability, service quality, and internal succession, influencing decisions on training investment, skills development, and talent management strategies.

Increasing employability of non-employees

The company contributes positively to employability within its value chain by engaging with service providers, interims and sub-contractors that require skilled labour and adherence to aviation standards in order to support operational reliability and quality, influencing procurement decisions, supplier selection, and long-term partnerships.

The positive impact stems from the company's reliance on qualified external partners to support ground handling operations to cover peak activities.

The company ensures that temporary workers benefit from skills development, employment opportunities, and improved working standards.



Risk of not possessing the right skills and capabilities to perform the work

Aviapartner faces a material operational and strategic risk related to its dependency on a skilled and experienced workforce to perform ground handling activities safely, efficiently and in compliance with regulatory and contractual requirements.

The ground handling sector is characterised by high employee turnover, which can result in the loss of operational experience, technical expertise, and institutional knowledge. This knowledge drain may be exacerbated by competition for skilled labour, physically demanding working conditions and evolving skills requirements linked to evolving technologies, digitalisation, and decarbonisation.

If Aviapartner is unable to attract, retain and develop employees with the appropriate skills and qualifications, it may lead to operational inefficiencies, increased error rates, service delays and lower quality and reliability of service. In addition, repeated recruitment and training cycles may increase operating costs, while errors or non-compliance linked to insufficient experience may result in safety and service quality incidents or regulatory scrutiny.

Training employees and offering them career development possibilities

Aviapartner is exposed to a strategic and operational opportunity to enhance performance and resilience by investing in employee training and offering clear career development opportunities. Given Aviapartner's strong dependency on a skilled workforce, the ability to attract, develop and retain qualified employees is a key driver of operational excellence.

By supporting employees' personal and professional growth, offering meaningful work, effective training and career development, and defining clear roles and responsibilities, Aviapartner can preserve critical skills and institutional knowledge. This, in turn, fosters higher engagement, strengthens long-term relationships with airports and airline customers, improves safety and service quality, and creates favourable conditions for continuous improvement and innovation within ground handling operations.

Across the value chain, improved competencies enable better coordination, adaptability to new technologies and compliance with evolving regulatory and contractual requirements.

2.3.3.3. Overview of Aviapartner's governance material Impacts, Risks and Opportunities

BUSINESS ETHICS

Business ethics and compliance is a highly material topic for Aviapartner, as ethical conduct and regulatory adherence underpin the integrity of its operations and the trust placed in the company by customers, partners, and regulators:

IRO	TYPE	TIME HORIZON	IMPACT ON VALUE CHAIN
Violation of the code of conduct	Risk	⑤ ④	① ② ③ Relevant among the whole value chain
Anti-competitive practices	Risk	④	① ② ③ This risk is relevant across the whole value chain and for all activities, but especially for core operations
Gaining credibility and competitiveness based on sustainability-related certification	Opportunity	⑤ ④	① ② ③ Relevant across the whole value chain

⑤ short-term, ④ medium-term, ③ long-term, ① upstream, ② own operations, ③ downstream

Risk of violation of the Code of Conduct

Aviapartner is exposed to a material compliance, legal and reputational risk related to potential violations of its code of conduct, including incidents of fraud, money laundering, corruption, or other forms of unethical behaviour. Certain activities, such as ticketing and transactions involving cash or credit card management, may present a higher exposure to this risk due to the handling of financial flows and sensitive customer data. While internal policies and controls are in place, there remains a risk of intentional misconduct or unintentional non-compliance, particularly if controls are bypassed or awareness is insufficient.

This risk arises from the dependency on employees, management, and contractors to perform operational and commercial activities in accordance with internal rules and applicable laws.

Violations of the Code of Conduct may result in legal and regulatory non-compliance, leading to fines, sanctions, or legal proceedings involving employees, management, or contractors. Such incidents may also give rise to indirect costs, including internal investigations, remediation actions, disciplinary measures, and enhanced monitoring or reporting requirements.

Reputational damage associated with integrity breaches may undermine trust with key stakeholders, including airports, airlines, regulators, and financial partners, potentially affecting contract awards, licence awards and renewals, access to markets, and long-term business relationships. Consequently, this risk influences strategic and operational decision-making, including the design of governance structures, internal controls, training programmes, and whistleblowing and monitoring mechanisms across the value chain.

Risk of anti-competitive practices

Aviapartner is exposed to a material compliance and reputational risk related to potential anti-competitive practices, including breaches of competition law or confidentiality obligations.

This risk arises from the sensitivity of interactions with sector stakeholders, such as competitors, airports, airlines, and other partners, where discussions may involve contractual terms, pricing structures, or customer approaches. This risk is closely linked to Aviapartner's dependency on maintaining trustful and transparent relationships with stakeholders, as any breach may undermine confidence and long-term cooperation.

Despite the existence of internal policies and controls, there remains a risk of unintentional non-compliance, particularly in informal settings, industry forums, or operational coordination contexts.

Actual or alleged anti-competitive behaviour may result in regulatory investigations, administrative proceedings, and potential fines, sanctions, or remedial obligations imposed by competition authorities. Even where no infringement is ultimately established, such investigations may generate significant administrative costs, management distraction, legal expenses, and delays in strategic or operational initiatives.

In addition, allegations of anti-competitive conduct may damage Aviapartner's reputation and erode trust with airports, airlines, public authorities, and other partners, potentially affecting tender outcomes, licence renewals, and long-term partnerships. As a result, competition law compliance considerations are embedded in strategic and operational decision-making, including employee training, approval processes, stakeholder engagement protocols, and governance oversight mechanisms.

Opportunity to gain credibility and competitiveness based on sustainability-related certification

Aviapartner has a material opportunity to enhance its market credibility and competitive positioning through the achievement of recognised sustainability-related certifications and active participation in sustainability awards and initiatives. These certifications and recognitions signal compliance with evolving regulatory and industry standards, demonstrate commitment to responsible environmental and social practices, and strengthen trust among key stakeholders, including airport authorities, airline customers, regulators, and employees. Certification requirements also promote closer engagement with suppliers and partners to align sustainability standards, thereby strengthening overall value chain resilience and consistency.

By embedding sustainability standards into its operations, Aviapartner can differentiate itself in tender processes and contract renewals, particularly in markets where sustainability performance is increasingly used as a selection or scoring criterion. This opportunity is relevant across all ground handling activities and geographies and affects all actors in Aviapartner's value chain, including internal operations, suppliers, and business partners.

Pursuing sustainability-related certifications positively influences Aviapartner's business model by encouraging more efficient, standardised, and transparent operational practices across the value chain. Certification requirements drive improvements in resource efficiency, process optimisation, and performance monitoring, which can lead to cost savings, reduced operational risks, continuous improvement, and enhanced service quality.

DATA PRIVACY AND CYBER SECURITY

Data privacy and cybersecurity are material topics for Aviapartner, as they are essential to protecting personal and business-critical information, ensuring regulatory compliance, and maintaining stakeholder trust in the company's operations:

IRO	TYPE	TIME HORIZON	IMPACT ON VALUE CHAIN
Risk of cybersecurity threats	Risk	Ⓐ Ⓜ	Ⓜ Ⓜ Ⓜ Relevant across the whole value chain
Risk of data breaches	Risk	Ⓐ Ⓜ	Ⓜ Ⓜ Ⓜ Relevant across the whole value chain

Ⓐ short-term, Ⓜ medium-term, Ⓜ long-term, Ⓜ upstream, Ⓜ own operations, Ⓜ downstream

Risk of cybersecurity threats

As with most companies operating in a highly digitalised environment, Aviapartner is exposed to a material operational, financial, and reputational risk related to cybersecurity threats. These threats include cyberattacks, malware, ransomware, phishing, and other forms of malicious intrusion targeting IT systems, operational technologies, and digital communication networks.

Cybersecurity incidents may compromise the confidentiality, integrity, and availability of critical systems and sensitive information, including operational data, customer information, and internal strategic information. Given Aviapartner's reliance on secure and reliable digital systems to support ground handling operations, this risk is considered material across all activities and locations.

Cybersecurity incidents can disrupt operational continuity, delay or interrupt ground handling services, and result in direct financial losses related to system recovery, business interruption, and potential contractual penalties. In addition, such incidents may damage stakeholder confidence and Aviapartner's reputation as a reliable service provider.

This risk directly affects Aviapartner's business model, which depends on secure, real-time information flows to coordinate with airlines, airports, and other partners across the value chain. As a result, cybersecurity considerations influence strategic and operational decision-making, including investments in IT infrastructure, security controls, employee training and awareness, and incident response capabilities, to safeguard operational resilience and stakeholder trust.

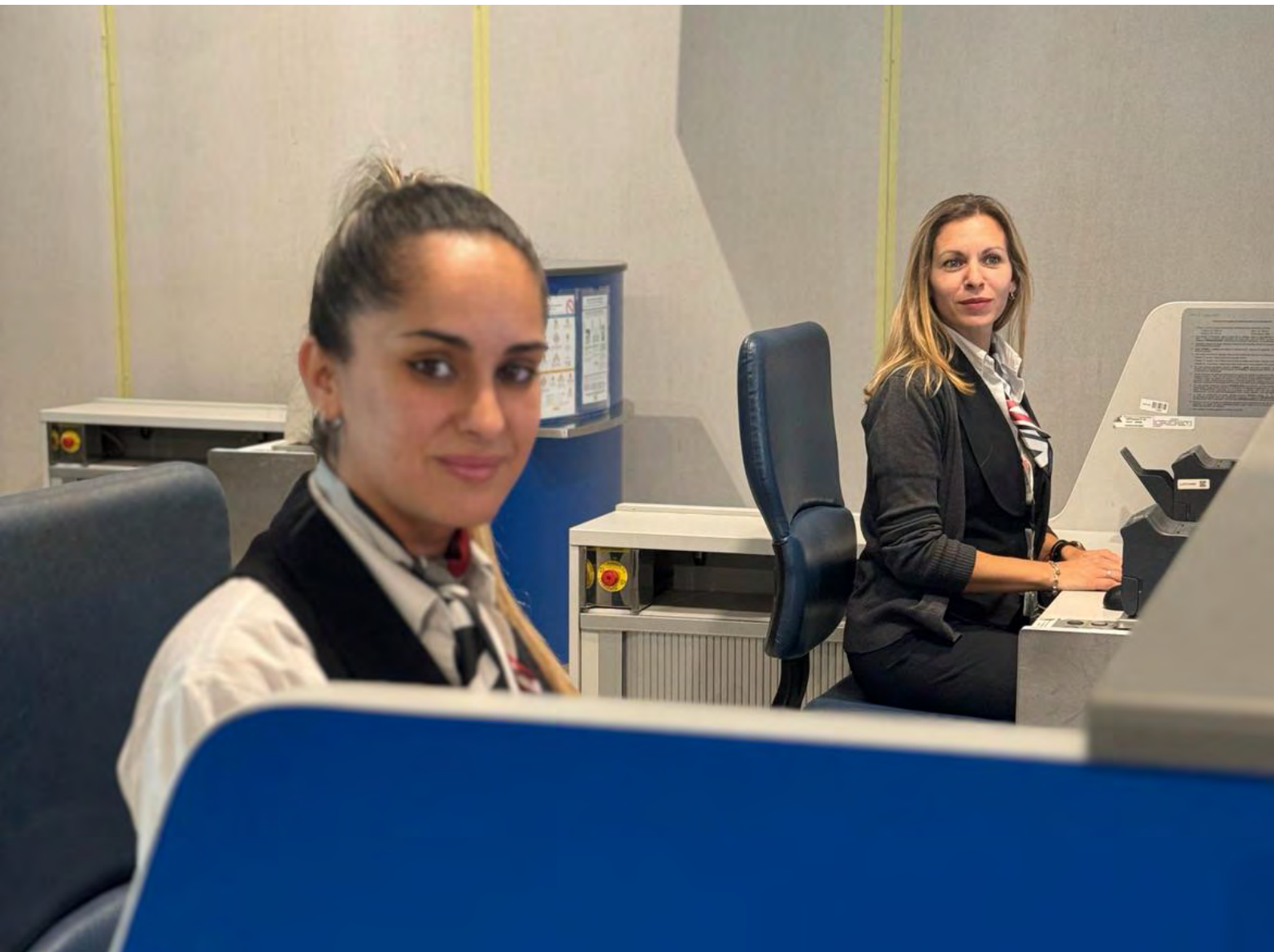
Risk of data breaches

Aviapartner is exposed to a material compliance and reputational risk related to the management, processing, and protection of company data and personal data of employees, passengers, customers, and other business partners. This risk arises from the collection, storage, and use of sensitive information within Aviapartner's operations, which are subject to strict legal and regulatory requirements, including the General Data Protection Regulation (GDPR).

Data breaches (whether resulting from cyberattacks, accidental disclosure, system failures, or internal misuse) could lead to non-compliance with applicable data protection regulations. Such incidents may trigger regulatory investigations, administrative fines, legal claims, increased insurance premiums, and contractual consequences.

Data breaches can significantly undermine trust with key stakeholders, including customers, airports, airlines, employees, and passengers, potentially affecting Aviapartner's ability to retain contracts, participate in tenders, and maintain market access.

Data protection considerations are embedded in strategic and operational decision-making, including governance structures, data management practices, system design, and employee training, to ensure regulatory compliance and business continuity.



2.4. DESCRIPTION OF THE PROCESS TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES (IRO-1)

2.4.1. Double materiality methodology

The double materiality assessment methodology adopted by Aviapartner is deeply embedded in the company's strategic framework, aligned with internal analyses and documentation, informed by stakeholder input, and benchmarked against international best practices.

First, to establish a comprehensive starting universe of potential impacts, risks and opportunities, Aviapartner mapped all sustainability matters that could be material from either an impact or a financial materiality perspective. The identification process combined ESRS requirements with broader sector-specific and company-specific considerations to ensure that no relevant topic was overlooked.

This initial mapping drew on multiple sources:

- > **Internal documentation**, including the outcomes of the previous GRI materiality assessment, provided insight into topics historically considered relevant to the business.
- > A **benchmark analysis of peers and competitors** was used to identify issues commonly recognised within the ground handling sector.
- > **International sustainability frameworks** (such as UNEP FI Sector Impact Matrix, SASB Materiality Finder, UNEP FI Human Rights Toolkit, World Economic Forum Strategic Intelligence) contributed to capturing widely recognised societal expectations in terms of sustainability matters that needed to be considered.
- > A final completeness check, with a comprehensive **list of topics defined by the ESRS** and their potential link with the company's business activities, ensured alignment with mandatory disclosure requirements.

Aviapartner categorised impacts, risks, and opportunities into significant areas of its value chain and core activities, considering both operational and external factors.

In the second stage, the company set up a structured **assessment process**. Internal and external evidence sources were used to score topics, including previous risk scores from the GRI-materiality exercise, an analysis of sustainability-related regulatory expectations, and an international sustainability framework for nature-related risks, contextualised the first exposure level.

A stakeholder mapping was used to identify key stakeholders based on their influence, interest, and their position in the value chain. Key stakeholders were asked to assess the impacts, risks and opportunities that have the highest relevance to them. As consultations with internal and external stakeholders progressed, additional impacts, risks and opportunities were incorporated and assessed when raised by stakeholders. Workshops and discussions with stakeholders helped surface emerging concerns and operational realities across different functions and geographies. Stakeholder consultation results provided insight into the severity of the impact or the likelihood and magnitude of risks and opportunities and potential business implications. These results were weighted according to stakeholder importance mapping and consultation methodology.

This approach ensured that the identification and materiality assessment reflected both internal and external expectations, while considering the business model, value chain, and industry context.

The current process represents an evolution from the materiality assessment previously conducted under the GRI framework. While it maintains continuity regarding the key themes already identified, the methodology has been significantly updated to align with ESRS requirements. This includes a more structured and comprehensive assessment of both impact and financial materiality, a clearer distinction between impacts, risks and opportunities, and enhanced involvement of internal and external stakeholders. However, limited quantitative data and trend analyses were used to perform this assessment. Governance and documentation requirements have also been strengthened to support future integration into broader risk management and strategic decision-making processes.

2.4.2. Impact materiality process

While Aviapartner is still in the process of formalising a comprehensive due diligence process to address its impacts, core components already include:

- > An **impact assessment** aligned with ESRS impact materiality guidance, with a focus on severity (i.e. scale, scope and irremediability of the impact) as well as likelihood.
- > Continuous stakeholder engagement described in section 2.3.2 *Interests and views of stakeholders (SBM-2)* is maintained through meetings and feedback forms. Aviapartner implements regular environmental risk assessments, Environmental Management System reviews, and compliance with standards like ISO 14001 and ISO45001⁵ to ensure alignment with regulatory requirements, best practices, and environmental commitments.
- > Supplier assessments, with periodic audits as described in section 5.1.1 *Business conduct policies and corporate culture (G1-1)*.
- > A **whistleblowing mechanism** to identify and monitor impacts the company may have on people, society and the environment in line with section 4.2.3 *Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)* and 5.1.1 *Business conduct policies and corporate culture (G1-1)*.

Impacts were first mapped along Aviapartner's value chain and described in relation to specific operational activities. Critical business relationships, including procurement practices, subcontracting arrangements and airport collaborations, were reviewed for their potential to cause, contribute to or be directly linked to adverse impacts. The process therefore focused on the activities, business relationships, and geographies most likely to give rise to significant adverse impacts. This allowed the assessment to distinguish between activities with inherently higher exposure to adverse impacts and those with more limited risk profiles. For instance, operational activities involving airside ground handling were assessed with increased attention due to their higher health and safety risk, stemming from direct interaction with aircraft, heavy equipment, and time-critical processes.

For each identified impact, Aviapartner consulted the stakeholder(s) most directly connected to the relevant activity, business relationship, or operational context, or those with the greatest level of knowledge of the specific impact. This approach ensured that the assessment of higher-risk impacts was informed by stakeholders with direct experience or expertise, without requiring all stakeholders to be consulted on all potential impacts.

5. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

Internal stakeholders across different geographies, and from each of the four main operational activities, participated in the assessment, thereby ensuring that operational contexts and exposure to sustainability impacts were properly reflected across all countries where the company operates.

To capture value chain-related impacts, a representative set of **external stakeholders** was selected in the countries where business relationships are considered most material. This allowed the assessment to reflect both upstream and downstream sustainability expectations and concerns.

Potentially affected stakeholders identified include Aviapartner's workforce, subcontractors, and passengers, in particular passengers with reduced mobility. Due to confidentiality constraints, limited direct contact and the nature of Aviapartner's business relationships, the company did not directly consult all affected stakeholders as part of the impact identification process. When it was not possible, their perspectives were taken into account through the use of proxy stakeholders and external experts.

Proxy stakeholders consulted included, for example trade unions, which were engaged to provide informed perspectives on the impacts affecting workers and subcontractors. External experts, such as labour authorities, were also consulted to provide their input on selected sustainability-related impacts, drawing on their specialist knowledge of labour practices, health and safety and relevant regulatory frameworks. Nature was considered as a "silent stakeholder", and nature-related impacts were pre-assessed with international frameworks before being scrutinised by stakeholders.

This approach enabled Aviapartner to consider how affected stakeholders may be impacted when identifying and assessing potential adverse impacts, despite practical limitations on direct engagement.

Stakeholders consulted were asked to evaluate each potential impact against the ESRS evaluation criteria. For **negative impacts**, this included scale, scope, and irremediable character, as well as likelihood (when the impact was potential). **Positive impacts** were solely evaluated based on their scale, scope of the impact, as well as the likelihood of occurrence when identified as potential.

Human rights impacts were assessed solely on scale, scope, and irremediable character, reflecting the recognition that severe human rights outcomes surpass their probability.

The results of these evaluations were aggregated for each impact using weighted averages that reflected both the degree of stakeholder influence and interest in the topic, and the specific consultation method used. This ensured that the voices of stakeholders most affected by a potential impact were appropriately reflected in the final prioritisation.

A materiality threshold was agreed upon with the Steering Committee on Sustainability Matters to distinguish the most significant impacts that should shape sustainability strategy and be disclosed in the sustainability statement.

2.4.3. Financial materiality process

Aviapartner applies a structured process to identify, assess, prioritise, and monitor sustainability-related risks and opportunities that may have financial effects on the company. The identification and assessment of sustainability-related risks and opportunities build on the company's existing risk register and scoring system.

The **identification** of risks draws upon different sources. On the one hand, it is supported by the Safety Management System, which incorporates hazard detection and risk analysis through digital tools. These systems allow operational risks to be visualised and mitigated, including through methodologies such as the Bow Tie Model. On the other hand, environmental performance and other sustainability-related risks are monitored continuously by the Quality and Environment department, supported by audits and targeted improvement actions that help reveal emerging risks and opportunities. A corporate risk register documents and monitors all risks, updated regularly for any new activities or system changes.

The links between sustainability impacts and dependencies, as well as the resulting risks and opportunities, were examined during the double materiality assessment.

- > Negative impacts were evaluated not only for their effects on people and the environment, but also for how they may translate into risks for the business.
- > Positive impacts were also distinguished from opportunities depending on their materiality perspective.
- > Dependencies were considered as potential sources of risks. The company relies heavily on secure access to skilled staff and on maintaining safe, efficient operational conditions across airport environments. Dependencies such as energy availability and pricing, and the reliability of suppliers that must deliver equipment or services on time and at required quality levels, were reviewed for how disruptions could affect continuity of operations.

The assessment of sustainability-related risks and opportunities builds on the company's existing risk register and scoring system. Risk and opportunity assessment is aligned with ESRS evaluation guidance and focuses on the magnitude of financial or operational consequences and the likelihood of risks and opportunities occurring. Initial internal assessments were scrutinised and refined through stakeholder consultations conducted as part of the double materiality assessment exercise.

Risks were primarily assessed internally, unless external stakeholders had direct exposure to, or influence over, the risk in question. Insights collected through stakeholder consultations contribute to identifying the most important sustainability risks that could translate into financial consequences due to regulatory developments, operational disruptions, or reputational concerns.

Opportunities, on the other hand, were reviewed both internally and externally with relevant stakeholder groups that could benefit from them or enable their realisation. Business opportunities were also screened for their potential to strengthen resilience or generate value creation over time.

Stakeholders assessed the nature of the effect qualitatively to determine whether it could disrupt operations, drive regulatory exposure, affect reputation, or unlock performance benefits in the case of opportunities. For the most significant risks and opportunities, the Accounting and Controlling teams conducted an initial quantitative estimation of the potential financial magnitude relative to Group turnover.

Evaluation results were aggregated using weighted averages that reflected stakeholder influence and interest in the topic, as well as the type of consultation method applied.

These analyses supported the confirmation of financial materiality. The Steering Committee on Sustainability Matters then established a materiality threshold to ensure that prioritisation focused on the issues most relevant for long-term business resilience and value creation.

Monitoring takes place through regular reviews embedded in existing governance processes, including environmental risk assessments, internal audits, and Environmental Management System performance checks aligned with ISO 14001 requirements. The Plan-Do-Check-Act cycle ensures that actions are tracked and that risk responses remain effective as conditions evolve.

Sustainability-related risks are not viewed as strictly separate from other operational and strategic risks, since many of them are tightly interconnected. At the same time, compliance with evolving regulatory requirements is treated as a key enabler of continued market access, which drives attention to environmental and social risks that may materialise through regulatory changes or heightened scrutiny.

The integration of sustainability risks into the Group's risk prioritisation is still in progress. In the future, the company aims to formalise how sustainability-related risks are compared against other risk categories and how their contribution to long-term resilience is evaluated in a more consistent and transparent manner.



2.4.4. Decision-making processes and integration into corporate risk management and internal control procedures

The company's approach to IRO decision-making is being progressively embedded into Aviapartner's existing risk management processes, which are strongly embedded in the company's certified management systems. Aviapartner's internal control systems involve regular audits and continuous improvement protocols. A documented scoring methodology and structured review process support consistency in evaluating sustainability matters across the Group, with internal controls in place to improve the reliability of assessment outcomes. Through these efforts, the company enhances internal processes by embedding non-financial IRO assessment findings into operational procedures, supporting alignment with corporate objectives, and ultimately helping to strengthen its sustainability approach.

As mentioned above, the identification, assessment and management of sustainability-related impacts and risks drew wherever possible on existing risk practices. The existing safety and environmental risk registers, scoring methodologies and stakeholder reviews led by the Quality, Safety, Security and Environmental (QSSE) team and Finance functions served as the primary foundation to align sustainability-related risks with operational risk exposure and business continuity considerations. Results from the double materiality assessment were shared with risk owners to inform ongoing prioritisation. Nevertheless, the integration remains partial. Sustainability-related risks are not yet consistently embedded into enterprise-wide systems.

The identification and assessment of sustainability-related opportunities is part of the yearly management review. Integration with the opportunities identified during this initial double materiality assessment, conducted as a standalone exercise to surface potential areas for value creation, is planned.

2.4.5. Focus on the environment

Aviapartner's process to identify and manage its **impacts on climate change** is being progressively structured as part of its broader environmental management framework. The company recognises that its main contribution to climate change stems from the consumption of fossil-based energy used to power ground support equipment (GSE), service vehicles, and (airport) facilities, as well as from indirect emissions linked to procurement and subcontracted operations.

Existing management system processes, including the ISO14001-certified Environmental Management System, already include the identification and monitoring of activities with significant environmental aspects, such as fuel use and energy efficiency.

To enhance this process, in 2021 Aviapartner initiated the development of a comprehensive greenhouse gas inventory covering direct and indirect emissions (Scopes 1 and 2). Environmental data is collected at station level and consolidated to support reporting and performance reviews. This work aims to establish a consistent baseline for monitoring and improving the accuracy of data needed to evaluate the company's contribution to climate change and define future emissions-reduction actions.

Supported by the current approach, which focuses primarily on data collection and operational awareness, it will progressively evolve into a structured process to assess the significance of climate-related impacts and to integrate mitigation measures into operational and investment decisions.

Aviapartner has not performed a fully-fledged **climate-related transition risk analysis**. Nevertheless, the company has initiated a preliminary assessment of climate-related transition risks and opportunities based on its existing environmental management system and the double materiality analysis. The DMA assessment highlighted areas where regulatory, technological, and market evolutions linked to low-carbon transition could influence operations and competitiveness.

The transition risks identified included potential changes in aviation and tightening environmental regulations, increased costs of energy and carbon pricing mechanisms, and changing expectations from customers and tendering authorities for decarbonised ground operations. The materiality of these factors may play an increasing role in shaping service delivery models and equipment investments. Along the same lines, opportunities relate to the electrification of ground support equipment (GSE), participation in collaborative decarbonisation projects with airports and airlines, and the development of services with lower environmental footprints, strengthening long-term resilience and customer partnerships.

Aviapartner is in the early stages of integrating climate-related physical risks into its risk management processes. The company has not yet carried out a full physical climate risk assessment or scenario-based analysis across defined time horizons, although preliminary qualitative screening has begun as part of the double materiality assessment. This initial step helped identify some categories of relevant physical hazards, including extreme heat affecting ramp activities, increased storm frequency disrupting ground handling, and airport operations.

The company's direct exposure mainly relates to its ability to continue using ground support equipment (GSE) and ensure workforce health and safety during extreme weather events, and dependencies on airport-managed facilities and regulations.

Given the nature of the business and Aviapartner's asset-light model, where airport infrastructure is owned and operated by airports, the exposure to physical climate risks is also closely tied to the resilience and adaptation measures put in place by airport authorities.

Existing processes partially capture these risks through the Safety Management System, occupational health and safety procedures, and continuity planning at station level. Although climate-related physical risks are not yet formally assessed or quantified, they are already reflected in heat-stress guidelines, extreme-weather work instructions, and operational disruption protocols. Further information on these procedures can be found in section 0 *As part of its Environmental Management System, Aviapartner defines key environmental sustainability actions in its Environmental Programme*. This programme is valid for three years with the 2023-2025 programme. A new programme will be defined for 2026-2028 based on the achievements and lessons learned from the previous one.

Management of impacts, risks and opportunities related to climate change adaptation.

Aviapartner plans to strengthen this approach by improving data availability and gradually integrating climate-related physical risk assessment into its risk management framework.

2.5. DISCLOSURE REQUIREMENTS IN THE ESRs COVERED BY THE UNDERTAKING'S SUSTAINABILITY STATEMENT (IRO-2)

A list of disclosure requirements complied with in preparing this statement following the outcome of the materiality assessment, as well as a list of data points deriving from other EU legislation and information on their location in the sustainability statement, can be found in appendix 6.2 *Disclosure requirements complied with in its sustainability statements (ESRS 2 IRO-2)*.




AVIAPARTNER
GO GREEN



ari

D   FS 4411E

Ich fahre 100% elektrisch mit www.ari-motors.com

3. ENVIRONMENTAL INFORMATION – CLIMATE CHANGE (E1)



The company's climate and energy-related material impacts, risks and opportunities relate to its **negative contribution to global warming through greenhouse gas emissions**, requiring significant investments to transition equipment and infrastructure toward more energy-efficient alternatives. At the same time, the transition drives **technical innovation to improve environmental efficiency** and creates strategic opportunities, notably in **securing and renewing operating licenses and airline contracts** through strengthened environmental management performance.

3.1. TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION (E1-1)

Aviapartner has **not yet adopted a formal transition plan** for climate change mitigation, nor has it adopted targets explicitly aligned with the objective of limiting global warming to 1.5°C in line with the Paris Agreement. The company is currently strengthening the foundations required for such a plan by improving its greenhouse gas inventory, with a particular focus on completing and consolidating Scope 3 emissions and improving the accuracy and consistency of underlying data. Once a full carbon footprint is available, Aviapartner intends to define emissions reduction targets, define its strategy, and integrate these elements into a structured transition plan. Aviapartner intends to have an initial outline of a transition plan within the next two years and to refine it progressively.

While a transition plan is not yet available, **key decarbonisation levers**, such as fleet electrification, are already integrated into its action plan with other initiatives under section 3.2.4 *Taking action on climate change mitigation and energy (E1-3)*. Further decarbonisation levers will be identified once a complete carbon footprint is calculated.

As the action plan's definition progresses, Aviapartner expects to map the investments needed. This will enable a clearer view of future expenditure requirements and support long-term planning at group level.

In 2025, Aviapartner did **not have any capex for oil-related activities**. Aviapartner is **not excluded from the EU Paris-aligned Benchmark**. As a matter of fact, the company does not operate in activities related to controversial weapons or tobacco, is not identified as breaching the UN Global Compact principles or the OECD Guidelines for Multinational Enterprises, and is not involved in coal- or gas-related activities. Aviapartner also derives less than 10% of its revenues from oil-related activities. The company therefore does not fall within the categories of fossil fuel-related activities that trigger exclusion under the benchmark framework.

Aviapartner has not yet assessed potential locked-in GHG emissions associated with its key assets or activities, which will require a more detailed analysis once group-wide GHG reduction targets are defined. As Aviapartner develops its full carbon footprint, the company will refine its assessment of whether existing assets could constrain future emissions reductions or create transition risks. However, the company operates with a relatively light asset base, mainly composed of ground support equipment.

The company expects that the progressive implementation of clear milestones, intermediate objectives and regular progress reviews will enable a transparent and credible transition pathway in the coming years. This staged approach is designed to ensure that the transition plan, once in place, is grounded in robust data, operational feasibility, and alignment with stakeholder expectations.

3.2. MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES RELATED TO CLIMATE CHANGE MITIGATION AND ENERGY

3.2.1. Policies related to climate change mitigation and energy (E1-2)

Aviapartner's **Environmental Policy**⁶ and **Ground Support Equipment (GSE) Policy** set out the company's commitments to climate change mitigation. These policies are operationalised through the ISO 14001:2015-certified Environmental Management System (EMS),⁷ which provides the framework for planning, implementing, and monitoring environmental actions. Together, they embed environmental sustainability into operational standards to ensure compliance and manage climate-related impacts, risks, and opportunities.

The Environmental Policy, forming the basis of the EMS, sets an objective to achieve low-carbon operations for Scope 1 and Scope 2. It commits to compliance with legal and environmental requirements and aims to go beyond regulatory standards wherever possible. It highlights Aviapartner's role in supporting more sustainable travel and reducing environmental impacts. It also upholds the environmental principles of the UN Global Compact and ensures continuous improvement through ISO 14001 certification.

In addition to climate-related concerns, Aviapartner is committed to **minimising its negative environmental impact at large**, while contributing positively to the environment whenever possible. In line with its environmental strategy, the company works to protect the environment and prevent pollution at all levels. The company promotes circular solutions by reusing resources and energy where possible and recycling when reuse is not feasible. It aims to minimise waste and eliminate single-use plastics, while improving energy performance. Aviapartner is committed to switching to renewable energy sources as soon as possible and encourages the introduction of innovative, energy-efficient technologies across its operations. Partnerships with airports and suppliers support these goals and encourage environmentally responsible practices throughout the value chain.

To ensure progress, Aviapartner regularly reviews and updates its strategic environmental objectives at Group level and for each station in which it operates.

Aviapartner's environmental policies are aligned **with internationally recognised frameworks** such as the UN Global Compact, providing an approach to reducing greenhouse gas emissions and achieving low-carbon operations. As mentioned previously, the environmental management system is guided by ISO 14001 and ISO 50001 standards, certified at selected stations, which establish requirements for environmental and energy management systems, promoting efficiency, renewable energy adoption, and pollution prevention.

The Environmental Policy and EMS integrate climate considerations into **investment planning** to strengthen long-term resilience. To support the decarbonisation of Scope 1 and Scope 2 operations, they prioritise energy efficiency and the transition to renewable energy and encourage innovation to improve environmental performance across activities. This approach enhances operational performance and supports licence and contract renewals.

6. The Environmental Policy can be found on Aviapartner's website: <https://www.aviapartner.aero/resources/files/Environmental%20policy%20ed241206%206.0%20-%20signed.pdf>

7. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

The environmental policy covers all operational activities of the company. It applies across geographies and includes a commitment to encourage the adoption of similar principles by suppliers and other stakeholders, i.e. joint ventures and certain activities not under the direct operational control of Aviapartner.

Accountability for implementing these policies rests with the Chief Executive Officer (CEO), who oversees the overall sustainability strategy and ensures the integration of low-carbon and energy transition objectives across operations. The CEO is supported by the Vice President of Quality and Environment, who is directly responsible for the Environmental Management System and reports directly to the CEO. This structure ensures that environmental performance, including emissions reduction and electrification initiatives, is effectively managed throughout the organisation.

Aviapartner integrates business partner expectations into its Environmental Policy through structured engagement processes and regular reviews. **Input from stakeholders**, such as airports, airlines, and suppliers, is taken into account to identify priorities and expectations related to greenhouse gas reduction and low-carbon transition. Their feedback informs the company's environmental targets and decarbonisation plans, ensuring that climate actions align with their concerns. This approach ensures successful collaboration and helps the company remain relevant in the market and competitive in tender processes.

Aviapartner ensures that all its **policies are accessible to all relevant internal and external stakeholders** through structured internal and external communication channels. The Environmental Policy is published on the company website and shared with suppliers such as airports, customers, and certification bodies to promote transparency and engagement. Internally, the policy is displayed in all areas and published on the corporate intranet. It is also included in the Environmental Awareness training, which is mandatory for all staff.

3.2.2. Targets related to climate change mitigation and energy (E1-4)

Aviapartner's sustainability strategy is rooted in climate mitigation through the reduction of environmental impacts. Aviapartner does not yet have a climate target quantified in tonnes of emissions reduction. A quantified carbon-equivalent target, including a baseline and interim milestones, will be defined as greenhouse gas calculations and data maturity progress. The transition to a low-carbon operations target might first cover Scope 1 and Scope 2 emissions. The organisation aims to calculate its scope 3 GHG emissions within the next two years to be able to set comprehensive GHG reduction targets thereafter.

In the meantime, a key ambition set out in the Environmental Policy is to achieve **100% electrification of vehicles and motorised Ground Support Equipment (GSE) by 2027**. The calculation of scope 1 and 2 emissions confirmed that Aviapartner's fleet should be the main decarbonisation lever in its own operations. As vehicles and GSE are the primary sources of direct GHG emissions across Aviapartner's activities, this goal is critical to delivering on the company's ambition. A full electrification was deemed ambitious but necessary to pursue the company's objective of moving towards low carbon operations on scope 1 and 2, together with measures aiming at improving energy efficiency and increasing the use of renewable energy sources.

The aim to reach 100% electrification of all GSE and vehicles by 2027 must take into account the different situations in each country, e.g. in Germany, where the airport license was lost, leading to an investment stop and rendering this consideration inapplicable. Where electrification is not feasible due to infrastructure or technological constraints, low-carbon alternatives such as biofuels may be used to reduce emissions.

Further information on the company's ability and limitations in implementing actions to achieve this target is provided in the next section 3.2.4 *Taking action on climate change mitigation and energy (E1-3)*.

These targets guide the company's climate strategy and will evolve as transition planning develops.

Methodology and assumptions

The electrification target is defined as relative, expressed as a percentage of total motorised equipment and vehicles electrified. The fleet includes all motorised GSE and vehicles, including those under lease agreements.

The target on fleet electrification includes Aviapartner's current operations and support functions, across multiple European countries. The scope of the target encompasses Aviapartner's activities in Ground Handling, Cargo Handling, Private Aviation, and Passenger Lounges for all entities within the current reporting scope. Fleet electrification is mainly relevant to the first three activities and to a lesser extent to the lounges, where the fleet is not the main driver. However, the target excludes subcontracted services.

Carbon calculations of scope 1 and 2 follow the GHG protocol. However, electrification targets do not yet follow an external standard or specific methodologies. Therefore, the current electrification target is not based on conclusive scientific evidence.

The electrification target is not compared to a baseline, but to the state of the fleet in scope as of 2027. Interim milestones include achieving 70% electrification of ground support equipment and vehicles by the end of 2025, before achieving full electrification by 2027.

Key stakeholders such as authorities, airports and customer airlines inspire priorities and expectations related to greenhouse gas reduction and low-carbon transition. Their feedback informs the company's environmental targets and decarbonisation plans, ensuring that climate actions align with stakeholder expectations.

In addition to the Group's ambition, the 2023–2025 programme for **Aviapartner Spain** defines further national quantified environmental targets on:

- > reduction of fuel consumption per one thousand flights; and
- > reduction of GHG emissions per one thousand flights.

These targets enable Aviapartner Spain to measure improvements and identify stations that require additional support.

At Group level, the interim target of reaching 70% electrification by the end of 2025 has not been met (57%). Significant progress has been achieved in certain geographies, including Spain where the milestone has been reached at country level, as well as across most large stations, which are at or close to target levels. However, progress at smaller stations has proven more challenging due to operational and infrastructural constraints, thereby affecting overall Group performance. For further information on the practical challenges, please refer to the action plan in section 3.2.4 *Taking action on climate change mitigation and energy (E1-3)*.

3.2.3. Climate-related metrics

Aviapartner evaluates performance and effectiveness in climate mitigation through environmental metrics such as:

- > GHG emissions, quantified according to international standards and tracked to assess both direct and indirect emissions;
- > the proportion of electrified motorised ground support equipment and vehicles;
- > fuel and electricity consumption and intensity per thousand flights.

Aviapartner calculates climate metrics using methodologies aligned with the Greenhouse Gas Protocol standards. Scope 1 and Scope 2 greenhouse gas emissions are quantified based on fuel consumption and energy usage, applying conversion factors to translate operational data into CO₂-equivalent emissions. The methodology also considers location-specific emissions factors for electricity consumption where available.

The company uses primary data whenever possible. Where direct measurements are not possible, **estimation** of energy consumption is based on verified internal secondary data and relies on historical data and industry-standard practices to maintain consistency. Where only cost information on fuel consumption is available, the official national average cost of fuel obtained from official sources of the ministry was applied to invoice data to estimate fuel consumption volumes. The company acknowledges limitations such as limited access to data on fugitive emissions or the incompleteness of its Scope 3 inventories.

Continuous refinement and verification are performed to align with evolving international standards and operational conditions. Data is collected from multiple operational sites and validated through third-party audits to ensure credibility. ISO certification bodies such as SGS in Spain, ANCCP (Associazione Nazionale Certificazione e Prodotti) in Italy and DNV in Belgium, the Netherlands and France, provide oversight for environmental management in all commercial locations in Spain, in the Netherlands, Brussels, Nice, Lille, Rome Fiumicino, Milan Malpensa and Bologna, which are ISO 14001 certified. Forética, a Spanish business network and non-profit organisation focused on sustainability and corporate social responsibility (CSR), validates Environmental Management Systems in commercial aviation and select private aviation stations in Spain by certifying SGE21 Ethical and Socially Responsible Management System standards. These companies provide external validation through certification and ensure that processes align with international standards. This is complemented by the assessment of data by external bodies such as EcoVadis and TIACA (Blue Sky), which also provide feedback and ratings on the company's sustainability practices, including its environmental performance.⁸

The methodology for monitoring electrification of GSE and vehicles is defined in section 3.2.2 *Targets related to climate change mitigation and energy (E1-4)*.

8. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

3.2.3.1. Energy consumption and mix (E1-5)

The following table represents Aviapartner's energy consumption:

Table 4: Aviapartner's energy consumption

ENERGY CONSUMPTION AND MIX in MWh	2025						
	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP
Total fossil energy consumption (MWh) (sum of (1) to (5))	18,231	5,245	11,801	6,448	743	1,339	43,807
(1) Fuel consumption from coal and coal products	0	0	0	0	0	0	0
(2) Fuel consumption from crude oil and petroleum products	8,836.08	3,050	9,644	5,347	81	1,071	28,029
(3) Fuel consumption from natural gas	1,655	0	0	0	0	0	1,655
(4) Fuel consumption from other fossil sources	0	0	0	0	0	0	0
(5) Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	7,740	2,195	2,157	1,101	662	268	14,123
Share of fossil sources in total energy consumption (%)	100%	98%	100%	67%	24%	100%	88%
Consumption from nuclear sources (MWh)	0	0	0	0	0	0	0
Share of consumption from nuclear sources in total energy consumption (%)	-	-	-	-	-	-	-
Total renewable and low-carbon energy consumption (MWh) (sum of (1) to (3))	82	120	0	3,178	2,414	0	5,794
(1) Fuel consumption from renewable sources, including biomass (also comprising industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) (MWh)	1	120	0	2,353	2,414	0	4,887
(2) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	81	0	0	825	0	0	906
(3) Consumption of self-generated non-fuel renewable energy (MWh)	0	0	0	0	0	0	0
Share of renewable and low-carbon sources in total energy consumption (%)	0%	2%	0%	33%	76%	0%	12%
Total energy consumption in own operations (MWh)	18,313	5,365	11,801	9,626	3,157	1,339	49,600

In 2025, Aviapartner consumed 49,600 MWh of energy across its operations. Based on the available evidence and classification criteria applied, 88% of reported energy consumption was classified as originating from fossil sources, while 12% was classified as renewable or low-carbon energy. Fossil energy consumption was primarily driven by diesel, gasoline and jet fuel used in ground support operations. Renewable and low-carbon energy consumption mainly resulted from the use of HVO100 biofuel and electricity for which renewable sourcing could be substantiated through appropriate contractual evidence.

The reported energy mix should be interpreted in light of the company's operating model. A significant share of electricity is supplied through airport operators and other landlords. While certain airport operators may procure renewable electricity and hold the associated contractual instruments, Aviapartner is not always able to demonstrate that these renewable attributes are specifically allocated to its own electricity consumption. Consequently, electricity was classified as renewable only where sufficient evidence of attribution to Aviapartner's consumption was available. The reported share of renewable energy therefore reflects renewable energy consumption that could be substantiated and attributed to Aviapartner, rather than the potentially renewable share of all electricity supplied through airport infrastructure.

The energy intensity of Aviapartner Group has not yet been calculated for 2025, as the group consolidated net revenues, as presented in the financial statement, were not yet approved at the time of publication of this statement, but will be added in future.

Aviapartner does not yet quantify energy production. Renewable energy production is also marginal and linked to some solar panels on non-motorised towable stairs.

Table 5: Aviapartner's energy production

ENERGY PRODUCTION	2025
Renewable (MWh)	0
Non-renewable (MWh)	0
Total energy production (MWh)	0



Methodology and assumptions

Aviapartner is classified under NACE code 52.23 (service activities incidental to air transportation), within Section H (Transportation and storage). In accordance with Commission Delegated Regulation (EU) 2022/1288, this sector is identified as a high climate impact sector for the purpose of calculating energy intensity indicators.

Energy consumption data were collected from fuel purchase records, utility invoices and information provided by airport operators and other landlords. Reported energy quantities were converted into a common unit of measurement (MWh) using applicable calorific values and conversion factors.

Where complete 2025 data was not available at the reporting date, the most recent available data, including 2024 data where relevant, was used as a proxy to estimate energy consumption. Management considers these estimates to provide a reasonable representation of actual energy consumption for the reporting period.

Purchased steam was classified as energy from fossil sources when the underlying production method and energy source could not be reliably determined. This approach was adopted as a conservative assumption to avoid overstating renewable energy consumption.

A significant portion of Aviapartner's operations is conducted within airport facilities, where energy is supplied and managed by airport operators. In such cases, information on the electricity mix is provided indirectly through the landlord. Although certain airports may procure renewable electricity, Aviapartner did not classify electricity consumption as renewable unless sufficient evidence was available to demonstrate a direct and attributable link between the consumed electricity and renewable energy procurement instruments. Guarantees of Origin held by airport operators were not considered attributable to Aviapartner's electricity consumption when such allocation could not be substantiated. Consequently, electricity consumption was reported as non-renewable unless adequate supporting evidence was available.



3.2.3.2. Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6)

The following table presents Aviapartner's scope 1 and 2 GHG emissions. Aviapartner has not yet quantified its scope 3 emissions. This should be addressed within the next two years.

Table 6: Aviapartner Gross GHG emissions

GHG EMISSIONS IN tCO ₂ eq	RETROSPECTIVE							MILESTONES AND TARGET YEAR ⁹
	2025							2030
	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP	CONSOLIDATED GROUP
Gross Scope 1 GHG emissions	2,505	768	2,427	1,354	28	268	7,350	-
Gross location-based Scope 2 GHG emissions	1,069	221	39	452	151	83	2,016	-
Gross market-based Scope 2 GHG emissions	987	221	39	258	151	83	1,740	-
Total scope 1 & 2 GHG emissions (location-based)	3,573	989	2,466	1,806	179	352	9,366	-
Total scope 1 & 2 GHG emissions (market-based)	3,492	989	2,466	1,612	179	352	9,090	-
Total Gross indirect (Scope 3) GHG emissions	-	-	-	-	-	-	-	-
1 Purchased goods and services	-	-	-	-	-	-	-	-
2 Capital goods	-	-	-	-	-	-	-	-
3 Fuel and energy-related activities	-	-	-	-	-	-	-	-
4 Upstream transportation and distribution*	-	-	-	-	-	-	-	-
5 Waste generated in operations	-	-	-	-	-	-	-	-
6 Business travel	-	-	-	-	-	-	-	-
7 Employee commuting	-	-	-	-	-	-	-	-
8 Upstream leased assets	-	-	-	-	-	-	-	-
9 Downstream transportation and distribution	-	-	-	-	-	-	-	-
10 Processing of sold products	-	-	-	-	-	-	-	-
11 Use of sold products	-	-	-	-	-	-	-	-
12 End-of-life treatment of sold products	-	-	-	-	-	-	-	-
13 Downstream leased assets	-	-	-	-	-	-	-	-
14 Franchises	-	-	-	-	-	-	-	-
15 Financial investments	-	-	-	-	-	-	-	-
Total GHG emissions (location-based)	-	-	-	-	-	-	-	-
Total GHG emissions (market-based)	-	-	-	-	-	-	-	-

9. Aviapartner has not yet determined 2030 GHG reduction targets.

In 2025, Aviapartner reported total Scope 1 and Scope 2 greenhouse gas emissions of 9,366 tCO₂e using the location-based method and 9,090 tCO₂e using the market-based method. Scope 1 emissions represented the largest share of emissions, accounting for approximately 78% of total Scope 1 and 2 emissions under the location-based approach. These emissions primarily originate from the consumption of fuels used in ground support equipment and operational vehicles.

Aviapartner's footprint confirms that the Group's decarbonisation challenge remains primarily linked to the transition away from fossil fuels used in ground support operations, while improvements in the traceability and substantiation of renewable electricity sourcing may further influence reported Scope 2 emissions in the future.



Methodology and assumptions

Aviapartner has no Scope 1 GHG emissions from regulated emissions trading schemes.

Aviapartner does not yet account for biogenic emissions (Scope 1, 2 or 3). Its GHG emissions accounting will be refined and improved within the next two years.

The Company calculates greenhouse gas (GHG) emissions using methodologies aligned with the GHG Protocol and applies an operational control approach for defining organisational boundaries. Under this approach, emissions arising from facilities and operations over which the Company exercises operational control are included within Scope 1 and Scope 2 emissions, irrespective of asset ownership.

Aviapartner conducts a significant portion of its activities within airport facilities and other leased premises. Where the Company is responsible for managing and operating activities within these facilities and obtains the related energy consumption data from airport operators or landlords, the associated fuel and electricity consumption are accounted for within Scope 1 and Scope 2, as applicable.

All countries and stations in scope provide data submitted in an internal management system.

Scope 1 emissions are based on actual fuel consumption data, collected from invoices and accounting records, and use DEFRA UK 2025 emissions factors.

Fugitive emissions are not yet included, but data collection has started to improve calculations in the future.

Scope 2 emissions are calculated using electricity and steam consumption data, with location-based emissions factors from the Association of Issuing Bodies (AIB) 2024 residual mix. Market-based emissions factors for renewable energy are not yet fully integrated but are used when and where available.

Estimations were made for 0.3% of the Scope 1 data on fuel consumption where only cost data was available. National averages were applied to determine estimated amounts, or where invoices were not yet available, and estimates were based on historical data.

Scope 2 emissions are based on 46% of estimated data. Where no data is available, estimated data for Scope 2 calculations is based on available data from landlords or other stations with reliable data based on intensity factors within the Aviapartner network.

On the total Scope 1 and 2 emissions, it represents 14% estimations in 2025.

The difference between the location-based and market-based results is limited, reflecting the fact that only a limited portion of electricity consumption could be associated with contractual instruments or supplier-specific emissions factors meeting the reporting requirements. As a result, the market-based method provides only a modest reduction in reported Scope 2 emissions.

All data is verified through validation checks at country and headquarter level. Third-party audits on the data are linked to the publication of this sustainability statement.

Aviapartner's Scope 1 and 2 GHG intensity per million in revenues has not yet been calculated for 2025, as the group consolidated net revenues, as presented in the financial statement, were not yet approved at the time of publication of this statement. This will be added in future.

3.2.4. Taking action on climate change mitigation and energy (E1-3)

As part of its Environmental Management System, Aviapartner defines key environmental sustainability actions in its Environmental Programme. This programme is valid for three years with the 2023-2025 programme. A new programme will be defined for 2026-2028 based on the achievements and lessons learned from the previous one.

The 2023-2025 Environmental Programme focused on:

1. **Fleet electrification:** In line with Aviapartner's target, the main action in the environmental programme concerns the electrification of motorised GSE and vehicles, which are the main source of GHG emissions for the company's activities.
2. **The introduction of renewable energy:** A core element of the decarbonisation plan also includes the shift from high-carbon fuels to cleaner alternatives, such as HVO100, as well as increasing the procurement of green electricity.
3. **Energy efficiency:** The company's decarbonisation objective is also supported by energy-efficiency strategies that promote the adoption of low-carbon technologies, including smart battery technology and telematics for its ground support equipment and vehicle fleet.
4. **Employee commuting:** Improving the sustainability of commuting through collaboration with airports and ongoing monitoring of progress.
5. **Supplier engagement:** Encouraging suppliers and other stakeholders to adopt its environmental principles, including by building capacity among suppliers and business partners. Further information on supplier engagement initiatives can be found under section 5.1.2 *Prevention and detection of corruption and bribery (G1-3)*.

Additionally, training and communication are integral components of Aviapartner's Environmental Management System, to raise awareness and promote environmentally responsible behaviour, in addition to ensuring the safe and effective implementation of new technologies. Environmental awareness training is provided to employees as part of the onboarding process to reinforce the company's commitments at the organisational level.

The scope of these mitigating actions encompasses Aviapartner's activities in Ground Handling, Cargo Handling, Private Aviation, and Passenger VIP Lounges within the current report scope. Sustainable practices are applied across offices, lounges, warehouses, and other operational areas. This includes Aviapartner's current operations and support functions, across multiple European countries. However, the scope of these activities excludes subcontracted services.

In the future, actions related to Scope 3 emissions include an initial carbon footprint screening in the coming year, laying the foundations to identify further decarbonisation initiatives that support the company's goal of transitioning towards low-carbon operations.

As specific quantified targets for expected GHG reductions have not yet been defined, Aviapartner does not publish previous emissions and does not disclose achieved reductions. Moreover, Aviapartner has not defined consolidated financial amounts related to its action plans as part of its 2025 sustainability statement. Moreover, there are currently no remediation actions since there are no capturing measures.

These actions are implemented on a continuous best-effort basis, subject to the availability of suitable technological alternatives and constraints imposed by business partners. It should be noted that limitations exist due to infrastructure dependencies at airports.

Aviapartner's ability to implement these actions depends significantly on the availability and allocation of financial, technological, and human resources. Access to finance at an affordable cost of capital is critical for achieving the electrification of the company's fleet of ground support equipment and vehicles. Financial resources are essential for transitioning to low-carbon operations, and ongoing access to affordable financing remains pivotal for initiatives such as fleet electrification and infrastructure upgrades.

The continued use of HVO and other low-carbon technologies depends on stable fuel supply, reasonable prices, and cooperation with suppliers and airport operators. Rising energy costs or limited availability of renewable fuels could slow down these efforts. Any disruption in energy supply or increases in energy prices could create financial and operational hurdles, challenging Aviapartner's decarbonisation efforts and increasing operational costs.

The company's ability to replace existing ground support equipment with economically and operationally viable alternatives also relies on the availability of technology and the capacity of European ground support equipment manufacturers and suppliers to provide these within the time limits agreed upon.

Moreover, the pace at which this process can be implemented is strongly influenced by the customer portfolio and the nature of their operations. Depending on the specific needs and activities of customers, the timeline for electrification may either accelerate or require adjustments to align with operational realities. Infrastructure readiness, including battery charging facilities, electric grid capacity, and sufficient space and facilities at airports (such as designated deployment areas), is essential to integrate electrified equipment efficiently into operations. The successful rollout of electrification is highly dependent on the availability and capacity of the airport's electricity infrastructure and related facilities, including the designated locations for implementation. In addition, ground support equipment suppliers play a key role in ensuring timely and efficient execution.

Human resources also play a crucial role in this process. Skilled labour, operators, and environmental specialists are needed. Targeted training and an effective organisational structure are necessary to implement sustainable practices and ensure compliance with environmental and safety standards. In addition, resources must be allocated for regulatory compliance and environmental management to meet legal obligations effectively.

Challenges such as resource scarcity and financial constraints require robust strategic planning and collaboration to secure the necessary resources for successful implementation of actions described above.

Aviapartner's Environmental Management System is ISO 14001-certified in all commercial locations in Spain as well as select stations in private aviation, in the Netherlands, as well as in the following stations: Brussels, Nice, Lille, Rome Fiumicino, Milan Malpensa and Bologna¹⁰. Aviapartner's Environmental Programme is tailored to each station based on its infrastructure, local requirements, and operational capabilities, defining local actions and targets aligned with corporate and airport stakeholder needs, which are then followed up on at regular intervals.

10. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

Aviapartner Belgium has implemented key environmental actions, as defined in the Aviapartner Environmental Programme. The environmental programme is composed of multiple actions to decarbonise and reduce our carbon footprint. These actions are either part of structured policies or initiated independently in response to stakeholder requirements. The scope of climate mitigating actions encompasses Aviapartner's activities for all Belgian airports: Ground Handling, Cargo Handling and Private Aviation, excluding subcontracted services.

In 2025, Aviapartner Belgium continued to contribute to the group's objective of electrifying its ground support equipment. This objective is supported by a phased action plan in Belgium. Short-term actions include procurement and deployment of electric GSE units, infrastructure upgrades, and staff training, with annual progress reviews. Activities involve coordination with equipment manufacturers and suppliers and the operational use of electric ground support equipment. A significant portion of the GSE fleet has already been converted. In 2025, Aviapartner Belgium made measurable progress toward its target of 70% electrification, but landed just below at 68% due to insufficient charging capacity, resulting in temporary restrained capacity to extend the electric fleet. Smaller airports such as Antwerp, Ostend and Liege have limited operational activities, which may delay or even compromise the electrification target. Brussels Airport plans to increase charging capacity in the coming years, which will enable a further expansion of the electric fleet without compromising ongoing daily operations. With the replacements planned for 2026, 70% should be reached by end 2026. The transition is supported by infrastructure upgrades and operational integration, and progress is tracked periodically and reviewed annually.

In addition, the transition to 100% green electricity contracts is pursued where technically and economically feasible. This is considered a short to medium-term objective, with contract evaluations and supplier negotiations ongoing. Implementation timelines vary by location, depending on local energy market conditions and airport infrastructure. Several operational sites at Brussels, such as the private aviation building, the battery charging areas in the baggage hall and the smaller battery charging areas on the apron, have already switched to certified green energy providers. Further expansion to the main battery charging area, as well as the site for de-icing and waste at Brussels Airport, is planned for 2026 subject to local availability and economic viability. Operations at smaller airports such as Antwerp and Ostend, as well as Cargo operations in Brussels, depend on the airport, as the electricity is provided by the airport operator.

The **switch from diesel to HVO fuel** (biodiesel) is planned as a short-term action, with initial feasibility assessments and supplier engagement already underway. While full implementation is still in development and will depend on technical compatibility and cost-effectiveness, the company has identified operational areas where HVO100 can be introduced in the short term. Although the purchase price of HVO100 is significantly higher than that of conventional fossil fuels, a clear commitment has been made to transition towards this more sustainable alternative. Efforts are focusing on supplier engagement and infrastructure readiness. Brussels Airport is making HVO100 available on-site, following a strategic decision to support the transition to more sustainable fuels and further decarbonisation. The insights and experiences gained from this implementation will serve as a reference for smaller stations in Belgium (e.g. Antwerp, Ostend, and Liege). The pace and feasibility of implementation are highly dependent on decisions made by the current customer base, as well as strategic choices by the airport authorities. (e.g. airlines increasing, decreasing, or halting their operations at a specific airport). Smaller stations are expected to follow suit and gradually shift towards bio-based diesel alternatives if further electrification is difficult due to local constraints.

Looking ahead, Aviapartner Belgium plans to address **employee commuting and business travel** to further reduce emissions over the next three years, taking into account available facilities and alternative transport options for staff in and around the airport, in line with their shift patterns. In Brussels, the airport, together with the community and the province, has launched a project to develop additional mobility options to the airport, including the deployment of a new tram line connecting Brussels to the airport, expected by 2030. It also includes a dedicated carpooling app with seven carpool points in the airport's surrounding area.

Aviapartner Belgium has also improved the monitoring of energy consumption using verified data sources, such as electricity invoices and airport-provided data (with 2019 as the baseline year), supported by structured activities, including data collection from energy providers and airport systems, internal reporting, and analysis.

Geographically, these actions are currently focused on Aviapartner's operations at Brussels Airport in Zaventem (passenger handling and cargo), with potential for expansion to other locations. These actions demonstrate Aviapartner Belgium's commitment to continuous improvement and transparency in environmental performance and are followed up on in the yearly management review.

In line with [Aviapartner Spain's](#) 2023-2025 environmental programme, the **electrification of GSE and motorised vehicles** was continued in 2025. The intermediate group target of 70% electric GSE by 2025 was achieved at country level in Spain. Aviapartner Spain applies an airport-by-airport electrification roadmap based on operational feasibility, available charging infrastructure, and sufficient electricity capacity. Many fleet categories are fully electrifiable (i.e. baggage tractors, belt loaders, GPUs, vans, and passenger steps), and these are being converted as infrastructure further develops in coordination with AENA.

Spain also worked on further **introducing renewable energy sources**. AENA's objective to supply one hundred percent renewable electricity by 2026 supports these decarbonisation ambitions. Future steps include expanding **renewable-fuel** adoption for GSE that cannot yet be electrified, such as the recent implementation of HVO fuel across a number of Spanish airports in 2025. At the end of 2025, the company is already using Hydrotreated Vegetable Oil (HVO) fuel at several airports, including Barcelona, Bilbao, Málaga, Oviedo, and Santiago de Compostela.

Aviapartner Spain's **energy-efficiency actions** and renewable integration strategy are directly aligned with AENA's national plan to supply all Spanish airports with 100% renewable electricity by 2026. As AENA upgrades the grid and expands charging capacity, Aviapartner can accelerate the electrification of its fleet. Aviapartner Spain plans and monitors its financial and operational resources annually to ensure that sustainability actions are achievable and cost-effective. However, challenges such as fluctuating energy prices, limited equipment availability, insufficient airport facilities, or resource constraints may impact the pace at which new initiatives can be introduced. Careful planning and cooperation with industry partners remain essential to keep progress on track.

In future, Aviapartner Spain will launch a national employee-mobility survey, to be able to better tackle emissions linked to **employee commuting**. This survey will map commuting patterns across all airports and guide future measures, such as carpooling incentives, public-transport support, and low-emission mobility options for staff.

Energy audits in Spain are conducted every four years in line with national regulations and provide recommendations for operational and energy-efficiency improvements. These **energy-efficiency actions** are implemented based on accredited recommendations, confirming the importance of ongoing fleet electrification. The audits also clearly identify areas for improvement, despite the constraints associated with operating within airport-owned premises. The recommendations have, for instance, led to the systematic replacement of internal lighting with LEDs in Fuerteventura Airport, the installation of presence detectors, the optimisation of smaller internal systems (such as IT and kitchen equipment), and improved operational control, e.g. by ensuring that equipment is switched off when not in use. At the same time, the audits have highlighted the importance of close collaboration with landlords in order to have a structural impact on energy use, such as for HVAC systems, lighting schedules and building envelope performance, since these cannot be modified unilaterally by Aviapartner.

The scope of these climate mitigation actions covers Aviapartner Spain's activities across all Spanish airports, including Ground Handling, Cargo Handling, and Private Aviation across several locations in Spain. Private Aviation in Ibiza, Málaga, Palma de Mallorca and newly added stations in Madrid and Barcelona includes lounges for private aviation passengers. "Cargo activities" refers exclusively to ramp and aircraft cargo operations, and does not include warehousing. These actions involve and impact key stakeholders such as airport authorities (AENA), airlines and their passengers, suppliers, and the Aviapartner Spain workforce.

In 2025, **Aviapartner France** further electrified its fleet, supported by adequate charging infrastructure at French airports. This initiative also includes staff training. Electrification requirements are increasingly embedded in tender and licensing processes at major airports, including Nice and Paris. French stations maintain close collaboration with airport authorities to meet compliance standards and regulatory expectations. Progress is reviewed annually. France has not yet reached the intermediate target of 70% electric GSE & vehicles at national level, except for Aviapartner Executive SAS.

In addition, the transition to 100% **renewable electricity** contracts is carried out wherever technically and economically feasible, subject to the electricity supply conditions provided by the airports. Contract evaluations and supplier negotiations are ongoing, with timelines varying by station based on local energy market conditions and airport infrastructure.

Efforts are underway to integrate renewable energy sources such as **alternative fuels** into operations, further reducing dependency on fossil fuels. No fixed date for full coverage can be provided due to local market constraints. Initial feasibility studies and supplier engagement are underway, with progressive implementation expected over the next three to five years. A pilot project will be launched in Nice by 2026, while Nantes is actively participating in an airport-led initiative to enable HVO adoption. The continued use of HVO and other low-carbon technologies will depend on reliable fuel supply chains, competitive pricing, and effective cooperation with suppliers and airport operators. However, rising energy costs or limited availability of renewable fuels could hinder progress.

Finally, initiatives related to **sustainable employee** mobility have already been implemented, and Aviapartner France will continue to maintain them in the coming years.

The scope of Aviapartner France's climate mitigation actions covers all activities across French airports, including Ground Handling, Cargo Handling, and Private Aviation. "Cargo operations" refers specifically to ramp and aircraft cargo handling and excludes warehousing activities, which are limited to a single express cargo facility in Toulouse. Aviapartner's Passenger Lounges at Paris Charles de Gaulle are also included. However, subcontracted services fall outside this scope.



Aviapartner Italy's GSE electrification programme focuses on Ground Support Equipment (GSE) renewal and optimised asset utilisation. The replacement of traditional diesel powered GSE with electric units is being pursued in a phased and pragmatic manner, taking into account airport infrastructure readiness and operational constraints specific to each station. In Italy, a structured and large-scale programme for the renewal and replacement of the Ground Support Equipment (GSE) fleet is currently underway, having been formally launched in 2024. The first major milestone of this programme concerned Rome Fiumicino Airport, where the complete replacement of conventionally powered (internal combustion) units with electrically driven equipment has been achieved. Other Italian stations are in progressive and differentiated phases of implementation, depending primarily on airport electrical infrastructure availability. As a general rule, equipment is replaced with an electric version when it needs to be substituted. At certain airports, electrification has not yet formally started or remains limited due to insufficient charging points, power capacity constraints, or shared infrastructure not yet upgraded by the airport operator.

During 2025, Italy continued the gradual introduction of electric GSE where feasible, prioritising high utilisation equipment types with the greatest potential impact on fuel consumption and local emissions. The electrification programme applies across all Italian Aviapartner operating units, including legacy Aviapartner stations as well as Consulta, where operations are fully integrated under Aviapartner governance, and Argos stations. However, the intermediate target of 70% electric GSE and vehicles has not yet been achieved at country level. For 2026, the Italian operation plans to continue this progressive approach, with further replacement of end of life diesel units where infrastructure conditions allow, and continued optimisation of charging strategies in coordination with airport stakeholders. The pace of deployment remains intentionally aligned with infrastructure availability to ensure operational resilience and safety.

In parallel, Italy also worked on **energy efficiency measures**: charging practices were optimised at station level by aligning charging cycles with operational demand, thereby reducing unnecessary energy consumption and avoiding peak load inefficiencies. These actions were supported by local monitoring of GSE utilisation and coordination with airport operators where charging infrastructure is shared.

In contexts where full electrification is not immediately feasible, Aviapartner has switched to alternative solutions, such as hybrid equipment fitted with auxiliary generators intended for battery recharging or HVO biofuel. This is currently only available at Rome Fiumicino, where an HVO supply has been established. Discussions are ongoing at Milan Malpensa and Linate airports.

Leveraging Italy's geographical position and favourable solar irradiation conditions, solar equipped towable passenger stairs were introduced on a pilot basis at select Italian stations, predominantly at airports with high sun exposure and suitable operational profiles. These units are currently in place at Pisa, Florence, and Milan Linate stations, and deployment at Milan Malpensa is planned for 2026.

Aviapartner Italy has also been pursuing the progressive installation of LED lighting. The use of motion sensors in low occupancy areas, and the optimisation of HVAC settings to reduce unnecessary energy use, will be implemented at Italian stations, primarily within administrative offices and operational support areas where Aviapartner holds direct responsibility for facilities. HVAC optimisation measures are applicable where tenant control is available, while remaining subject to airport landlord systems and lease agreements. These discussions, primarily in Rome and at the Rome HQ office, have been on the table for some time, and continuing discussions are open for implementation in 2026.

Aviapartner Italy's climate mitigation actions encompass all activities at domestic airports, including ground handling services, cargo handling, private aviation, and passenger VIP lounges in several airports (Rome, Bologna, Palermo). "Cargo operations" refers specifically to cargo handling on the ramp and onboard aircraft and excludes warehousing activities, which are provided by specific providers.

At [Aviapartner Netherlands](#), the transition to electric GSE is well underway, supported by a phased replacement plan. In 2025, Aviapartner successfully replaced 28 diesel-driven units with electric alternatives, prioritising high-usage equipment to maximise environmental impact. At Amsterdam, most operations are already carried out with electric GSE, and the company is awaiting delivery of additional units that have been ordered to complete the transition. However, limited skilled labour at GSE manufacturers and maintenance providers has led to long delivery and service lead times. Additionally, the Dutch electricity grid is at capacity, and demand is expected to rise faster than supply, which is delaying the installation and operation of charging infrastructure. The ongoing transition to electric alternatives is dictated by operational feasibility, with electrification remaining the default option for all standard operations. While electrification is the primary goal, a limited number of diesel-powered units will remain in use on a temporary or exceptional basis. At Rotterdam, the only remaining diesel-powered GSE are backup units used when electric equipment is temporarily unavailable or for tasks performed only a few times per year. Aviapartner Netherlands has not yet achieved the intermediate target of 70% electric GSE and vehicles at country level, but is not far off in all its locations. In 2027, all narrow-body handling will be performed solely by electric GSE. For all wide-body handling, this will be in 2028.

When it comes to its efforts to **introduce renewable energy sources**, HVO100 renewable diesel is available and used in the Netherlands to significantly reduce emissions until full electrification becomes feasible.

Employee commuting emissions are monitored and reported annually in compliance with Dutch regulatory requirements. The company promotes the use of public transport through financial incentives defined in the collective labour agreement, whereby commuting by public transport is reimbursed at a higher maximum rate than commuting by private car. This reimbursement structure is designed to encourage lower emissions commuting choices.

To further minimise environmental impact, **energy audits** are conducted every four years in line with legislation to identify opportunities for efficiency improvements in all areas of operation, such as electrification of the fleet and the installation of energy monitoring tools in the offices, which will take place in 2026. The next energy audit is scheduled for 2026 to reassess performance and identify further improvement opportunities.

Finally, all stations successfully achieved **ISO 14001 certification** in 2025, underscoring Aviapartner's commitment to environmental management.

These activities encompass Ground Handling in Amsterdam Schiphol Airport and Rotterdam The Hague Airport, private aviation at Amsterdam FBO and a passenger VIP lounge in Rotterdam. Climate mitigating actions are implemented across all activities and currently exclude subcontracted services.

Activities at **Aviapartner Germany** are currently affected by a slowdown due to the prevailing context. Following the loss of its ground handling license¹¹, Aviapartner Dusseldorf continued to operate as a subcontractor. Due to the uncertainty surrounding the anticipated joint venture agreement, planned investments in electric ground support equipment (e-GSE) were put on hold, clearly demonstrating its dependency on an operating license and viable operation to achieve electrification targets. The intermediate target of 70% electric GSE and vehicles by 2025 remains far off as a result of this situation.

The loss of the operating licence at Dusseldorf Airport had a cascading effect on operations at Hannover Airport, where interdependent measures were delayed or deprioritised due to resource reallocation and strategic adjustments. As a result, the local environmental targets could no longer be achieved within the originally intended time horizon. At Aviapartner Hannover, planned investments depend to a large extent on customers and their daily flight volumes, which have a direct impact on strategic planning and resource allocation. Aviapartner Hannover continues to evaluate alternative pathways to meet its environmental objectives, with revised time horizons currently under review. Hannover Airport is also reviewing the option of HVO (Hydrotreated Vegetable Oil), with a decision expected no earlier than 2026.

A few additional initiatives were still carried out in 2025. The introduction of an IoT-based system to support a coordinated use of GSE, in order to control, monitor and reduce fuel consumption in combination with a real-time planning tool, helps to locate required equipment, minimise unnecessary search-related movements, and dispatch loading teams to the nearest handling position. This reduces unnecessary driving and ultimately saves fuel. A systematic tracking of energy consumption has been implemented to identify and act on efficiency opportunities.

Finally, business travel and employee mobility are being monitored. Employees are encouraged to form carpool groups, reducing individual commuting emissions.

¹¹. The license, which is granted for a period of seven years, authorises ground handling. Without this license, no activities can be carried out on the apron: e.g. transport of baggage and cargo, loading and unloading of the aircraft, pushback services. Due to insolvency, the operations were discontinued on 28.10.2025.

3.3. MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES RELATED TO CLIMATE CHANGE ADAPTATION

At present, the company has not identified any material impacts, risks, or opportunities (IROs) related to climate adaptation. Nevertheless, it acknowledges that **climate adaptation is an emerging area of strategic importance** with the potential to significantly influence longterm business continuity. Given the nature of its activities, the company's exposure to climate adaptation challenges is closely tied to the infrastructure, preparedness, and policy decisions of the airports in which it operates.

3.3.1. Policies related to climate change adaptation (E1-2)

Aviapartner acknowledges that formal policies for adaptation to climate change have not yet been adopted. A risk assessment still has to be quantified, and the topic does not yet have a comprehensive global overview or centralised management.

However, operational procedures are in place to address specific weather events, and existing policies related to **health and safety and contingency planning** already cover these aspects and are detailed in the relevant section *3.3.3 Taking action on climate change adaptation (E1-3)* and chapter *4.3.1 Policies related to health & safety (S1-1)*.

3.3.2. Targets related to climate change adaptation (E1-4)

For climate adaptation, Aviapartner has not defined a level of ambition or established qualitative or quantitative indicators to assess progress. The company does not currently monitor the effectiveness of policies and actions in this area, as no formal adaptation strategy is in place. It has also not set measurable, outcome-oriented, or time-bound targets, due to the absence of a comprehensive assessment of physical climate risks across its operations.

While certain operational resilience measures exist through health and safety and contingency planning, their outcomes are not systematically monitored or evaluated against adaptation-specific indicators.

The company intends to strengthen its climate risk assessment processes before developing mechanisms to evaluate and monitor the effectiveness of future adaptation measures. Targets will be considered once structured climate risk assessments and performance indicators are established, ensuring their relevance and feasibility.

It should also be noted that, as Aviapartner operates within airport infrastructures it does not control, its ability to define and monitor adaptation-related performance indicators remains limited and requires coordination with local airport operators.

3.3.3. Taking action on climate change adaptation (E1-3)

In 2025, initial steps were taken in Aviapartner's climate adaptation journey, which aims to lay the foundation for a structured climate resilience plan that will ensure continuity, safety, and reliability for internal and external stakeholders. Aviapartner has performed an initial identification of climate hazards relevant to its operations (heat waves, storms, freezing conditions, etc.) and conducted an initial qualitative assessment of the vulnerability of its personnel, infrastructure, and processes.

Since 2025, initial measures have been introduced across the Group to protect staff and minimise impacts on physical assets during extreme weather events, ensuring operational efficiency and business continuity while maintaining fleet operations under changing weather conditions.

- > **Severe weather procedures and emergency response:** Aviapartner's procedures regarding severe weather are included in its Ground Operations Manual, the key document for safe operations. The plan is complemented by local procedures on adverse weather conditions, including specific guidelines to adapt to wind speed and storm intensity. This is complemented by a dedicated emergency response plan describing the actions to be taken in the event of strong winds likely to cause injury and property damage, including possible activity suspension.
- > **Workforce protection and heatwave management:** Local heatwave plans, primarily aimed at protecting the workforce, were developed in all countries to address the effects of a changing climate. Heatwave management deployed throughout the company includes hydration measures (such as water dispensers and in some stations reusable bottles), cooling solutions with access to air-conditioned or cooled spaces, appropriate work clothing (caps, sunglasses, etc.), sunscreen dispensers, and in some cases the organisation of regular breaks. These measures are aligned with country-specific needs and legislation but generally include protecting the head and eyes, adopting a suitable diet, and ensuring that a bottle of water is always within reach while working. Posters remind employees of hydration guidelines, how to recognise symptoms of heatstroke, and how to report early signs. Visual awareness campaigns highlight the importance of following preventive measures, particularly in **Spain** and **France**.
- > **Protection of assets and operations:** Across the network, targeted communications and detailed plans are in place to protect equipment, infrastructure, and aircraft during storms and freezing conditions. Winter plans stipulate measures related to ice, snow, and freezing temperatures, covering staff, ground service equipment, facilities, and workspaces.

The key actions described here apply to all operational staff in ground handling, private aviation, and cargo, and involve upstream coordination with civil aviation and airport authorities, equipment suppliers, and subcontracting staff. The implementation of measures and deployment of emergency plans occur in close cooperation with airport authorities and local stakeholders. However, structural adaptation measures are limited to the airports where Aviapartner owns and operates infrastructure.

While the above framework applies across the Group, several measures are specific to individual countries and reflect local risks, regulatory requirements, and operational contexts.

Aviapartner France has identified climate hazards relevant to its operations (heatwaves, storms, freezing conditions, etc.) and assessed the vulnerability of personnel, infrastructure, and processes, in order to develop a structured plan with actions designed to prevent workplace accidents, occupational illnesses, and property damage.

In 2025, it integrated measures to address the growing impact of extreme temperatures and storms into a formal risk assessment document and action plan aligned with its national legislation. Operational practices were adapted during heatwaves, including adjusted schedules, extended breaks, and the use of cooled rest areas. Technical solutions such as fans were used to reduce thermal stress. Enhanced protection is provided for vulnerable employees (pregnant women, people with heart conditions, diabetics, etc.) by minimising their exposure time as much as possible. Water fountains providing cooled drinking water are installed in all stations in France, and a portion of staff received reusable bottles to encourage hydration.

Aviapartner France also works closely with airport authorities to study the feasibility of technical solutions such as fans, misting systems, shading structures, outdoor shelters, and access to cooled drinking water in terminals. These measures apply across operational areas, including ramp services, ground handling, and maintenance zones, ensuring that every station activates these protocols during critical weather conditions. Internal teams (operations, health and safety, HR) and external stakeholders (airport authorities, regulatory bodies) are involved in implementation.

In addition, communication protocols were deployed at all stations in France. Awareness campaigns supported by posters and training sessions reinforced guidelines on hydration, recognising heatstroke symptoms, and reporting early signs. Visual campaigns promoted compliance with preventive measures, including head and eye protection, nutrition advice, and carrying water bottles during site movements. These combined actions resulted in improved compliance and a measurable reduction in heat-related incidents. Operational adjustments and awareness campaigns remain ongoing and are activated during heatwave alerts. Continuous improvement of training programmes remains an annual initiative. Future considerations include expanded cooling infrastructure and digital monitoring systems linked to Météo-France alerts.

Aviapartner Belgium developed a similar heatwave plan based on specific temperature measurements.

To strengthen operational resilience to extreme weather conditions, **Aviapartner Spain** leverages telematics to optimise equipment usage and minimise time spent in extreme conditions.

The company is implementing telematics (ADVEEZ) across its ground support equipment (GSE) fleet. This system provides realtime visibility on equipment location, utilisation, and idle time, enabling optimisation of fleet usage, reduction of unnecessary running time, and minimisation of equipment exposure to extreme weather conditions.

Deployment began in Barcelona in March 2025, serving as the first reference site in Spain. Following a phased rollout, full implementation at Barcelona is planned to be achieved by March 2026. The deployment is now being expanded to other Spanish airports, with functional testing already completed and final adjustments underway. Full implementation across all operating stations is expected during 2026.

Visual awareness campaigns also highlight the importance of following preventive measures.

In Italy, heatwave management takes the form of seasonal briefings on heatwaves and hydration protocols.



4. SOCIAL INFORMATION (S1)



Aviapartner has developed comprehensive governance frameworks, policies, and processes to manage material impacts, risks, and opportunities related to the workforce, adhering to ESG and sustainability standards.

Aviapartner is committed to the ten principles of the United Nations Global Compact, driving collaborative efforts among employees, airlines, airports, and suppliers to integrate sustainable practices. The company has embedded the social accountability principles of the SA8000 standard, which focuses on social accountability, in its way of operating. The improvements made during this process to policies and procedures are applicable across the Aviapartner network but have only been certified with SA8000 certifications in seven commercial stations in Spain. There is currently no intention to extend this further.

4.1. HUMAN RIGHTS

As human rights are central to Aviapartner's due diligence, the topic is presented as an overarching social topic covering all its stakeholder relations.

Through the double materiality exercise, the company has identified that it can have a **material negative impact on human trafficking within its value chain**, as it has the responsibility to remain vigilant in the detection and reporting of suspicious activities. Along these lines, the company can also have a **positive impact on the prevention of human trafficking** through effective controls, awareness, and collaboration with relevant stakeholders.



4.1.1. Aviapartner's human rights policy

The Aviapartner Policy on Human Respect¹² and its Human Resources Strategy and Procedures align with the principles of the **United Nations Global Compact, endorsed by the company since 2021**. This influences the strategies and operations across various dimensions such as human rights, labour, and environmental protection.

The Human Respect policy covers **core internationally recognised labour and human rights**, including non-discrimination, equality, and human dignity, while the Human Resource Strategy and Procedures also cover fair pay (living wage), freedom of association, prohibition of child and forced labour, health & safety, and grievance mechanisms:

12. The Human Respect policy can be found on Aviapartner's website: <https://www.aviapartner.aero/resources/files/Policy%20on%20Human%20Respect.pdf>.

By referring to core human rights principles, these two policies together guarantee:

- > **Right to equality and non-discrimination:** The policy commits to equal and fair treatment in recruitment, promotion, remuneration, and working conditions, explicitly prohibiting discrimination on grounds such as gender, age, disability, ethnicity, religion, etc.
- > **Right to fair and just working conditions:** Aviapartner commits to fair remuneration, internal pay equity, respect for collective agreements, and the progressive implementation of a living wage going beyond legal minimums.
- > **Right to freedom of association and collective bargaining:** The policy recognises trade unions, works councils, a European Works Council, and structured social dialogue, in line with UN Global Compact Principle 3.
- > **Prohibition of forced labour:** Aviapartner explicitly prohibits all forms of forced or compulsory labour across its workforce and supply chain, with a zero-tolerance approach.
- > **Prohibition of child labour:** The policy commits to the effective abolition of child labour and verifies age only to ensure legal compliance, aligned with UN Global Compact Principle 5. Aviapartner enforces a zero-tolerance principle for labour rights issues, supported by age verification processes during recruitment and supplier self-assessments.
- > **Right to safe and healthy working conditions:** Health & safety is embedded as a core value, with targets of zero injuries, mandatory safety training, and alignment with EU health and safety legislation.
- > **Right to human dignity and ethical treatment:** The policy commits to respecting human rights, ethical conduct, non-retaliation (e.g. whistleblowing), and treating employees with respect and dignity.
- > **Right to access grievance and reporting mechanisms:** A whistleblowing procedure with confidentiality and non-retaliation guarantees is required in each country, enabling employees to raise concerns safely.
- > **Right to training and professional development:** All employees are entitled to training, skills development, and career progression opportunities throughout their employment.
- > **Right to equal opportunity and gender equality:** The policy commits to equal opportunities, gender pay equality, country-level equality plans, and measurable gender diversity targets in management and operations.

The Human Respect policy is intended to be clarified in the course of 2026.

In addition, Aviapartner maintains a **Supplier Code of Conduct** addressing forced and child labour, discrimination, and anti-corruption, reflecting alignment with global ethical standards.

The Ten Principles of the UN Global Compact are derived from internationally recognised instruments, including the **Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work**. In line with these ILO principles, Aviapartner upholds freedom of association and the effective recognition of the right to collective bargaining, promotes equal opportunities and non-discrimination, and enforces a zero-tolerance approach to forced and child labour. To foster the practical implementation of these commitments, the company maintains structured social dialogue mechanisms and engages regularly with employees, unions, and worker representatives to support a safe, fair, and positive work environment.

Alignment with additional international standards, such as the **OECD Guidelines for Multinational Enterprises**, will be progressively assessed as part of the company's human rights and labour rights maturity roadmap. Nevertheless, Aviapartner maintains secure and confidential reporting channels for employees to raise concerns, supported by whistleblowing systems that ensure protection against retaliation. The organisation also applies the Just Culture principle, originally rooted in aviation safety, fostering a transparent and learning-oriented environment where employees can report errors or concerns without fear of disproportionate disciplinary action.

While a fully explicit and comprehensive alignment with the **UN Guiding Principle on Business and Human Rights**, specifically covering all components such as the International Bill of Human Rights, is not detailed, Aviapartner's policies demonstrate progressive efforts toward these recognised frameworks. This aligns with the active review process to ensure continuous improvement.

Since 2023, **Aviapartner Spain** has aligned with the SGE21 Ethical and Socially Responsible Management System Standards of Forética and the SA8000 Standard, ensuring adherence to internationally recognised labour principles, including those of the International Labour Organisation (ILO). The SA8000 standard is based on international human rights conventions (Universal Declaration of Human Rights, the Convention on the Rights of the Child, and several conventions of the International Labour Organisation – ILO, etc.). These standards set requirements for working conditions in supply chains, addressing issues such as child and forced labour, occupational health and safety, freedom of association, and the right to collective bargaining, among others.¹³

4.1.1.1. Human rights for own workforce

Aviapartner's Human Resources Strategy and Procedures explicitly address forced labour, compulsory labour, and child labour as part of its endorsement of the 10 United Nations Global Compact Principles. Committed to a safe and ethical sector, the Airport Council International (ACI) developed the ACI Combatting Human Trafficking course. In line with its endorsement of UNGC Principle 4 regarding the elimination of all forms of forced and compulsory labour, Aviapartner has been offering this course on a voluntary basis to frontline staff in private aviation, and in commercial aviation since 2020. It raises awareness to provide an understanding of the key issues and challenges in relation to human trafficking at airports, including recognising the signs the employees may spot during their job.

¹³ For further information on entities certified, please refer to 6.3 *List of certification coverage*.

These commitments are operationalised through **structured engagement strategies**, including collaboration with unions to ensure robust social dialogue and address employee concerns. Aviapartner has set out a clear framework of responsibilities to discuss work-related issues, including human rights-related issues, contributing to a positive social climate and avoiding social tensions. The company is also maintaining open communication channels to discuss working conditions, including a European Workers Council and regular consultations (e.g. surveys and psychosocial risk analyses) on transnational issues of concern to all Aviapartner employees, which help management understand workforce needs and adjust strategies accordingly. For further information, see section 4.2.2 *Processes for engaging with own workers and workers' representatives about impacts (S1-2 & S1-5)*.

Communication is complemented with **trainings**, which cover human respect, anti-harassment, addressing aggressive behaviour, etc. to ensure the zero-tolerance policy for discrimination and harassment is enforced. Training programmes further support this engagement by connecting corporate practices with human rights principles and grievance mechanisms, including a Whistleblowing Policy that guarantees confidentiality and protection against retaliation and ensures that employees can safely raise concerns.

The process to ensure respect for human rights is further supported through the annual reporting of progress to the United Nations Global Compact, which provides a structured framework for transparency and internal self-assessment.

Compliance is overseen by Managing Directors, with structured review and oversight processes in place. The governance structure includes designated roles for implementing and monitoring these policies, supported by third party audits on Occupational Health and Safety standards (ISO 45001) in Belgium, France, Italy, and Spain, as well as SGE21 Ethical and Socially Responsible Management System Standards and Social Accountability standards (SA8000) in Spain.¹⁴

Specific local initiatives, particularly in **Spain**, have been identified for enhanced training on human rights and labour rights, with varying levels of implementation observed across other countries. Aviapartner Spain has implemented a **Social Responsibility Policy**, signed by the Managing Director Spain, which reinforces the company's zero-tolerance approach to child labour, forced labour, and any form of exploitation. The local approval of this policy ensures direct management accountability and effective implementation within the Spanish legal and operational context, while remaining fully aligned with Group human rights commitments.

These practices reflect Aviapartner's efforts to embed human rights into everyday workforce interactions and decision-making.

4.1.1.2. Human rights in the value chain

Human trafficking, a form of modern-day slavery, often involves the movement and exploitation of people across borders. The aviation industry, including ground handling, can inadvertently facilitate this crime by providing the means for traffickers to transport victims. All stakeholders in aviation, especially passenger-facing staff, have a crucial role to play in identifying and reporting suspicious behaviour. This responsibility is shared across the value chain and is supported through collaboration with other industry partners.

14. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

Moreover, the company's **Supplier Code of Conduct** mandates ethical practices throughout the supply chain, precluding trafficking and labour exploitation. Human rights principles are embedded in this policy, which addresses labour rights risks across the company's value chain. All subcontractors and suppliers considered critical to the business are required to sign and adhere to the Aviapartner Supplier Code of Conduct, which reflects the principles outlined in the Human Respect Policy. This ensures alignment with the commitment to human rights and ethical practices across the supply chain. These are supported by mandatory self-assessments and on-site audits and inspections for suppliers which are considered critical.

The **Whistleblowing Policy** includes mechanisms for reporting and addressing serious malpractice, including human trafficking and child and forced labour, while protecting whistleblowers from retaliation. For further information on this policy, see section 5.1.1 *Business conduct policies and corporate culture (G1-1)*.

In addition, **Aviapartner Spain's** Social Responsibility Policy reinforces the company's zero-tolerance approach to human trafficking, forced labour, and any form of exploitation in its value chain.

4.1.2. Incidents, complaints and severe human rights impacts (S1-17)

To the best of Aviapartner's knowledge, there has been no **severe human rights issues** or incidents (e.g. forced labour, child labour, or human trafficking), nor penalties connected to its own workforce in the course of the year 2025.

Table 8: Aviapartner's severe human rights incidents and complaints

SEVERE HUMAN RIGHTS ISSUES AND INCIDENTS	2025
Number of severe human rights issues and incidents connected to own workforce	0
Amount of fines, penalties, and compensation for damages as result of human rights incidents of discrimination	€0

For further information on incidents of discrimination, refer to chapter 4.4.3 *Diversity metrics*.

Aviapartner does not have processes in place to identify the total number of severe human rights issues and incidents connected to own workforce that are violations of the UN Guiding Principles and OECD Guidelines for Multinational Enterprises. Nevertheless, Aviapartner has implemented grievance mechanisms and clear reporting channels that allow employees and external stakeholders to raise concerns anonymously, with safeguards in place to protect individuals from retaliation.

Aviapartner's Whistleblowing Policy describes in detail a "step-by-step" process, from identification and reporting to in-depth investigations and follow-up with timelines (for further information, see section 5.1.1 *Business conduct policies and corporate culture (G1-1)*). The policy ensures confidentiality and reinforces the company's commitment to data privacy and the protection of human rights. The scope of the Whistleblowing Policy includes not only all employees of Aviapartner (even within the framework of an employment relationship that has already ended), but is extended to those of third parties, such as subcontractors, suppliers, customers, etc. who, in one way or another, are related to the company.

4.2. MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES RELATED TO WORKING CONDITIONS AND GENERAL PROCESSES IN RELATION TO OWN WORKFORCE

The topic of working conditions is presented as an **overarching chapter** that naturally overlaps with related themes such as health & safety, training and career development, and diversity and inclusion. This chapter also consolidates the company's **cross-cutting employee-engagement mechanisms** and the processes used to **identify, address, and remediate social impacts**.

The company's management of working conditions is driven by the **material impact of working conditions on employee satisfaction, motivation, and overall social climate**, including the **risk of social tensions and strikes**, as well as the **opportunity to build constructive cooperation with trade unions** to maintain positive and stable labour relations.

4.2.1. Policies related to working conditions (S1-1)

Aviapartner's **HR Strategy and Procedures** frames structured social dialogue as a key mitigator of social tensions, an aspect that is critical for key stakeholders such as airports and customer airlines, where operational stability and service continuity are essential. This policy strengthens cooperation with trade unions to maintain a positive social climate. By cooperating with trade unions and employee representatives through transparent communication and regular engagement, the company builds mutual trust and shared responsibility. Engagement takes place through structured consultations and grievance procedures, which inform policy updates. This collaborative approach enables proactive resolution of workplace issues and supports adaptation to economic and technological changes, ensuring stability and well-being across all operations.

Through the implementation of its Human Resources Strategy and Procedures, Aviapartner adheres to the 10 Principles of the United Nations Global Compact. Its structured social dialogue aligns with these principles, notably those promoting respect for internationally recognised human rights and the effective recognition of the right to collective bargaining.

Though established independently, the Human Resources Strategy and Procedure is also influenced by recognised standards such as SA8000 Social Accountability and SGE21 Ethical and Socially Responsible Management and ISO45001 Occupational Health and Safety.¹⁵ These standards and their certifications, implemented at several stations in the network, are relevant because they promote the principles of fair labour practices, respect for human rights, and structured social dialogue in alignment with international regulations and standards.

The HR Strategy and Procedures set the overarching framework but do not specify implementation details, allowing countries to define these at country level, in line with local legislation and context.

15. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

The HR Strategy and Procedures apply to all activities across Aviapartner's operations, ensuring consistent implementation of policies on social dialogue, employee engagement, and human rights. There are no exclusions within this scope. The most senior level accountable for the implementation of the Human Resources Strategy and related procedures is the Chief Executive Officer (CEO). This ensures responsibility at the highest governance level for managing social matters and maintaining alignment with the company's overall governance framework.

HR strategy and procedures, with a dedicated chapter on social dialogue, are made accessible through multiple channels to all internal stakeholders and those responsible for implementation, in order to guarantee transparency and accessibility. Employees, unions, and staff representatives receive direct communication via established consultation frameworks, regular meetings, and dedicated newsletters. In addition, the Aviapartner intranet provides access for all workers, while mobile communication tools ensure consistent and timely updates for operational teams. This multi-channel approach guarantees transparency and enables stakeholders to understand and apply the policy effectively across all locations.

The European Works Council further strengthens this cooperation by addressing transnational matters collectively. Communication with unions happens regularly in all countries to ensure transparent communication and dialogue on working conditions and collective agreements, as well as regular information about economic and financial matters, enabling them to participate in decision-making processes.

In Belgium, Aviapartner applies the group HR Strategy and Procedures across all operations without any exclusions, ensuring consistent implementation of policies on social dialogue, employee engagement, and human rights in line with Belgian labour law and the overall company framework. The entity ensures that social dialogue mechanisms actively involve employees' representatives in shaping Collective Bargaining Agreements (CBAs) and/or policies, particularly those related to working conditions and labour standards.

In France, HR policy is dictated by labour law and the case law derived from it, as well as by European and international standards. In France, collective agreements on the right to disconnect have existed for many years and aim to regulate the use of digital tools in order to ensure respect for the rest and leave periods of company employees, but also for their personal and family life. All Company agreements (i.e. "Accords d'Entreprise" in French) are digitally available to employees on the HR intranet.

In the same vein, **Aviapartner Spain** (only at Fuerteventura Airport at the moment) has also implemented a digital disconnection policy aimed at regulating the use of digital tools in order to ensure respect for the rest and leave periods of company employees, but also for their personal and family life. This measure supports employee well-being, prevents work-related stress, and ensures compliance with Spanish and French labour regulations, while remaining aligned with Group principles on work-life balance.

In Spain, flexible working arrangements are also applied in accordance with operational and safety requirements. Teleworking is limited exclusively to corporate staff whose functions allow it, ensuring continuity of airport operations and service quality. In addition, consultations with trade unions and employee representatives are held regarding collective agreements.

In **Italy**, HR policy is dictated by labour law, the National Collective Contract, local union agreements as well as by European and international standards¹⁶. The National Labour Collective Contract is drafted with the participation of national unions and handling associations and applied to all handling companies in the country. The national unions are requested to sign the labour contract. All agreements are published on the company notice board, as required by Italian law.

In **the Netherlands**, a collective labour agreement applies uniformly across the entire sector for passenger and baggage handling. Aviapartner Netherlands actively participates in the drafting and implementation of this agreement. The sector-wide collective labour agreement is accessible and transparent for both employees and trade unions in the Netherlands.

In **Germany**, there are general binding collective agreements in place, which apply to the Federal Republic of Germany. Local HR Policies support compliance with European and German labour law, as well as local labour agreements.

In all countries, the Managing Director is the most senior level in the organisation that is accountable for implementing those policies, often supported by the HR Director, who together adapt and integrate the group strategy into local strategies and procedures.

4.2.2. Processes for engaging with own workers and workers' representatives about impacts (S1-2 & S1-5)

Engagement with employees and their representatives is an integral part of Aviapartner's approach. Structured social dialogue, collective bargaining agreements, and recognised employee representation ensure that workforce perspectives are actively considered in decision-making.

Across its network, the company engages with the workforce and other stakeholders, including through **consultations at various organisational levels**, from station-specific to broader discussions, ensuring employee input is reflected in decision-making, both at corporate and local levels. Corporate engagement focuses on safety and strategic planning, while country-level engagement involves annual reviews and bi-annual strategy discussions to incorporate local perspectives.

Engagement methods include information sharing, consultation initiatives, and formal participatory interactions. Aviapartner maintains two-way communication through employee surveys, open-door practices, and direct access to line managers and Human Resources. Employee engagement also takes place during planning and evaluation phases. These mechanisms, together with regular dialogue with unions and representative bodies, are embedded in the company's Human Resources strategy to promote transparency, strengthen trust, and ensure that employee views on working conditions and safety are consistently integrated into management decisions.

Direct **involvement in setting specific targets** is not consistently documented. Materiality assessments and feedback channels help inform strategic direction, although formal documentation of workforce participation in target-setting remains limited. However, workforce representatives participate in discussions on employee development, safety protocols, and environmental initiatives. These dialogues contribute to shaping priorities and expectations, particularly in areas such as emergency planning, risk mitigation, and the selection of environmentally responsible materials.

16. The Italian certification standard UNI PDRI25 defines requirements and KPIs for gender equality in organisations (covering culture, governance, HR, pay equity, and work-life balance). It promotes nondiscrimination, equal opportunity, and dignity at work in line with internationally recognised human rights principles. For further information on diversity and inclusion aspects, consult section 4.5.1 *Policies related to diversity and inclusion (S1-1)*.

Nevertheless, Aviapartner shares performance against targets through structured engagement with employees and their representatives. Employees participate in annual country strategic review meetings and bi-annual strategy sessions, where performance indicators are discussed collaboratively.

Social dialogue platforms, joint management-worker committees, and feedback channels are also used to **monitor progress** and ensure alignment with strategic goals. Social dialogue mechanisms are used to discuss working conditions and gather feedback across locations. Aviapartner identifies lessons learned and areas for improvement through structured engagement with its workforce and workers' representatives. These processes ensure that employees are informed and consulted on issues affecting them, contributing to transparency and continuous improvement. Collective agreements further support this process, with elected worker representatives involved in various committees, including health and safety.

By integrating workforce feedback into decision-making, the company is better positioned to mitigate potential adverse impacts and strengthen its commitment to a supportive and inclusive work environment. Structured social dialogue, collaboration with worker representatives, and regular feedback meetings have directly informed decisions affecting working conditions and safety.

At the transnational level, Aviapartner does not currently have a Global Framework Agreement in place with workers' representatives. However, the company engages with its workforce through structured social dialogue mechanisms, including the **European Works Council**, which serves as a platform for incorporating employee perspectives into decision-making processes. This council ensures that workforce perspectives are considered in decisions with cross-border implications. Collaboration with unions and worker representatives plays a critical role in identifying and addressing working conditions that may negatively impact employee satisfaction and motivation. Engagement activities at corporate level are scheduled regularly, typically quarterly or annually, and align with strategic timelines. These structured interactions foster mutual trust and open communication, enabling Aviapartner to proactively manage risks related to workforce motivation, retention, and productivity.

At group level, Aviapartner does not currently take specific steps to gain insight into the perspectives of **workforce members who may be particularly vulnerable to impacts or marginalised**, such as women, migrants, or people with disabilities. Nevertheless, social dialogue mechanisms and confidential whistleblowing procedures provide safe channels for employees to express concerns, helping to surface the perspectives of those who may be at greater risk of adverse impacts.

Engagement with **external stakeholders**, such as subcontractors and critical suppliers (GSE rental, maintenance companies, etc.) happens regularly and is structured around operational, environmental, and safety topics.

The CEO leads engagement efforts in collaboration with Managing Directors within countries, who work with HR Managers and their teams, particularly in areas such as social dialogue, recruitment, health and safety, diversity, and employee satisfaction. At country level, Managing Directors are responsible for stakeholder engagement, ensuring that engagement outcomes inform strategic decisions and align with regulatory requirements. HR Managers and their teams are responsible for implementation of the engagement initiatives with the workforce, gathering input for decision-making and maintaining feedback loops.

To further improve engagement effectiveness, open communication channels such as direct access to management enable open dialogue and transparency, underpinning efforts to enhance job satisfaction and work-life balance. Across all countries, except Germany, employee satisfaction surveys or psychosocial risk assessments are conducted at regular intervals to gather insightful feedback. These focus on psychosocial risks and job satisfaction, helping inform decisions regarding workforce impacts, such as employee satisfaction and motivation related to working conditions. Individual discussions, group interviews, and yearly management meetings complement these efforts, ensuring comprehensive feedback collection.

The channels and responsibility for workforce engagement and the integration of employee perspectives into decision-making vary across stations and focus areas.

Within **Aviapartner Belgium**, employee engagement takes place through structured consultations and formal grievance procedures. The company mobilises several mechanisms, such as regular and documented consultations with employee representatives and trade unions, internal audits, and systems to monitor compliance. In Belgium, the structure of the local Works Council consists of three separate delegations: one for white collar employees; one for blue collar employees; and one for Liège Cargo employees, both white and blue collar.

By promoting transparent communication and collaboration, Aviapartner Belgium strengthens trade union relationships, fosters a positive social climate, and helps mitigate social tensions, ensuring operational stability for key stakeholders such as airports and customer airlines. For example, Aviapartner Belgium has negotiated a collective bonus plan for 2025 together with the employee representatives for white and blue collars.

In Belgium, quarterly newsletters provide updates and initiatives at operational level, but also on HR topics such as ongoing social dialogue. Through Aviapartner's digital communication platform, employees can access detailed information, for example minutes from union meetings, thereby combining structured face-to-face dialogue with digital and written communication. These tools complement the established consultation frameworks, ensuring that all staff, unions, and representatives remain informed and engaged. In this way, Belgium consistently promotes familiarity with, and the effective application of, HR policies across all operational teams.

Within **Aviapartner Spain**, regular meetings are held with trade unions at each airport in accordance with applicable local and national labour legislation. These meetings ensure structured social dialogue, transparent communication, and effective management of labour relations at operational level. In Spain, a distinction is made between local and central unions. The first ones meet more regularly and focus mainly on local matters, while the second meets every quarter.

Regular consultations with trade unions and employee representatives of Aviapartner Spain are organised at the local and national level to proactively address workforce concerns. Employees contribute directly to safety performance monitoring through roles such as Ramp Safety Coaches and participation in training programmes. Tools like the Q-Pulse system for reporting and monitoring support continuous improvement and provide structured mechanisms for tracking safety and operational performance.

Satisfaction surveys, psychosocial risk assessments and monthly staff meetings provide insights that inform improvement plans, including updates to job descriptions and performance reviews. In Spain, idea sharing and dialogue are encouraged, and workforce representatives are involved in negotiations and collective bargaining. Aviapartner Spain has also implemented joint labour-management meetings that are organised when the union requires it. Monthly reporting to senior management and active involvement in social dialogue and collective negotiations reinforce workforce engagement in performance tracking.

In parallel, Aviapartner Spain reviews social performance, assesses risks, monitors compliance with ethical and social responsibility commitments, and tracks the implementation of improvement actions as part of monthly management business review meetings. In Spain, governance and oversight of social and ethical matters are also reinforced through annual management reviews conducted at country level, ensuring alignment with Group strategy, objectives, and performance monitoring. This is supported by certifications: the SGE21 Ethical and Socially Responsible Management System Standards and the SA8000 Social Accountability standards are well embedded in Spain's management system and certified at select locations.¹⁷

In addition, Aviapartner Spain holds monthly meetings with ASEATA (Asociación de Empresas de Servicios de Asistencia en Tierra), of which the company is an active member. Through ASEATA, Aviapartner Spain participates in the negotiation, agreement, and formal signature of collective bargaining agreements and other arrangements related directly or indirectly to ground handling activities at Spanish airports.

At **Aviapartner France**, in addition to daily dialogues, communication with unions is also formalised through mandatory annual negotiations on wages, working conditions and workplace equality.

Within **Aviapartner Italy**, regular meetings are held with union representatives, and internal messaging tools are used to communicate procedures, information, and updates to all employees.

Aviapartner Netherlands strives, through Dutch legislation and the sectoral collective labour agreement (or Collectieve arbeidsovereenkomsten (CAO) in Dutch), to create social dialogue within a structured framework. Internally, this is reflected through the Works Council, trade unions, and an employee satisfaction survey.

The Federation of Dutch Trade Unions (FNV) is a trade union association that any employee may voluntarily join and for which membership fees are reimbursed by Aviapartner. However, information provided by the FNV is considered privacy-sensitive and may not be shared with third parties. Within the Netherlands, this is mandatory for all ground handling companies, thereby ensuring operational stability and continuity of service at Dutch airports. Through cooperation with both the FNV and the Works Council, Aviapartner Netherlands strives to foster a positive social climate within the organisation.

¹⁷ For further information on entities certified, please refer to 6.3 *List of certification coverage*.

Meetings with the Works Council take place on a regular basis. All employees within Aviapartner Netherlands have access to the AFAS pocket app (a mobile application where employees can find information about their schedule, salary, days off, travel expenses, and other collective labour agreement elements). In addition, multiple channels, such as newsletters, internal announcements, and other updates, keep employees informed. This variety of communication channels and bodies ensures that Aviapartner Netherlands guarantees transparency towards its employees in matters of policy and communication.

At **Aviapartner Germany**, regular meetings with the Works Council and town hall meetings are organised. The entity uses an internal messaging tool to communicate procedures, information, and updates to all employees.

In addition to the structures mentioned above, a Health and Safety Committee is established in most countries (except for Germany¹⁸), reinforcing their commitment to a safe and supportive environment and focusing on all concerns regarding health, safety, and well-being at work.

4.2.3. Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)

In cases where Aviapartner has caused or contributed to a material negative impact on employee satisfaction and motivation due to working conditions, its approach to providing or contributing to remedies is based on its **whistleblowing policy**. Aviapartner has implemented a comprehensive system to enable its workforce to raise concerns directly with the company and for handling grievances and complaints related to employee matters. Employees can report a long list of concerns not limited to discrimination, harassment, unfair labour practices, health and safety issues, corruption and bribery, compliance issues etc. via various channels. All reports are subject to thorough investigation, with remediation implemented through corrective action plans handled locally.

Employees are actively encouraged to report their concerns via select internal and external Whistleblowing channels that guarantee confidentiality and protection against retaliation. The Whistleblowing Policy protect individuals from retaliation when using channels to raise concerns or needs. All reporting channels comply with EU Directive 2019/1937 on the protection of whistleblowers, ensuring confidentiality and protection of all stakeholders against retaliation, including employees and external parties, as specified in the policy. Protections are reinforced through confidential and impartial advice, with retaliation treated as a disciplinary offense.

Moreover, specific to the aviation industry, Aviapartner's Safety Policy includes a "Just Culture" principle which promotes a culture of openness, allowing individuals to report issues without fear, in line with retaliation protections.

Additionally, internally available channels, such as the reporting tool from the Quality and Safety management reporting software, provide anonymous access via mobile apps from any device. This encourages the reporting of incidents and hazards and fosters participation in the Safety Management System. The concept is strongly embedded in internal processes, and reporting rates may be considered high.

18. This information was not reported by Germany (see explanation in 2.1.1 General basis for preparation of the sustainability statement (BP-1)).

Information on reporting channels for discrimination and harassment is consistently communicated to staff during their basic safety training, which happens during their onboarding, with a strong emphasis on the company's zero-tolerance policy. These communications are further reinforced during recurrent training sessions on "Business Ethics, Human Respect and Antitrust and Competition Law Compliance", which are mandatory for senior management, managers, quality/eco pilots, and administration staff working in finance, treasury, controlling and human resources

One of the main channels used by Aviapartner is an externally hosted online "SD Whistle tool", a confidential external reporting line easily accessible to staff from [Belgium](#), [the Netherlands](#) and [Italy](#) through the company intranet. For the Belgian workforce, this tool is additionally accessible via a mobile application.

These channels are designed to be transparent and legitimate, with clear procedures and defined timeframes including:

- > acknowledgement of receipt within seven days;
- > initiation of the preliminary investigation without delay (max. 10 days);
- > and feedback to the reporting person within a reasonable timeframe not exceeding three months from the acknowledgement of receipt (or, if no acknowledgement was sent, three months from the expiry of the seven-day period after the report was made), allowing dialogue for issue resolution and stakeholder involvement.

Dialogue with complainants is prioritised to achieve consensus-driven solutions rather than unilateral conclusions, as described in Aviapartner's Whistleblowing Policy.

In short, Aviapartner has established processes to track and monitor issues raised and to ensure the effectiveness of the channels provided for addressing them. Currently, effectiveness is primarily monitored through follow-ups on reporting rates and oversight from the legal department. Information is systematically recorded through the available tools in each country or at group level, such as the external confidential reporting system used in Belgium, the Netherlands and Italy. For the group reporting mechanism integrated into the quality and safety software, reporting may be tracked in real time, while for other local tools, this depends on both the tool and the country.

Assessments of workforce awareness and trust in channels and processes for reporting grievances and complaints, including confidence in the non-retaliation process, are primarily conducted at local level. At group level, only the external reporting channel used in Belgium, the Netherlands and Italy may be evaluated centrally. Reporting rates on this channel, particularly when low, may indicate that the mechanism is not functioning optimally. The same principle applies to local channels, where low reporting rates may suggest a lack of trust. For this reason, numbers are closely monitored. However, low figures do not necessarily mean that concerns are absent or that channels are ineffective. Numbers can be misleading, as they may reflect early resolution of issues or cultural preferences for informal approaches rather than formal reporting.

During the annual review of outcomes, the system's effectiveness is assessed. Insights such as low reporting rates are used for ongoing improvement, for example by increasing communication to make the channels better known or by ensuring direct access on the intranet homepage (as is already the case for Belgium, the Netherlands and Italy). Users are involved in this improvement process to ensure that thresholds for reporting remain as low as possible and additional channels are made available and tailored per country. These include local dedicated email addresses, the option to submit a formal letter to the legal department, and other locally adapted channels for direct reporting.

In Belgium, multiple channels are available for employees to raise concerns. In addition to group-level mechanisms, staff can contact the HR department or their designated HR Business Partners for Ground Handling or Cargo activities, who manage reports with care and provide well-considered responses. Employees may also report concerns confidentially or anonymously through whistleblowing channels, in line with EU Directive requirements. All reports, whether anonymous or not, are handled with strict confidentiality, thoroughly investigated, and followed by appropriate actions.

The grievance and complaint handling framework complies with applicable legislation and will be formally embedded in the new Work Rules of Aviapartner Belgium, which are expected to be finalised by early 2026. These Work Rules will also include the Whistleblowing Procedure and the Safety Policy, ensuring clear guidance and consistent protection for employees.

To further support reporting, both internal and external persons of confidence are available. In Belgium, these individuals are selected through internal recruitment to ensure representation across departments, helping to lower reporting barriers. After interviews, they are approved by the Health and Safety Committee, receive dedicated training, and are introduced through internal communication channels and onboarding processes.

Finally, Aviapartner's Safety Policy promotes a "Just Culture" that encourages open, fear-free reporting. Awareness campaigns (e.g. using posters, notice boards, and TV screens) are regularly organised across several stations, focusing on improvement topics defined jointly by Health and Safety and management teams. In addition, trained Health and Safety prevention advisors and external psychologists from occupational health services are available to address concerns, particularly those related to psychosocial risks and working conditions.

In Belgium, the number of reports from both group-level communication channels and local communication channels is critically monitored. These figures are closely tracked by the HR team during their weekly meetings, and if any irregularities are observed, they are reported to the Belgian management team and addressed within the departments. The HR Department then assesses what solution or improvement may be possible.

A whistleblower policy was introduced within **Aviapartner Spain** that enables confidential and secure reporting of any behaviour that may be illegal, fraudulent, contrary to internal policies, harmful to workers' rights or linked to discriminatory practices, harassment, or workplace safety risks. Spain has developed internal procedures and a dedicated grievance and whistleblowing channel (also known as "buzón"), in compliance with Law 2/2023 on whistleblower protection. All communications are handled by authorised personnel under strict confidentiality and with guarantees against retaliation.

When the HR Department in Spain receives a grievance or complaint through the available channel, this is registered in a file to monitor compliance with the procedure. Each complaint is monitored following a process with specific timelines, which is described in the Spanish Employee Handbook, or "Manual del Empleado" in Spanish. The Regional Managers and strategic directors meet on a monthly basis to deal with issues raised. Effectiveness is monitored regularly using tests carried out by management to verify that the channel is functioning properly. Compliance with the procedure itself and its timelines is monitored via the social and ethical certification audits, based on SGE21 Ethical and Socially Responsible Management System Standards and the SA8000 Social Accountability standards.

All procedures are handled with the highest level of confidentiality and investigated internally. Procedures for handling complaints, grievances and ethical concerns are detailed in the Manual del Empleado. The procedure for collecting and processing complaints and whistleblowing policy are given to new employees in this manual upon hiring. These documents are also available on the company intranet and updated regularly, with any updates communicated. The channel is available to all employees and may also be used by subcontractors and external collaborators, in accordance with internal protocols.

Aviapartner France has developed internal procedures for reporting and handling alerts. The French local “Internal Whistleblowing Reporting and Handling Procedure” (or “Procédure interne de recueil et de traitement des alertes” in French) protects whistleblowers as long as they act in good faith and selflessly. It explicitly states that there is zero tolerance for threats, intimidation, or direct or indirect retaliation against whistleblowers. This formal internal alert mechanism provides a structured framework for collecting and processing alerts and is established in line with French whistleblower legislation (i.e. Sapin II and the “Waserman” laws, with the related decree specifying the requirement for companies employing at least fifty people to have a collection and processing procedure in place). Whistleblowers enjoy civil immunity and enhanced criminal immunity.

This alert procedure identifies the available channels for raising concerns, such as dedicated mail addresses for whistleblowing purposes, postal mail to designated persons, or directly speaking with the direct line manager, which represents a more informal entry point. The established “alert” procedure details the alert handling process, with acknowledgment of receipt of the alert within seven working days. Following an analysis of the case, including a check to see if it is actionable, an internal investigation ensues, with the outcome communicated within three months of acknowledgement. Employees may also submit an external report to the competent authorities, either after an internal report or directly.

This applies to any collaborator who raises an alert in good faith. The company's rules and procedure for collecting and processing complaints are given to new employees upon hiring, along with the information that it can be found on the company's intranet. These procedures are also appended to the internal regulations of each entity in France.

As the procedure is recent, currently no complaints have been submitted via this channel. For the same reason, the effectiveness of the processes for raising concerns is currently not yet formally assessed or measured.

In Italy, the whistleblowing tool is well promoted through training sessions and internal communications. Aviapartner Italy communicates the company's Whistleblowing Policy through the company intranet. Confidentiality for the reporter and persons concerned is protected (including through encrypted solutions and data-protection controls). Confidentiality of identity is guaranteed in the Italian Ethics Code. Furthermore, any form of threat, retaliation, or adverse action against individuals who report concerns is strictly prohibited and subject to disciplinary measures. If the reporter does not want to use the SD Whistle tool, they may send a letter by ordinary mail to the company address, or directly by email to the HR Department at their station or at the Italian headquarters. For cultural reasons, employees tend to approach local union representatives, who then contact the HR Department directly.

Should a different channel be used, the concern will still be submitted to the Whistleblowing Committee, consisting of the supervisory body and the HR function lead. All reports submitted are thoroughly investigated, and appropriate action is taken. Reports are received and handled only by the Whistleblowing Committee, which must acknowledge receipt within seven days (unless the reporter requests otherwise), maintain dialogue as needed, and provide feedback within three months (extendable to six months in justified cases).

Effectiveness is supported through record-keeping/traceability and periodic review, including monitoring indicators and a yearly review of the use of channels, outcomes/actions taken, and any complaints relating to retaliation or breaches of confidentiality. The Supervisory Committee “Comitato di Vigilanza” and the HR Department regularly monitor the whistleblowing database, which to date has not recorded any reported events.

Aviapartner Netherlands supports the facilitation of open communication channels, which are also aligned with international standards. The company’s Whistleblowing Policy is communicated through the company intranet. Employees have several options to raise concerns or complaints. All channels guarantee confidentiality and protection against retaliation. The HR team and dedicated HR partners are available to handle reports with care and to work with employees on an appropriate action plan. They may be reached via email, phone, or personal meetings. The HR Department reviews all whistleblowing reports received and takes action. For those who prefer anonymous reporting, both internal and external confidential counsellors are available. For external counsellors, a procedure has been established in collaboration with an external agency of confidential counsellors (called ‘Centrum Vertrouwenspersonen Plus’). External counsellors are appointed by Aviapartner and may be contacted directly by phone or email. Aviapartner Netherlands further guarantees that all reports submitted via the communication channels are thoroughly investigated and that appropriate action is taken based on the report.

In addition to monitoring complaints raised through the internal HR systems and intranet channels, Aviapartner Netherlands receives an annual report from the external confidential counsellor agency. This report provides measurable, anonymous data that offers insight into the number of reports and allows for trend comparisons. Based on this information, the company continuously improves its reporting and complaint-handling processes, with transparency and confidentiality remaining of utmost importance.

4.2.4. Targets related to working conditions (S1-5)

Aviapartner’s “Human Resources Strategy and Procedures” document embeds social dialogue as a core principle, aiming to foster inclusive and respectful workplace relations. The percentage of employees covered by collective bargaining agreements is a key metric used to assess the effectiveness of this strategy, as it reflects the extent of structured employee participation in labour rights and decision-making processes. Social dialogue is measured using **the percentage of employees covered by collective bargaining agreements, with a target of 100% coverage.**

This target focuses on participation in collective bargaining, employee representation in decision-making, and engagement with management on workplace and welfare matters.

Methodology and assumptions

Social dialogue is measured using the percentage of employees covered by collective bargaining agreements at any given time and is monitored annually. Progress is evaluated through annual reviews. Data is collected each year at country level through human resources systems and covers all employees across Aviapartner's operations and subsidiaries.

The target is considered ongoing and is reviewed annually to ensure continued alignment with Aviapartner's Human Resources Strategy.

Results are consistently at or near 100%; however, full coverage is not achieved as certain groups, such as interns or specific categories of employees, may be subject to alternative contractual arrangements.

As this represents a long-term strategic objective rather than a time-bound goal, no formal end date has been defined. In the same way, no baseline value or baseline year has been defined for the social dialogue target, nor have any interim milestones been established. Since its introduction, there have been no changes to the target or to its measurement methodology.

The target integrates stakeholder expectations by aligning with the organisation's commitment to the Ten Principles of the United Nations Global Compact (UNGC), with particular emphasis on Principle 3, which promotes freedom of association and the effective recognition of the right to collective bargaining. Customer airlines, as key stakeholders, played an indirect yet significant role in shaping this target. Many of these customers actively support the Principles of the UNGC, and some require formal endorsement of them. Therefore, aligning with these principles ensured that stakeholder priorities were reflected in the targetsetting process.

4.2.5. Metrics related to working conditions

At group level, Aviapartner has not yet established formal metrics to evaluate the performance and effectiveness of its social dialogue. The metrics used vary by country and are shaped by national legislation, operational realities, and workforce structures, providing contextual insights into workforce-related risks.

However, at country level, entities monitor the negative impact of working conditions on **employee satisfaction and motivation** through locally adapted survey processes and psychosocial risk analysis.

While surveys at national level are designed and implemented based on national legislation, operational context, and workforce structure, the methodology typically includes anonymous feedback collection and periodic analysis by local HR teams. Aviapartner assumes the representativeness of survey responses and the reliability of self-reported data. Nevertheless, there are limitations, such as the lack of standardisation across entities, which may affect comparability and consistency at group level. While not standardised across the group, these local efforts contribute to understanding and managing material impacts on employee well-being.

These metrics on social dialogue are not validated at group level by any external body. The only exception is in Spain, where Aviapartner holds SA8000 certifications across seven commercial stations. Under the SA8000 Social Accountability Standard, external auditors validate this data. The SA8000 standard includes a specific chapter on “Freedom of Association and the Right to Collective Bargaining”. This section explicitly addresses workers’ rights to form and join trade unions and to engage in collective bargaining, which is the core mechanism for social dialogue within the SA8000 framework.

4.2.5.1. Collective bargaining coverage and social dialogue (S1-8)

The following table presents the percentage of own employees covered by collective bargaining agreements and the percentage of employees covered by workers’ representatives:

Table 8: Aviapartner collective bargaining and social dialogue coverage

COVERAGE RATE	COLLECTIVE BARGAINING COVERAGE	SOCIAL DIALOGUE
	Employees - EEA	Workplace representation (EEA only)
0-19%		
20-39%		
40-59%		Italy
60-79%		
80-100%	Belgium, Spain, France, Italy, The Netherlands ¹⁹	Belgium, Spain, France, The Netherlands

Collective agreements and elected representatives cover nearly all workforce segments. Aviapartner has established a European Works Council at group level, based on formal agreements, to ensure transnational employee representation across its European operations. These structures collectively ensure that a significant share of Aviapartner’s workforce is represented through formal employee representation mechanisms.

At national level, employee representation and social dialogue is organised in accordance with applicable legislation and typically involves recognised trade unions. In addition, national sectoral collective agreements in the ground handling industry define key working conditions in each country where Aviapartner operates.

The lower percentage of employees covered by representative bodies in **Italy**, compared with other European countries, is mainly the result of a highly voluntaristic system. In the Italian context, employee representation is not automatically mandated by law. Instead, the establishment of representative structures depends on the voluntary initiative of employees or trade unions within individual companies. This approach leads to greater variability in coverage levels across organisations.

Methodology and assumptions

For this first statement under the ESRS framework, this KPI does not include non-employees, i.e. workers that are not on payroll such as subcontractors.

¹⁹ Data was not reported by Germany (see 2.1.1 General basis for preparation of the sustainability statement (BP-1)).

4.2.5.2. Social protection (S1-11)

The following table presents whether Aviapartner's own employees are covered by social protection in the case of specific life events:

Table 9: Employee social protection

SOCIAL PROTECTION	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP
All employees are covered by social protection against loss of income due to sickness	Yes	Yes	Yes	Yes	Yes	Yes	Yes
All employees are covered by social protection against loss of income due to unemployment starting from when own worker began working for undertaking	Yes	Yes	Yes	Yes	Yes	Yes	Yes
All employees are covered by social protection against loss of income due to employment injury and acquired disability	Yes	Yes	Yes	Yes	Yes	Yes	Yes
All employees are covered by social protection against loss of income due to parental leave	Yes	Yes	Yes	Yes	Yes	Yes	Yes
All employees are covered by social protection against loss of income due to retirement	Yes	Yes	Yes	Yes	Yes	Yes	Yes

There are currently no categories of employees within the scope of this report who are not covered by social protection mechanisms against loss of income, including maternity leave, sickness, unemployment, work-related injury, disability, and retirement.

Given Aviapartner's presence in several countries, the structure of the supporting schemes, the applicable conditions and the level of coverage, such as the percentage of salary guaranteed, are governed by national frameworks and may differ across countries.

Methodology and assumptions

For this first statement under the ESRS framework, this KPI does not include non-employees, i.e. workers that are not on payroll such as subcontractors.

4.2.5.3. Work-life balance (S1-15)

Table 10: Aviapartner work-life balance

FAMILY-RELATED LEAVE	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY ²⁰	CONSOLIDATED GROUP
Percentage of employees entitled to take family-related leave	100%	100%	100%	100%	100%	-	100%
Percentage of entitled employees that took family-related leave	6%	3%	5%	13%	1%	-	6%
Of which male	70%	68%	54%	57%	44%	-	59%
Of which female	30%	32%	46%	43%	56%	-	41%

Methodology and assumptions

This KPI does not include non-employees, i.e. workers that are not on payroll such as subcontractors.

4.2.6. Taking action on working conditions (S1-4)

At Aviapartner, robust governance and continuous monitoring ensure that practices do not cause or contribute to material negative impacts on the workforce. Therefore, Aviapartner is implementing a series of measures to mitigate material risks related to social tensions due to working conditions. These initiatives aim to strengthen operational stability, safeguard employee well-being, and maintain service quality across all operations.

The company aims to maintain these mechanisms where they are already in place, implement them consistently across all existing locations, and ensure they are established from the outset in any new location that opens. This approach guarantees continuous representation and fosters a positive social climate throughout the network.

At group level, a draft protocol of cooperation was established with the European Workers Council. It sets out the main principles for governance, meeting organisation, information sharing, and resource allocation, ensuring clarity on roles, procedures, and communication. This initiative was prepared in 2025 and will possibly be finalised in 2026.

Psychosocial risk analyses are conducted at regular intervals in the countries, followed by action plans, including strategies targeting harassment, discrimination, workload balance, employee welfare, and specialised training for employees facing external aggression.

Moreover, flexible working hours were introduced where this is feasible to improve work-life balance and reduce turnover risk. These arrangements are periodically reviewed to assess employee satisfaction and operational impact.

20. Data on this topic was not received from Germany, as mentioned in 2.1.1 General basis for preparation of the sustainability statement (BP-1).

At Aviapartner, efforts are also made to identify and mitigate the negative impacts on workers arising from the transition to a greener, climate-neutral economy. These efforts are part of standard processes:

- > Training and reskilling initiatives are adjusted to ensure that employees are equipped with critical skills to adapt to new operational standards and practices, including environmental awareness.
- > Employee health and safety are prioritised through risk assessments, comprehensive training programmes, fatigue and ergonomics management, and structured social dialogue with employee representatives.
- > Social dialogue mechanisms ensure robust communication channels to address operational changes that may affect working conditions.

These group initiatives apply to all employees across Aviapartner's European operations, including Belgium, the Netherlands, Spain, Italy, France, and Germany. The scope of the action varies depending on the country and station, as action plans and initiatives are taken on local level. They are implemented in collaboration with HR, social partners, local management, and trade unions to strengthen employee representation and engagement.

Actions to address negative impacts on the workforce due to quality, health & safety and environmental issues are identified following a structured process designed to ensure relevance and effectiveness. The process begins with a management review, which uses a SWOT analysis to assess the company's context and identify potential issues. This initial analysis is complemented by KPI reporting, employee surveys, psychosocial risk assessments, and the outcomes of internal and external audits. Additionally, stakeholder expectations and certification requirements are considered as key inputs. Issues identified through these sources are evaluated and prioritised by management teams based on their potential impact and urgency. This prioritisation in the management team leads to the development of an action plan, which consolidates all necessary measures. Actions are then implemented and monitored throughout the year, with progress reviewed during the next management cycle. The effectiveness of these initiatives is tracked through employee surveys and the annual evaluation of union engagement outcomes. These allow Aviapartner to monitor workforce sentiment and address concerns proactively.

Additional actions are taken at local level:

In Belgium, a local Single Point of Contact (SPOC) for Labour Relations was appointed in all entities in 2025. As of 2026, this role will be extended to cover sectoral matters for both white- and blue-collar employees. The SPOC coordinates labour relations and ensures consistent application of HR policies and social dialogue at the local and national level to strengthen transparency, compliance, trust, and collaboration among stakeholders.

In addition, new "Work Rules" were also prepared to be finalised in early 2026, and the HR intranet was revamped in 2025 for launch in 2026. In 2026, the onboarding process at Aviapartner Belgium is planned to be reviewed.

The Respect & Tolerance programme, initiated in 2024 and applicable to all entities, was further rolled out in Belgium throughout 2025 and is expected to continue in 2026. To support the Respect & Tolerance charter, a poster campaign was initiated in 2025, and will be continued in 2026, highlighting all the topics included. To strengthen this messaging, an e-learning training on Respect & Tolerance is being prepared for launch in 2026.

Finally, panic buttons were introduced at check-in, and well-being surveys were organised for Passenger Services in 2025 and are planned for the Operations Department and the Antwerp and Ostend stations in 2026. A Passenger Services well-being survey was also organised in Brussels in 2025, with an action plan scheduled for 2026 based on the outcome.

In Spain, Aviapartner supplements the Group's approach by implementing psychosocial risk assessments across its airport operations. During 2025, psychosocial risk surveys were conducted in stations where Aviapartner has been present for some time, such as the Canaries, Malaga, and Sevilla, to identify potential risks related to work organisation, workload, stress, and employee well-being. Some actions derived from these assessments remain open and are subject to ongoing monitoring and follow-up. These processes are integrated within the SGE21 Ethical and Socially Responsible Management System, ensuring structured analysis, traceability of corrective actions, and continuous improvement. In parallel, Aviapartner Spain provides equality and diversity training to reinforce a respectful, inclusive, and psychologically safe working environment (for further information, refer to section 4.4.4 *Taking action on diversity (S1-4)*). This approach ensures that psychosocial risks are systematically identified, addressed, and aligned with both Group standards and Spanish regulatory requirements.

Employee satisfaction surveys also took place in 2025 in Alicante and Bilbao, where the participation rate was lower than 10%. Finally, Aviapartner Spain was active on social media reinforcing its messaging on working conditions, such as mental health and work-life balance.

In France, no specific actions outside legal requirements were taken with respect to working conditions, excluding those already existing for several years, such as the collective agreement on the right to disconnect, which aims to regulate the use of digital tools and ensure respect for work-life balance and for rest and leave periods of company employees, as well as for their personal and family life. Aviapartner France has implemented an information feedback platform named Teamstarter, allowing employees to propose innovative ideas that will then be transformed into concrete actions.

In 2025, a survey was launched by **Aviapartner Italy** for all employees in Rome Fiumicino (10% of employees answered) and Linate (17% of employees answered) concerning internal mobility, car sharing and public transport use, aiming to reduce GHG emissions. The survey, launched yearly, also aimed to improve the home/work balance in order to reduce absenteeism due to illness and other absences.

In the Netherlands, an employee satisfaction survey is held once every four years, with all employees invited to participate. The survey of spring 2024 identified areas for improvement, including organisational culture, communication, support, and work-life balance. Following these results, staff were asked in 2025 to volunteer for round table discussions around these topics. The purpose of the round table was to share their opinions and experiences with an external independent communication agency. As responses were limited, Aviapartner Netherlands decided to apply a random sampling approach to ensure that employees from all departments were represented. This guaranteed broad organisational input during the discussions and ensured that the outcomes reflected a wide range of perspectives. Following analysis of the results and discussion in the round tables, which resulted in broad input from diverse perspectives, actions were identified and partially initiated in 2025 and will continue in 2026. This action plan is being discussed with the works council. The actions resulting from these "round table discussions" will be monitored annually.

Aviapartner in the Netherlands works with a risk assessment and evaluation, which it reviews and updates annually. Part of this is the psychosocial action plan on respect and tolerance in the workspace.



4.3. MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES RELATED TO HEALTH & SAFETY

The company's health- and safety-related topics presented in this chapter are driven by the material **impacts of its working conditions on employee health, safety, and overall well-being**, as well as the operational **risks associated with workplace accidents and unsafe conditions**, requiring robust preventive measures and continuous improvement of safety management practices.

4.3.1. Policies related to health & safety (S1-I)

Aviapartner's **Safety Policy** is designed to achieve zero labour accidents and aircraft accidents. Performance is reviewed versus long-term objectives with the aim to take corrective actions where required. Furthermore, the policy addresses the prohibition of psychoactive substances, including but not limited to alcohol, drugs, and medications. Aviapartner is committed to complying with applicable health, safety, security, and environmental laws and regulations as well as the requirements of its stakeholders.

Aviapartner's **workplace accident prevention system and Safety Policy** are fully integrated within its **Safety Management System (SMS)**. The Safety Management System and the policy addresses hazard **identification**, risk **assessment**, and safety risk **management**, using both proactive and reactive methods through a continuous improvement process aimed at reducing or eliminating occupational health and safety risks wherever practicably feasible. In addition, a cornerstone of Aviapartner's Safety Management System and safety policy is the "Just Culture" concept, whereby safety concerns may be reported without fear of reprisal. Emergency Response Plans (ERP) are in place at all stations, with regular drills and training to ensure preparedness. This policy is supported by organisational resources, including employee consultation committees, training, and equipment.

Aviapartner's safety policy and its management system are guided by and committed to full compliance with the ISO 45001 international standard for Occupational Health and Safety Management Systems. The system is **ISO45001-certified for Occupational Health and Safety** in select stations in Belgium, France, Italy²¹ and Spain, with certification underway in the Netherlands. There are no such certifications in Germany. The company also aligns its practices with industry-specific frameworks: the headquarters and over thirty stations throughout Europe (except Germany) are registered with the **IATA's Safety Audit for Ground Operations (ISAGO)**. The **International Standard for Business Aircraft Handling (IS-BAH)** is applied and certified in Belgium, the Netherlands, and in select private aviation stations in France and Spain. Regular internal and external audits by airports, airlines, the International Air Transport Organisation (IATA) and the International Civil Aviation Organisation (ICAO) are organised to ensure compliance and drive continuous improvement. Safety Performance Indicators (SPIs) are monitored monthly and quarterly, with results reviewed by management during Safety Review Boards and communicated to staff. **Aviapartner is committed to achieving full compliance with the European Union Aviation Safety Agency (EASA) regulation** and is currently implementing the required measures on operational safety and personnel competence, including practices such as return-to-duty after a long absence, record keeping, and

21. Consulta S.p.A. stations (Ciampino, Florence and Pisa) are currently in the process of acquiring ISO45001 certification by 2026).

continuous training. These obligations, designed for aerodrome operators under EASA oversight, are cascaded to Aviapartner via contractual interfaces, ensuring harmonisation of safety practices across the airport environment and continuous development of the Safety Management System. In addition, Aviapartner Spain fully complies with the SGE21 Ethical and Socially Responsible Management System Standards.²²

The system applies to all employees, contractors, and relevant third parties, across all operational locations and activities, with no exclusions or limitations applicable. It is also adapted to local legal requirements in each country of operation. The Safety Policy, reviewed annually, is made available to all employees and subcontractors through mandatory induction programmes, regular mandatory training sessions, and publication on the company intranet, ensuring that everyone involved in its implementation can access the latest version at any time. Moreover, the Safety Policy is clearly displayed in all operational offices. Local management teams are responsible for communicating updates of the policy and verifying understanding. Externally, Aviapartner shares its policy with customers, suppliers, and subcontractors. These measures ensure that potentially affected stakeholders, including employees, unions, subcontractors, airport authorities, and customers, are informed about the policy and can contribute to its effective implementation and ongoing improvement.

The CEO is the most senior level accountable for implementing health and safety policies and for ensuring that the necessary resources and governance structures are in place. The Vice President of Safety and Occupational Health reports directly to the CEO and is responsible for managing the Safety Management System, conducting audits, and monitoring performance indicators. At the country level, Managing Directors and local executives oversee implementation to ensure compliance with international and local standards, including ISO 45001, and alignment with company-wide objectives. Responsibilities, including those for accident prevention, are clearly assigned at all levels, from the CEO to local safety officers and every employee, in a detailed responsibility matrix.

When setting the Safety Policy, Aviapartner considered the **interests of key stakeholders**, including employees, customers, airport partners, regulatory authorities, subcontractors, and suppliers. As a result, the policy has developed gradually through structured reviews, numerous audits by stakeholders, consultations in safety committees and engagement with regulatory bodies.

Local joint management-worker health and safety committees, representing a significant portion of the workforce, ensure employee views are embedded in operational strategies. For instance, in Spain, Health and Safety Committee meetings are held regularly with the active participation of workers' representatives. These committees serve as a key forum for sharing relevant information related to occupational health and safety, operational risks, preventive measures, and improvement actions, ensuring that employees are informed, consulted, and involved in matters that directly affect their working conditions.

4.3.2. Targets related to health & safety (S1-5)

Aviapartner has no quantified outcome-oriented target defined in a certain timeframe at group level, but a general ambition to achieve zero workplace injuries, directly supporting the company's Safety Policy objective of ensuring a safe and healthy working environment for all employees and stakeholders.

22. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

At local level, **Aviapartner Spain** has also set a target of a minimum 5% reduction in OH&S accident severity and frequency in 2025 vs. 2024. For this first year of target measurement, figures from the stations are showing worse results for frequency and better results for severity (days lost).

In France, a target to reduce incident levels by 1% in 2025 vs. 2024 has been introduced. The target has been achieved. In 2024, the frequency rate was 64.57, compared to 60.8 in 2025, representing a decrease of 5.8%. The severity rate, on the other hand, was 4.71 in 2024 and dropped to 3.58 in 2025, representing a decrease of 24%.

Methodology and assumptions

The scope of this health & safety ambition covers all stations in the country, all employees, and operational activities within Aviapartner, including ground handling and private aviation services.

The target in **Spain** is a relative year-on-year improvement target and is measured based on figures from the last day of December each year. There is no interim target or milestone. This target in Spain covers frequency and severity rates, number of accidents, and days lost. The target is calculated based on ratios (total accidents/working hours and total days lost/working hours).

The target in **France** is measured using frequency and severity rates, number of incidents, and days lost. Injury rates per one million hours worked are calculated using data from internal incident reporting systems, with all data consolidated at country level. It is important to note that the data used for the target is not comparable with the quantitative data used in the metrics presented below (S1-14), as it is based on the data provided by the national Health & Safety insurance body (CPAM). This data is lower due to some H&S injuries being excluded compared to what was accounted for in this sustainability statement. This target is assessed and renewed every year.

Employees, unions, and management are actively involved through the safety committees to ensure that their perspectives and concerns are reflected in the company's ambitions on this topic. The national-level employee representative bodies provide formal platforms for continuous dialogue and consultation on health and safety objectives. This engagement process ensures that objectives are relevant, inclusive, and aligned with both regulatory standards and the expectations of affected stakeholders.

4.3.3. Health & Safety Metrics (S1-14)

Aviapartner evaluates the performance and effectiveness of its health and safety actions using a set of quantitative and qualitative metrics. Key indicators include the frequency and severity of work-related incidents and employee injury rates. Aviapartner calculates health and safety metrics using structured and standardised methodologies based on a fixed digital template composed of mandatory fields for all countries and optional fields.

The numbers reported in the following table only include Aviapartner's own employees:

Table 11: Aviapartner health & safety metrics

HEALTH AND SAFETY METRICS (S1-14)	EMPLOYEES (2025)	NON-EMPLOYEES (2025)
Percentage of own workers who are covered by the health and safety management system based on legal requirements and/or recognised standards or guidelines	100%	100%
Number of fatalities in own workforce as a result of work-related injuries and work-related ill health	0	-
Number of fatalities in own workforce as a result of work-related injuries	0	-
Number of fatalities in own workforce as a result of work-related ill health	0	-
Number of recordable work-related accidents for own workforce	572	-
Rate of recordable work-related accidents for own workforce	44	-
Number of cases of recordable work-related ill health of own workforce	3	-
Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health, and fatalities from ill health ²³	-	-

All workers, including non-employees, are covered by the health and safety management system.

Methodology and assumptions

For this first statement under the ESRS framework, KPIs in this table do not include non-employees, i.e. workers that are not on payroll, such as subcontractors.

Work-related accidents are categorised by type and severity (from 1: lowest, to 5: highest) based on established criteria. Injuries categorised as "1" (very light injury or event) have not been taken into account for 2025, as no medical treatment – as defined in ESRS – is required for this category. **Injury rates** are calculated based on the ESRS definition (except for the definition of recordable work-related accidents, as explained here), using data collected from all operational and administrative sites where possible.

For hours worked, the data available in the Management System, excluding interim staff, was used for all operational sites, while for the administrative sites this was provided locally.

23. Aviapartner does not currently monitor workdays lost related to injuries from work-related accidents and work-related ill health.

Health and safety metrics are validated by external certification bodies and organisations, such as DNV in Belgium and France, SGS in Spain, SI-Cert in Italy (during ISO 45001 Occupational Health and Safety audits), the International Air Transport Association (IATA) (during IATA Safety Audits for Ground Operations (ISAGO)) and the International Standard for Business Aircraft Handling (IS-BAH). These bodies provide third-party oversight to ensure that occupational health and safety practices meet regulatory and international standards.²⁴

In addition, within **Aviapartner Spain**, health and safety metrics are validated during SGE21 Ethical and Socially Responsible Management System Standards and SA8000 Social Accountability standards.

In France, an external auditor reviews all health and safety incidents and diseases to ensure completeness and compliance with regulations, before they are declared to the local body of the French Social Security system responsible for managing health insurance and worker compensation (named CPAM). The number of H&S incidents and days lost are checked yearly by the Country Safety Manager to ensure that metrics declared by stations and recorded by the CPAM are consistent.

4.3.4. Taking action on health & safety (SI-4)

Safety remains the company's number one priority. At Aviapartner, we ensure that practices do not cause or contribute to material negative impacts on the workforce through robust governance, safety standards and certifications, and continuous monitoring.

Aviapartner's health and safety strategy, which is centred on achieving zero workplace injuries, is underpinned by systematic prevention, training, and continuous improvement measures. Key actions, as defined in the five-year Safety Plan, include actions to strengthen safety culture, enhance risk prevention, and monitor performance. They are centred around People, Equipment and Operational Safety.

Within the "People" pillar, the focus is on creating a systematic programme and standard for ergonomic improvements across the network. This includes improving the ergonomic work environment, including further increasing the number of "in hold" ergonomically enhanced baggage conveyor belts that require less physical exertion and can mitigate harmful long-term physical impacts on the human body.

In addition, "ex-hold" ergonomic improvements, such as lifting devices, were further explored to reduce musculoskeletal risks and improve working conditions in baggage handling.

Within the "Equipment" pillar, Aviapartner focuses on the continuous improvement and modernisation of Ground Support Equipment (GSE) to enhance both safety performance and operational reliability. This includes targeted investments in ergonomic and technologically advanced equipment, such as inhold and exhold handling solutions designed to reduce physical strain and support safer working practices. In addition, the implementation of GSE telemetry and safety oversight programmes enables improved monitoring of equipment performance, the early identification of risks, and data-driven decision-making to further strengthen preventive measures across the network.

In the area of "Operational safety", the Ramp Safety Coach Programme, introduced in 2023, was further rolled out in the network to promote safe practices, provide on-the-job guidance, and reinforce behavioural safety at operational sites.

24. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

Aviapartner provides remedies for employees and other affected stakeholders harmed by workplace incidents through a structured process that includes immediate medical support triggered by an Emergency Response Plan where appropriate. It is followed by incident investigation and corrective actions to prevent recurrence. Since 2025, incidents are tracked in the internal system software for safety and quality management to ensure a standardised approach and trend analysis and provide lessons learned at network level. Each case is followed up on with documented improvements, and changes to procedures or equipment are performed where necessary. Confidential reporting channels and grievance mechanisms are available to ensure that concerns can be raised safely and addressed promptly.

Within this domain, ISO 45001²⁵ is being rolled out across the network to drive continuous improvement of working conditions, develop a stronger culture of shared responsibility and ensure regulatory compliance. Internationally recognised ISO45001 standards for occupational health and safety management are embedded in procedures and management practices. ISO 45001 provides a structured framework for identifying and controlling health and safety risks, ensuring compliance with legal requirements, and promoting employee involvement. This certification drives continuous improvement, external verification, and a strong culture of safety and accountability across the network. The rollout of ISO 45001 certification is progressing across stations as part of the five-year Safety Plan, with the planned certification of Amsterdam extending ISO 45001 coverage to the Netherlands.

In 2025, safety trainings at group level were reviewed and expanded:

- > Human factor training, which is applicable to all functions, was expanded with basic facts on medication, drugs and alcohol and their side effects. It explains how drug and alcohol abuse impacts company operations, productivity, and employee health and safety. It promotes the use of any available self-assessment tools to help individuals identify the status of their drug and alcohol use.
- > The basic safety and safety management system training was expanded to include health and safety law, as well as national and international regulations.
- > A section on injury prevention and manual handling was added to the airside safety training.
- > Conflict resolution and decision-making topics were added to the training on supervision and oversight.

Aviapartner's health and safety actions apply to all employees, subcontractors, and agency staff involved in operational activities, covering both airside and landside environments at every operational site where the company is present. These actions extend across the entire value chain where Aviapartner has operational control or influence, including upstream suppliers and downstream partners such as airport authorities and customers. These initiatives are implemented in all geographies where Aviapartner operates, without significant exclusions, and are coordinated by HR and Health & Safety teams in close collaboration with local management and union representatives. All relevant stakeholder groups are included, such as employees, unions, subcontractors, and airport partners.

25. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

The Safety Management System is supported by digital platforms, such as risk assessment and quality & safety management software, to conduct risk assessments, inspections, and investigations. The effectiveness of these initiatives is tracked through internal audits, performance reviews, incident trend analysis, employee surveys, and the annual evaluation of union engagement outcomes. Results are regularly reviewed by management and integrated into the company's risk management and continuous improvement processes. Mandatory safety training is provided to all employees, with completion rates and incident statistics used to monitor effectiveness.

As part of the Health and Safety Management System, psychological risk assessments and employee satisfaction surveys are conducted to identify and address concerns. Audits and assessments support the process of activity identification and implementation. The process is dynamic: emerging risks or opportunities may trigger additional actions outside the regular cycle, ensuring a continuous improvement approach across the network. For specific topics, the same logic applies in project meetings, where targeted actions may be agreed upon. Furthermore, certification projects function as formal triggers for improvement initiatives, as Aviapartner views certifications as catalysts for raising standards and embedding best practices.

In short, Aviapartner has demonstrated measurable progress in its health and safety action plans over prior periods. The most important progress made in 2025 includes:

- > Progress has been made on in-hold and ex-hold ergonomic devices in the countries of operation.
- > ISO45001 was implemented in one additional country, the Netherlands, where an Amsterdam audit took place. However, certification is delayed and expected by Q1 2026.
- > The realignment of operational training programmes with industry standards began with some delay in June 2025, and completion is now expected by end 2026. For more information, consult *4.5.4 Taking action on training and career development (S1-4)*.
- > The development and rollout of the ground support equipment telemetry programme has begun.

Each country also implements additional actions, often described in the national version of the five-year Safety Plan. Further information on progress is detailed country by country below.

In **Belgium**, the five-year safety plan includes measures to:

- > Optimise transport between the baggage room and ramp with the introduction of ergonomic support devices
- > Review ergonomics training to optimise knowledge on ergonomics.
- > Launch risk assessment working groups and training.
- > Expand psychosocial support with additional persons of confidence, in all airports.
- > Improve emergency procedures with the introduction of a new methodology for practical emergency and evacuation exercises on various levels, as well as the creation of a fire prevention file with all details on fire prevention, including facilities, infrastructure, training, evacuation exercises, risk assessment, prevention, and recovery tools to achieve an aligned approach in the event of an emergency.

In 2025, Aviapartner Belgium made progress on the following items in particular:

- > Ergonomic support devices in the baggage room and ramp were introduced for the Brussels Commercial station in 2025 and will be extended to Ostend airport in 2026.
- > The introduction of additional in-hold ergonomic assistance devices to facilitate manipulation of heavy loads (e.g. electric wheelchairs) in the aircraft hold. Some devices have been tested in 2025 and will now be rolled out in 2026.
- > The optimisation of knowledge on ergonomics with ergonomics training: training materials were reviewed in 2025 and will be rolled out in 2026 using a Train-the-Trainer programme for all airports.
- > The optimisation of transport between the baggage room and ramp to reduce the risk of accidents and increase safety. Additionally, dollies and baggage carts were modified as ergonomic support.
- > The launch of a risk assessment working group and training to familiarise operational management (with a focus on Cargo all over the country and Ostend stations). Aviapartner Belgium Brussels and private aviation and Antwerp will follow in 2026 and 2027.
- > Psychosocial support was expanded with one additional person of confidence in Ostend station, with another one in Brussels for the ramp, and two persons were added in Liège airport during the year.
- > A new methodology for practical emergency and evacuation exercises on different levels was introduced in 2025, with a focus on Brussels (all entities) and Ostend. Several actions were defined as a result of this. Efforts will continue in 2026 to complete the project, whereby in future practical exercises will be done every two years.
- > A fire prevention file with all details on fire prevention, including facilities, infrastructure, training, evacuation exercises, risk assessment, prevention, and recovery tools, was introduced to Brussels operations and communicated with stakeholders, including subcontractors and the airport, achieving an aligned approach in case of emergencies. The project will continue in 2026.

In addition, improvements were introduced including numerous measures, such as adjustments to GSE to avoid squeezing the hand and the introduction of anti-impact gloves.

At **Aviapartner Spain**, the main items in the five-year safety plan include:

- > The implementation of ergonomic assistance devices in baggage sorting areas.
- > An increase in the number of baggage tractors equipped with inching control buttons, allowing the tractor to slowly move forwards or backwards in order to make connecting baggage carts easier and safer.
- > The introduction of physiotherapy sessions for the whole Spain staff.
- > Speed reductions on electric ground support equipment.

Major progress on the actions implemented in 2025 in Spain include:

- > The launch of an ergonomic study to evaluate the most suitable solutions for reducing manual handling incidents in baggage sorting areas, which will inform the selection of two types of assistance devices for potential deployment at Spanish commercial stations, followed by a pilot at a selected station. Final roll-out is expected for 2027.
- > Outfitting 9% of the belt loader fleet with “in-hold” ergonomic devices, for a target of 30% of the total belt loader fleet before the end of 2027.
- > Conducting an ergonomic study to evaluate the best ergonomic assistance device for manual handling incident reduction. A specific device to implement at the Spanish Commercial Stations was selected and tested at Barcelona, with additional tests at Malaga. However, the outcome was negative.
- > Achieving the target to equip the baggage tractors with buttons to move the ground support equipment forward/backward to aid with the cart connections.
- > Testing embedded speed reductions on electric ground support equipment. Nevertheless, the system was shown not to be reliable during the tests performed. This action is planned to be completed by end of 2027.
- > Implementing physiotherapy sessions for staff via a Health and Safety tool.

At **Aviapartner France**, the health and safety plan is structured around the following items:

- > The implementation of two new programmes: a musculoskeletal disorder prevention programme, which runs between 2024 and 2026; and a psychosocial disorder prevention programme, with a focus on the negative impact of (physically and verbally) disruptive and abusive passengers, including training for front-of-house personnel.
- > Participation and action in professional entities and committees where airport authorities, other ground handlers, and Civil Aviation are present to push improved regulations in the field of Health & Safety. This focuses mainly on disruptive passengers affecting ground operations and the risk prevention process with airports and customer airlines, even when not required by French legislation.
- > Participation in all Health and Safety risk prevention actions organised by airport authorities.
- > The provision of free access to psychological aid (via top-up health insurance) to all staff since 2020.
- > The introduction of a new provider of personal protective equipment and knee-length shorts only for staff wearing a uniform, taking into consideration comfort at work and mitigations for heat stress when selecting new uniforms and shoes.
- > Campaigns related to climate conditions at each change of IATA season (working in extreme heat or cold) to adapt to climate change, which were addressed to all staff, subcontractors, and agency workers.
- > The introduction of ergonomic considerations for administrative working positions through actions implemented since 2023: ergonomic mice, chairs, etc.
- > The management of fatigue with a rostering tool to guarantee legal requirements for working hours: introduced since 2015, this action has been fully implemented.

In 2025, the following activities were achieved in France:

- > The implementation of in-hold assistance devices: Easyload was deployed in Marseille, Lyon, Toulouse and Bordeaux in 2024-2025. In 2026, a different system, AviaRoll, will be introduced across all stations in France and made available on conveyor belts for operational use.
- > The completion of a musculoskeletal disorder prevention programme called “Trouble Musculoskeletal Injury Prevention Programme” (TMS Pro) for Lyon station.
- > A change in working clothes for ramp staff to better adapt to climate change (heat), as a continuation of the initiative launched in 2024.
- > The launch of a campaign related to climate conditions, avoiding injury as a result of heat strokes.

The five-year health and safety plan at [Aviapartner Italy](#) includes:

- > In addition to “in-hold” conveyor belts devices, “in-hold” ergonomic devices for manual baggage handling, for instance the exoskeleton.
- > Ex-hold ergonomic devices for manual baggage handling (Exoskeleton) will be activated at the beginning of 2026.
- > The consolidated implementation of Personal Protective Equipment (PPE) dispensers activated with a personal badge.
- > The introduction of Health & Safety campaigns related to climate change and working in extreme heat at all Aviapartner Italian stations (increased rest breaks, availability of fluids and mineral salt supplements).
- > The launch of risk-based campaigns with safety bulletins to address the main Health & Safety risks resulting from the review of safety performances.
- > The organisation of a specific training module for awareness on disruptive passengers for front-of-house supervisors, lead agents, coordinators, and trainers, with guidelines to handle the increasing number of disruptive passengers.
- > The expansion of ISO45001 to Aviapartner Consulta stations in Florence, Pisa, and Ciampino in 2026.
- > The implementation in Q1 2026 of telemetry systems on ground support equipment at Fiumicino, Milan Malpensa, Linate and Palermo airports, with expansions to other stations in Italy being considered.
- > The installation of Automated External Defibrillators (AEDs) in operational and administrative offices, including Aviapartner Argos and Consulta stations, is planned for Q3 2026.
- > The integration of psychological support for all staff in Italy, which is set to be activated and completed in Q3 2026.

The main achievements of the country five-year safety plan in **Italy** are the following:

- > In-hold ergonomic devices (PowerStow) are currently in trial phase in Rome Fiumicino, Milan Malpensa and Linate and Turin stations. At year end, 23% of all conveyor belt loaders across Aviapartner stations in Italy were equipped with PowerStow (compared to 10% at the end of 2024).
- > Telemetry systems (Kmaster): the installation of Kmaster On Board Units (OBUs) has been completed at stations currently included in the scope (i.e. Rome Fiumicino, Milan Malpensa and Linate and Palermo stations).
- > The implementation of Personal Protective Equipment (PPE) dispensers has been completed at stations currently in the scope, i.e. at Rome Fiumicino, Milan Malpensa, and Linate stations.
- > Health & Safety awareness campaigns related to heat conditions were completed in July 2025 in all stations.
- > Risk-based awareness campaigns to address the main Health & Safety risks, with a focus on “Approaching aircraft with engines running” and “Falling from height”, were completed by the end of August 2025.
- > The awareness training module on handling disruptive passengers was reviewed, and training materials were completed. Training sessions will be launched at the beginning of 2026, and will be expanded to all front-of-house staff later on.

At **Aviapartner in the Netherlands**, the five-year action plan is structured around:

- > Finetuning “ex-hold” solutions such as lifting devices to further ease the baggage handling process in the sorting areas, in addition to the airport investments in advanced ergonomic devices that assist in transferring baggage from the airport system, contributing to safer and more efficient workflows in all Dutch stations.
- > Implementing the ISO45001 Occupational Health and Safety Standard.
- > Testing Ultra Fine Particles and Personal Protective Equipment facemasks (FFP3) in all Dutch stations.

Major progress from 2025 in the Netherlands includes:

- > The implementation of “ex-hold” lifting devices in the baggage make-up area and arrival area, and Cobot and Skelex (exoskeletons) for baggage tracing began in Amsterdam in 2025 and will later (2026) be rolled out in Rotterdam. The plan from the airport was shared with the Dutch labour inspection. It includes the introduction of a full mechanised baggage system at the airport whereby “no hands” are needed to load a Unit Load Device (ULD) or baggage cart.
- > The introduction of additional aircraft “in-hold” baggage conveyor belts designed to minimise physical strain.
- > The implementation of the ISO45001 Occupational Health and Safety Standard has been completed in Amsterdam, reinforcing a culture of shared responsibility and ongoing improvements in workplace safety. Certification is expected for Q1 2026.
- > The launch of testing on Ultra Fine Particle (UFP) and Personal Protective Equipment facemasks (FFP3) in cooperation with the Works Council and Labour inspection.

Finally, in **Germany**, additional “in-hold” baggage conveyor belts have been purchased to reduce physical stress on the operating staff (ramp).

Through these measures, Aviapartner strives to prevent health and safety risks and reduce operational stressors, ensuring that practices do not cause harm to the workforce.



4.4. MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES RELATED TO DIVERSITY

The company's diversity-management approach focuses on the positive impact of **increasing gender diversity within a traditionally male-dominated industry**, thereby strengthening inclusion, broadening the talent pool, and enhancing organisational performance and culture.

4.4.1. Policies related to diversity and inclusion (S1-1)

Aviapartner recognises the importance of diversity and inclusion as part of its social responsibility and strives to provide fair opportunities and a respectful work environment. Therefore, Aviapartner has implemented comprehensive policies aimed at eliminating discrimination in the workplace. The **Human Resources Strategy and Procedures** and the **Human Respect Policy** promote inclusion and equal opportunities and non-discrimination in both recruitment and promotion. These two policies extend across all entities. While the Human Resources Strategy and Procedures are applicable to the workforce within Aviapartner and its subsidiaries, the Human Respect Policy explicitly includes the supply chain with suppliers, subcontractors, customers, etc.

Aviapartner upholds the principles of diversity and non-discrimination, as described in the **Human Respect Policy** in section 4.1.1 *Aviapartner's human rights policy*, fostering a respectful work environment free from harassment. The Human Respect Policy strives for zero tolerance for discrimination. The company's Human Respect Policy defines discrimination as unfair treatment based on nationality, sex, gender identity, national or ethnic origin, colour, religion, language, age, marital status, same-sex partnership status, family status, disability, receipt of public assistance, and any other status protected by law. This policy directly references the definition provided by the International Labour Organisation (ILO) and includes a provision for "any other status protected by law and other relevant forms of discrimination", ensuring that both internal and external stakeholders are protected across all operational contexts.

The **Human Resources Strategy** and Procedures commit to gender equality in management positions and in airside operations. It commits to maintaining fair recruitment practices across the organisation. It reflects Aviapartner's endorsement of the United Nations Global Compact.

In 2021, Aviapartner committed to the **25by2025 initiative**, launched by the International Air Transport Association (IATA), which represents airlines worldwide, including many of Aviapartner's customer airlines. This industry-wide programme aims to **enhance female representation and promote gender equality in aviation** by increasing the representation of women in management roles and in minority groups across the aviation industry. It encourages participating organisations to monitor gender equality, set measurable targets, and report progress. Although the programme is not explicitly referenced in Aviapartner's Human Resources Strategy and Procedures, its principles have directly shaped the inclusion of gender equality and diversity objectives and the establishment of related targets.

In order to prevent such risks, Aviapartner's **recruitment and selection policy** provides clear guidelines to ensure that all internal and external applicants are assessed in a fair and equal manner. These principles are communicated to and enforced among all recruitment staff and partners. Aviapartner considers it an absolute priority that the company does not discriminate in any way, particularly during the recruitment of internal and external employees. **Diversity, inclusion, and non-discrimination** are fundamental principles in every selection process. Non-discrimination means that personal characteristics are never taken into account during evaluation. This includes age, race, skin colour, religion or belief, national or ethnic origin, language, disability, sexual orientation, gender identity and expression, family situation, and any other protected characteristics.

Aviapartner recognises the **importance and value of fair recruitment practices and of promoting inclusion and diversity in the workplace through recruitment and selection**. Recruitment staff and partners remain aware of reference frameworks or unconscious biases that may influence selection and actively address them throughout the process. This approach is supported by recruitment specialists and the use of detailed job descriptions, which help ensure fairness and prevent bias throughout the hiring process. Competencies (both hard and soft) are considered the most important criteria in the selection process. In addition, relevant and transferable experience is taken into account, as well as alignment between the candidate's values and those of the company. The recruitment staff and partners do not impose language requirements beyond what is strictly necessary to ensure communication with staff and third parties and compliance with safety regulations during the performance of work.

Our recruitment staff and partners also assess candidates' attitudes toward others, colleagues, and customers, both directly and indirectly. This evaluation is not limited to discriminatory aspects but focuses on general attitudes toward others. Recruitment staff and partners see it as their mission to contribute to an open organisation where professionalism goes hand in hand with a positive attitude toward one another. Aviapartner aims to create a healthy, collegial environment where individuals harmoniously combine their own opinions and personalities with those of others.

These procedures are structured to eliminate both direct and indirect discrimination and include annual reviews of targets related to non-discrimination.

Furthermore, the Corporate Training Manual mandates that all countries provide recurrent mandatory training to all employees. This **training**, which includes foundational content on discrimination and harassment, emphasises the importance of the zero-tolerance policy and raises awareness about prevention and reporting mechanisms. Completion of this training is monitored through Key Performance Indicators.

This commitment is actively reflected in the procedures for both internal and external candidates. In the same vein, all recruitment staff and partners sign this policy, pledging to participate in the recruitment and selection process for internal and external candidates in full compliance with these principles and guidelines, acting honourably and conscientiously to recruit objectively.

The Whistleblowing Policy complements this framework by providing a clear process and dedicated tools for reporting concerns. As outlined in the Whistleblowing Policy, employees are assured confidentiality and protection against retaliation when submitting complaints in good faith via established reporting channels. Procedures for responding to discrimination once detected are defined at the local level, in accordance with national legislation and practices. For further information, please see section 4.2.3 *Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)*.

The same principles are extended to external partners through the Supplier Code of Conduct, requiring suppliers critical to the business to uphold non-discrimination standards in their employment practices. For further information, consult section 5.1.7 *Business conduct policies and corporate culture (G1-1)*.

Together, these policies, addressing different target groups, explicitly prohibit discrimination across a wide range of grounds, in accordance with Union regulations and national legislation.

Aviapartner does not have specific policy commitments at group level related to inclusion or positive action for vulnerable groups in its workforce.

The **CEO is accountable** for the overall implementation of diversity and inclusion policies, ensuring their integration within the company's governance and culture. Senior executives, including Human Resources leaders and local management teams, are responsible for operationalising diversity initiatives, ensuring equitable recruitment, and monitoring progress toward inclusion goals.

The HR Strategy and Procedures and Human Respect Policies are made available to employees through internal platforms such as the intranet and employee handbooks, as well as during onboarding and awareness sessions. The company's commitment to maintaining a workplace free from discrimination and harassment is embedded in every employment contract. Externally, Aviapartner shares its commitment to diversity via its corporate website and participation in initiatives such as the **European Diversity Charter**. This ensures that partners, customers, and suppliers are informed of the company's inclusivity principles and expectations for equitable practices across its network.

Relevant policies and initiatives exist at country level, tailored to local legal and social contexts. The group monitors these local efforts and encourages the sharing of best practices. Specific diversity management initiatives exist for instance in Aviapartner Spain, and workplace inclusion efforts in Aviapartner Belgium. Implementation efforts are managed at country level, where initiatives are in place to promote non-discrimination and inclusion. Local recruitment policies aim to counteract unconscious bias and comply with national legislation.

Aviapartner Belgium has embedded respect and tolerance into daily operations through the Respect & Tolerance Charter, developed in close cooperation with employer and union representatives. This charter is captured in **ten basic rules of good conduct**, which serve as practical guidelines for embodying Aviapartner Belgium's values. Each department translates these rules into specific initiatives relevant to their operational context, ensuring they are not just theoretical but actionable. In Belgium, the Managing Director retains overall accountability for implementing diversity and inclusion policies, while at the local level the HR Director and team, in cooperation with local management, ensure their practical application through equitable recruitment and monitoring of inclusion objectives. The diversity and inclusion Respect & Tolerance Charter is available through the intranet, employee handbooks, posters, and onboarding sessions.

Aviapartner Spain has an “Equality Commitment” described in its Employee Handbook. Equality is considered a strategic tool for the company, and an **Equality Plan** is in place to foster a positive impact, which has been developed in line with Spanish legislation. Spain’s Equality Commitment is applicable to all Aviapartner employees in Spain from the first day of their joining the company. In Spain, **the Managing Director and HR Corporate Director retain overall accountability** for implementing diversity and inclusion policies. At the local level, senior management ensures their practical application through equitable recruitment and monitoring of inclusion objectives. Policies are available on the company intranet, physically displayed in all offices, and included in the Manual del Empleado, which is provided to employees upon hiring.

Aviapartner Spain’s Equality Commitment is based on meetings with the union representatives. The Spanish Diversity Charter and the Sustainable Development Goals are the inspiration for diversity, which is also influenced by the charity institutions Aviapartner Spain works with, such as Integra, Ellas Vuelan Alto (EVA) and Fundacion Auro, which organise actions that bring diversity closer to Aviapartner employees.

In addition, policies are formally communicated to all subcontractors as part of contractual and onboarding processes, ensuring that internal and external stakeholders are aware of and aligned with Aviapartner Spain’s requirements and commitments.

In Spain, the Supplier Code of Conduct is translated into Spanish to facilitate understanding and effective implementation across the value chain. All suppliers and subcontractors are required to formally sign and adhere to it as a mandatory condition of employment. This ensures that suppliers and subcontractors clearly understand their ethical, human rights, labour, and social responsibility obligations, supporting consistent compliance and risk management throughout the supply chain.

In addition, Aviapartner Spain reinforces its commitment to ethical conduct, human rights, and social responsibility through internationally recognised certifications and formal commitments. Aviapartner Spain holds **SGE21 Certifications for its Ethical and Socially Responsible Management System** and **SA8000 Social Accountability certifications** for select stations, confirming that its management system meets high standards of ethical behaviour, social responsibility, and good governance.²⁶

Since 2021, Aviapartner Spain and France have continuously signed **national Diversity Charters**, supporting inclusivity, equality, and diversity in the workplace, and reaffirming their commitment again in 2025 to European principles of inclusion and shared responsibility.



Aviapartner France has an **agreement relating to gender equality in the workplace** aiming to ensure that women and men benefit from equal treatment in terms of access to employment, access to training, qualifications, classification, promotion, remuneration and working conditions. In France, there are several legal obligations regarding professional equality between women and men. Companies with at least fifty employees are required to have an agreement or action plan on professional equality and must annually calculate and publish an index (score out of 100) measuring pay gaps and the representation of women in key positions. The local policy is based on national legislation and fully complies with the group’s policies.

26. For further information on entities certified, please refer to 6.3 List of certification coverage.

By renewing its signature of the Diversity Charter for 2025 and 2026, Aviapartner France commits to:

- > **Raising awareness** and providing training on the issues of non-discrimination and diversity.
- > **Promoting the application of the principle of non-discrimination** in all its forms in all management and decision-making acts of the company.
- > **Promoting the representation of the diversity in French society.**
- > **Communicating** this commitment to all the employees, as well as to customers, partners, and suppliers, in order to encourage them to respect and implement these principles;
- > Making the development and implementation of the diversity policy a subject of **social dialogue** with staff representatives.
- > Regularly **assessing progress** made and informing both internal and external stakeholders of practical results.

The Diversity Charter covers all entities and all employees in France.

Trade unions and staff representatives are regularly consulted during mandatory annual negotiations and at the renewal of agreements on professional equality. The Managing Director and HR Director retain overall accountability for implementing diversity and inclusion policies. At the local level, senior management ensures their practical application through equitable recruitment and monitoring of inclusion objectives.

In Italy, there are no additional local policies concerning diversity. However, since 2024 the Aviapartner Handling SRL head office is **UNI PDR125-certified** for ground handling for commercial and private aviation and VIP lounges.²⁷ This certification is an Italian standard of practice that defines a management system for gender equality, based on predefined KPIs covering governance, HR processes, pay equity and worklife balance. This certification confirms that the entity has implemented and is monitored against this recognised framework for gender equality management. Within this framework, a local "Comitato Guida" has been elected with five members. In Italy, the **Managing Director and HR Corporate Director retain overall accountability for implementing diversity and inclusion policies.**

In the Netherlands, the group policy is applied as there are no local policies. The Managing Director retains overall accountability for implementing diversity and inclusion policies. At the local level, the **HR Director and senior management** ensure their practical application through equitable recruitment and monitoring of inclusion objectives. In the Netherlands, the deployment of the New Heroes Academy training programme aims to enhance personal development, leadership skills, and employee engagement. It is a digital training institute where all employees can develop skills.

At Aviapartner Germany, the local approach is aligned with the Basic Law for the Federal Republic of Germany (Art. 3 Equality before the law), in particular the **General Act on Equal Treatment** to promote transparency in wage structures among women and men, European legislation, and the policies of the Group. Due to the mandatory co-determination rights of a German Works Council (amongst other rights regarding recruiting and remuneration of employees), equal treatment of men and women is ensured in Germany.

27. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

4.4.2. Targets related to diversity (S1-5)

Aviapartner's Human Resources Strategy and Procedures explicitly define equal working conditions and inclusive recruitment as core objectives. These principles form the foundation of the commitment to diversity and inclusion. To operationalise these objectives, Aviapartner has established objective on diversity Key Performance Indicators (KPIs), which set measurable targets for representation and inclusion.



The diversity targets were established following Aviapartner's commitment to the **25by2025 initiative**, launched by the International Air Transport Association (IATA), which represents airlines worldwide, including many of Aviapartner's customer airlines. This commitment marked the starting point for Aviapartner's gender-specific diversity focus, as gender representation had not been measured previously. Aviapartner deliberately chose the **growth target of +25% by the end of 2025** to ensure that the targets were ambitious yet realistic for the organisation. Other stakeholders were not involved in the target-setting process, and the choice reflects Aviapartner's alignment with industry-wide priorities while tailoring objectives to its specific workforce composition.

Based on the baseline year 2021, Aviapartner has committed to **increasing the share of women by 25% in management roles and in airside operations** where women are traditionally underrepresented. These commitments translate into two specific targets to be reached by 2025:

- > 48% women in management positions;
- > 13% women in airside operational roles.

The airside operation was identified as having the greatest gender imbalance, and the same +25% growth target was applied to ensure consistency.

There are no intermediate steps defined to get there. These measurable and time-bound goals are in line with its commitment to the IATA 25by2025 programme.



Methodology and assumptions

Diversity targets apply to Aviapartner employees across management roles and to airside operations specifically. The scope includes efforts to increase female representation in management and traditionally male-dominated areas, monitored by country to track progress against defined milestones.

The definition of “management” was determined at the country level, while “airside operations” was defined based on the data collected from different operational departments. Roles are classified according to HR job codes on the reporting date. All roles classified as “Manager” and above are used for calculations involving management positions. Data is collected per country from local HR systems and reflects end-of-year headcount. The scope of airside operations includes all roles in ground handling within ramp, baggage handling, and operations departments, as well as any other roles defined at station level as belonging to airside activities.

The percentage of women in airside operations is calculated as: (number of women in airside roles ÷ total airside and landside roles) × 100.

In alignment with Aviapartner’s commitment to IATA 25by2025, an initial assessment of gender diversity was conducted across the organisation in 2021. The workforce composition as of the 2021 baseline included 38% of women in management and 10% at airside. Based on the options provided by IATA, the company adopted the “growth” approach, targeting a 25% increase versus the initial assessment. The 25% increase refers to growth on top of the actual representation achieved in 2021. This means Aviapartner is committed to improving female representation by an additional 25% compared to the 2021 figures, ensuring continuous progress rather than maintaining previous gains. For example, female representation in management was 38% in 2021. The 2025 target reflects 38% + 25% growth, resulting in 48% women in management and 13% women in airside operations by 2025.

Neither the targets nor methodology have changed since its definition. However, new acquisitions and expansion during the period may affect comparability because they increase the total workforce and potentially alter gender representation ratios. While the percentage targets remain unchanged, the inclusion of newly acquired entities could make progress appear slower or faster depending on their starting diversity levels. Aviapartner will disclose such changes in reporting to ensure transparency and explain any significant variances from the original growth trajectory.

Data is collected and reviewed yearly by countries to monitor progress against milestones and consolidated for reporting to IATA.

Progress is monitored yearly through structured internal reporting on workforce composition. Local ongoing measures aim to address remaining gaps in representation and foster inclusive workplace practices.

With women representing 33% of top management positions and 11% of airside operational roles, Aviapartner has not reached its 2025 gender-balance targets. While significant efforts have been made in monitoring, awareness-raising and initiatives promoting equality, progress remains below the expected trajectory. The results suggest the presence of structural barriers that may limit women’s access to certain roles, particularly in operational environments. Strengthening the action plan and addressing these barriers will be essential to achieving a more balanced workforce and meeting the company’s commitments.

4.4.3. Diversity metrics

Workforce indicators such as gender representation are monitored in the countries and consolidated at group level to benchmark internally and identify best practices and areas for improvement. For gender diversity, KPIs used to measure the effectiveness of the actions and initiatives include the percentage of women in management roles and the percentage of women in airside operations.

- > **Percentage of women in management positions:** This metric measures the proportion of female employees holding management roles within the organisation as described in the target.
- > **Percentage of women in airside operations:** This metric measures the proportion of female employees in any role working in airside departments such as ramp services, baggage services, operations, or other airside operations within the organisation.
- > **Nationalities of employees in the organisation:** this metric measures the number of different nationalities in the organisation. The data for this metric is based on passport nationality provided by employees at the time of registration in the HR system. Only one nationality per employee is counted; dual nationality is not considered. Nationalities are reported as absolute numbers, with each distinct nationality counted once, including the nationality of the country of operation. Regarding gender, data is based on self-identification in HR records; current HR systems allow only male or female options.

There are no additional validations by external bodies; however, gender-related data is evaluated by external organisations such as EcoVadis and TIACA (Blue Sky), which assess sustainability practices in this area and provide feedback for improvement where applicable.

Alongside these group metrics, some countries have also implemented their own.

In Spain, gender- and age-based remuneration is monitored annually. The average annual remuneration is analysed by gender, occupational category, and age range. Aviapartner's gender-related KPIs are validated by external auditors responsible for SA8000 Social Accountability certification in **Spain**. They provide external validation, ensuring that processes align with this international standard.

Aviapartner France, which has more than fifty employees, is required to have an agreement or action plan on professional equality and must calculate and publish annually a Gender Equality Index (score out of 100) measuring pay gaps and the representation of women in key positions. The index is published on the **Aviapartner France** website²⁸. This index is calculated using several indicators related to pay gaps, salary increases, promotions, increases after maternity leave, and the presence of women among the ten highest earners.

Finally, **Aviapartner Netherlands** must provide data to the local Social and Economic Council (SER). Currently, it is merely an inventory and not an obligation of results. The data is checked by this authority digitally.

28. The gender equality index of Aviapartner France may be consulted here: <https://www.aviapartner.aero/indicateursFR.php>

4.4.3.1. Diversity of employees (S1-9)

The gender distribution of employees at top management level is as follows:

Table 12: Aviapartner gender distribution at top management level

GENDER AT TOP MANAGEMENT LEVEL	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP
Female	10	21	37	15	4	0	87
	20%	30%	43%	41%	25%	0%	33%
Male	41	49	50	22	12	1	175
	80%	70%	57%	59%	75%	100%	67%
Other	-	-	-	-	-	-	-
Not disclosed	-	-	-	-	-	-	-
Grand Total	51	70	87	37	16	1	262
	100%	100%	100%	100%	100%	100%	100%

Methodology and assumptions

Top management is understood as all management functions, with the exception of governance bodies, which are presented in ESRS2 Gov-1 within section 2.2.1 *The role of administrative, management and supervisory bodies (GOV-1)*.

The percentage of women in management is calculated as: (number of women in management roles ÷ total management roles) × 100.

It is important to note that this figure may include self-employed management members working for Aviapartner.



The age group distribution of employees at Aviapartner is as follows:

Table 13: Aviapartner distribution of employees by age group

AGE GROUPS	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP
Under 30 years old	402	697	535	744	352	14	2,744
	26%	34%	24%	27%	51%	24%	29%
30-50 years old	692	907	1189	1,242	219	23	4,272
	45%	45%	52%	45%	32%	40%	46%
Over 50 years old	453	417	548	770	124	21	2,333
	29%	21%	24%	28%	18%	36%	25%

Methodology and assumptions

These KPIs do not include non-employees, i.e. workers that are not on payroll such as subcontractors.

4.4.3.2. Persons with disabilities (S1-12)

The following table presents the percentage of employees with disabilities per country:

Table 14: Aviapartner's percentage of persons with disabilities amongst employees

DISABILITY AMONGST EMPLOYEES AND MANAGEMENT	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY ²⁹	CONSOLIDATED GROUP
Percentage of persons with disabilities amongst employees	N/A	1%	5%	2%	N/A	-	2%
Percentage of persons with disabilities amongst governance bodies (entity-specific KPI)	N/A	0%	0%	0%	N/A	-	0%

In Belgium and the Netherlands, the data is reported as “Not Applicable”, as national legislation prohibits employers from collecting or processing information related to disabilities, which is classified as sensitive medical data and protected by medical confidentiality and data protection laws.

Methodology and assumptions

The KPI on disabilities amongst employees does not include non-employees, i.e. workers that are not on payroll such as subcontractors. However, some members within governance bodies may be self-employed. For the purposes of this data point, information on persons with disabilities among employees is collected where legally permissible.

4.4.3.3. Incidents of discrimination (S1-17)

To Aviapartner's knowledge, no incidents of discrimination and no fines or penalties were declared in 2025.

Table 15: Aviapartner's incidents of discrimination

INCIDENTS OF DISCRIMINATION	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP
Total number of incidents of discrimination, including harassment	0	0	0	0	0	-	0
Total number of complaints filed through channels for people to raise concerns	0	6	0	0	10	-	16
Total amount of fines, penalties, and compensation for damages as a result of incidents and complaints disclosed above	€0	€0	€0	€0	€0	-	€0

29. This data was not reported by Germany (see 2.1.1 General basis for preparation of the sustainability statement (BP-1))

Methodology and assumptions

The following definitions are used: incidents are cases escalated through an internal formal process or action, while a complaint is a grievance that is formally voiced.

The number of incidents is monitored through the whistleblowing tool or external partners.

For complaints, these are officially recorded in **Spain** and in the Netherlands.

In the Netherlands, Aviapartner works with an external confidential advisor. Each year, Aviapartner Netherlands receives a communication report. In Spain, the Health and Safety Department keeps a formal register. For Belgium, the information is based on facts & figures linked to legally required reporting from external confidential advisors, the external whistleblowing tool, Persons of Trust and the Health and Safety Department.

In other countries, they are directly managed by HR or the manager without being subject to any record.

Aviapartner does not have any process in place to identify the number of complaints filed to National Contact Points for OECD Multinational Enterprises.

The whistleblowing mechanism allows anonymous reporting. Consequently, the employment status of complainants is not always known, and reported cases may include submissions from both employees and non-employees. As a result, the reported figures cannot be reliably disaggregated between these groups.

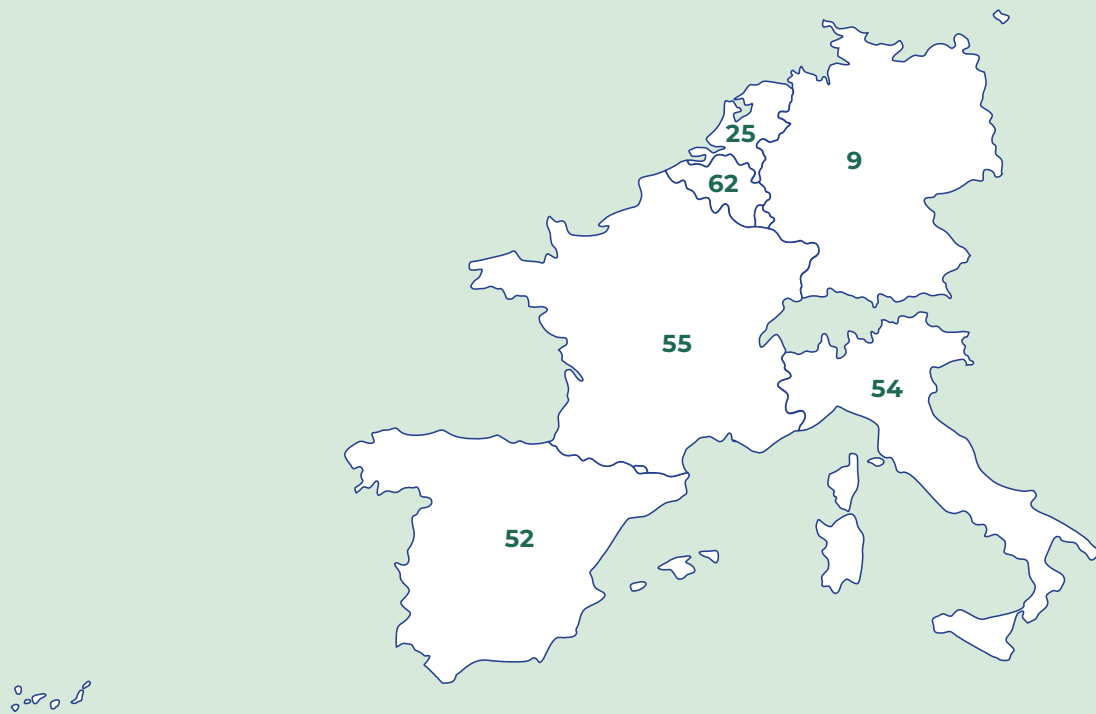
4.4.3.4. Diversity of origin (entity-specific)

The diversity within Aviapartner teams is also reflected in HR data, with employees representing over one hundred different nationalities. This multicultural representation continues to grow in every country.

Table 16: Diversity of origin within Aviapartner

DIVERSITY OF ORIGIN	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP
Number of different nationalities	62	52	55	54	25	9	107

Employee nationalities



4.4.4. Taking action on diversity (S1-4)

At group level, gender equality is promoted through equitable recruitment and fair wage practices, alongside measures to create a safe and inclusive environment for women in operational areas where they remain underrepresented.

The commitment to human respect and zero tolerance for discrimination is operationalised at country and station level through a combination of corporate and local procedures designed to prevent, mitigate, and address discrimination, while also promoting diversity and inclusion. Structured plans for promoting diversity and inclusion, including certifications and audits, are developed and implemented locally. For instance, work-life balance initiatives, such as flexible scheduling, remote work options for non-operational roles, and digital disconnection protocols in Spain and France, further support inclusion and well-being.

In Belgium, the SONAR action plan addresses workplace harassment and discrimination, with duty supervisors facilitating direct communication and empowerment. Feedback is integrated into meetings and training sessions to support both top-down and bottom-up dialogue. In 2025, several initiatives on gender equality were implemented and cover all local operations, applying to employees, management, and relevant stakeholders (for example in-house partners assisting in bulk recruitments):

- > A new HR intranet will be set up to make all policies easily accessible internally. This initiative was designed in 2024, prepared in 2025, and planned for launch in 2026.
- > Starting in 2025, the principles of diversity are being included in ISO processes. This initiative is expected to close in 2026.

- > The principles of diversity are included in the new Labour Regulation. Full incorporation into the new Labour Regulation is scheduled for completion by early 2026.
- > As part of the Respect & Tolerance campaign launched in 2024, as outlined in the policies, an initiative was launched in 2025 using posters to encourage discussion on sensitive topics, such as support for women experiencing menopause. This initiative encourages open dialogue and provides options for temporary working condition adjustments, discussed confidentially with an HR Business Partner or management. These efforts reflect Belgium's commitment to creating an inclusive, respectful workplace where every employee feels valued and supported.
- > In addition, an e-learning course is in preparation as part of the Respect & Tolerance campaign, and is set to launch in 2026.

At Aviapartner Spain, the renewal of the Equality Plan began in 2025 and is being negotiated with the unions, and should be finalised in 2026. In addition, specific initiatives in 2025 include:

- > The renewal of the Equality Plan, valid for all stations, started in 2025 and is being negotiated with the unions to finalise in 2026.
- > The renewal of the Diversity Charter for two years was officialised during a formal signature in late 2025. This was promoted by Fundación Diversidad to reaffirm Aviapartner Spain's commitment to equality, diversity, and inclusion in the workplace. It is applicable to all Spain stations.
- > The hiring of employees with special needs and specific conditions in collaboration with external stakeholders such as Fundación Adecco, whom Aviapartner is working with on a continuous basis and more recently, in 2025, with Fundación Aura. This charity institution specialises in social and labour market integration, such as for people with disabilities. This institution helps Aviapartner to hire employees with disabilities. Each new hire is accompanied by a company trainer who facilitates their integration into the workforce, supporting inclusive onboarding and skills development (began in 2025 and will continue in 2026). Aviapartner also collaborated with external inclusive employment organisations such as Fundación Randstad to broaden access to diverse talent pools (in 2025, no contracts for the moment).
- > The organisation of Open Days across its commercial stations, inviting new talent to engage directly with the company and explore career opportunities. This is a continuous process in high season and has been started at new stations where the company is expanding.
- > Activities on social media to strengthen messaging on diversity and working condition topics, such as mental health, intolerance and work-life balance.

At Aviapartner France, a concrete action plan for gender equality will begin implementation in 2026. In the meantime, the main actions in 2025, which applied to all entities, types of employees and activities, included:

- > The renewal of the Diversity Charter for 2025 and 2026.
- > The renegotiation, for a period of three years, of a 2025 agreement relating to gender equality in the workplace which aims to ensure that women and men benefit from equal treatment in terms of access to employment, access to training, qualifications, classification, promotion, remuneration and working conditions.

Aviapartner Italy sets two-year action plans (2025-2026), with measures including:

- > Participation in an innovative international project with Colombia, “Wings for a new future”, which brings skills, inclusion, and development together. This project for UNCHR refugees is a part of a broader labour corridor initiative for refugees, led by Skillab Human Resources Development Centre and funded by Fondimpresa. It provides structured and legal pathways for qualified entry into the Italian job market, offering refugees a concrete opportunity to rebuild their lives, while at the same time helping companies find qualified staff. It includes a structured preparation process with selection, training, and legal entry into Italy for individuals who are already qualified and have skills applicable to specific sectors. The project is ongoing and should begin hiring in 2026.
- > Participation in Open Days for the recruitment of unemployed and disabled people, as Italy requires businesses by law to employ 7% disabled people. These Open Days are organised by specialised organisations collaborating with disabled people.

Aviapartner in the Netherlands will translate diversity into a concrete action plan starting in 2026. In 2025, several initiatives were implemented and applied to all entities, types of employees and activities:

- > An analysis of how the company can increase gender diversity in management positions, which will end in 2026.
- > A review and update to the Employee Handbook, which includes DEI, and will continue in 2026.
- > The establishment of an ethics committee.
- > The launch of poster campaigns, with the aim of combatting undesirable behaviour within the organisation.

Across the various countries, there is a clear ambition toward increasing female representation across roles, including in traditionally male-dominated and operational positions. This demonstrates a shared commitment to fostering diversity and inclusion and a clear ambition to further strengthen the presence of women in the workforce. However, in most countries, this progress remains largely organic, as formalised action plans have not yet always been fully developed or implemented. As such, while the direction is positive, it is not yet possible to fully assess or claim structured progress. Going forward, the focus will be on translating this ambition into concrete, actionable plans starting in 2026.

4.5. MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES RELATED TO TRAINING AND CAREER DEVELOPMENT

The company's training and career development topic relates to Aviapartner's role in **fostering employees' career prospects and employability**, as well as supporting the employability of non-employees, while addressing the **risk of lacking the necessary skills and capabilities to perform work effectively**, through structured training and career development initiatives.

Training and career development is also considered as a cross-cutting topic that underpins the company's ability to operate in line with its strategy and sustainability commitments. By ensuring that employees are adequately trained and equipped, this topic supports the effective implementation of Aviapartner's strategy. As a result, certain disclosures may intentionally intersect with content presented in other chapters.

4.5.1. Policies related to training and career development (S1-1)

The **Aviapartner Corporate training policy** is designed to support and develop Aviapartner's most valuable asset, its employees, by addressing their professional growth, safety, and well-being. This policy aims to ensure that all staff are competent and safe, and that trainings are compliant with legal and customer requirements. Training content is standardised and regularly updated to reflect changes in legal, regulatory, and ethical standards, as well as local requirements. It is a core policy that also supports the company's quality, safety, security, and environmental objectives.



This policy sets the principle that all employees must complete mandatory initial and recurrent training that is tailored to their specific job requirements and is designed to attract, develop, and retain skilled employees through structured training programmes. The company recognises that ensuring comprehensive employee training contributes positively to organisational culture, risk reduction, and stakeholder trust. It plays a significant role in supporting the company's ability to attract, develop, and retain a skilled workforce, both within its own operations and among subcontractors and interim staff. By mandating comprehensive initial and recurrent training, the policy ensures that all personnel possess the necessary skills and competencies to perform their roles effectively and safely.

Aviapartner's training approach is **aligned with AHM1110 industry standards** for training, as defined by IATA, the International Air Transport Association. IATA is a global trade association representing airlines worldwide. It sets international standards and procedures—such as those in the IATA Ground Operations Manual (IGOM) and Airport Handling Manual (AHM)—which define how ground handling tasks like baggage, ramp, and cargo operations and training should be performed.

Aviapartner's training also aligns with **other international standards**, such as ISO9001 for Quality, ISO14001 for the Environment and ISO45001 for Occupational Health & Safety.

The training process is managed for technical and supporting skills, with collectively agreed industry standards for the group, as defined in the **Corporate Training Manual**, which sets out the rules to be followed in the countries.

Assessments are documented, and only staff who are certified as qualified are permitted to perform operational tasks. Depending on the type of training, recurrent courses are conducted annually, biennially, or triennially, as determined by the training plan. By the end of each year, all personnel should complete the relevant mandatory training in accordance with the plan. Training obligations apply to all staff within the company's own operations and among subcontractors and interim staff. This is applicable to all stations in the report scope, and across all activities.

Accountability for training and skills development policies lies with the CEO, who ensures that the company's governance supports continuous learning and employee development. This top-level accountability is supported by a defined organisational structure consisting of the VP Occupational Health & Safety and the VP Quality & Environment at group level, together with the Euro Training Team, a group with all Country Training Managers working together to oversee training engagement, manage and supervise country specific trainings and manage the delivery of mandatory training in their country, guided by the Network Learning Management Coordinator, who reports to the VP Safety & Occupational Health.

The Corporate Training Policy is developed with the **requirements of key stakeholders** at its core. By aligning with IATA AHM1110, the company ensures that trainings meet the operational needs and expectations of the airline industry. Regular audits by airline customers further verify compliance and alignment with industry standards.

Aviapartner ensures that the Corporate Training policy and all related documentation is **accessible internally** to all relevant employees through structured internal communication channels on the intranet. Employees receive detailed information about available programmes during **onboarding** and **annual reviews**, ensuring that training initiatives are understood and implemented effectively. Training content and policy updates are also shared via the intranet to ensure consistent access across all sites.

This systematic approach not only mitigates the risk of skill gaps that could impact operational performance, but also enhances the employability and career prospects of employees and external staff alike. Furthermore, the policy creates structured opportunities for ongoing learning and career development, thereby fostering a culture of continuous improvement and supporting the organisation's long-term strategic objectives.

4.5.2. Targets related to training and career development (S1-5)

Aviapartner's ambition considers broader sustainable development objectives by **promoting lifelong learning and equal opportunities for all employees**. The company continues to monitor activities under existing policy objectives, such as enhancing employee competencies and fostering ethical and sustainable business practices.

The company has a **general ambition** that aims to ensure that **100% of employees complete all mandatory training programmes** as established in the Aviapartner annual training plan by the end of each calendar year. The training plan is developed in line with regulatory and legal requirements and aligned with the roles and responsibilities of the employee.

The training needs identified in the training plan are based on **industry standards** defined in the IATA Airport Handling Manual, ensuring that all relevant industry requirements are addressed. This concerns technical training, but also training on safety, security, etc. Additional stakeholder requirements come from customers, airlines, airports, and local authorities. Moreover, based on internal assessment, additional group level mandatory training, considered essential for supporting ethical conduct, compliance, workplace safety, quality, and employee well-being, is defined.

Methodology and assumptions

The scope of this target includes all company employees engaged in its operational activities across every location in which Aviapartner operates. The geographical scope encompasses all countries and regions where Aviapartner maintains operations, ensuring that the training programme and reporting coverage are comprehensive at a global level.

The completion of the individual annual training plan is monitored by the country training department. Data is sourced from the company's Learning Management System, Aviapartner Academy, which records enrolment, participation, and successful completion data for each employee across all training modules in the Academy.

Only a part of the training records is currently available at the local or country level, as not all training has been migrated to the Learning Management System. This system is already applicable in **Belgium, Spain, the Netherlands, France, Italy and Germany**. The company is currently in a transition to create all courses in the Academy. Some courses are still paper documented (presentations, certificates, exams) and not available in the Academy to track results.

The ambition of 100% completion of mandatory training is considered achieved when all employees complete all required modules and pass any associated assessments. Assumptions include the timely registration of new hires and equal access to training materials and resources.

As this is a rolling year-on-year target, it is not compared to a baseline and does not include intermediate milestones.

At the moment, the progress on this general ambition is assessed qualitatively, at the end of each year, based on feedback from employees, participation rates in training programmes, and observed improvements in workplace culture and compliance. However, due to data quality issues, the company did not present results on this ambition in its 2025 sustainability statement.

4.5.3. Training and skills development metrics (S1-13)

For career development purposes, KPIs include training hours per employee, which are tracked locally, although no consolidated results are currently available. At group level, no specific metrics are in place yet to evaluate the performance and effectiveness of the training programme. The completion of the training programme is ensured through regular reviews, internal audits, and the monitoring of training rollouts. However, the training performance KPI (S1-13) is not published in this 2025 sustainability statement due to data quality and the lack of representativeness in the internal data.

4.5.4. Taking action on training and career development (S1-4)

Aviapartner is committed to equipping its employees, interim staff, and, where relevant, subcontractors with the skills and capabilities required to perform their roles effectively and to support ongoing employability and career growth.

Aviapartner is implementing a series of measures to mitigate **material risks related to skill shortages**: dedicated programmes address skill gaps through internal training, participation in job fairs, partnerships with educational institutions, and guest lectures. These initiatives help to attract a competent, motivated, and adaptable workforce aligned with operational needs.

To ensure Aviapartner's **positive impact, career possibilities** are strengthened through structured training programmes, leadership coaching, and personal development plans, which can be initiated during performance reviews. These programmes aim to build skills, prepare staff for future roles in and outside the company, and address workload challenges to ensure sustainable career growth. Aviapartner maintains structured recruitment and evaluation processes that prioritise internal mobility, fostering vertical moves wherever possible and supporting job rotation to broaden expertise.

While these practices are already embedded in its HR approach, the plan is to achieve greater consistency in applying them across the entire network, ensuring equal access to career development opportunities in all locations. Employability is extended beyond direct employees by including subcontractors and interim staff in technical training opportunities where agreed, supporting their ability to gain, maintain and develop skills relevant to the aviation sector while meeting stakeholder requirements.

Aviapartner delivers comprehensive, competency-based programmes. Most of these programmes are provided in-house, through certified training centres under the Aviapartner Training Academy. The company's structured training portfolio encompasses three core competencies (technical, behavioural and leadership) and digital and specialist skills. Tailored programmes in IT, languages, and other specialised areas are also available. Additionally, operational excellence is reinforced for AviaVIP training, delivered every 24 months to Private Aviation teams, focusing on service standards and operational style.

Trainings are provided through a combination of classroom sessions, e-learning, and on-the-job experiences, with blended learning pathways selected based on the topic and the most suitable method. Training and development programmes are tailored based on employee feedback and stakeholder requirements, emphasising continuous skill development and adaptation to change.

Aviapartner's training initiatives primarily address its own workforce and interim staff engaged in Ground Handling operations. The scope further includes selected segments of Cargo Handling and Private Aviation personnel, particularly those involved in ramp-related activities, as well as subcontractors whose roles are directly linked to these domains.

In 2025, Aviapartner took several key actions at group level, including:

- > The launch of a comprehensive revision of all Ground Handling training materials in the summer of 2025, expected to be completed by the end of 2026. The revision and standardisation work is being led by the European Training Team, composed of the training managers from each country, with participation from all countries, and is being implemented through the training management system. All content is being standardised in line with industry standards and applicable regulations. A single version of the training catalogue for all countries is being created to ensure compliance with standards from the International Air Transport Association (IATA AHM section 1110) and the European Union Aviation Safety Agency (EASA), with room to include national regulation requirements as well. The objective is to meet stakeholders' expectations and to deliver a uniform, professional and efficient learning experience to the workforce, supported by audit-proof traceability via the Aviapartner Training Academy.
- > A full review and update of trainings for frontline Private Aviation staff to enhance the quality and professionalism of service delivery.
- > A strong emphasis on Information Security training for all personnel, to improve resilience against cyber threats and meet regulatory requirements, encompassing all Aviapartner employees regardless of their function. Dedicated programmes are delivered monthly to staff with corporate email access, annually to all employees for awareness purposes, and annually to managers for advanced Information Security Training. Information Security Training initiatives were intensified in 2025 and are expected to continue in 2026.
- > An assessment with trainers of the potential to expand currently available trainings to raise awareness and address human trafficking risks, highlighting the opportunity for positive impact through enhanced employee education.

Key actions planned for the future (2026 and beyond) include:

- > The completion and deployment of **revised ground handling training materials** by the end of 2026.
- > Continued periodic review and development of technical, behavioural, and digital/ specialist training modules to keep pace with evolving best practices and regulations.
- > **The expansion of digital and specialist training initiatives**, including advanced upskilling for IT systems and data literacy.

These initiatives aim to significantly enhance workforce competence and drive operational excellence across the organisation. By standardising and ensuring consistency in training deliverables, alignment will be achieved throughout the network. Lastly, the initiatives will strengthen information security awareness and reinforce regulatory compliance among all employees, fostering a culture of responsibility and resilience.

These actions apply across Aviapartner's entire European network under the coordination of the Euro Training Team, ensuring consistent implementation. The stakeholder groups involved include all direct employees, interim staff, and relevant subcontractors, alongside all individuals with access to company IT systems.

To monitor progress, Human Resources Departments collaborate with external partners to evaluate survey results and adapt training programmes accordingly. Strengthening and standardising the training programme will improve traceability and auditability, ensuring full compliance with industry standards. Control and assurance are embedded through management reviews, internal audits, and external assessments, ensuring continuous improvement and compliance.

Activity-based indicators complement this process to monitor the implementation and effectiveness of training materials. Up to now, previous training programmes have been implemented successfully, particularly in information security, business ethics, safety, anti-discrimination, and environmental practices.

These actions materially support Aviapartner's objectives of ensuring safe, compliant, and high-quality ground handling, promoting employee empowerment, fulfilling stakeholder expectations, and advancing the company's digital and information security capabilities.

No material negative impacts related to training have been identified. Aviapartner continuously monitors its training practices to ensure they are inclusive, fair, and aligned with regulatory and ethical standards. In the absence of any reported or identified material harm, no specific remedial actions have been required.

In addition to the group trainings, a series of initiatives addressing local employee needs and priorities that go beyond job-specific skills are implemented through tailored initiatives across all countries (except for Germany). This is the case for instance in the following countries:

As part of the SA8000 certification requirements, training sessions were delivered in **Aviapartner Spain** during 2025, in addition to existing mandatory programmes. These include:

- > **Ergonomic Risk Assessment and Age Management** in collaboration with Ergo/IBV (50 hours) for occupational risk prevention staff (Health & Safety);
- > **Communication for Leadership** targeted at HQ Directors and Station Directors.

In addition to other initiatives, several additional training courses have been organised at Rome Fiumicino airport within **Aviapartner Italy** for supervisory staff (e.g. with the training of trainers ("Formazione Formatori") on: Digital Trainers, Talent Management, Benessere Organizzativo in Azienda on well-being, MS Power BI, Next Generation).

In the Netherlands, communication and leadership skills can be enhanced through the New Hero's Academy, a website where employees take short external training courses, such as: Dealing with Aggressive Behaviour, Transgressive Behaviour, Active Listening, Turning a No into a Yes, Listening Better, and Communication through Body Language.

4.6. ADDITIONAL METRICS RELATED TO OWN WORKFORCE

4.6.1. Characteristics of Aviapartner's employees (S1-6)

Aviapartner's workforce totals 9,349 employees and is distributed in the following way across the national entities:

Table 17: Aviapartner's employees by gender and country (HC)

EMPLOYEES (HC) BY GENDER AND COUNTRY	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP
Male	1,074	1,366	1,358	1,697	383	35	5,913
Female	473	655	914	1,059	312	23	3,436
Other	-	-	-	-	-	-	-
Not reported	-	-	-	-	-	-	-
Total	1,547	2,021	2,272	2,756	695	58	9,349

The following table shows the same view of Aviapartner's workforce, but in terms of full-time equivalents:

Table 18: Aviapartner's employees by gender and country (FTE)

EMPLOYEES (FTE) BY GENDER AND COUNTRY	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP
Male	1,002.37	1,092.56	1,276.1	1,318.77	268.02	33	4,990.82
Female	389.95	512.87	836.2	758.32	168.48	15	2,679.82
Other	-	-	-	-	-	-	-
Not reported	-	-	-	-	-	-	-
Total	1,391.32	1,605.43	2,112.3	2,077.09	436.5	48	7,670.64

The following table shows employees by contract type and gender in headcount:

Table 19: Aviapartner's employees by contract type and by gender (HC)

EMPLOYEES (HC) BY CONTRACT TYPE	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP
Number of permanent employees	1,459	1,490	1,867	2,146	291	57	7,310
Of which female	466	500	746	815	126	23	2,676
Of which male	993	990	1,121	1,331	165	34	4,634
Number of temporary employees	88	531	405	610	259	1	1,894
Of which female	7	155	168	244	95	0	669
Of which male	81	376	237	366	164	1	1,225
Number of non-guaranteed hours employees	0	0	0	0	145	0	145
Of which female	0	0	0	0	91	0	91
Of which male	0	0	0	0	54	0	54

This table shows the same information in full time equivalent:

Table 20: Aviapartner's employees by contract type and by gender (FTE)

EMPLOYEES (FTE) BY CONTRACT TYPE	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP
Number of permanent employees	1,306.87	1,255.12	1,772.3	1,746.42	240.39	48	6,369.1
Of which female	381.95	409.96	693.80	626.24	98.66	15	2,225.61
Of which male	924.92	845.16	1,078.5	1,120.18	141.73	33	4,143.49
Number of temporary employees	84.45	350.31	339.9	330.67	196.13	1	1,302.46
Of which female	7	102.91	142.3	132.08	69.84	0	454.13
Of which male	77.45	247.40	197.6	198.59	126.29	1	848.33
Number of non-guaranteed hours employees	0	0	0	0	0	1	1
Of which female	0	0	0	0	0	1	1
Of which male	0	0	0	0	0	0	0

It is important to note that the aviation sector is significantly influenced by seasonal fluctuations, and that these figures reflect the workforce as of the year-end reporting date.

Methodology and assumptions

The KPIs presented in tables 19, 20, 21 and 22 have been calculated based on the state of the total workforce on the 31st of December 2025 and are presented as both full time equivalents and headcounts. This KPI does not include non-employees, i.e. workers that are not on payroll such as subcontractors.

The following presents the number of employees who left the company during 2025, as well as the corresponding employee turnover rate. Turnover levels may be influenced by the inherent seasonality of the sector. This effect is particularly pronounced in Spain and France, where the majority of seasonal workers are employed directly on the payroll rather than engaged as temporary staff or subcontractors.

Table 21: Aviapartner employee turnover

EMPLOYEE TURNOVER (HC)	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY	CONSOLIDATED GROUP
Number of employees who have left the company	334	1,432	1,159	87	220	14	3,208
Employee turnover	22%	71%	51%	3%	32%	24%	34%

Methodology and assumptions

The data on employee turnover has been compiled based on information on the 31st of December 2025 and is reported as headcounts (HC) in line with internal HR systems. The % turnover has been calculated based on the total number of employees who have left during the reporting year divided by the total staff at the end of the year.

Although significant seasonal fluctuations mean that year-end figures may be less representative of the workforce over the full year, this approach was selected because it provides more reliable data given current data quality limitations.

This KPI does not include non-employees, i.e. workers that are not on payroll such as subcontractors.

4.6.2. Characteristics of Aviapartner's non-employees (S1-7)

The following table shows the number of non-employees within each country where Aviapartner is active at year end:

Table 22: Total number of non-employees

NON-EMPLOYEES (HC)	BELGIUM	SPAIN	FRANCE	ITALY	THE NETHERLANDS	GERMANY ³⁰	CONSOLIDATED GROUP
Total number of non-employees	147	0	113	0	172	-	432

Methodology and assumptions

Note that in France, only interims are taken into account, while in other countries these metrics may include other types of non-employees such as self-employed consultants, agency workers, etc.

Aviapartner does not publish further information on whether non-employees in own workforce are self-employed or provided by undertakings primarily engaged in employment activities due to data quality issues.

30. This data was not reported by Germany (see 2.1.1. General basis for preparation of the sustainability statement (BP-1)).



5. GOVERNANCE – BUSINESS CONDUCT (G1)



5.1. MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES RELATED TO BUSINESS ETHICS

The company's business ethics-related IROs concern the risk of **violations of its code of conduct and engagement in anti-competitive practices, alongside the opportunity to strengthen credibility and competitiveness** through sustainability-related certifications and responsible business conduct.

5.1.1. Business conduct policies and corporate culture (G1-1)

CORPORATE CULTURE

At Aviapartner, corporate culture is defined by six core company values³¹ that form the backbone of the company culture:

- > **Customer and Passenger Focus:** Customer satisfaction through the safe delivery of bespoke handling solutions. Partnerships and trust with airlines are the cornerstone of a growing organisation.
- > **Creativity:** Pioneering is considered the way to success. Active stimulation of new business ideas and practices. Aviapartner encourages a proactive and dynamic approach to ground handling solutions for its customers. New technologies form the backbone of an efficient and streamlined organisation.
- > **Competitiveness:** In an ever-changing environment, quality, safety, and customers come first. Aviapartner, together with its customers, actively seeks to identify new dynamic ways of approaching aircraft handling logistics, resulting in sustained competitive advantages.
- > **Quality & Safety:** Quality & Safety go hand in hand. Safety always comes first and is never compromised. New standards in quality handling processes and procedures are incorporated into daily activities. Certifications are drivers of the continuous improvement strategy.
- > **People's Business:** People make the difference. Commitment and flexibility, strong team spirit, dialogue, and mutual respect are the engines of the company. This is also the reason why training, job opportunities, dialogue, and respect for each other's work are so important within the company. These are the priorities when serving customers.
- > **Environmental Sustainability:** Investing in processes and technology which are key to ensuring environmental sustainability for generations to come is a commitment to the environment.

These values are embedded in the DNA of the company and reflect its approach to doing business. Gradually, the core values were rephrased, while a baseline and details to promote a common understanding were added to align them with the business and with stakeholder needs and expectations.

31. Further information on company values can be found here: <https://www.aviapartner.aero/company-values>

These commitments are included in onboarding training for all staff and are also communicated externally via the website, reinforcing Aviapartner's reputation as a responsible and trustworthy partner. Promotion and communication of corporate culture are often guided by core values and ethical standards. Several initiatives are linked to these values. However, at the moment, corporate culture is not formally evaluated at group level.

Integral to these values is a strong commitment to business ethics, which underpins every aspect of Aviapartner's operations. The company's **Code of Business Conduct and Ethics** sets clear expectations for honesty, integrity, and compliance with all applicable laws and regulations. Together with the **Antitrust and Competition Law Compliance Policy**, these two policies establish a comprehensive framework for ethical business conduct, legal compliance, and integrity across all company activities. This aligns with Aviapartner's commitment to conduct all activities in accordance with high standards of integrity and in compliance with all applicable laws and regulations. This ethical framework guides decision-making, fosters trust with stakeholders and ensures that all activities are conducted with transparency and accountability.

The **Code of Business Conduct and Ethics**³² articulates Aviapartner's commitment to honesty, integrity, and adherence to high ethical and legal standards. It publicly sets out the company's expectations regarding ethical behaviour for all directors, managers, and employees, including the avoidance of conflicts of interest, compliance with all applicable laws and regulations, and the prompt reporting of any violations. The policy prohibits bribery, corruption, fraud, and money laundering, and provides clear guidelines on gifts, events, sponsorships, and charity contributions, ensuring that such activities are transparent, proportionate, and in line with ethical standards. Confidentiality is emphasised, with employees required to protect sensitive information both during and after their employment. The policy applies to the entire Aviapartner Group, including all of its subsidiaries and other business entities controlled by it. This means it applies to all directors, managers, employees, and representatives of Aviapartner, as well as relevant third parties such as subcontractors and suppliers.

The **Antitrust and Competition Law Compliance Policy** reinforces Aviapartner's strict adherence to antitrust and competition laws. It outlines the prohibition of anti-competitive behaviour, such as collusion, market division, and the sharing of sensitive business information with competitors. The policy details the severe consequences of breaches, including fines, damages, criminal prosecution, and reputational harm. Employees are provided with clear dos and don'ts to ensure compliance, and are encouraged to seek guidance from the Legal Department when in doubt. The policy also addresses conduct during official investigations and emphasises the importance of continuous monitoring and regular training.

Both policies described above are considered part of every Aviapartner employment contract. Any behaviour that contravenes these standards is subject to disciplinary action, up to and including termination of employment.

32. Aviapartner's Code of Business Conduct and Ethics can be found on its website: <https://www.aviapartner.aero/resources/files/Aviapartner%20Code%20of%20Business%20Conduct%20and%20Ethics.pdf>

The **Whistleblowing Policy**³³ is directly linked to the above policies. It establishes the channels and procedures for reporting, receiving, and handling concerns about possible violations of Aviapartner's policies or the law. This policy aims to protect whistleblowers, providing mechanisms to report improper conduct, protect stakeholders, and promote ethical values. It covers a wide range of malpractice cases, including human rights issues, business ethics, environmental and safety concerns, discrimination, harassment, fraud, anti-competitive practices, and data protection breaches. The process includes multiple reporting channels, both local and central, and ensures confidentiality, protection against retaliation, and compliance with data protection laws to ensure thresholds for reporting are as low as possible. Reports are acknowledged within seven days and investigated, with feedback provided within three months. The policy mandates continuous monitoring, yearly reviews, and record-keeping, with specific safeguards to protect whistleblowers' identities and rights.

Aviapartner's Antitrust and Competition Law Compliance Policy and Whistleblowing Policy not only cover all employees of Aviapartner (even within the framework of an employment relationship that has already ended), but also **extend to third parties**, such as subcontractors, suppliers, customers, etc. who, in one way or another, are related to the company.

Additionally, Aviapartner has a dedicated **Supplier Code of Conduct**³⁴ that critical external suppliers and their employees must follow as a condition of doing business. The Supplier Code of Conduct requires full compliance with laws and regulations, respect for human and labour rights, environmental protection, and anti-corruption. Suppliers must ensure fair, non-discriminatory employment practices and safe and respectful workplaces, while prohibiting harassment and child or forced labour. They are also expected to support diversity, equal opportunity, and freedom of association. Environmental responsibility is central to this code, with suppliers required to align with Aviapartner's sustainability goals, minimise negative impacts, and promote continuous improvement. The code forbids bribery, improper payments, and anti-competitive behaviour, and obliges suppliers to report conflicts of interest and protect confidential information in line with data protection laws.

Suppliers are responsible for communicating these standards throughout their supply chain and providing confidential channels for reporting non-compliance. This code of conduct **covers mainly interim labour, subcontractors and suppliers** providing aircraft cleaning, ground support equipment renting and maintenance, transport and baggage services, including lost & found services, loading and unloading services, de- and anti-icing services and training. For ground support equipment and IT service providers, additional requirements may apply. The Supplier Code of Conduct is presented to suppliers for their approval during the onboarding process and is reviewed and signed every three years or whenever changes occur. Acceptance of the code is formalised through a signed agreement, underscoring the binding nature of these commitments.

In addition to complying with laws and regulations, the company's Code of Business Conduct and Ethics, its Antitrust and Competition Law Compliance Policy, its Whistleblowing Policy and its Supplier Code of Conduct are aligned with several recognised third-party standards and initiatives. The most important reference is **the United Nations Global Compact (UNGC)**, to which the company is a formal signatory. This commitment covers the UNGC's Ten Principles, which covers human rights, labour rights, environmental responsibility, and anti-corruption.

33. Aviapartner's Whistleblowing Policy can be consulted on its website: <https://www.aviapartner.aero/resources/files/Whistleblowing%20Policy.pdf>.

34. The Supplier Code of Conduct can be found on Aviapartner's website: <https://www.aviapartner.aero/resources/files/Aviapartner%20Supplier%20Code%20of%20Conduct.pdf>.

By implementing the Whistleblowing Policy and the Supplier Code of Conduct specifically, Aviapartner also respects international standards such as **ISO 14001 (Environmental Management)**, **ISO 45001 (Occupational Health And Safety)**, **ISO 9001 (Quality Management)**, and **SA8000 (Social Accountability)**³⁵, as these policies cover both internal and supply chain malpractice issues, including possible direct or indirect human rights issues, environmental and safety issues, and business ethics issues such as corruption and bribery.

Aviapartner's Code of Business Conduct and Ethics, its Whistleblowing Policy and its Supplier Code of Conduct are **publicly available on Aviapartner's corporate website**, ensuring accessibility to all external stakeholders, including suppliers, regulators, and partners. Internally, these policies are shared through the Aviapartner intranet. The Whistleblowing Policy, for instance, is easily available through a link on the homepage, and the policies are communicated in a central place. However, the **Antitrust and Competition Law Compliance Policy is only available through internal channels**.

The importance of business ethics is reflected in the inclusion of these principles, since 2021, in a **training course on Human Respect, Business Ethics and Compliance**, which was expanded from the governance bodies to a group of 449 staff members, a number that has increased year on year. This recurrent training, which focuses on Aviapartner's Code of Business Conduct and Ethics, its Antitrust and Competition Law Compliance Policy and its Whistleblowing Policy, is an important vehicle for communicating policies. The deployment of this training ensures that staff at risk of exposure to anti-competitive practices and violations of the code of conduct on gifts understand and uphold Aviapartner's standards of ethical behaviour.

Stakeholder feedback supports the continuous refinement of governance frameworks to strengthen ethical oversight and accountability. When setting policies such as Aviapartner's Code of Business Conduct and Ethics, its Antitrust and Competition Law Compliance Policy, its Whistleblowing Policy, and its Supplier Code of Conduct, Aviapartner actively considers the interests of key stakeholders. During the yearly context analysis, which includes a review of internal strengths and weaknesses and external opportunities and threats, the interests of different stakeholders are considered. For these policies, this concerns mainly the interests of the company itself, inspired by external stakeholders through market practice comparisons, regulators, certification and rating companies, United Nations' principles, and suppliers and customers, but can equally be inspired by internal stakeholders such as employees, unions, etc.

Within Aviapartner, the highest level of **accountability for the implementation of these key policies rests with the CEO**, who is supported by the directorship level of Aviapartner Group holding companies. Accordingly, the CEO holds ultimate responsibility for ensuring that Aviapartner's Code of Business Conduct and Ethics, its Antitrust and Competition Law Compliance Policy, its Supplier Code of Conduct, and its Whistleblowing Policy are effectively communicated, understood, and respected throughout the organisation.

This leadership is **further supported by the General Counsel**, who oversees the review and continuous improvement of these policies, and by Managing Directors in each country, who are responsible for ensuring that the policies are known and adhered to locally. This governance structure ensures that ethical standards, legal compliance, and integrity are embedded at every level of Aviapartner's operations.

35. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

Since 2021, **Aviapartner Spain** has implemented a structured procedure to ensure effective communication of the code and adherence by all employees by including this information within the employee handbook and ensuring national deployment of the training programme on Human Respect and Business Ethics, which covers, among other crucial topics, the fight against corruption and bribery.

At **Aviapartner France**, and in accordance with French legislation, a procedure for collecting and processing alerts has been put in place for entities employing at least fifty employees. This procedure defines how alerts can be reported and handled within Aviapartner, in line with Sapin II and the Wasserman law. An “alert” covers serious breaches of law or ethics (e.g. crime, corruption, violations of EU or national law, threats to health, safety, the environment, data protection, or the general interest), excluding individual labour disputes. Alerts can be reported internally or directly to external authorities. They are received, analysed, and investigated by designated internal officers, who ensure confidentiality, impartial review and timely follow up. These procedures are appended to the internal regulations of each entity. The internal regulations and the procedure for collecting and processing complaints are given to new employees upon hiring.

In addition to group policies, **Aviapartner Italy** also published the “Codice Etico - D.Lgs 231/2001” on its intranet. The Code of Ethics defines the set of ethical principles and values that inspire the companies of the Aviapartner Italia group in the conduct of their business. Italy identifies the rules of conduct that all those who work or collaborate with the group’s companies must observe to maintain the high image and reputation that Aviapartner has acquired and consolidated over the years. To develop skills and professional growth, increase its value, and maintain its competitiveness on the market, Aviapartner asks its internal staff, suppliers, and other stakeholders to share and comply with the provisions contained in this code. The Code of Ethics is an official document, approved by the directors of the group’s Italian companies. The provisions set forth therein form the foundations of the Organisational and Management Model adopted by the companies of the Aviapartner Italia Group. All directors, managers, employees, collaborators, consultants, suppliers, customers, commercial partners, and all those who, directly or indirectly, establish relationships with the companies of the Aviapartner Italia group, are obligated to comply with the provisions of Codice Etico.

In **the Netherlands**, the employee handbook explains, among other things, the Ethical Code of Conduct applied within Aviapartner Netherlands. It also includes definitions and standards regarding bullying and (sexual) harassment, along with information about the external confidential advisor bureau with which Aviapartner Netherlands collaborates. Any changes or additions to these policies are communicated to employees via internal email announcements. Furthermore, the employee handbook is reviewed and updated annually to ensure that all policies remain up to date and relevant.

FURTHER INFORMATION ON THE WHISTLEBLOWING PROCEDURE AND REPORTING CONCERNS³⁶

Aviapartner has established a framework to identify, report and investigate concerns related to unlawful behaviour or breaches of its Code of Conduct. The process is open to both internal and external stakeholders and is supported by the company's Whistleblowing Policy, which provides confidential reporting channels.

Aviapartner offers several **channels for whistleblowers to report violations** of the Code of Conduct, compliance issues, anti-competitive practices, and other incidents detailed in the Whistleblowing Policy. These include local reporting options established in each country, the external online "SD Whistle" tool provided at group level on the intranet (used in the Netherlands, Belgium, and Italy), and direct communication with management or the CEO.

Reports are reviewed promptly, usually within seven to 14 days, by designated Responsible Persons with oversight from the General Counsel. Investigations are impartial and may involve independent evaluators when required.

The "Just Culture" approach, which is a core element of the safety and compliance framework, encourages non-punitive reporting and supports openness, ensuring employees are encouraged to report incidents, hazards, and concerns without fear of reprisal. **Confidentiality and protection against retaliation** are ensured in line with EU Directive 2019/1937 and Law 2/2023 on the protection of informants. Anyone raising concerns in good faith is safeguarded against any form of retaliation, which is treated as a disciplinary offence. Disclosures are handled seriously and fairly. No action is taken against employees who act in the public interest, even if their allegation is not confirmed. However, malicious or frivolous reports may lead to disciplinary measures. Confidentiality clauses cannot be used to prevent reporting or penalise complainants. While reporting does not grant immunity for prior misconduct, voluntary disclosure, whereby employees willingly report their own mistakes proactively to support learning and improvement, may be taken into account.

To respect national laws and ensure inclusive access in different languages, management encourages employees to use locally defined channels. Reports are handled locally by appointed staff responsible for maintaining strict confidentiality and conducting immediate, thorough investigations.

Information about whistleblower channels is **communicated to all employees**. The principles of reporting and "just culture," in line with whistleblower protections, are included in basic safety training for all staff, focusing on local channels.

The Whistleblowing Policy and SD Whistle tool are also part of corporate training on Business Ethics, Human Respect, and Antitrust and Competition Law Compliance for approximately 450 key employees. Although the policy is applicable to everyone, **specific training** related to it is currently **directed at those functions identified as being most exposed to risks of corruption and bribery, known as "at-risk functions"**. This target group includes:

36. The whistleblowing policy can be found on Aviapartner's website: <https://www.aviapartner.aero/resources/files/Whistleblowing%20Policy.pdf>

1. The entire management population, consisting of Senior Management (i.e. governance bodies) as well as all other staff categorised as managers;
2. Employees in certain roles are included due to the nature of their responsibilities, notably Quality/Eco pilots, administrative personnel working in finance, accounting, or controlling, and staff within Human Resources.

These functions are considered more vulnerable to potential corruption or bribery exposure and are therefore prioritised for training. The definition of this at-risk group is reviewed regularly and is progressively being expanded to ensure that the exposed groups are gradually being included. The training is delivered yearly to governance bodies, and every three years to other staff included in this target group.

While no specific group-level training is mandated for local staff members, countries may organise their own.

At **Aviapartner Belgium**, the reporting channels on unlawful behaviour or breaches of the Code of Conduct are well established and regularly re-communicated to all staff, including through newsletters. In addition to the group-wide whistleblowing tool and procedure, Aviapartner Belgium provides access to both internal and external persons of confidence who can be contacted in cases of suspected or actual breaches of the Code of Conduct. In February 2025, three new persons of confidence were introduced to staff via the newsletter; these individuals are also trained on Aviapartner Group's policies and codes. In addition, two neutral persons are specifically designated to ensure close and impartial follow-up on whistleblower procedure cases.

At **Aviapartner Spain**, the promotion of a Just Culture is a core element of the safety and compliance framework, ensuring that employees are encouraged to report incidents, hazards, and concerns without fear of reprisal, provided there is no wilful misconduct or negligence. It provides full guarantees of confidentiality and protection against retaliation for employees to report serious concerns, including ethical breaches, misconduct, or regulatory violations. As part of this framework, tools such as the Aviapartner mailbox "Buzon" are available to all employees, providing a structured channel to submit complaints, report incidents, and propose improvements. The process includes defined investigation and follow-up procedures, ensuring that all reports are handled consistently and in line with corporate governance standards and European regulatory requirements. This mechanism enhances internal communication, supports organisational learning, and contributes to a transparent and responsible working environment. Aviapartner's whistleblowing process is applicable to all activities, including all subsidiaries in Spain. Aviapartner Spain's certification under the SGE21 Ethical and Socially Responsible Management System Standards ensures the integration of ethical, social, and governance principles into daily operations.

At **Aviapartner France**, employees are informed of the French alert collection and processing procedure upon hiring, with the procedure also available on the intranet. Concerns can also be reported directly to station managers by email. The alert procedure is linked to a dedicated email address and identifies the persons responsible for collecting and processing alerts, the actions a whistleblower must take to submit a report, and the guarantees of confidentiality and protection afforded to them. External stakeholders also have access to the Whistleblowing Policy via the Aviapartner website, which provides mechanisms to raise concerns about serious malpractice while being protected against retaliation.

In Italy, a supervisory committee named “Comitato di Vigilanza” has been appointed within the “Codice Etico” and is responsible for verifying, monitoring, and proposing improvements and updates to this code of ethics. The committee also takes all necessary measures to investigate possible fraud and corruption. Directors and personnel in the group companies are responsible for monitoring the concrete application of the Codice Etico and are required to report any violations or non-compliance to the Organismo di Vigilanza.

In addition to the group Whistleblowing Policy, the process in **the Netherlands** also includes local reporting options via email or direct communication with the relevant HR business partner, HR, or management, and the external online “SD Whistle” tool on the intranet. Furthermore, Aviapartner Netherlands consistently applies the “Just Culture” approach to all reports, ensuring that investigations are impartial and, when necessary, involve external independent evaluators such as the confidential advisors. Aviapartner Netherlands cooperates with an external confidential advisory office to strengthen independent and objective investigations within the company to strive for a fair and open environment in which incidents can be reported and investigated. The confidential advisors can be reached both by phone and by email.

5.1.2. Prevention and detection of corruption and bribery (G1-3)

Aviapartner has established comprehensive **procedures to prevent, detect, and address corruption and bribery** following the policies described in the previous section, the whistleblowing procedure and the training described above.

Training and awareness are key elements of prevention. As explained previously, the Corporate Training on Human Respect, Business Ethics and Compliance is mandatory every three years for a group of approximately 420 key staff, while the 30 governance bodies receive a yearly refresher. These sessions all focus on the content of the procedure, covering anti-corruption measures extensively. For instance, it outlines anti-corruption practices and policies with dos and don'ts on gifts and rewards, ensuring ethical interactions with third parties, in line with the Code of Business Conduct and Ethics, which requires modest gift values and mandates Group CEO approval for items exceeding 50 EUR.

With this training, the Aviapartner Code of Business Conduct and Ethics receives extensive and in-depth treatment. The e-learning course outlines the principles of honesty, integrity, and legal compliance expected from all employees, managers, and directors. The training covers the entire Code of Business Conduct Policy, presenting it as a central behavioural framework. It provides a structured overview of Aviapartner's key ethical and compliance policies, including Business Ethics and Whistleblowing policies. It combines policy explanations, practical expectations, concrete examples, and detailed behavioural guidance to ensure employees understand not only what the rules are, but how to apply them in daily situations. It goes beyond a high-level overview and provides detailed operational rules on conflicts of interest, mandatory reporting duties, and expected judgement in cases of uncertainty. It also offers comprehensive practical guidance on gifts, events, sponsorship and charity (defining limits, approval requirements, prohibited practices, and transparency obligations), ensuring the code is translated into clear, applicable rules rather than abstract values.

The percentage of staff who have completed training on Human Respect, Business Ethics, and Compliance is monitored by the Training Department in each country and reported to the head office.

Table 23: Number of employees receiving anti-corruption or anti-bribery training

ANTI-CORRUPTION OR ANTI-BRIBERY TRAINING	AT-RISK FUNCTIONS	ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES
Total employees in the target group	419	30
Total receiving training	268	24
Percentage covered by the training programme	64%	80%

Aviapartner's Whistleblowing Policy and process for reporting outcomes to administrative, management, and supervisory bodies include **a clear protocol for whistleblowing situations, particularly those involving suspected corruption or bribery**, and ensure that investigations into suspected corruption or bribery are handled independently, without involvement from those responsible for prevention and detection.

When an **initial investigation** suggests that a staff member may be involved in such an offence, the designated responsible person is required to promptly notify the company's highest leadership to ensure immediate action can be taken to prevent further harm or loss. Following this, a detailed report outlining the findings and conclusions of the investigation is prepared and submitted to the directorship or legal department. This ensures that all serious allegations, especially those related to anti-corruption or bribery, are escalated swiftly and transparently, allowing the organisation to address the issue at the highest level and maintain its commitment to ethical conduct and compliance.

In addition, **formal investigations** are overseen by two designated Responsible Persons (one from Human Resources and one from another department) from the country which receives the corruption or bribery report, or by the General Counsel if the report is received at group level. Depending on the nature of the report, an investigator with no ties to the case or the individuals involved is selected. If no suitable internal candidate is available, an external expert is appointed. This approach guarantees that the investigation remains impartial and is not influenced by the management chain tasked with preventing or detecting corruption or bribery.

Non-compliance with anti-corruption and anti-bribery rules will result in proportionate disciplinary measures, which may include termination of employment and referral to legal authorities, in line with Aviapartner's commitment to ethical conduct and regulatory requirements.

5.1.3. Targets related to business conduct

Aviapartner has set measurable, outcome-oriented targets to assess progress in the training and communication of its Code of Business Conduct and Ethics and its Antitrust and Competition Law Compliance Policy. These targets are relative and measure the number of persons within the predefined target group who have completed the training with the frequency applicable to them.

The overarching target is to ensure, every year, that **100% of the entire target group is trained on Human Respect, Business Ethics & Compliance**. For the majority of the target group, this means that at least every three years they need to redo the training to remain valid. However, for governance bodies in particular, the target is to ensure that 100% of members are trained every year on the Antitrust and Competition Law Compliance Policy, reflecting the heightened risk associated with their roles.

Targets were set while taking into account stakeholder expectations regarding policy training. The recurrent training frequency of every three years reflects industry standards adopted across Aviapartner training programmes in the absence of more stringent rules. For governance bodies, the more frequent annual training corresponds with the average cadence of management conferences.

Methodology and assumptions

The training target is designed to maintain a valid qualification of policy knowledge, which requires regular, recurrent training rather than one-off completion. While annual tracking of the percentage of staff trained is performed, the underlying assumption is that ongoing qualification is most relevant, as training does not occur simultaneously for all staff.

The **target group of at-risk functions** (comprising senior management, managers, quality/eco pilots, administrative personnel working in finance, accounting, and human resources staff) is translated at country level into a specific list of names, including staff exposed to risks of anti-competitive practices or non-compliance with the Code of Conduct. Moreover, the “at-risk” target group is expanded every year, and new employees are continuously included.

In parallel, the same training is provided with a yearly frequency to governance bodies, consisting of a predefined selection of managers. The target for this training is determined yearly by the CEO, and reflects the particular responsibilities and decision-making authority held by these groups in overseeing compliance with competition law.

At the end of 2025, only 64% of the total target group had completed the assigned training on Human Respect, Business Ethics and Competition Law. The target was missed due to the fact that the scope of the target group to be trained was considerably expanded during the year (increasing by >70% from 2024 to 2025) in order to implement the group’s requirements more consistently across all entities. It is expected that the staff who have been assigned the training as part of this expanded scope will complete training as required in the course of 2026.

5.1.4. Business ethics metrics and incidents of corruption or bribery (G1-4)

To evaluate the effectiveness of processes related to business ethics, Aviapartner systematically monitors both compliance and the risk of violations to the Code of Conduct, as well as the risk of anti-competitive practices. The company tracks the number of corruption incidents reported across its countries of operation, which serves as a direct indicator of exposure to anti-competitive behaviour and provides insight into the effectiveness of whistleblowing mechanisms.

The volume of whistleblowing reports is specifically used to assess the practical functioning of the whistleblowing policy, while the proportion of staff who have completed training on Human Respect, Business Ethics, and Compliance reflects the reach and impact of internal communication and training efforts. Further information on the anti-corruption or anti-bribery training and prevention process can be found in section 5.1.2 *Prevention and detection of corruption and bribery (G1-3)*.

To the best of Aviapartner’s knowledge, no fines for violation of anti-corruption and anti-bribery laws were incurred in 2025.

Table 24: Incidents of corruption or bribery

INCIDENTS OF CORRUPTION OR BRIBERY	2025
Number of convictions	0
Amount of fines	€0

Methodology and assumptions

The number of corruption and bribery incidents is collected manually and reported annually by each country of operation, as is the number of whistleblowing reports. These metrics provide valuable insight into the effectiveness of the company's compliance and ethics framework. However, certain limitations are inherent in these methodologies. There is a risk of underreporting, as not all incidents may be captured, and the integration of data from various sources may be incomplete.

The reliability of these metrics rests on two key assumptions: first, that the technical quality of the reporting systems ensures accurate and complete data capture; and second, that stakeholders are willing to report incidents. Both of these factors are shaped by privacy laws, such as the GDPR, which can influence how information is collected and the extent to which individuals feel comfortable reporting.

In addition, the company evaluates the robustness of its ethical standards among suppliers by monitoring the number of signed Supplier Codes of Conduct and by assessing suppliers on environmental and social topics through self-assessments, audits, and inspections. Supplier Codes of Conduct are registered in an internal database when signed, while assessments are registered in an internal audit software.

For these metrics, the limited assurance provider reviewed a selection of disclosure requirements included in the report, which are detailed in the assurance report. No external validation is performed beyond the assurance provider for the present sustainability statement.

5.1.5. Taking action on business conduct

As no impacts were considered material in respect to this topic, no specific remediation measures are needed. Nevertheless, the following two initiatives have been implemented at Aviapartner Group level on a needs-basis, whenever processes are refined, but are not part of a structured action plan.

In 2025, the **content of the Corporate Training on Human Respect, Business Ethics and Competition Law was revised** to include the external online whistleblowing tool and ensure governance bodies and key staff in the target group for this training are aware of the risks of violations to the Code of Conduct and uncompetitive practices, as well as the existing remediation channels. The update to this training affects all profiles across the groups subject to this mandatory training.

In addition, in January 2025, the **Supplier Code of Conduct was revised** based on an updated Environmental Policy published in December 2024, along with new requirements on Information Security, Personal Data Protection and access control audits for ICT suppliers. These updates were communicated to internal stakeholders via internal channels and published on the website for external stakeholders. The update to this policy applies to the whole Aviapartner Group.

In addition, specific actions have been taken at the local level.

In Belgium, the Corporate Training on Human Respect, Business Ethics and Competition Law has been included in the revised Training Plan for both 2025 and 2026. A close follow-up is organised by the Training Manager Ground Handling and Cargo. Currently, an effort is underway to extend this training to Key Staff, such as all HR employees, in addition to the existing requirement, e.g. Senior Management and management. This expansion is planned for 2026, ensuring that the identified gap will be fully closed. As for the Supplier Code of Conduct, all suppliers, with a particular focus on critical ones, are assessed as part of a recurring review process to confirm whether they have signed the Supplier Code of Conduct.

In 2025, **Aviapartner Italy** assigned the mandatory training to HR, Administration and a number of managers who had previously not completed the training. The situation is being closely monitored in order to fill in all gaps by first quarter 2026.

In France, the Training Department regularly sends reminder emails to ensure that all relevant individuals are up to date on the training modules. The training department sends a reminder through the email alert system managed by the security department and conducts monthly monitoring with the stations.

In 2025, **Aviapartner Netherlands** planned for key staff to complete the mandatory training on Human Respect, Business Ethics, and Competition Law for 2026. In addition, the number of signed Supplier Codes of Conduct is closely monitored, and the signed documents are registered in internal databases.

For its part, **Aviapartner Spain** will complete a training analysis before the end of first quarter 2026.



5.2. MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES RELATED TO CYBERSECURITY AND DATA PRIVACY

The company's digital risk-related IROs concern its exposure to **cybersecurity threats and data breaches**, which may disrupt operations, compromise sensitive information, and result in legal, financial, and reputational consequences, requiring robust information security and risk management measures.

5.2.1. Cybersecurity and data privacy policies

Aviapartner's Information Security Policy aims to protect the confidentiality, integrity, and availability of company information, with a strong emphasis on data privacy and cybersecurity. The policy addresses material risks such as unauthorised access, data breaches, and compliance with General Data Protection Regulation (GDPR) by establishing clear controls and responsibilities for all personnel.

The Information Security Policy was implemented in accordance with the international ISO27001 standard on information security. Cybersecurity threats are managed through regular training, incident reporting procedures, and a structured Information Security Management System (ISMS) aligned with ISO/IEC 27001:2022.

The **Information Security Policy** covers all information security activities group-wide, applying to anyone accessing or using Aviapartner information or IT systems, on-site or remotely, and extends across the value chain and all operational geographies. Exclusions are limited to activities outside Aviapartner's control or unrelated to information processing.

The effectiveness of the policy is monitored through continuous system oversight, audits, and annual reviews, ensuring ongoing improvement and resilience against evolving risks. The Information Security Policy is formally reviewed at least annually as part of the ISMS management review cycle, and additionally on an ad-hoc basis following significant changes in risk, regulatory requirements, or security incidents.

Aviapartner's General Privacy Policy sets out the principles and safeguards for processing personal data in compliance with the GDPR. The policy's main objective is to ensure that all personal data is handled lawfully, fairly, and transparently, protecting the rights and privacy of individuals whose data is processed during business activities. The General Privacy Policy contains information required by the GDPR, covering the principles for processing personal data, information on personal data processed by Aviapartner (legal grounds, possibly sensitive data), the rights of data subjects, data retention, and transfers of personal data to other parties inside and outside the European Economic Area (EEA). The policy addresses material risks such as unauthorised access, data breaches, and non-compliance with privacy laws by requiring strict adherence to data protection principles, including data minimisation, accuracy, and purpose limitation.

Technical and organisational measures are implemented to prevent unauthorised or unlawful processing and accidental loss or damage. All GDPR incidents are reviewed and documented on an ongoing basis, and data breach management procedures require immediate reporting and investigation, typically within 24 to 72 hours depending on severity. Policy communication and updates are provided to relevant stakeholders when applicable to ensure that all data and cybersecurity actions are implemented and monitored within defined timeframes, supporting continuous compliance and risk management.

This is complemented by privacy notices for employees and for job applicants, and by a website privacy policy, which all provide further details about the actual data processing taking place.

The most senior person accountable for both the General Privacy Policy and the Information Security Policy at Aviapartner is the Chief Executive Officer (CEO). While operational responsibilities are delegated to roles such as the Data Protection Coordinator and the Information Security Officer, ultimate accountability for the implementation and effectiveness of these policies resides with the CEO. Monitoring and enforcement of this policy is overseen by the Data Protection Coordinator, with regular training for staff, clear procedures for handling data subject rights and breaches, and ongoing review and updates to ensure continued compliance and effectiveness.

Aviapartner's **General Privacy Policy** applies to all personal data processing by Aviapartner Holding NV and its affiliates, covering every business activity, department, and location, including upstream and downstream value chain interactions with employees, applicants, customers, suppliers, and partners. It governs all personal data handling, including cross-border transfers, wherever Aviapartner operates.

The interests of customers, employees, and business partners regarding data protection were considered in the design of the General Privacy Policy. Engagement with stakeholders includes regular consultations, feedback mechanisms, and alignment with industry standards to ensure that expectations for confidentiality, transparency, and regulatory compliance are addressed. In addition, the Data Protection Coordinator is available for queries, questions, and complaints for all data subjects, and ensures Aviapartner's legal obligations with regard to these queries and complaints are met.

Aviapartner ensures that the General Privacy Policy and the Information Security Policy are **accessible to all relevant internal and external stakeholders** through structured internal and external communication channels such as the Aviapartner intranet and websites.

The General Privacy Policy and employee privacy notices are communicated through the intranet; the job applicant privacy notices are made available on the jobs portal (and must be accepted by job applicants); and the website privacy policy and cookie notice is communicated on the Aviapartner websites³⁷.

5.2.2. Targets related to cybersecurity and data privacy

Aviapartner has not yet formally defined measurable, outcome-oriented, and time-bound targets within its Information Security Policy or General Privacy Policy.

In practice, Aviapartner aims to have **100% of all stations certified for the international ISO27001 standard on information security by the end of 2026**. This new ambition was introduced in 2025 in line with stakeholder expectations such as rating agencies and EcoVadis assessment. Progress is tracked through gap analysis, policy and process alignment, staff training, and completion of the certification audit. Interim milestones include the completion of the gap analysis and risk assessment in Q2 2025, full policy and process alignment by Q4 2025, and the external certification audit scheduled for 2026. Though the certification process is currently on track, the target has not yet been reached.

Progress towards ISO/IEC 27001 certification is monitored through quarterly reviews by the Information Security Steering Committee.

37. Further information is available here: <https://www.aviapartner.aero/privacy-cookie-notice>

The scope of the ISO/IEC 27001 certification process in particular includes all core business units and supporting functions within Aviapartner, covering all operational geographies and relevant information assets. The certification process encompasses the entire information security management system (ISMS), including people, processes, and technology, and extends to interactions with key suppliers and partners where applicable.

These operational ambitions support the policy objectives of ensuring lawful, fair, and transparent data processing, as well as safeguarding information confidentiality, integrity, and availability.

5.2.3. Metrics related to cybersecurity and data privacy

General key performance indicators in this topic include completion of certification gap analysis, closure of identified non-conformities, staff training rates, and successful completion of internal and external audits. However, the main metrics used by Aviapartner to evaluate performance and effectiveness regarding data privacy and cybersecurity are the following:

- > The percentage of employees trained in the GDPR and cybersecurity;
- > The number of GDPR reports (data breaches) and cybersecurity incidents.

A **GDPR training course** is offered as part of the overall information security training programme. The metrics related to the percentage of employees trained in the General Data Protection Regulation (GDPR) measure the percentage of a selected target group, which consists of employees who have successfully completed the Aviapartner “GDPR” e-learning in the last three years. The company pursues objectives such as 100% GDPR training coverage for targeted workers and full review and documentation of all GDPR incidents. Progress is monitored through training records and incident management.

The percentage of **employees trained in cybersecurity** measures the percentage of employees who have successfully completed a predefined number of Information Security Sessions covering various topics via e-learning during 2025. Successful completion of each e-learning is subject to a test with a minimum pass rate of 80%.

The number of **GDPR reports** (personal data breaches) **and cybersecurity incidents**, including their follow-ups, are continuously monitored internally through the systems.

The target group for these KPIs includes both Aviapartner staff and self-employed/contracted staff with access to Aviapartner mail accounts.

The methodology used for these metrics is currently not formally described in the company’s “General Privacy Policy” and “Privacy Notice for Employees”.

These metrics are reviewed annually as part of the Information Security Management System (ISMS) cycle. The scope explicitly covers the alignment of information security practices with ISO/IEC 27001:2022 standards across Aviapartner’s operations. The methodology for these metrics will be formally documented in future updates to the General Privacy Policy and Privacy Notice for Employees.

The Data Protection Coordinator function is outsourced to an external company, and as such has a degree of independence, allowing an objective validation. However, no other external validations are performed for GDPR metrics.

The metrics demonstrating the risks linked to cybersecurity threats and to data breaches are communicated to external bodies such as the United Nations Global Compact, which Aviapartner has endorsed since 2021, and assessed during certification audits such as the international Quality Management standard ISO9001, with certifications in select stations across all countries within the reporting scope. Rating companies, such as EcoVadis, IntegrityNext and the TIACA Blue Sky sustainability rating for cargo handling companies, also assess these metrics.

For **Aviapartner Spain** specifically, the metrics are also validated by the SA8000 Standard – Social Accountability International (SAI) and the SGE21 Ethical and Socially Responsible Management System Standards developed by Forética.³⁸

5.2.4. Taking action on cybersecurity and data privacy

Aviapartner ensures the protection of data and digital assets through a structured Information Security Management System (ISMS), governed by formal policies and overseen by the Information Security Steering Committee. These efforts safeguard operational integrity and stakeholder trust.

In 2025, progress was made on data privacy and cybersecurity. Aviapartner tracks all GDPR and cybersecurity training coverage for key personnel, and all GDPR incidents are reviewed and documented, with actions taken as needed.

In the course of the reporting year, Aviapartner implemented the following actions at group level:

- > **Deployment of Managed Detection and Response (MDR) services across core infrastructure, enhancing real-time threat detection and incident response capabilities:** Managed Detection and Response services are deployed across Aviapartner core IT infrastructure and centrally monitored, providing continuous threat detection and coordinated incident response.
- > **Execution of periodic internal audits and risk assessments to validate control effectiveness and identify improvement areas:** Periodic information security risk assessments are performed as part of the ISMS risk management lifecycle, with risks, control effectiveness and improvement actions documented and tracked. Internal ISMS audits are scheduled as part of the ISO/IEC 27001 certification and maintenance cycle to assess conformity, maturity, and effectiveness of controls. In addition, technical control effectiveness is validated through periodic penetration testing of infrastructure and systems, with identified findings remediated and followed up on.
- > **Delivery of cybersecurity and data protection training to all employees, with a target of 100% annual GDPR coverage:** Mandatory cybersecurity training is in place for all employees, with annual refreshers. Coverage is tracked centrally with the objective of full (100%) annual completion.
- > **Strengthening of data governance through revised access controls, encryption protocols, and retention standards:** Data governance has been strengthened through the implementation of role-based access controls, data classification rules, and encryption of data at rest and in transit. Data retention standards are defined and applied in line with legal, regulatory, and business requirements. Data protection measures, including targeted data loss prevention controls for sensitive information, support the enforcement of these governance rules. This activity is implemented and subject to continuous improvement.

38. For further information on entities certified, please refer to 6.3 *List of certification coverage*.

- > **Integration of cybersecurity oversight into business continuity planning and ESG risk management:** Cybersecurity risks have been implemented and integrated into business continuity management.
- > **Ongoing alignment of the ISMS with ISO/IEC 27001:2022 requirements, with the objective of achieving certification for core business units.** The Information Security Management System (ISMS) defines the framework by which Aviapartner governs, implements, operates, monitors, and continually improves information security. The ISMS applies to information systems, information processing, and supporting processes used to deliver aviation ground handling and related services across the organisation. This includes comprehensive policy updates, risk assessments, and preparation for external audits. The gap analysis was completed as planned in Q2 2025. The risk assessment was finalised in Q4 2025 as part of the ISMS risk management process. Additionally, full alignment of policies and processes was achieved in Q4 2025, with the ISMS aligned to ISO/IEC 27001:2022 and operating under a continuous improvement model.

As of end 2025, Aviapartner is on track with policy alignment and staff training milestones.

Implementation is led by the IT department, the Information Security Office, and an external Data Protection Office, with support from business units. Data protection relies on the technical and organisational security controls implemented by cybersecurity for the protection of personal data.

These actions apply to all Aviapartner entities and digital operations globally, encompassing employees, partners, and supplier data. They cover all business units and geographies, ensuring consistent cybersecurity and data governance across the organisation and its value chain, including employees, contractors, customers, suppliers, airport partners, unions, and communities. Regular audits and compliance reviews ensure that coverage remains robust and is updated in response to emerging risks.

Progress is regularly monitored through audits and compliance reviews, and policies and procedures are continuously improved based on lessons learned and feedback from prior periods. Progress is reported to executive management and will be publicly disclosed upon certification.

These actions are expected to improve detection and response times for security incidents, enabling the organisation to react more effectively to potential threats. In addition, employee awareness will be strengthened, leading to a reduction in vulnerabilities caused by human factors. Finally, these efforts will contribute to enhanced compliance with key regulatory and standard requirements, such as for ISO 27001 and the GDPR.

6. APPENDIX



6.1. LIST OF ENTITIES COVERED BY THE SUSTAINABILITY STATEMENT

6.1.1. Fully consolidated entities that are part of the sustainability statement

ENTITY ID	NAME OF THE ENTITY	COUNTRY	% OF CAPITAL HELD
BE0788562884	Aviapartner Genav Brussels BV	Belgium	100%
BE0643921632	Aviapartner Group Shared Services NV	Belgium	100%
BE0432388386	Aviapartner Holding NV	Belgium	100%
BE0777848344	Aviapartner Liège PAX SRL	Belgium	100%
BE0449093172	Aviapartner Liège S.A.	Belgium	100%
BE0428763358	Aviapartner NV	Belgium	100%
BE0832301273	Aviapartner Ostend NV	Belgium	100%
BE0694760619	Aviation Ground Handling Services SA	Belgium	100%
BE0788860220	Aviation Tuscany SRL	Belgium	100%
BE0404529392	Aviapartner Belgium N.V.	Belgium	100%
BE0563910290	Aviapartner Cargo N.V.	Belgium	100%
FR48453002719	Aviapartner Academy France SAS	France	100%
FR48901599589	Aviapartner Executive SAS	France	100%
FR14445180078	Aviapartner La Rochelle SAS	France	100%
FR17380502419	Aviapartner Lille SAS	France	100%
FR96879601169	Aviapartner Lounge Paris SAS	France	100%
FR87388007882	Aviapartner Lyon SAS	France	100%
FR44344830872	Aviapartner Marseille SAS	France	100%
FR20520077660	Aviapartner Merignac SAS	France	100%
FR19803843432	Aviapartner Montpellier SAS	France	100%
FR01404953721	Aviapartner Nantes Atlantique SAS	France	100%
FR27957809627	Aviapartner Nice SAS	France	100%
FR82911539740	Aviapartner Orly Airside SAS	France	100%
FR47911900827	Aviapartner Orly Landside SAS	France	100%
FR50904630290	Aviapartner Orly SAS	France	100%
FR36379250996	Aviapartner SAS	France	100%
FR73491636825	Aviapartner Toulouse SAS	France	100%
FR85534205570	Fueling Partner SAS	France	100%
FR95480352111	Maintenance Partner SAS	France	100%
DE288767766	Aviapartner Hannover GmbH	Germany	100%
DE274876921	Aviapartner Holding Deutschland GmbH	Germany	100%
IT10064001000	Alirent IT SRL	Italy	81%

IT06192701008	Argos VIP Private Handling S.R.L	Italy	94%
IT05891411000	Aviapartner Handling S.p.A	Italy	100%
IT09070271003	Aviapartner Italia S.R.L.	Italy	100%
IT04038020873	Aviapartner Palermo S.R.L	Italy	100%
IT05696821007	Aviapartner S.p.A	Italy	100%
IT11199871002	Aviapartner Sicily S.R.L	Italy	100%
IT06192701008	Societa della Consulta S.p.A	Italy	81%
NL897879368B01	Aviapartner BV	The Netherlands	100%
ESA10958486	Aviapartner Alicante SA	Spain	100%
ESA10958494	Aviapartner Aviavip Spain SA	Spain	100%
ESA10957132	Aviapartner Barcelona SA	Spain	100%
ESA10958528	Aviapartner Bilbao SA	Spain	100%
ESA87307435	Aviapartner Fuerteventura S.A	Spain	100%
ESA87307393	Aviapartner Girona S.A	Spain	100%
ESA10958874	Aviapartner Grupo Canario SA	Spain	100%
ESA87754081	Aviapartner Ibiza FBO S.A	Spain	100%
ESA10958510	Aviapartner Ibiza SA	Spain	100%
ESA87307401	Aviapartner Lanzarote S.A	Spain	100%
ESA10957140	Aviapartner Madrid SA	Spain	100%
ESA87307377	Aviapartner Malaga FBO S.A	Spain	100%
ESA87307377	Aviapartner Malaga Handling S.A.	Spain	100%
ESB57130296	Aviapartner Menorca FBO S.L.U	Spain	100%
ESA87307211	Aviapartner Menorca S.A	Spain	100%
ESA88515408	Aviapartner Palma de Mallorca FBO S.A.	Spain	100%
ESA87307369	Aviapartner Sevilla S.A	Spain	100%
ESA87100608	Aviapartner Spain S.A.	Spain	100%
ESA87307443	Aviapartner Tenerife S.A	Spain	100%
ESA10958502	Aviapartner Valencia SA	Spain	100%
ESA10958866	AviaVIP FBO Barcelona SA	Spain	100%
ESA10957124	AviaVIP FBO Madrid SA	Spain	100%

6.1.2. Entities not part of the sustainability statement

While most operational entities are included, joint ventures that are not fully consolidated are not considered in the sustainability statement. In addition, due to the expansion in 2025 of Aviapartner's international activities, the company is working on integrating those activities and is implementing processes and procedures to identify, collect and process sustainability reporting data for these new entities, which are therefore not yet included in this 2025 sustainability statement. This therefore creates non-material discrepancies with the financial statement.

ENTITY ID	NAME OF THE ENTITY	COUNTRY	% OF CAPITAL HELD
DZ00231605206464	Algeria Ground Handling Aviapartner SPA	Algeria	47%
AO5001945785	Aviapartner Angola LDA	Angola	100%
BF00046324H	Aviapartner Aeroflight S.A.R.L	Burkina Faso	74%
BG203078789	Omega Aviation Ltd	Bulgaria	60%
FR75400578399	Strasbourg Handling SAS	France	25%
FR23942111469	Aviavip Heliservices SAS	France	100%
DE812562114	Aviapartner GmbH	Germany	100%
DE288767740	Aviapartner Handling GmbH	Germany	100%
DE288767758	Aviapartner Handling Services GmbH	Germany	24%
DE260960453	Aviapartner Services GmbH	Germany	100%
EL802139972	Aviapartner Greece Single Member SA	Greece	100%
NL807879368B01	Aviapartner Schiphol BV	The Netherlands	100%
ZA4770134494	Colossal Aviapartner (RF) Limited	South Africa	50.03%

6.2. DISCLOSURE REQUIREMENTS COMPLIED WITH IN ITS SUSTAINABILITY STATEMENTS (ESRS 2 IRO-2)

6.2.1. List of disclosure requirements complied with

Impacts, risks, and opportunities were mapped to the relevant ESRS topics and sub-topics to determine the required disclosures. Topics that could logically fit under multiple ESRS sections were positioned where they were most relevant in relation to Aviapartner's strategy, supported by cross-references when needed to preserve clarity and coherence across the disclosure.

For this first year of reporting, the focus was placed on mandatory data points. Seeing the simplification process occurring at the European level, voluntary requirements and phase-in provisions were deferred to ensure that efforts could be concentrated on establishing reliable data collection and strong overall reporting quality.

Alignment with other reporting initiatives, such as the UN Global Compact Communication of Progress and assessments such as EcoVadis assessment, was considered to avoid duplication of data collection efforts and ensure consistency in how information is presented externally.

In addition, local entities were also invited to identify national disclosure obligations that should be reflected in the Group report, to avoid overlapping reporting at country level. When such disclosures differ from ESRS definitions, contextual explanations are provided to maintain transparency and comparability.

STANDARD	STATUS	PARAGRAPH
General Disclosure		
ESRS2 BP-1	Material	2.1.1 General basis for preparation of the sustainability statement (BP-1)
ESRS2 BP-2	Material	2.1.2 Disclosures in relation to specific circumstances (BP-2)
ESRS2 GOV-1	Material	2.2.1 The role of administrative, management and supervisory bodies (GOV-1)
ESRS2 GOV-2	Material	2.2.2 Information provided to, and sustainability matters addressed by, the undertaking's administrative, management and supervisory bodies (GOV-2)
ESRS2 GOV-3	Material	2.2.3 Integration of sustainability-related performance in incentive schemes (GOV-3)
ESRS2 GOV-4	Material	2.2.4 Statement on due diligence (GOV-4)
ESRS2 GOV-5	Material	2.2.5 Risk management and internal controls over sustainability reporting (GOV-5)
ESRS2 SBM-1	Material	2.3.1 Strategy, business model and value chain (SBM-1)
ESRS2 SBM-2	Material	2.3.2 Interests and views of stakeholders (SBM-2)
ESRS2 SBM-3	Material	2.3.3 Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (SBM-3)
ESRS2 IRO-1	Material	2.4 Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)
ESRS2 IRO-2	Material	6.2 Disclosure requirements complied with in its sustainability statements. (ESRS 2 IRO-2)
ESRS2 MDR-P	Material	3.2.1 Policies related to climate change mitigation and energy (E1-2) 3.3.1 Policies related to climate change adaptation (E1-2) 4.1.1 Aviapartner's human rights policy 4.3.1 Policies related to health & safety (S1-1) 4.2.1 Policies related to working conditions (S1-1) 4.4.1 Policies related to diversity and inclusion (S1-1) 4.5.1 Policies related to training and career development (S1-1) 5.1.1 Business conduct policies and corporate culture (G1-1) 5.2.1 Cybersecurity and data privacy policies
ESRS2 MDR-A	Material	3.2.4 Taking action on climate change mitigation and energy (E1-3) 3.3.3 Taking action on climate change adaptation (E1-3) 4.2.6 Taking action on working conditions (S1-4) 4.3.4 Taking action on health & safety (S1-4) 4.4.4 Taking action on diversity (S1-4) 4.5.4 Taking action on training and career development (S1-4) 5.1.5 Taking action on business conduct 5.2. Taking action on cybersecurity and data privacy
ESRS2 MDR-M	Material	3.2.3 Climate-related metrics 4.3.3 Health & Safety Metrics (S1-14) 4.2.5 Metrics related to working conditions 4.4.3 Diversity metrics 4.5.3 Training and skills development metrics (S1-13) 5.1.4 Business ethics metrics and incidents of corruption or bribery (G1-4)
ESRS2 MDR-T	Material	3.2.2 Targets related to climate change mitigation and energy (E1-4) 3.3.2 Targets related to climate change adaptation (E1-4) 4.2.4 Targets related to working conditions (S1-5) 4.3.2 Targets related to health & safety (S1-5) 4.4.2 Targets related to diversity (S1-5) 4.5.2 Targets related to training and career development (S1-5) 5.1.3 Targets related to business conduct 5.2.2 Targets related to cybersecurity and data privacy

STANDARD	STATUS	PARAGRAPH
Climate Change		
ESRS2 GOV-3	Material	2.2.3 Integration of sustainability-related performance in incentive schemes (GOV-3)
ESRS2 SBM-3	Material	2.3.3 Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (SBM-3)
ESRS2 IRO-1	Material	2.4 Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)
ESRS E1-1	Material	3.1 Transition plan for climate change mitigation (E1-1)
ESRS E1-2	Material	3.2.1 Policies related to climate change mitigation and energy (E1-2) 3.3.1 Policies related to climate change adaptation (E1-2)
ESRS E1-3	Material	3.2.4 Taking action on climate change mitigation and energy (E1-3) 3.3.3 Taking action on climate change adaptation (E1-3)
ESRS E1-4	No target set	3.2.2 Targets related to climate change mitigation and energy (E1-4) 3.3.3 Taking action on climate change adaptation (E1-3)
ESRS E1-5	Material	3.2.3.1 Energy consumption and mix (E1-5)
ESRS E1-6	Material	3.2.3.2 Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6)
ESRS E1-7	Not applicable	N/A
ESRS E1-8	Not applicable	N/A
ESRS E1-9	Phase-in allowed	N/A
Pollution		
ESRS2 IRO-1	Not material	N/A
ESRS E2-1	Not material	N/A
ESRS E2-2	Not material	N/A
ESRS E2-3	Not material	N/A
ESRS E2-4	Not material	N/A
ESRS E2-5	Not material	N/A
ESRS E2-6	Not material	N/A
Water and Marine Resources		
ESRS2 IRO-1	Not material	N/A
ESRS E3-1	Not material	N/A
ESRS E3-2	Not material	N/A
ESRS E3-3	Not material	N/A
ESRS E3-4	Not material	N/A
ESRS E3-5	Not material	N/A
Biodiversity and Ecosystems		
ESRS E4-1	Not material	N/A
ESRS2 SBM-3	Not material	N/A
ESRS2 IRO-1	Not material	N/A
ESRS E4-2	Not material	N/A
ESRS E4-3	Not material	N/A
ESRS E4-4	Not material	N/A
ESRS E4-5	Not material	N/A
ESRS E4-6	Not material	N/A

STANDARD	STATUS	PARAGRAPH
Resource Use and Circular Economy		
ESRS2 IRO-1	Not material	N/A
ESRS E5-1	Not material	N/A
ESRS E5-2	Not material	N/A
ESRS E5-3	Not material	N/A
ESRS E5-4	Not material	N/A
ESRS E5-5	Not material	N/A
ESRS E5-6	Not material	N/A
Own Workforce		
ESRS2 SBM-2	Material	2.3.2 Interests and views of stakeholders (SBM-2)
ESRS2 SBM-3	Material	2.3.3 Material impacts, risks and opportunities (IROs) and their interaction with strategy and business model (SBM-3)
ESRS2 S1-1	Material	4.2.1 Policies related to working conditions (S1-1) 4.3.1 Policies related to health & safety (S1-1) 4.4.1 Policies related to diversity and inclusion (S1-1) 4.5.1 Policies related to training and career development (S1-1)
ESRS2 S1-2	Material	4.2.2 Processes for engaging with own workers and workers' representatives about impacts (S1-2 & S1-5)
ESRS2 S1-3	Material	4.2.3 Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)
ESRS2 S1-4	Material	4.2.6 Taking action on working conditions (S1-4) 4.3.4 Taking action on health & safety (S1-4) 4.4.4 Taking action on diversity (S1-4) 4.5.4 Taking action on training and career development (S1-4)
ESRS2 S1-5	Material	4.2.2 Processes for engaging with own workers and workers' representatives about impacts (S1-2 & S1-5)
ESRS2 S1-6	Material	4.6.1 Characteristics of Aviapartner's employees (S1-6)
ESRS2 S1-7	Material	4.6.2 Characteristics of Aviapartner's non-employees (S1-7)
ESRS2 S1-8	Material	4.2.5.1 Collective bargaining coverage and social dialogue (S1-8)
ESRS2 S1-9	Material	4.4.3 Diversity metrics
ESRS2 S1-10	Material	Not available for the first reporting year
ESRS2 S1-11	Phase-in allowed for the first year of reporting	4.2.5.2 Social protection (S1-11)
ESRS2 S1-12	Material	4.4.3.2 Persons with disabilities (S1-12)
ESRS2 S1-13	Material	4.5.3 Training and skills development metrics (S1-13)
ESRS2 S1-14	Material	4.3.3 Health & Safety Metrics (S1-14)
ESRS2 S1-15	Phase-in allowed for the first year of reporting	4.2.5.3 Work-life balance (S1-15)
ESRS2 S1-16	Material	Not available for the first reporting year
ESRS2 S1-17	Material	4.1.2 Incidents, complaints and severe human rights impacts (S1-17) 4.4.3.3 Incidents of discrimination (S1-17)

STANDARD	STATUS	PARAGRAPH
Workers in the value chain		
ESRS2 SBM-2	Not material	N/A
ESRS2 SBM-3	Not material	N/A
ESRS2 S2-1	Material	4.1.1 Aviapartner's human rights policy
ESRS2 S2-2	Not material	N/A
ESRS2 S2-3	Not material	N/A
ESRS2 S2-4	Not material	N/A
ESRS2 S2-5	Not material	N/A
Affected communities		
ESRS2 SBM-2	Not material	N/A
ESRS2 SBM-3	Not material	N/A
ESRS2 S3-1	Not material	N/A
ESRS2 S3-2	Not material	N/A
ESRS2 S3-3	Not material	N/A
ESRS2 S3-4	Not material	N/A
ESRS2 S3-5	Not material	N/A
Consumers and end-users		
ESRS2 SBM-2	Not material	N/A
ESRS2 SBM-3	Not material	N/A
ESRS2 S4-1	Not material	N/A
ESRS2 S4-2	Not material	N/A
ESRS2 S4-3	Not material	N/A
ESRS2 S4-4	Not material	N/A
ESRS2 S4-5	Not material	N/A
Business Conduct		
ESRS2 GOV-1	Material	2.2.1 The role of administrative, management and supervisory bodies (GOV-1)
ESRS2 IRO-1	Material	2.4 Description of the process to identify and assess material impacts, risks and opportunities (IRO-1)
ESRS2 G1-1	Material	5.1.1 Business conduct policies and corporate culture (G1-1)
ESRS2 G1-2	Not material	N/A
ESRS2 G1-3	Material	5.1.2 Prevention and detection of corruption and bribery (G1-3)
ESRS2 G1-4	Material	5.1.4 Business ethics metrics and incidents of corruption or bribery (G1-4)
ESRS2 G1-5	Not material	N/A
ESRS2 G1-6	Not material	N/A

6.2.2. List of datapoints in cross-cutting and topical standards that derive from other EU legislation

This table lists all data points that derive from other EU legislation:

DISCLOSURE REQUIREMENT AND RELATED DATAPPOINT	SFDR ⁽³⁹⁾ REFERENCE	PILLAR 3 ⁽⁴⁰⁾ REFERENCE	BENCHMARK REGULATION ⁽⁴¹⁾ REFERENCE	EU CLIMATE LAW ⁽⁴²⁾ REFERENCE	MATERIAL / NOT MATERIAL	PARAGRAPH REFERENCE
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13, Table #1, Annex 1		Commission Delegated Regulation (EU) 2020/1816 (43), Annex II		Material	2.2.1 The role of administrative, management and supervisory bodies (GOV-1)
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		Material	2.2.1 The role of administrative, management and supervisory bodies (GOV-1)
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10, Table #3, Annex 1				Material	2.2.4 Statement on due diligence (GOV-4)
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4, Table #1, Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (44) Table 1: Qualitative Information on Environmental Risk and Table 2: Qualitative information on social risk	Delegated Regulation (EU) 2020/1816, Annex II		Material	2.3.1 Strategy, business model and value chain (SBM-1)
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9, Table #2, Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Not Material	-

39. Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosures Regulation).

40. Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation "CRR").

41. Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014.

42. Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ("European Climate Law").

43. Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are reflected in each benchmark provided and published.

44. Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks.

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	SFDR ⁽³⁹⁾ REFERENCE	PILLAR 3 ⁽⁴⁰⁾ REFERENCE	BENCHMARK REGULATION ⁽⁴¹⁾ REFERENCE	EU CLIMATE LAW ⁽⁴²⁾ REFERENCE	MATERIAL / NOT MATERIAL	PARAGRAPH REFERENCE
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14, Table #1, Annex 1		Delegated Regulation (EU) 2020/1818 (45), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not Material	-
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not Material	-
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	Material	3.1 Transition plan for climate change mitigation (E1-1)
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12.1 (d) to (g), and Article 12.2		Material	3.1 Transition plan for climate change mitigation (E1-1)
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4, Table #2, Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		Material	3.2.2 Targets related to climate change mitigation and energy (E1-4)

45. Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks.

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	SFDR ⁽³⁹⁾ REFERENCE	PILLAR 3 ⁽⁴⁰⁾ REFERENCE	BENCHMARK REGULATION ⁽⁴¹⁾ REFERENCE	EU CLIMATE LAW ⁽⁴²⁾ REFERENCE	MATERIAL / NOT MATERIAL	PARAGRAPH REFERENCE
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5, Table #1 and Indicator n. 5, Table #2, Annex 1				Material	3.2.3.1 Energy consumption and mix (E1-5)
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5, Table #1, Annex 1				Material	3.2.3.1 Energy consumption and mix (E1-5)
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6, Table #1, Annex 1				Material	3.2.3.1 Energy consumption and mix (E1-5)
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2, Table #1, Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		Material	3.2.3.2 Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6)
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicator number 3, Table #1, Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Material	3.2.3.2 Gross Scopes 1, 2, 3 and Total GHG emissions (E1-6)
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Not applicable	-
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Phase-in allowed	-

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	SFDR ⁽³⁹⁾ REFERENCE	PILLAR 3 ⁽⁴⁰⁾ REFERENCE	BENCHMARK REGULATION ⁽⁴¹⁾ REFERENCE	EU CLIMATE LAW ⁽⁴²⁾ REFERENCE	MATERIAL / NOT MATERIAL	PARAGRAPH REFERENCE
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			Phase-in allowed	-
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34; Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Phase-in allowed	-
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Phase-in allowed	-
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8, Table #1, Annex 1 Indicator number 2, Table #2, Annex 1 Indicator number 1, Table #2, Annex 1 Indicator number 3, Table #2, Annex 1				Not material	-
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7, Table #2, Annex 1				Not material	-
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8, Table 2, Annex 1				Not material	-
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12, Table #2, Annex 1				Not material	-

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	SFDR ⁽³⁹⁾ REFERENCE	PILLAR 3 ⁽⁴⁰⁾ REFERENCE	BENCHMARK REGULATION ⁽⁴¹⁾ REFERENCE	EU CLIMATE LAW ⁽⁴²⁾ REFERENCE	MATERIAL / NOT MATERIAL	PARAGRAPH REFERENCE
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2, Table #2, Annex 1				Not material	-
ESRS E3-4 Total water consumption in m3 per net revenue on own operations paragraph 29	Indicator number 6.1, Table #2, Annex 1				Not material	-
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7, Table #1, Annex 1				Not material	-
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Indicator number 10, Table #2, Annex 1				Not material	-
ESRS 2- IRO 1 - E4 paragraph 16 (c)	Indicator number 14, Table #2, Annex 1				Not material	-
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11, Table #2, Annex 1				Not material	-
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12, Table #2, Annex 1				Not material	-
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15, Table #2, Annex 1				Not material	-
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13, Table #2, Annex 1				Not material	-
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9, Table #1, Annex 1				Not material	-
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13, Table #3, Annex 1				Material	2.3.3.2 Overview of Aviapartner's social material Impacts, Risks and Opportunities
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12, Table #3, Annex 1				Material	2.3.3.2 Overview of Aviapartner's social material Impacts, Risks and Opportunities

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	SFDR ⁽³⁹⁾ REFERENCE	PILLAR 3 ⁽⁴⁰⁾ REFERENCE	BENCHMARK REGULATION ⁽⁴¹⁾ REFERENCE	EU CLIMATE LAW ⁽⁴²⁾ REFERENCE	MATERIAL / NOT MATERIAL	PARAGRAPH REFERENCE
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9, Table #3 and Indicator number 11, Table #1, Annex I				Material	4.1.1 Aviapartner's human rights policy
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		Material	4.1.1 Aviapartner's human rights policy
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11, Table #3, Annex I				Material	4.1.1 Aviapartner's human rights policy
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1, Table #3, Annex I				Material	4.1.1 Aviapartner's human rights policy
ESRS S1-3 grievance/ complaints handling mechanisms paragraph 32 (c)	Indicator number 5, Table #3, Annex I				Material	4.2.3 Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2, Table #3, Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Material	4.3.3 Health & Safety Metrics (S1-14)
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3, Table #3, Annex I				Material	4.3.3 Health & Safety Metrics (S1-14)
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12, Table #1, Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Not disclosed	-
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8, Table #3, Annex I				Not disclosed	-

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	SFDR ⁽³⁹⁾ REFERENCE	PILLAR 3 ⁽⁴⁰⁾ REFERENCE	BENCHMARK REGULATION ⁽⁴¹⁾ REFERENCE	EU CLIMATE LAW ⁽⁴²⁾ REFERENCE	MATERIAL / NOT MATERIAL	PARAGRAPH REFERENCE
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7, Table #3, Annex I				Material	4.4.3.3 Incidents of discrimination (S1-17)
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10, Table #1 and Indicator n. 14, Table #3, Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Material	4.4.3.3 Incidents of discrimination (S1-17)
ESRS 2- SBM3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13, Table #3, Annex I				Not material	-
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9, Table #3 and Indicator n. 11, Table #1, Annex I				Not material	-
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4, Table #3, Annex I				Not material	-
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10, Table #1, Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	-
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Not material	-
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14, Table #3, Annex I				Not material	-
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9, Table #3, Annex I and Indicator number 11, Table #1, Annex I				Not material	-

DISCLOSURE REQUIREMENT AND RELATED DATAPOINT	SFDR ⁽³⁹⁾ REFERENCE	PILLAR 3 ⁽⁴⁰⁾ REFERENCE	BENCHMARK REGULATION ⁽⁴¹⁾ REFERENCE	EU CLIMATE LAW ⁽⁴²⁾ REFERENCE	MATERIAL / NOT MATERIAL	PARAGRAPH REFERENCE
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	Indicator number 10, Table #1, Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	-
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14, Table #3, Annex 1				Not material	-
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9, Table #3 and Indicator number 11, Table #1, Annex 1				Not material	-
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10, Table #1, Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	-
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14, Table #3, Annex 1				Not material	-
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15, Table #3, Annex 1				Not material	-
ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	Indicator number 6, Table #3, Annex 1				Not material	-
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17, Table #3, Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		Material	5.1.4 Business ethics metrics and incidents of corruption or bribery (G1-4)
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	Indicator number 16, Table #3, Annex 1				Material	5.1.4 Business ethics metrics and incidents of corruption or bribery (G1-4)

6.3. LIST OF CERTIFICATION COVERAGE

The table below provides an overview of the share of entities within the scope of this Sustainability Statement that are covered by selected management system and operational and sustainability certifications as of 31 December 2025. An entity is considered certified when at least one site, station or operation within the entity holds a valid certification under the relevant standard.

CERTIFICATION SYSTEM	ISO9001	ISO14001	ISO45001	ISO50001	ISAGO	IS-BAH	SCE21	SA8000	IATA-CEIV PHARMA	QUALIOPI	UNI PDR125	BREEAM	ISO56001	UNE16606	UNE16608
% Certified entities within the group ⁴⁶	57	55	49	2	73	69	37	16	2	2	2	2	2	2	2



46. On 31/12/2025, minimum 1 certified station within the operational entity or holding in the scope of this sustainability statement.

6.4. LIMITED ASSURANCE REPORT OF THE STATUTORY AUDITOR ON THE CONSOLIDATED SUSTAINABILITY STATEMENT OF AVIAPARTNER



AVIAPARTNER HOLDING N.V.

Sustainability information at
December 31, 2025

THE POWER OF BEING UNDERSTOOD
AUDIT | TAX | CONSULTING



AVIAPARTNER HOLDING N.V.

REPORT OF THE INDEPENDENT AUDITOR FOR THE YEAR ENDED DECEMBER 31, 2025 TO THE ATTENTION OF AVIAPARTNER HOLDING N.V.

SCOPE

We have been engaged by Aviapartner Holding N.V. to perform a 'limited assurance engagement', hereafter referred to as "the Engagement", to report on certain consolidated sustainability information of Aviapartner Holding N.V. (the "Company") as listed in Appendix 1 (the "Subject Matter") and as included in the sustainability report 2025 (the "Report") for the period from 1 January 2025 to 31 December 2025.

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

CONCLUSION

Based on review, nothing has come to our attention that make us believe that the Subject Matter of Aviapartner Group, as listed in Appendix 1, and as included in the Report for the period from 1 January 2025 to 31 December 2025, was not prepared, in all material respects, in accordance with the Criteria.

CRITERIA APPLIED BY AVIAPARTNER

In preparing the consolidated sustainability information as listed in Annex 1 of the Report, Aviapartner Holding NV applied the ESRS standards (on a voluntary basis, excluding intensity metrics) and the Greenhouse gas protocol, (the "Criteria").

BASIS FOR CONCLUSION

We conducted our limited assurance engagement in accordance with the International Standard on Assurance Engagements 3000 (Revised) "Assurance Engagements other than Audits or Reviews of Historical Financial Information" (ISAE 3000), published by the International Auditing and Assurance Standards Board. This standard requires that we plan and perform our Engagement to obtain limited assurance about whether, in all material respects, the Subject Matter is presented in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error

Our engagement has been carried out in compliance with the legal requirements in respect of auditor independence, particularly in accordance with the rules set down in the Belgian Act of 7 December 2016 organizing the audit profession and its public oversight of registered auditors, and with other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm also applies the International Standard on Quality Management 1. Quality Control for Firms that Perform Audits and Other Reviews of Financial Statements, and Other Assurance and Related

AUDIT | TAX | CONSULTING

RSM Belgium is a member of the RSM network and trades as RSM. RSM is the trading name used by the members of the RSM Network. Each member of the RSM network is an independent accounting and consulting firm which practices in his own right. The RSM network is not itself a separate legal entity in any jurisdiction.

RSM InterAudit BV-SRL - registered auditors - -- Registered office : Lozenberg 18 - B 1932 Zaventem
audit@rsmbelgium.be - VAT BE 0436.391.122 - RLP Brussels .

Member of RSM Toelen Cats Dupont Koevoets - Offices in Aalst, Antwerp, Liège, Charleroi, Mons and Zaventem

Services Engagements, and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

Aviapartner Holding's responsibilities

Aviapartner Holding's management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with the Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the Subject Matter, such that it is free from material misstatement, whether due to fraud or error.

Our responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Subject Matter and related information and applying analytical and other appropriate procedures.

Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

Our procedures included amongst other:

- ▶ Obtaining an understanding of the reporting processes for the Subject Matter;
- ▶ Evaluating the consistent application of the Criteria;
- ▶ Interviewing relevant staff at local level responsible for data collection, reporting and calculation of the Subject Matter;
- ▶ Interviewing management and relevant staff at corporate level responsible for consolidating and carrying out internal control procedures on the Subject Matter;
- ▶ Determining the nature and extent of the review procedures for each of the locations contributing to the Subject Matter.
- ▶ Obtaining information that the Subject Matter reconciles with underlying records of the Company;
- ▶ Evaluating, on a limited test basis, relevant internal and external documentation;
- ▶ Performing an analytical review of the data and trends in the Subject Matter for consolidation at corporate level and the data reported by the sites;
- ▶ Evaluating the overall calculation of the Subject Matter.

We also performed such other procedures as we considered necessary in the circumstances.

ANNEX 1

Our assurance engagement covers the following information:

- ▶ Double materiality assessment
- ▶ ESRS 2
 - ▶ BP1
 - ▶ BP2
 - ▶ GOV1
 - ▶ GOV2
 - ▶ GOV4
 - ▶ GOV5
 - ▶ SBM1
 - ▶ SBM2
 - ▶ SBM3
 - ▶ IRO1
 - ▶ IRO2
- ▶ ESRS E1
 - ▶ E1-2
 - ▶ E1-3
 - ▶ E1-5
 - ▶ E1-6
- ▶ ESRS S1
 - ▶ S1-1
 - ▶ S1-2
 - ▶ S1-3

- ▶ S1-4
- ▶ S1-5
- ▶ S1-6
- ▶ S1-9
- ▶ S1-14
- ▶ S1-17
- ▶ ESRS G1
 - ▶ G1-1
 - ▶ G1-3

Zaventem, June 26th, 2026

**Déborah
Fischer**

Digitally signed by Déborah Fischer
DN: cn=Déborah Fischer ou=Users
e=d.fischer@rsmbelgium.be
Reason: I am the author of this
document
Location:
Date: 2026-06-26 17:53+02:00

RSM INTERAUDIT SRL
Registered Auditors

Represented by
Deborah Fischer
Partner

ACKNOWLEDGEMENTS

We would like to express our sincere gratitude to all those who contributed to the preparation of this Sustainability Report.

Special thanks to:

- > All Subject Matter Experts across the countries for their expertise and valuable contributions to this report.
- > The Ngage team for their guidance and support throughout the reporting process.
- > Aviapartner teams across all stations for providing data and insights.
- > All colleagues who shared their expertise and commitment to sustainability.
- > EU-turn for design and layout support.

Your collaboration and dedication made this report possible.

IMPRINT & LEGAL NOTICE

Publisher

Aviapartner Holding NV
Luchthaven Brussel Nationaal
1930 Zaventem
Belgium
www.aviapartner.aero

Contact for Report

Eva Vanallemeersch
VP Quality & Environment

Design & Layout

EU-turn

Year of Publication

2026

Legal Disclaimer

This Sustainability Report has been prepared by **Aviapartner** for informational purposes only. While every effort has been made to ensure the accuracy and completeness of the information contained herein, Aviapartner makes no representations or warranties, express or implied, as to the accuracy, reliability, or completeness of the information.

This report may contain **forward-looking statements**, including goals, targets, and projections. These statements are based on current expectations and assumptions and are subject to risks and uncertainties that could cause actual results to differ materially. Aviapartner undertakes no obligation to update or revise any forward-looking statements. Data from third-party sources is believed to be reliable but has not been independently verified. This report does not constitute legal, financial, or investment advice and does not create any legal obligations.

© **Aviapartner**, 2026. All rights reserved. No part of this report may be reproduced or distributed without prior written permission.





Aviartner Group
Luchthaven Brussel Nationaal
1930 Zaventem
Belgium
www.aviartner.aero