

# POLICY STATEMENT ON RESPECTING HUMAN RIGHTS



# CONTENTS

<b>POLICY STATEMENT</b>	<b>5</b>
<b>SWISSPORT COMMITMENT</b>	<b>5</b>
<b>SWISSPORT'S EXPECTATIONS OF EMPLOYEES AND SUPPLIERS</b>	<b>6</b>
<b>OUR APPROACH TO IMPLEMENTING DUE DILIGENCE OBLIGATIONS</b>	<b>7</b>
1. RESPONSIBILITIES	7
2. RISK MANAGEMENT	7
3. ANNUAL RISK ANALYSIS	7
4. IDENTIFIED PRIORITIZED RISKS	8
5. PREVENTIVE AND REMEDIAL MEASURES	8
6. PROVISION OF A COMPLAINT PROCEDURE	8
7. EFFECTIVENESS MONITORING AND CONTINUOUS IMPROVEMENT	9
8. DOCUMENTATION AND REPORTING	9

## **POLICY STATEMENT**

This policy is applicable to all operating Companies, subsidiaries, affiliates, and Joint Ventures which collectively constitute the Swissport group of companies hereinafter referred to as "Swissport Group". Therefore, the policy applies to all employees within Swissport Group, regardless of their position, tenure, or department.

The overriding objective of this policy is to provide an appropriate employment framework within which all Swissport Group employees regardless of their position, work in an environment where they feel valued, empowered, engaged, motivated and above all safe. The policy will be truly representative of all sections of society and each employee will feel respected and able to give their best.

Swissport Group upholds the highest standards in running its businesses, as demonstrated within our "Code of Conduct" which confirms that all our employees are expected to demonstrate integrity and always abide by applicable laws and regulations. The company supports the protection of internationally proclaimed human rights and respects all associated laws and regulations and as such, this policy is based on:

- Ten principles of the UN Global Compact,
- Universal Declaration of Human Rights,
- International Labour Organization's Declaration on the four Fundamental Principles and Rights at Work,
- OECD Guidelines for Multinational Enterprises,
- UN Guiding Principles on Business and Human Rights,
- UN Sustainable Development Goals.

The policy has the full endorsement and support from the Swissport Group's Board Members, Executive Leadership Team Members, and senior managers, ensuring its effective execution and adherence. The Swissport Group has a zero-tolerance policy for any form of modern slavery, forced labour, discrimination, harassment, intimidation, or bullying.

## **SWISSPORT COMMITMENT**

Swissport Group is committed to full compliance with the following internationally recognised standards in employment and ethical trading:

- Universal Declaration on Human Rights
- International Labour Organisations Declaration of Fundamental Principles and Rights at Work
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- International Convention on the Elimination of all forms of Racial Discrimination
- International Convention on the Protection of Rights of all Migrant Workers and Members of their Families
- United Nations Global Compact
- United Nations Convention on the Rights of the Child
- United Nations Convention on the Elimination of all Forms of Discrimination Against Women
- United Nations Standards of Conduct for Business for Tackling Discrimination Against LGBTQ+ People

- United Nations Declaration on the Rights of Indigenous People
- United Nations Guiding Principles on Business and Human Rights
- United Nations Guiding Principles on Reporting Framework
- Women's Empowerment Principles

It is our goal to ensure that every individual within our organization adheres to the principles outlined in this policy statement, ensuring that the fundamental human rights of all employees, airport passengers, airline customers and workers in our value chain are protected. Through policy which encompasses all employees, we reaffirm our dedication to fostering a workplace culture that values and respects the contributions of every member of our team as we strive to:

- Foster an environment that values and appreciates the unique contributions of every employee, promoting inclusivity and embracing individual differences.
- Guarantee that every employee is provided with a workplace that is respectful and dignified.
- Ensure that all employees have access to equal opportunities for growth and promotion through our comprehensive training, development, and advancement programmes, together with our open and transparent recruitment processes.
- Promote equality in the workplace is essential for effective management and drives corporate success, in addition to being ethically sound.
- Minimize our impact on the environment through sustainable practices and through a commitment to de-carbonize our operations in line with the Swissport Group's sustainability commitments and associated policies.
- Focus on maximising effectiveness, this policy statement will be regularly monitored and reviewed, highlighting our unwavering dedication to promoting diversity and inclusion.

Swissport Group upholds a zero-tolerance policy against discrimination or harassment of any form. Swissport Group is committed to providing services impartially, ensuring fairness. We are committed to fostering an inclusive environment where all customers, clients and workers in our value chain are treated with dignity, respect, and fairness, irrespective of their background or identity. Discrimination or harassment in any form is not tolerated, reflecting our unwavering dedication to diversity and inclusion in every aspect of our operations and value chain.

## **SWISSPORT'S EXPECTATIONS OF EMPLOYEES AND SUPPLIERS**

Swissport has both a Code of Conduct for employees ([see here](#)) and a Supplier Code of Conduct ([see here](#)) in place, in which we express our support of the protection of internationally proclaimed human and labor rights and the respect of all applicable laws and regulation. The corporate Code of Conduct and the Swissport Supplier Code of Conduct are based on several key principles including the labor rights principles of non-discrimination, the elimination of child and forced labor or the right to work under safe and healthy working conditions. These codes of conduct are supported by other policies, including a Global Labor Relations Policy, a SpeakUp Policy, a Human Rights Policy, a QHSE policy and an Anti-Human Trafficking, Forced Labor and Child Labor Policy.

## **OUR APPROACH TO IMPLEMENTING DUE DILIGENCE OBLIGATIONS**

At a global level, we have put in place structures and measures in line with our human rights and environmental due diligence obligations. These are implemented with a particular focus on ensuring compliance with the specific requirements of the German Supply Chain Act, which applies to our German-based subsidiaries.

### **1. RESPONSIBILITIES**

The Swissport Group has defined responsibilities to ensure compliance with human rights and environmental due diligence obligations in accordance with the German Supply Chain Act. Ultimately, the Swissport Group management is responsible for compliance with human rights and environmental standards.

As of the reporting year 2024, the Swissport Group's General Counsel acts as the Human Rights Officer responsible for monitoring risk management in relation to the duties required by the German Supply Chain Act. In her role, she reports to the existing Safety, Health and ESG Committee at least once a year and on an ad-hoc basis on the status of risk management.

Several departments of the Swissport Group (in particular Legal & Compliance, ESG and Procurement) are working in synergy to implement the processes required by the German Supply Chain Act and are providing human resources for this purpose.

### **2. RISK MANAGEMENT**

We have established a risk management approach with responsibilities and processes in accordance with the requirements of the German Supply Chain Act. Through this approach, the Swissport Group ensures that risks related to human rights and environmental violations are identified and that appropriate mitigation and remediation measures are taken.

### **3. ANNUAL RISK ANALYSIS**

A key aspect of fulfilling our due diligence obligations is identifying and prioritizing human rights and environmental risks. For this purpose, the Swissport Group conducts an annual risk analysis regarding human rights and the environment as mandated by the German Supply Chain Act as well as by other due diligence requirements.

The core of our risk analysis is our annual double materiality assessment that we conduct adhering to the European Sustainability Reporting Standards (ESRS) and aligned with the guidance document issued by the European Financial Reporting Advisory Group (EFRAG). Potential and actual human rights and environmental impacts on our own workforce, workers in the value chain, affected communities, consumers and end-users are an integral part of that assessment. This process is tightly linked with our yearly Enterprise Risk Management (ERM).

We build on the double materiality assessment with targeted risk assessments. For example, employee safety and wellbeing are our highest priority, and we have a policy requiring health and safety risk assessments at all stations at least every three years. We have also introduced a vendor risk analysis process for suppliers, using a multi-stage approach to identify human rights risks among direct suppliers. The initial stage evaluates criteria such as country of origin, product group and spend. If elevated risk is identified, the supplier undergoes a more detailed review, which may include a questionnaire or third-party audit. These criteria are integrated into our supplier

approval and evaluation processes, ensuring that human rights and environmental due diligence is addressed across the Swissport Group.

At a minimum, our risk analysis is conducted on an annual basis, with additional assessments conducted ad hoc as needed.

#### **4. IDENTIFIED PRIORITIZED RISKS**

Based on our risk analysis for the financial year 2024, we have prioritized the following risk areas: Health and Safety, Climate Change, Fair Labor Conditions, and Diversity & Inclusion.

#### **5. PREVENTIVE AND REMEDIAL MEASURES**

The Swissport Group is firmly committed to upholding human rights as well as protection of the environment and preventing violations. We have implemented a series of preventive measures with the aim of mitigating potential human rights and environmental risks and ensuring compliance with applicable legal obligations.

Our approach is based on clearly defined guidelines that set out our expectations for employees and suppliers. These are formalized through our Employee Code of Conduct and Supplier Code of Conduct, which are both incorporated into our contractual agreements and acknowledged by every employee. Furthermore, we provide targeted training to ensure that our employees fully understand and adhere to these commitments. Sustainable procurement goals are also embedded in the performance reviews of our procurement team, complemented by training on sustainable procurement practices. Additionally, environmental, social, and governance (ESG) criteria, including human rights considerations, are integrated into our vendor selection and evaluation processes.

Our internal processes and procedures have been subject to external verification against leading ISO standards. The Swissport Group has received the following certifications:

- ISO 9001 – quality management system
- ISO 14001 – environmental management system
- ISO 27001 – information security management system
- ISO 37001 – anti-bribery management system
- ISO 45001 – occupational health and safety management system

Swissport is committed to maintaining these certifications through regular audits and recertifications.

In cases where increased risks are identified during risk analysis, or specific concerns are raised through our whistleblower system or other channels, we conduct thorough investigations and implement preventive or remedial measures to prevent, end, or mitigate violations. Issues related to the German Supply Chain Act are regularly addressed in meetings of the Safety, Health, and ESG Committee, ensuring ongoing attention and action where required.

#### **6. PROVISION OF A COMPLAINT PROCEDURE**

The Swissport Group has a complaint procedure – the whistleblower channel "SpeakUp" – in place that allows the reporting of any violations of human rights in our operations and along our value chain. SpeakUp is an external whistleblower hotline introduced at Swissport in 2019 that enables all employees as well as other affected

stakeholders to report suspected violations. This includes reporting individuals who are believed to have violated or are suspected of preparing to violate the Code of Conduct, the Supplier Code of Conduct or other corporate policies in force.

SpeakUp includes both an online and telephone service that allows employees and other affected stakeholders to report compliance concerns confidentially and anonymously, accessible via our webpage. The hotline is available 24 hours a day, seven days a week, and in 35 languages. Reports are first received by the SpeakUp hotline and subsequently passed on to a dedicated team at Swissport, ensuring confidentiality and anonymity along the process. The Swissport team acknowledges and reviews each report within seven working days. Reports received through SpeakUp are investigated in accordance with our SpeakUp Policy and Investigation Manual, and employees who report in good faith are protected from any form of retaliation.

Swissport Group's complaint procedure is available for reports of alleged or verifiable violations regarding direct and indirect suppliers. Should Swissport Group gain credible information about a potential human rights or environmental breach involving a direct and indirect supplier, measures will be taken. For example, in the case of an indirect supplier, it shall activate an incident-specific risk analysis and implement suitable preventive and corrective actions.

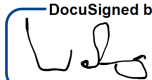
## 7. EFFECTIVENESS MONITORING AND CONTINUOUS IMPROVEMENT

Given the dynamic nature of supply chain circumstances, we recognize the continuous necessity to adjust our implementation of due diligence obligations. We are dedicated to conducting annual assessments, as well as incident-specific reviews, to monitor our compliance with all due diligence requirements set forth by the German Supply Chain Act. Our commitment includes continuously enhancing these measures to ensure they remain appropriate and effective.


## 8. DOCUMENTATION AND REPORTING

The Legal & Compliance department, in partnership with the ESG and procurement department, is tasked with documenting supply chain risks and the corresponding measures, as well as ensuring that this information is continuously updated. These departments also prepare the annual report mandated by the German Supply Chain Act, which is submitted to the Federal Office for Economic Affairs and Export Control in Germany (BAFA). Furthermore, the report shall be available on the company's website for a minimum duration of seven years.

### SWISSPORT International Ltd.

DocuSigned by:  
  
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**Warwick Brady**  
President & CEO

DocuSigned by:  
  
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**Christopher Rayner**  
Chief People Officer

DocuSigned by:  
  
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**Ilse De Loof**  
General Counsel &  
Company Secretary