# Menzies' Aviation's account of their human rights and decent working conditions due diligence in accordance with the Norwegian Transparency Act Year 2024

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## Introduction

This statement has been published in accordance with the requirements of the Norwegian Transparency Act. The document covers the operations of Menzies Aviation (Oslo) AS, which is a subsidiary of Menzies Aviation Group, owned by Agility Public Warehousing Company K.S.C.P.

Menzies aviation operates at a global level, and therefore conducts their due diligence process and sustainability work at a global level. This is to ensure a well functioning system that can better catch potential negative impacts and allows Menzies Aviation to have a greater positive impact on people and affected communities in their value chain. All Menzies Aviation subsidiaries are therefore subject to and have to comply with Menzies Aviation global strategies, policies and procedures.

This report sets out the steps taken by Menzies Aviation to continue the work to assess, prevent, and mitigate the risks of violation of fundamental human rights and decent working conditions in its business operations and supply chains.

# Who we are

When traveling, each passenger has both visible and invisible interactions with Menzies. We provide ground services, cargo services and much more to the many passengers traveling by plane each day. We do our best to deliver safe and reliable service and a work class traveling experience for each passenger. Each year our dedicated team ensures that millions of passengers are reading for take off.

Our vision is to make Menzies Aviation the handling provider of choice wherever we operate by always being solutions oriented and working with our airline customers to deliver their goals safely and securely. Menzies Aviation provides services to over 500 customers globally including Air France-KLM, American Airlines, Cathay Pacific, easyJet, Frontier Airlines, IAG, Norwegian, Qantas Group, Qatar Airways and United Airlines. Best in class safety and security is the number one priority each day and every day

In Norway we are primarily based at Gardermoen Airport and the main services we provide are:

#### **Ground Services:**

We offer the full range of ground services including passenger check-in, customer relations, full

ramp handling, baggage sorting, loading and tracing, asset maintenance and aircraft washing. We are the leading company in the industry in this time critical process and our ground crew is incredibly proud to deliver best in class services and an exceptional approach to security.

### De-icing

We are specialists in de-icing and always make sure that the de-icing process runs smoothly, no matter the weather conditions. We de-ice planes in an efficient and secure method so that all of our clients can maintain their scheduled take-off time even when the weather is unpredictable.

## Passenger Services:

To receive passengers and treat them with world class customer service during their travels is a responsibility we do not take lightly, especially considering we are often the first people passengers meet during their travels. Our team offers friendly and efficient passenger services from check-in to boarding and back again.

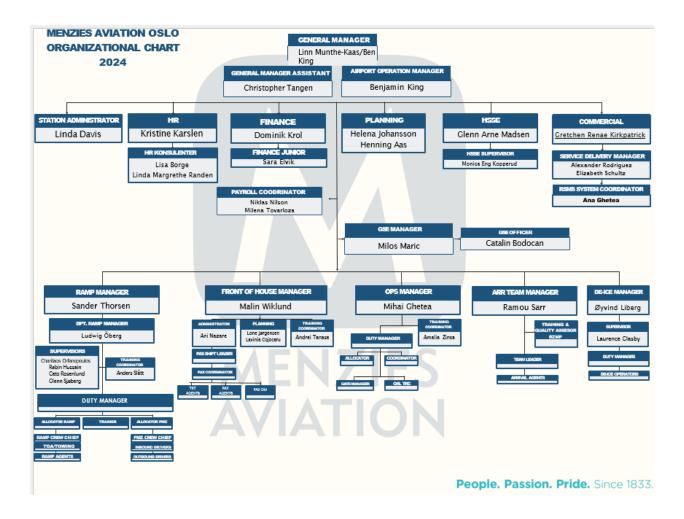
## How we are set up (governance)

Established in 1833 and with its head office in Edinburgh, the Company is one of Scotland's largest companies with its success depending upon providing an efficient, high quality, time-critical service to its customers and partners. Today, the Company is a leading global provider of landside and airside services operating at more than 300 airports in 65 countries, supported by a global team of approximately 50,000 highly trained people.

Menzies Aviation is managed on a geographical basis primarily in three regional segments: Americas, EMEA (incorporating Northern Europe, United Kingdom & Ireland and Mediterranean & Africa) and Rest of World. The Norwegian company falls within the Scandinavian part of EMEA.

The Norwegian company is based in the Oslo region of Norway and divided into Business Administration, Finance, CSDM, HSSE and Airport Operations.

#### **MENZIES AVIATION OSL ORGANIZATION**



#### Roles and responsibilities related to sustainability

Our Board of Directors sets and ensures implementation of Menzies long term strategy, builds community relationships, and provides the governance framework. The Board has oversight of our approach to sustainability and our *All In* plan, with particular responsibility residing with our Chairman, Hassan El-Houray and CEO, Philipp Joeinig.

Our Executive Management Board (EMB) reports to our Board of Directors and is responsible for operational and business performance with a focus on embedding a customer centric focus throughout the business and making us the provider of choice for our customers.

These strategies and governance frameworks are then followed up by the local subsidiaries. In Norway the General Manager and HR are responsible for sustainability, including human rights and decent working conditions, and compliance with the Norwegian Transparency Act.

## Our values

We take pride in providing the safest, most secure and consistent services tailored to our customers' needs. This will continue to be our priority as we grow alongside our customers and support their sustainability journeys. For us, sustainability is at the heart of everything we do. It's the cornerstone of our business strategy and we are pleased to share progress on our goals.

The process of creating a clearer 'sense of self' and what we believe in as a company has helped to shape and weave together our values, culture, strategy, approach to sustainability, and to analyze our stakeholder relationships. This has set us on a path to lead and effect positive change, deliver leading sustainable aviation services and achieve our ambition of becoming the undisputed number one aviation services provider.

#### Our purpose

Our purpose is to provide safe, trusted and sustainable aviation services serving the needs of our customers now and for the future.

#### Our culture

Our culture is built on strong ethics and integrity, underpinned by our values and purpose. We continually strive to develop an inclusive and nurturing environment, where people are guided and inspired to deliver their best for themselves, for each other and for our customers, every day.

#### Our strategy

Our strategy sets out our plan for achieving our purpose, accelerated sustainable growth and strong returns, securing our place as the number one aviation services provider in the world.

#### **ESG** and Sustainability

All In is our plan for a fair and sustainable future and was introduced Company-wide in 2021. It is at the heart of everything we do. It outlines our priorities, actions and initial targets set for the most material issues across the Environmental, Social and Governance spectrum, and is fully integrated into our approach to strategy, risk, governance, and ethical conduct. Targets and initiatives aimed at supporting human rights are captured in our 'People' and 'Safety' pillars, and more specifically for modern slavery under our 'Legal and Ethical' pillar, where targets include:

- Zero tolerance to unethical behavior
- Ethical supply chain

Through our ambitious goals and plans, and collaboration with our partners, we will lead the

way in delivering the most sustainable aviation logistics services, enabling responsible accelerated growth for a thriving future.

#### **Values**

Living our values every day is what enables us to achieve our ambition and deliver our purpose. They are at the core of our business and help us to create and maintain an inclusive culture, guide our decisions and actions, and deliver the best for our customers.

#### Respect for Human Rights

As a signatory of the UN Global Compact, we fully support the United Nations Guiding Principles on Business and Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work. We take a zero-tolerance approach to breaches of human rights and all forms of modern slavery and human trafficking and respect the right to freedom of association and fair work and wages for our employees.

We will continue to evolve our approach, goals, and initiatives for advancing the UN Sustainable Development Goals (SDGs) and provide transparency in our reporting and communications. In our progress report for the UN SDGs and UN Global Compact published July 2022, we explained how we work towards contributing to goals 5 Gender Equality and 8 Decent Work and Economic Growth.



SDG Target 8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

## Our policies and procedures

At Menzies we believe that our strong internal governance practices together with compliance of ESG reporting frameworks and regulation are beneficial for our company and our stakeholder communities and should be embraced.

Through good governance, we can embed sustainable development principles throughout our strategy and decision-making, develop structured sustainability plans, hold ourselves to account and be clear, consistent and transparent in communicating progress towards the commitments and high standards we set as a company, and in our stakeholder relationships.

#### M.O.R.S.E

Our M.O.R.S.E. (Menzies Operating Responsibly, Safely and Effectively) Code and Charter, along with our Golden Rules, encapsulates our safety culture and how we embed it in everything we do, that sets us apart from competitors. The M.O.R.S.E. code sets the way we work every-day, ensuring our airline customers and the traveling public can trust every journey they take. It is embedded throughout our business, from our induction programs, initial and refresher training, safety, security and environmental promotions, incorporated onto uniforms, and features regularly in our internal communications.

#### Approach to protecting Human Rights

Our approach and response to protecting human rights forms part of our Group Sustainability Program as well as our Group Compliance Program, both of which have the full support of our John Menzies plc Board and apply group-wide including all our Subsidiaries.

## **Group Compliance Program**

Our Group Compliance Program is assessed regularly to ensure it continues to be fit for purpose and that it evolves and improves in line with changing legislation, business priorities and risk areas, as well as the changing expectations of our stakeholders. Our program contains key policies, procedures, training and controls to ensure it is effective in meeting these requirements and ensuring our compliance with legislation and ethical conduct.

#### **Group Sustainability Program**

Our Sustainability Program sets goals and commitments across environmental, social and governance topics that are material for our Group. This includes goals that focus on ensuring our supply chain is sustainable, ethical and that we engage and do business with partners that adhere to those same values. As reported last year, developing our processes, policies and implementing our new Business Partner Onboarding solution were key areas of focus for us in 2024.

#### Code of Conduct

Our Code of Conduct remains at the heart of our suite of ethical and legal policies and is updated regularly to ensure it remains up to date and reflective of the changes that matter for our business, legislatively, socially and culturally. It aims to create and support a culture of ethics, integrity, respect, pride and excellence in our organization, providing a framework for

'doing the right thing at the right time. It is intended to provide our People, at all levels of our organization, with the awareness and understanding of the values and behaviors expected of them and what they can expect in return as an employee. It acknowledges the rights of our people to engage in collective bargaining as well as other areas relating to protecting their rights. It also covers key areas of ethics and compliance, including modern slavery and human trafficking, human rights, equality, diversity and inclusion, and anti-bribery and corruption amongst many other topics.

In addition to our general handbooks and manuals, and Code of Conduct, we have many dedicated key policies and training modules implemented group-wide including: Anti-Slavery and Human Trafficking, Anti-Bribery and Anti-Corruption, Equality, Diversity and Inclusion, People, Recruitment, and SpeakUp to name a small few.

Read more about this in our <u>Sustainability Report</u> and in our <u>Anti-slavery and Human Trafficking</u> Statement.

#### Third Party Code of Conduct

This Third Party Code of Conduct (the "Code") outlines the values, ethics and behaviors we expect from our Business Partners and reflects the Group's own internal Code of Conduct. We expect our Business Partners to ensure that this Code is communicated to relevant people within their organizations and is also made available to any Business Partners they engage to undertake work for us or on our behalf.

Read our Third Party Code of Conduct here

# Due diligence process

To ensure a good due diligence process Menzies Aviation has globally implemented a Third Party Risk Management system that will help with our Sustainability Due Diligence. The system uses a third-party database with information combined with data from our suppliers and it will help us continue our dialogue with our suppliers, conduct audits and ensure quality information and control when onboarding new suppliers.

We adopt a risk-based approach to due diligence and continue to work on adapting and enhancing our due diligence processes on a range of human rights and working conditions

issues. We focus in particular on risks of modern slavery and human trafficking in our global supply chain and are continuously working to expand the scope of our human rights and working conditions due diligence.

Prior to entering into a relationships with any supplier, new joint venture partners or companies who may be considered high risk and/or who operates in a higher risk region(s), we use a robust and mature process which includes an assessment of modern slavery risk in addition to all other aspects of due diligence, to ensure we understand business risks and practices. Our integration of activities ensure that our policies and training are implemented within any new operations and expectations are clear for all new partners and employees.

We already build contractual provisions for ethical and compliance topics such as modern slavery and anti-bribery and anti-corruption into our contractual arrangements, along with our Third Party Code of Conduct, but our new system and procedures significantly enhance our supplier due diligence and onboarding processes and will help progress a number or priority goals and metrics in our *All In* plan.

## Risk assessment within our own operations

Menzies Enterprise Risk Management (ERM) framework was updated in 2022 to evolve our ERM capabilities and processes to take a more proactive approach to risk and drive value through accountability, governance and oversight, and strategic integration. A number of improvements were made at that time and further planned improvements were implemented in 2022, including the implementation of our new ERM system.

Our Risk Committee finalized a thorough assessment of all top-down and emerging risks at the beginning of 2025, which are now actively tracked and managed in our Enterprise Risk Management (ERM) system. Following this, our principal risks were identified and presented to the Audit & Risk Committee, and ratified by them.

Our risk framework and governance structure is shown in the diagram below. We will continue to test and improve our risk framework including management, controls and oversight, to ensure we remain resilient, grow responsibly and protect our business and stakeholders at all times.



#### Risk Committee

Our global Risk Committee was formed in 2021 and provides enterprise-wide governance and skilled business assessment, as well as identification, of the risks facing our business, with a particular focus on topdown, emerging and principal risks, whether they be strategic, change, financial, regulatory, climate, political, financial, IT, legal, regulatory, reputational or other risks. The committee also reviews risks related to new business opportunities along with the executive management board. The committee has a responsibility to instill enhanced awareness and corporate risk governance in a meaningful way, informing our strategy and action planning. The committee meets quarterly.

## Our ERM system

Our ERM system holds our risk registers and provides greater visibility, ownership, management and reporting of risks, and is enabling improved tracking of associated actions. It has helped provide a dynamic view and tracking of our risks, impacts and actions that can be viewed across our global business and maintained dynamically by risk owners in real time.

#### THE RISK MANAGEMENT CYCLE



## **Operational Risk**

Reflecting our purpose of ensuring safe and secure operations, as well as our core value of Safety, the removal and management of risk throughout our day-to-day operations is fundamental. Continuing to improve and embed our Menzies Operating Responsibly Safely and Effectively (M.O.R.S.E.) program and safety management systems, is a top priority. By linking our M.O.R.S.E. system with our ERM system we will create a more dynamic, 'live' operational risk register that can be effectively managed.

## Risk assessment of supplier and business partners

It is important to us that we lead by example and demonstrate to our own stakeholders that we set and operate to the highest standards, acting responsibly and ethically at all times. In accordance with this, we expect the same of our own third parties, including suppliers, contractors, consultants (our "Suppliers") and joint venture partners.

We therefore seek to ensure that we engage only with those Suppliers who uphold the values to which we adhere and require that all our Suppliers, through contractual commitments, act ethically and with integrity at all times, sharing our commitment to humane and safe working practices.

We work with many Suppliers across the globe, and we acknowledge that some of these Suppliers may operate in sensitive industries and countries and the risk of violation of human rights and decent working conditions may be greater in some areas than in others. This is considered within our overall risk assessment process along with information from other relevant resources including Transparency International, the UN Global Compact and the TRACE matrix, which provides an indication of corruption perceptions.

We have been a member of TRACE for many years, supporting our zero-tolerance approach to bribery and corruption. We use TRACE best practices, training courses and risk matrix data to support our own internal processes, including providing regular specialist training on bribery, corruption, fraud and conflicts of interest for higher risk employee groups and senior employees, including those at executive level. <a href="https://www.traceinternational.org/">https://www.traceinternational.org/</a>

We monitor the risk of violation of fundamental human rights and decent working conditions, specifically modern slavery and human trafficking, within our overall approach to identifying risks across our business. As part of this, we identify categories of suppliers who may pose a higher risk from a modern slavery and human trafficking perspective including our uniform and PPE suppliers, suppliers of temporary/short-term labour, service providers such as cleaning contractors, as well as information technology suppliers. These category factors also inform our risk assessment process and help ensure we focus due diligence and assessment efforts in the best way.

All our Suppliers are expected to be able to demonstrate and provide evidence where appropriate, of the standards they adhere to and to complete a level of risk-based due diligence. In some circumstances this may include audits and independent verification of standards.

# Significant risks

Below is an overview of the main risks of violation of human rights and decent working conditions, both in our own operations and in our supply chain. These risks have been identified through our continuous due diligence assessment and will be updated if any changes are identified.

## Own operations

## Health and safety

The safety and security of our people is our number one priority. We are a people business and continue to invest in making Menzies a great place to work.

We aim to have the best safety culture in the industry by delivering the highest health, safety and security risk standards everywhere we operate. We want our people to feel safe in their working environment by providing the training and tools required to do their job safely and securely. We want our customers to trust Menzies to deliver the safest and most reliable services and to know that we are committed to continually evolving and embedding our safety and security practices. We are proud to say that we have achieved a 59% reduction in personal injuries since 2022 globally, and we continue to work towards our safety goals – zero injuries and zero damage. In 2024, there was a 49% increase in reported hazards compared to 2023 on a global basis, and we stay focused on improving our safety culture furthermore. On a local level, two weeks a year are set aside to highlight the importance of health, safety and security. During these weeks, employees may participate in activities that promote reporting, alertness and safety, and may win prizes for their participation. In general, we take pride in how our employees show ownership of their positions by prioritizing health and safety.

Our Safety Management Systems include our policies, procedures, training and manuals, designed to the highest industry best practices and standards for safety management, occupational health, security, training and quality assurance.

We successfully renewed our IATA Safety Audit for Ground Operations (ISAGO) registration, entailing an audit of all central policies, procedures, training and quality management. Our most recent ISAGO HQ audit was successfully completed in Q1 2023 with zero findings. We also maintained our IATA Ground Handling Partner (GHP) and IATA Strategic Partnerships membership that provides a platform to contribute to the development of solutions that impact safety and damage reduction, while promoting efficiency improvements initiatives as well as strengthen relationships with key industry stakeholders.

## Diversity and Equal opportunities

One of Menzies Aviation's core values is to ensure equal opportunities and to create a workplace where everyone feels safe and respected. In our Equality report of 2024, we have found that there is a lower percentage of female employees, particularly within the business areas that are physically taxing. As a result, there are more female employees in business areas that have lower paying tariff agreements, which then leads to a pay gap. This pay gap can

mainly be explained by the seniority levels of the staff, as salaries are governed through collective agreements, ensuring equal pay for equal work.

Over the last few years we have seen an increase in not only female applicants as well as females in leadership positions. We will continue to implement measures to improve the gender balance furthermore.

We encourage everyone to apply for positions in the company, regardless of the gender, background, religion, sexual orientation, etc. We do believe that diversity is key to a truly successful working environment.

## Supply Chain

Our global supply chains rely on a number of key business partners and suppliers including, but not limited to, sectors including consultancy and professional services, cleaning and security companies, labor and agency providers, equipment providers, IT solutions, infrastructure and hardware, uniform and PPE providers, de-icing suppliers, aircraft fuel companies, catering/food and drink providers, other aviation services providers. As a recent initiative, we have partnered with UN Global Compact to participate in the UN Sustainable Suppliers Training Programme. The training is ongoing.

Though there may be many risks associated with many of our suppliers we have identified two main significant risks in our supply chain. The first being labor hired through agency arrangements, this is due to the frequency it is used and risk for non decent working conditions. Second is modern slavery human trafficking, which is due to the severity of the human rights violation.

## Labor through agency arrangements

We have recognized a heightened risk of violation of human rights and decent working conditions, in particular modern slavery, where we engage labor through agency arrangements, particularly where those resources are engaged on a temporary basis as opposed to becoming our own permanent employees. We are also mindful of the conflict in Ukraine and the potential risk that brings with displacement and vulnerability of persons affected by it. We have monitored our business and recruitment in this regard and set up a dedicated internal contact point for Ukrainian nationals seeking work. As a preliminary measure to ensure the hired workers fundamental human rights and good working conditions we worked together with the Union and wrote a protocol of agreement to ensure their rights.

# Overview of risks related to modern slavery and human trafficking

Risk	Potential Issues	Actions Taken to Assess and Address Risks
Labour providers and service providers	Engaging with labor providers who are themselves engaging in modern slavery, including underpaying staff wages and employee entitlements.  Employee misclassification.	Detailed analysis and reporting on our supplier population by category, geography and analysis of risks supported by our new system.  Engage more fully with our suppliers through our new onboarding system and processes.  Improved supplier due diligence and assessments including assessment of whether provider may themselves have Modern Slavery reporting obligations, which we can review.  Ensure awareness of our Third-Party Code of Conduct and the obligations of our suppliers.  Potential for undertaking our own or requesting independent audits.
Suppliers	Engaging with suppliers who are engaging in modern slavery practices including underpaying staff wages and employee entitlements or engaging in human trafficking.	We set out our actions in relation to suppliers below.
Indirect risks within our supply chain	Engaging with suppliers whose own supply chains may be at increased risk from modern slavery practices, including forced labour, underpaying staff wages or engaging in human trafficking.	We set out our actions in relation to these categories of suppliers below, including enhanced due diligence and evidence of independent audits. We may also undertake our own audits, where appropriate.

## Actual negative impacts

Menzies has not been notified of any instances of violations of fundamental human rights, including modern slavery and child labour, within our own operations or supply chain during the past year. However, we acknowledge that even if we have not identified any violations that does not mean it has not occurred, rather that it has not been discovered. We will therefore continue to monitor our own operations and supply chain and improve our policies and procedures to ensure that violations do not occur.

Further, by using the Trace system mentioned above, we were able to identify and take action on one localized report of unethical business practices in the supply chain in 2023.

There have also been reports of sexual harassment incidents in 2023 and 2024, which were swiftly dealt with in accordance to our local procedures.

## Grievance Mechanisms/Whistleblowing policies

We offer many channels for seeking guidance, reporting concerns and raising grievances, including our independent whistleblowing hotline, which we have had in place across our global network since 2016. Our current whistleblowing hotline service is called 'SpeakUp'. Our SpeakUp service offers reporters the ability to raise any issues or concerns anonymously and confidentially around unethical conduct, malpractice, illegal acts or failures, including human rights' violations such as slavery or human trafficking. We encourage everyone working with us and on our behalf to use the service in confidence and that their concern will always be taken seriously, treated confidentially and fully investigated. Our service allows us to engage with a reporter via the SpeakUp system without them having to disclose their contact details or identity, enabling us to better investigate any reports made and confirm back to reporters when investigations are concluded. Our SpeakUp service offers separate contact details for third parties to report any serious issues or concerns related to our business. Reports can be made anonymously, are always treated confidentially and will be fully investigated and, where required, remedial action will be taken. SpeakUp contact details for third parties are available in our Third Party Code of Conduct.

Our SpeakUp Policy and Guidance document was updated for the start of 2021 and offers clear guidance and support on when and how to make a report, how it will be treated and investigated, and how and when a reporter will be informed of an outcome. We adhere to all applicable legislation in relation to whistleblowing and our own policy standards protect the

rights of those making reports in good faith. The increased awareness is making a difference and we gives us confidence that our communications are effective, more people feel comfortable making a report and we gain greater insight into employee concerns and relations. The vast majority of reports focus on concerns or grievances of some form.

The safety of our people and our operations is critical and as such, we mandate that all health, safety and security issues, concerns or incidents be reported via our safety management systems to ensure they are communicated, responded to and remediated appropriately. SpeakUp can still be used for anyone who wishes to report a concern or issue in this area anonymously. We continue to undertake risk assessments and analysis across our organization to ensure consistency, comprehensiveness and quality in the manner and mode of Supplier assessment, both pre and post engagement. We are fully committed to conducting the appropriate investigations and taking the necessary actions should evidence of violations of fundamental human rights and decent working conditions ever be identified. Should any issues be identified, we will require that immediate remedial steps are taken to ensure compliance with appropriate standards and legislation. As part of our approach to remediation, we will seek to work together with Suppliers (and other Business Partners), providing guidance and training on compliance topics, where we believe this may be appropriate and/or beneficial.

# Our responsibilities

#### Measures

We implement different kinds of measures, both globally and locally to mitigate risks of violation of human rights and decent working conditions. Through these measures we hope to achieve a safer working environment and better control of our risks within the supply chain.

#### **MORSE** Week

As already mentioned, each year we hold two global safety and security MORSE Weeks to reinvigorate, inspire and influence the behaviors that help create a positive safety culture which ultimately prevents incidents. Our industry-leading safety principles of Menzies, Operating, Responsibly, Safely & Effectively are at the heart of the activities. We saw an increase in hazard and near miss reporting on our Swift MORSE reporting tool and more people received instant SMART excellences via our award-winning SMART app.

#### Training and development

We want everyone at Menzies to unlock their full potential and enjoy coming to work. We provide on-the-job training and career development. We make sure the training is up-to-date and that all employees are familiar with the updated on relevant policies, such as Code of

Conduct and our Personnel Handbooks. We hold our leadership courses: Thrive - Women in Leadership, Living Leadership and Ready to Lead.

#### We Are Menzies Awards

Held for the first time in 2022, we invited colleagues to nominate their peers for a We Are Menzies Award, having received more than 3500 nominations globally. From administering first aid in an emergency and stopping work in dangerous situations, to supporting colleagues and customers, the wide range of nominations celebrated the commitment of our colleagues who live our values every day.

#### Code of conduct

Our suppliers are expected to adhere to Menzies Third Party Code of Conduct and we incorporate contractual provisions relating to this, as well as specific clauses relating to modern slavery and other ethical conduct and legislation, such as anti-bribery.

Through the incorporation of suitable provisions within our Supplier contracts relating specifically to modern slavery as well as our Third Party Code of Conduct more generally. We review Supplier contracts and, where possible/if considered appropriate, strengthen their terms to further limit the likelihood of slavery or human trafficking occurring in our supply chains or any part of our business.

### Supply chain measures

We have implemented multiple different measures to better mitigate risks in the supply chain. Below is an overview of the steps we are taking in 2025:

Action	2025 Steps
Continue to develop and expand our Supplier due diligence and Business Partner onboarding procedures and seek to implement a new systems solution.	Review the effectiveness of our new solution and adapt as required. Review monitoring of suppliers via our new solution.
Develop increased transparency on the geographical spread and categorization of our Supplier population and deeper analysis across the tiers.	Further detailed analysis and reporting on our supplier population by category, geography and analysis of risks supported by our new system.

Seek new opportunities and ways to better collaborate with our business and industry partners that help us build on best practice and incorporate learnings.	Review the need to provide learning and support to our supplier population in this area.
Continue to develop and create awareness of modern slavery and other human rights risks across our Group.	Raise awareness internally through internal communication platforms or posters, and externally within supply chains.

## What is next?

Sustainability, and in particular human rights and decent working conditions, are very important for Menzies Aviation. Both to ensure our company is a safe place for our employees and to contribute positively to society.

We will continue to work on implementing and maintaining our human rights and decent working conditions due diligence in the next year and look forward to working more closely with mitigating the risks of human rights violations and indecent working conditions.

If you have any questions this report or to the Norwegian subsidiary of Menzies Aviation please contact us at: OSL.HR@menziesaviation.com