



# Human Rights Policy Statement



## Our commitment

Avia Solutions Group (ASG) PLC (we, us or the Company) is a leading provider of aviation capacity services with a large and diverse team of aviation professionals operating in countries around the world. Our extensive reach allows us to embrace a multitude of cultures and backgrounds, making us committed to acknowledging and safeguarding the human rights of our valued employees. We recognize their paramount importance and strive to create an inclusive and supportive work environment across all our operations.

As an integral component of our Environmental, Social, and Governance (ESG) strategy, we place utmost emphasis on the well-being and dignity of our workforce. This commitment is manifested through the provision of a nurturing and secure work environment that fosters our employees' professional growth. We care deeply about the human aspect of the workplace and are dedicated to ensuring respect for human rights at all levels of our organisation.

### **This Human Rights Policy Statement (the Statement) is based on the following international human rights agreements and commitments:**

- The Ten Principles of the United Nations (UN) Global Compact;
- The International Bill of Human Rights;
- The International Labour Organization's Declaration on the Fundamental Principles and Rights at Work and Core Conventions on Labor Standards;
- The OECD Guidelines for Multinational Enterprises;
- The UN Guiding Principles on Business and Human Rights;
- The UN Sustainable Development Goals.

At the core of our business, we prioritize strict compliance with all applicable laws across all the regions and countries we engage in. Where national law and international human rights standards differ, we will follow the higher standard; when faced with conflicting requirements, we will adhere to national law, while seeking ways to honour the principles of internationally recognised human rights.





## Our support



United Nations  
Global Compact

We support the Ten Principles of the UN Global Compact as a participant. By engaging in this initiative, we dedicate ourselves to fulfilling core obligations encompassing human rights, labor standards, environmental stewardship, and the fight against corruption.



### HUMAN RIGHTS

- Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights;
- Principle 2:** Make sure that they are not complicit in human rights abuses.



### LABOUR

- Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4:** the elimination of all forms of forced and compulsory labour;
- Principle 5:** the effective abolition of child labour;
- Principle 6:** the elimination of discrimination in respect of employment and occupation.



### ENVIRONMENT

- Principle 7:** Businesses should support a precautionary approach to environmental challenges;
- Principle 8:** Undertake initiatives to promote greater environmental responsibility;
- Principle 9:** Encourage the development and diffusion of environmentally friendly technologies.



### ANTI-CORRUPTION

- Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

We also align our ESG strategy with the Sustainable Development Goals (SDGs) of the 2030 Agenda for Sustainable Development established by the UN. The SDGs in which we contribute throughout our actual ESG performance of the Company are:

### Environment:



### Social:



### Governance:





## Fundamental human rights



Prevention of  
violence and  
harassment



Child Labour and Modern  
slavery including Human  
Trafficking, Forced, Bonded  
or Indentured Labor



Equity through equal  
treatment, opportunities,  
and non-discrimination



Freedom of association  
and collective bargaining



Working conditions



Privacy



Environmental footprint  
and related human rights  
issues



Respect local  
communities



## Fundamental human rights



### Prevention of violence and harassment

We strictly prohibit any form of violence or harassment in the Company through the implementation of our Violence and Harassment Policy, in which we reject any act (or omission) of the Company's employees aimed at causing physical, social, or psychological harm to another employee or group of employees in order to ensure the psychological safety of the employees at the work environment.



### Child Labour and Modern slavery including Human Trafficking, Forced, Bonded or Indentured Labor

We prohibit and reject all forms of child labour and modern slavery, including but not limited to human trafficking, forced, bonded, or indentured labour, in compliance with all global, international, and local laws and regulations. This Statement is intended to reinforce and inform our message against any illegal practices that carry the risk of any form of child labour and modern slavery practices. Indeed, our Suppliers' Code of Conduct holds all our suppliers, including subcontractors who conduct business with any subsidiary or division of the Company, to the same high standards of responsible business practices and ethical behaviour. The Suppliers' Code of Conduct is based on our corporate values and adheres to the principles of the UN Global Compact.



### Equity through equal treatment, opportunities, and non-discrimination

Equity through the equal opportunities and equal treatment are principles that advocate for fairness and non-discrimination in our workplace. Because we believe in the value of a diverse and inclusive team, we work by following the value of equal opportunities and treatment to all employees of our Company without discrimination of any kind based on age, race, color, gender, disability, sexual orientation, parental status, religion, national origin, pregnancy, medical condition, or sexual harassment in our work environment.

Equal treatment mandates that individuals be treated fairly and without bias in similar situations, covering areas such as employment, remuneration, promotions, and access to services. These principles aim to create inclusive environments where individuals can excel based on their talents and efforts, free from unjust obstacles or prejudices.



### Freedom of association and collective bargaining

We respect the right to trade-union freedom, freedom of association, and the right to collective bargaining of our employees in accordance with the local legal requirements and without any form of retaliation, intimidation, or harassment. We encourage open dialogue within our team, as we believe that communication between team members and their managers is essential to the good performance of the Company. We also provide whistleblowing program (Trust Line) to provide employees with appropriate and anonymous access to report potential wrongdoing.



## Fundamental human rights



### Working conditions

We provide fair working conditions for all employees, offering them various benefits and competitive remuneration in line with the market. The health and safety of employees is also extremely relevant and important for us. Thus, we are focused and committed on the Company's human value by ensuring a respectful and safe working environment for our employees.

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### Privacy

We respect and protect the privacy and security of personal information of our employees, suppliers, providers and customers in accordance with our Data Protection Policy. We comply with applicable laws and standards relating to personal data protection.

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### Respect local communities

To respect the cultures, customs and values of the people in communities in which we operate. To contribute, within the scope of our capabilities, to promote the fulfilment of human rights through improving economic, environmental and social conditions and serve as a positive influence in communities in which we operate. To have open dialogue with stakeholders and participate in community engagement activities.

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### Environmental footprint and related human rights issues

We recognise that a safe, clean, and sustainable environment is integral to the full enjoyment of human rights. Protecting the environment is therefore fundamental to protecting and respecting human rights. Throughout our Environmental Management System (EMS) Policy, which serves as a framework for setting and achieving our environmental objectives and targets, we are committed to be responsible with the environment.

We acknowledge the importance of addressing climate change and will work to minimize our relative greenhouse gas emissions. We commit to set targets to minimize our carbon footprint, promote energy efficiency, and explore renewable energy sources. We are also committed to promote the efficient use of natural resources, to implement measures to conserve resources and explore opportunities for recycling and reusing materials whenever possible. In addition to this, we develop initiatives to encourage our colleagues to adopt environmentally responsible habits.



## Monitoring, assessment, and grievance mechanisms

We monitor the effectiveness of our approach to human rights in various ways, including a periodic review of our adherence to our policies and standards, and ongoing dialogue with stakeholders. To take action and implement this Statement, human rights are integrated into our impact and risk assessments that seek, among other things, to achieve positive impact for all stakeholders, and all other regular business activities.

We encourage and allow employees, suppliers and other stakeholders disclose any suspected or actual violation of human rights through our whistleblowing program (Trust Line), which provides transparency and accountability across the Company, as well as ensuring and reinforcing a healthy and ethical workplace. Action will be taken to investigate any reported violations and based on the outcome of the investigation appropriate remediation measures will be taken. We have zero tolerance policy for any form of retaliation or discrimination against whistleblowers.

We are committed to being as open and transparent as possible about the way we do business. We communicate proactively with stakeholders and offer different channels for them to engage with us. We seek to understand their perspective on our products and services, our business performance, our role in society and other topics. This input is used in both defining our strategy and our decision-making processes and tells us how we can best align the interests of our businesses with the needs and expectations of our stakeholders.

## Approval

The Board of Directors of the Company has approved this Statement and is responsible for the ongoing development of this Statement and Company's overall commitment to respect human rights.

This Statement will be reviewed every 2 (two) years, and revised, if necessary, to continue to ensure its relevance in the course of time.

Date of Last Update: 15 July 2024.

## Purpose and scope

The establishment of this Statement as a robust reinforcement of our management's and employees' unwavering commitment to uphold human rights in a reasonable and lawful manner. Through this Statement, we aim not only to foster a culture of respect and protection of human rights but also to communicate our steadfast dedication to this cause across the Company and its subsidiaries. It stands as a powerful tool in our collective efforts to ensure that human rights remain at the forefront of our values and actions.

## Governance

The governance of human rights at the Company engages the highest levels of the Company's leadership and aims to involve all the employees of the Company at certain extent. The key levels of human rights governance within the Company include the Group Chief Executive Officer, along with the Chief Executive Officers of the subsidiary companies, are responsible for monitoring the execution of this Statement. Their role is to guarantee that all aspects of our organization understand their duty to uphold human rights and actively carry out these principles in their daily operations.





*Avia Solutions Group*

The information provided herein is prepared in accordance with [Avia Solutions Group Human Rights Policy Statement](#) approved by Decision of Board of Directors of Avia Solutions Group.