

Process owner : General Counsel

## 1. Purpose and scope

Aviapartner recognizes that our work environment plays a critical role in supporting our core values and in achieving our goals. Thereto, our environment must be one which demonstrates respect, dignity, fairness and safety for all members of the Aviapartner staff.

The purpose of this policy is to maintain a working environment free from acts of discrimination or harassment. This policy is a clear statement of Aviapartner's commitment and determination to act promptly against any incident of discrimination or harassment or abuse of power and to create an environment where such behaviour will not be tolerated.

The scope of this 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.

Aviapartner expects that all its employees, as well as all individuals with whom they conduct business, are treated with respect, fairness and dignity. We furthermore believe that it is essential, especially in our international business environment, to take advantage of the potential afforded by diversity.

This policy is considered an integral part of the employment contract of every Aviapartner employee and representative.

Any behaviour that is either unethical, illegal or does not comply with this Policy will be subject to disciplinary and legal action up to termination of employment without prejudice to Aviapartner's right to compensation.

## 2. Definitions and abbreviations

- **Discrimination:** act and result of treating persons unequally by imposing unequal burdens or denying benefits instead of treating each person fairly on the basis of individual merit
- **Discrimination incident :** an 'incident' refers to a legal action or complaint registered with the reporting organization or competent authorities through a formal process, or an instance of non-compliance identified by the organization through established procedures. Established procedures to identify instances of non compliance can include management system audits, formal monitoring programs, or grievance mechanisms
- **Harassment :** a course of comments or actions that are unwelcome, or should reasonably be known to be unwelcome, to the person towards whom they are addressed.

Definitions are based on Global Reporting Initiative standards.

## 3. Roles and responsibilities

- The Policy on Human Respect falls under the responsibility of the General Counsel.

- The Managing Directors ensure it is applied and communicated in their country and any incidents are reported.

#### 4. Background

Since 2021 Aviapartner supports the UN Global Compact to demonstrate its commitment to the **10 UN Global Compact Principles** including :

- Principle 1 Businesses should support and respect the protection of internationally proclaimed Human Rights;
- Principle 2 Businesses should make sure that they are not complicit in human rights abuses
- Principle 6 the elimination of discrimination in respect of employment and occupation.

Progress on the above topics is reported annually in a Communication of Progress to the UN.

#### 5. Objectives

Objectives with respect to Human Respect are :

- To state and promote Aviapartner's commitment to protect the dignity and rights of its staff members and of any individual with whom it conducts business.
- To alert and educate to the fact that harassment is prohibited under the laws of the European Community and all European countries where we are operating.
- To provide appropriate remedies to complainants in recognition of the impact of harassment
- To provide appropriate responses and consequences where harassment has occurred.
- All staff 100% trained on prevention of discrimination
- Aviapartner has a zero-tolerance on discrimination and strives for zero discrimination incidents with regards to nationality, sex, national or ethnic origin, colour, religion, language, or any other status
- Aviapartner has a zero-tolerance on harassment and strives for zero harassment incidents

#### 6. Policy principles

Aviapartner, embraces the principle of non-discrimination, encourages equal opportunities and the valorisation of diversity.

Any form of discrimination or harassment is prohibited in Aviapartner. In addition, Aviapartner will not accept discriminatory, harassing or offensive conduct by any third parties dealing with the Company, such as customers and advisors. All complaints will be considered seriously.

Every person has the right to report an incident or suspected incident without fear of reprisal. For this reason, each country, shall have a whistleblower procedure in place with as a minimum :

- A dedicated reporting channel
- Confidentiality guarantee
- Non-retaliation guarantee

Any form of retaliation against any individual who in good faith files a complaint under this policy or who assists in a complaint investigation will not be tolerated. See AP P LD03 Whistleblowing Policy for more details.

## 6. 1 Discrimination

Discrimination generally refers to actions toward or practices regarding members of a group which results in them being disadvantaged.

Section 1 of the Human Rights Code provides that “every person has a right to equal treatment with respect to services, goods and facilities, without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital status, same-sex partnership status, family status, disability or the receipt of public assistance.”

The effective implementation of this policy to avoid discrimination is a basic expectation of socially responsible conduct.

## 6. 2 Harassment

Harassment is a form of discrimination and is against the law. Harassment is defined in the Human Rights Code as “engaging in a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome.”

Such conduct, whether verbal, visual, or physical, includes sexual harassment ( such as unwelcome sexual advances or requests for sexual favours, or sexual jokes or innuendoes) and any other conduct which has the purpose or the effect of interfering with an individual’s work performance or development, or which creates an intimidating, offensive, or hostile work environment.

A single act or expression can constitute harassment, for example, if it is a serious violation.

## 7. What can you do ?

Anyone who believes that discriminatory, harassing or offensive conduct or retaliation in violation of this policy is occurring or has occurred is strongly encouraged to formally report and/ or discuss such conduct with their supervisor, station manager, the HR manager, or a member of the legal staff.

If you are a victim, know someone who is a victim or see behaviour which you feel may be discrimination or harassment:

if it is safe to do so, tell the person to stop;

write down what happened; include names, how often it has happened, time, date, location, any witnesses, who else you have told and if you know of anyone else who may have experienced similar conduct;

All reports will be taken very seriously and will be handled in a timely and respectful way for everyone involved.

See AP P LD03 Whistleblowing Policy for more details on reporting channels

## 8. Continuous Monitoring

The following KPI are used to monitor :

In reference to the GRI Disclosure 406-1 Non-discrimination

- The total number of incidents of discrimination. This includes incidents of discrimination on grounds of race, color, sex, religion, political opinion, national extraction, or social origin as defined by the ILO, or other relevant forms of discrimination involving internal and/or external stakeholders across operations.
- The status of the incidents and actions taken with reference to the following :
  - Incidents reviewed by Aviapartner
  - Incidents no longer subject to action (= resolved, the case is completed, or no further action is required)

Other relevant KPI :

- % of staff trained Safety training on preventing discrimination.

## 9. Review

On a yearly basis a report with results on the above KPI shall be presented to the General Counsel and the Directorship level Aviapartner Group holding companies for review.

This review aims to compare outcomes to objectives, determining the overall effectiveness of the current policy and improving where needed.

The current policy will be reviewed minimum every 3 years by its process owner who is responsible for updating, revising and monitoring the application of the policy and the achievement of the specified targets.