

Account of due diligence

**Issued on behalf of AVIATOR AIRPORT ALLIANCE AS, AVIATOR-OSL AS (further -
“Aviator”)**

21st June 2023

Introduction

This statement is issued on behalf of Aviator in accordance with the requirement of Norwegian act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act). Aviator recognises that respect for fundamental human rights and decent working conditions are essential part of performing any commercial activity.

We have reviewed our existing commercial activities and processes to determine what preventative measures already exist, and what further measures may be required to support the prevention of any potential breaches in the field of human rights and maintaining decent working conditions in any part of our business or supply chains. We are committed to acting ethically and with integrity in all our business relationships and aim to ensure that our employees, customer and suppliers understand our commitment to act according to the requirements stated in the Transparency Act. We expect all those companies who have, or seek to have, a business relationship with us to act at all times in a way, which is consistent with our values.

Our Business

Aviator is primarily engaged in the provision of ground handling services for passenger and cargo aircrafts. We are a full-range provider of aviation services, taking care of passengers and equipment., including all support services – from passenger and baggage handling through de-icing, cargo and full freight handling to station services like airport security.

Our Partners

Prior to cooperation every partner is assessed through KYC procedure, which involves monitoring of potential issues in the field of human rights. Additionally, clauses, which allows termination of relationship with every partner in case of violations in human rights are included into partner agreements. A risk-based approach is adopted into the process to assess industry, geographical factors, which could increase potential chance of human rights violations.

To date, there have been no reported instances of concerns regarding human rights or working conditions.

Guidelines and procedures

Responsibility for the CF Entities' anti-slavery initiatives is as follows:

- Account of due diligence - updated annually by key personnel and approved by Peter Stackeryd, Managing Director of Aviator Norway.

- Partners due diligence - includes assessment of potential human rights and working conditions violations risk as a part of due diligence. Our Compliance, Commercial and Finance Departments are responsible for developing and managing our due diligence and contracting processes with the following training of all related functions.
- Training - internal, internet based, training programme has been implemented for all employees, which covers partners due diligence and whistleblowing topics. This training is intended to raise awareness and to include identification of various risks, including human rights and working conditions violations.

Relevant Internal Documentation

Aviator operates the following relevant documentation and procedures:

- Code of conduct – essential document, which states our vision and values in the fields of health and safety, internal communication, actions in case of discrimination and harassment, bullying.
- Whistleblowing policy – documentation covering policy and actions in case of potential breaches of law, health and safety violations and other unethical conduct.
- Onboarding and Due Diligence Procedure 'KYC' – human rights or working conditions violation is a red flag that is searched for against adverse media during the due diligence procedure when onboarding any partner.

Continuous Improvement

We will continue to review, develop and promote our policies and practices to identify and mitigate risk areas in any way related to human rights and working conditions in our business and supply chains. We are currently working with our parent company to implement group-wide policies, which would allow us to more efficiently identify and document such risks and violations.

Board Approval

This account of due diligence is made pursuant to section 5 of the Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (Transparency Act) and has been approved by Peter Stackeryd, Managing Director of Aviator Norway and will be reviewed and updated annually.