

# **POLICY STATEMENT OF EUROWINGS GMBH**



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From left to right Jens Bischof Chairman of the Board of Management, Chief Executive Officer (CEO) and Chief Commercial Officer (CCO) and Edi Wolfensberger Member of Eurowings Executive Board and Chief Operation Officer (COO)

Jens Bischof

A handwritten signature in black ink that reads "Jens Bischof".

Edi Wolfensberger

A handwritten signature in black ink that reads "Edi Wolfensberger".

## DECLARATION OF THE LUFTHANSA GROUP FOR THE RESPECT OF HUMAN RIGHTS

Eurowings GmbH is part of the Lufthansa Group. The Lufthansa Group connects people, cultures, and economies every day. We are a company that stands for open-mindedness, tolerance, and diversity, and we believe we have a responsibility to uphold human rights and operate in a sustainable manner.

Unfortunately, the protection of human rights is not guaranteed in all countries in which we operate as a company. We cannot control the political development of these countries. However, we can contribute to respect for human rights in our business division and also in our supply chain by identifying risks relating to human rights and the environment and by preventing violations. We therefore select our suppliers carefully and contractually oblige them to comply with human rights, labor and health standards, and environmental protection. In case of doubt, we conduct a review. Embedding human rights and sustainability in our business processes and our global supply chain is an ongoing task.

### **In doing so, we follow key international conventions and declarations such as**

- the Universal Declaration of Human Rights,
- the International Covenant on Civil and Political Rights,
- the International Covenant on Economic, Social and Cultural Rights,
- the core labor standards of the International Labor Organization (ILO),
- the UN Guiding Principles on Business and Human Rights,
- the 10 principles of the UN Global Compact,
- the OECD Guidelines for Multinational Enterprises,
- der IATA-Resolution zur Bekämpfung von Menschenhandel
- the IATA Resolution on Combating Human Trafficking and environmental agreements such as the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Transboundary Movements of Hazardous Wastes and their Disposal.

They form the framework for our actions in conjunction with the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz-LkSG).

The Lufthansa Group always complies with applicable national law. Where international human rights are restricted

by local laws, we strive to comply with internationally recognized standards while not clashing with local laws. If local laws exceed international standards, then the Lufthansa Group will comply with local laws.

## LUFTHANSA GROUP'S EXPECTATIONS OF EMPLOYEES AND SUPPLIERS

The Lufthansa Group expects its employees and suppliers to respect human and environmental rights and to support the Lufthansa Group in preventing, minimizing, and/or ending risks and violations related to human and environmental rights.

The expectations placed on the employees and managers of the Lufthansa Group are specifically set out in the Lufthansa Group Code of Conduct.

### [↗ The Lufthansa Group Code of Conduct](#)

The expectations regarding the conduct of suppliers are summarized specifically in the Code of Conduct for Suppliers.

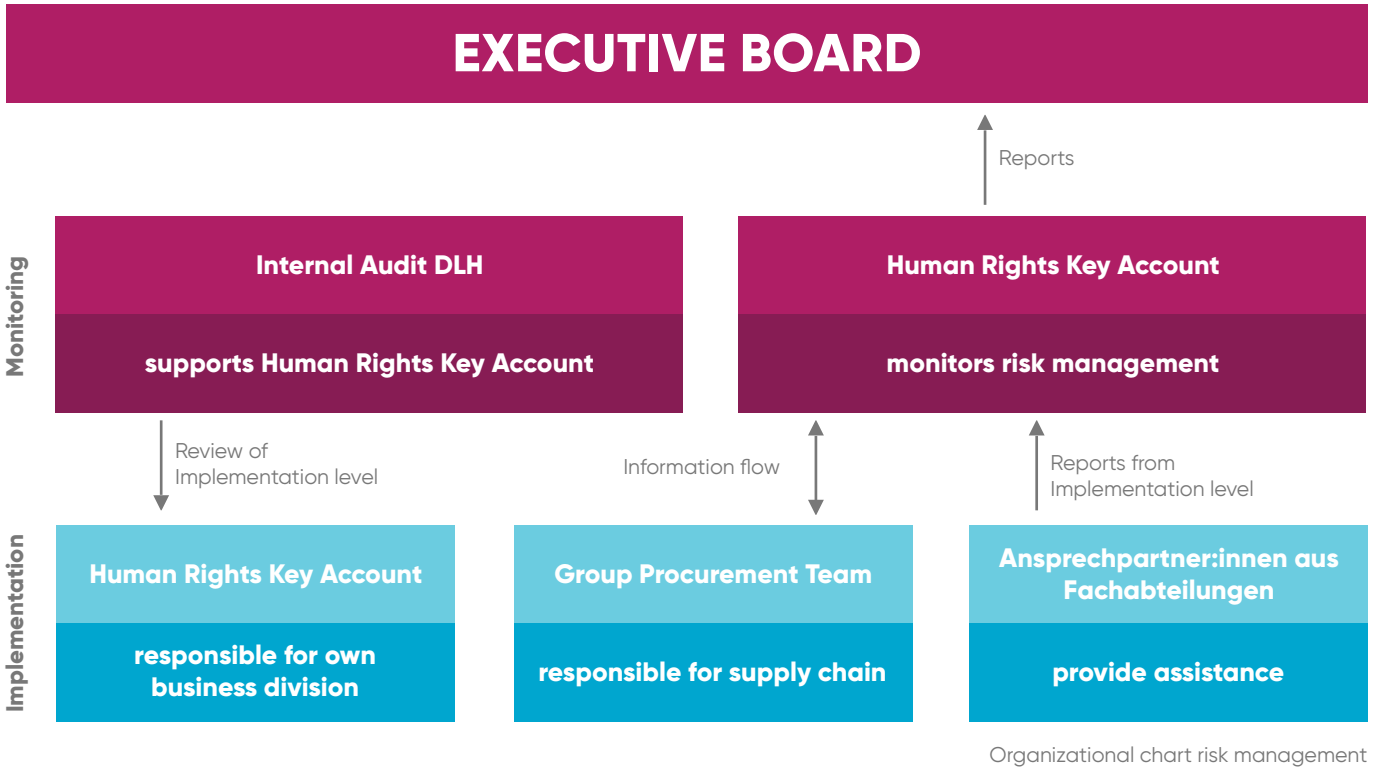
### [↗ The Code of Conduct for Suppliers](#)



# PROCEDURES OF EUROWINGS GMBH TO FULFILL ITS DUE DILIGENCE OBLIGATIONS

## 3.1 RISK MANAGEMENT

Eurowings GmbH has established a risk management system that aims to identify, pre-vent, and eliminate human rights and environmental risks and violations in its own business division and along the supply chain.



### Eurowings GmbH has therefore established the following clear internal responsibilities, in particular:

At Eurowings GmbH, two teams are responsible for implementing the LkSG. In the Legal Team, the Human Rights Key Account coordinates compliance with human rights and environmental obligations within Eurowings GmbH.

The Procurement department is responsible for the associated processes with regard to our suppliers and the supply chain. The two teams are supported by contacts from specialist departments, e.g. Occupational Health and Safety, Human Resources, Works Council and Environmental Issues.

This network can be continuously expanded based on the results of the risk analysis. Internal Audit is deployed to support the Human Rights Officer and to carry out checks at the implementation level.

To monitor risk management within the Group, the function of a Human Rights Officer was created in the "Human Resources and Infrastructure" Executive Board division with a direct reporting line to the divisional board.

This is exercised by Robert Müller, Vice President Labor Relations Ground. The Human Rights Officer informs the Group Executive Board about the work of the responsible persons at regular intervals and as warranted.



Robert Müller, Human Rights Officer of the Lufthansa Group

### 3.2 RISK ANALYSES AND PRIORITY RISKS

Eurowings GmbH carries out risk analyses relating to human rights and the environment every year and as warranted. Each of the eight facilities and more than 2300 suppliers were included in the annual risk analysis in 2024.



Software is used to assist in the appropriate identification, weighing, and prioritization of risks given the large number of companies and suppliers. The companies and suppliers are screened by country, sector, and media references. For companies in our own business division, the plausibility of identified risks is checked on the basis of surveys and company statistics. In addition to external data sources, internal findings such as information received via Group reporting channels, including the anonymous whistleblower system, are also taken into account.

The identified risks are then weighed and prioritized, while taking into account the appropriateness criteria of the LkSG, such as Eurowings GmbH's ability to influence a supplier.

With companies and suppliers that have a prioritized human rights or environmental risk, Eurowings GmbH takes preventive measures to avoid violations. If violations are identified, Eurowings GmbH stops the violation as quickly as possible or creates a remedial concept depending on the type of violation and where it occurs.

Each year, the Human Rights Officer informs the Management Board of Eurowings GmbH about the results of the risk analysis. The results are also communicated to other key decisionmakers such as the Works Council.

Eurowings GmbH considers the disregard for occupational health and safety and work-related health hazards to be particularly relevant in its own business area and the disregard for freedom of association and the right to collective bargaining and the disregard for occupational health and safety and work-related health hazards to be particularly relevant in the supply chain. Eurowings GmbH addresses these risks primarily through the preventive measures described below.



### 3.3 PREVENTIVE MEASURES

Eurowings GmbH pursues a two-pronged strategy for the protection of human and environmental rights: First, it aims to eliminate any risks before they emerge. Second, it seeks to respond to structural risks identified during the risk analysis with appropriate measures and prevent, or at least minimize, adverse impacts on human rights and the environment.

Risks should be prevented from arising in our own business division by means of regular campaigns to raise awareness, a wide range of grievance mechanisms and a broad range of advisory services. To strengthen occupational safety in our own business division, the Group's occupational safety guidelines were updated to provide employees with even better protection against health risks. Eurowings GmbH has also adapted its purchasing processes so that sustainability criteria, for example, already play an important role in the selection of suppliers and that suppliers are generally checked for compliance with human rights, labor and environmental standards and integrity before contracts are concluded. Suppliers are also contractually obliged to protect human rights and the environment. The Lufthansa Group's Code of Conduct for Suppliers once again reinforces the requirement for suppliers to respect freedom of association and the right to collective bargaining. A portfolio of measures has been developed in particular to prevent, eliminate, or mitigate the Lufthansa Group's priority risks, which especially includes the following measures:

#### **Training measures and dialog**

To raise awareness of human rights and environmental due diligence obligations, the Human Rights Key Account Manager and the Group Procurement Team conduct training and dialog formats as required. One focus of the Human Rights Key Account is the continuous implementation of training and communication concepts.

To firmly establish measures in the supply chain, the Group Procurement team maintains a close exchange with risk-prioritized suppliers. These are specifically surveyed with the help of standardized questionnaires, among other methods.

#### **Codes of conduct and contractual measures**

The Lufthansa Group has consolidated its expectations with regard to respecting human rights and protecting the environment into two Codes of Conduct: a code addressed to managers and employees of the Lufthansa Group and a code addressed to suppliers. Both Codes have been revised to fully meet the requirements of the LkSG. The rules of conduct are actively communicated as part of the risk analysis to prioritized companies in our own business division and to suppliers. The employment contracts of managers of prioritized companies are also extended to include an annex that requires them to ensure respect for human rights and environmental obligations in their area of responsibility. Supplier contracts include a detailed corporate social responsibility clause that combines the expectations of the Lufthansa Group with rights and obligations that suppliers are requested to pass on further down the supply chain.

### Control measures

The Lufthansa Group uses audits to check for compliance with human rights and environmental due diligence obligations and whether the risk management performed by Eurowings GmbH's risk management is appropriate. The audits are primarily carried out by Internal Audit. They can also be carried out by external auditors as warranted or on the basis of required specialist knowledge. Audits are carried out by external auditors on a risk basis for direct suppliers and as warranted for indirect suppliers.



## 3.4 REMEDIAL MEASURES

If Eurowings GmbH becomes aware of an actual or imminent violation of human rights or environmental obligations, it will take appropriate remedial action without delay.

If a supplier is unable to immediately terminate, prevent, or minimize a violation, Eurowings GmbH will draw up and implement an appropriate remedial and/or preventive concept.

When creating and implementing the concept, particular consideration is given to (i) the joint development and implementation of a plan to end or minimize the violation with the company causing the violation, (ii) joining forces with other companies as part of industry initiatives and industry standards in order to increase the possibility of

influencing the originator and (iii) temporarily suspending the business relationship while efforts are made to minimize the risk. As a last resort, Eurowings GmbH reserves the right to terminate business relationships.

## 3.5 EFFECTIVENESS MONITORING AND CONTINUOUS IMPROVEMENT

For the effective prevention of negative human rights or environmental impacts, Eurowings GmbH reviews the effectiveness of its preventive and remedial measures and makes any necessary adjustments.

This includes evaluating information from affected parties, obtaining feedback from target groups and conducting spot checks and audits.





### 3.6 COMPLAINTS OPTIONS

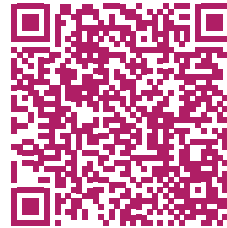
The Lufthansa Group relies on information to protect those affected and to recognize structural risks at an early stage. Regardless of whether they are Lufthansa Group employees or external whistleblowers, such as employees of a supplier or affected parties, any person can report risks or violations relating to human rights and the environment that were caused by the Lufthansa Group or one of its suppliers to the Human Rights & Non-Discrimination Team. These can be reported directly by e-mail, via an electronic whistleblower system, or via an external ombudsperson. The channels for complaints are available in a variety of languages.

Every report is examined impartially and with due regard for confidentiality. Information can also be submitted anonymously via the electronic whistleblower system or the ombudsperson. The Lufthansa Group is expressly committed to protecting whistleblowers from reprisals

and discrimination. The Lufthansa Group reviews the effectiveness of the complaints procedure at least once a year and as warranted, e.g. with regard to the necessary communication of the complaints procedure.

All information regarding the complaints procedure, including the reporting channels, is summarized in the Rules of Procedure and published on the Lufthansa Group website.

[↗ Lufthansa Group Website](#)



### 3.7 DOCUMENTATION AND REPORTING

Eurowings GmbH continuously documents the fulfillment of its human rights and environmental due diligence obligations in accordance with the requirements of the LkSG.

In this Policy Statement, which is updated annually and as warranted, Eurowings GmbH reports on the procedure by which it fulfills its due diligence obligations, on the priority risks, and on the expectations of employees and suppliers. It also reports each year to the German Federal Office for Economics and Export Control (BAFA). As a globally operating company, it also issues an annual UK Modern Slavery Act Statement. All reports are published on the Internet:

[↗ The reports](#)

## CONTACT

For questions and comments on this Policy Statement or other human rights or environmental issues, please contact [legal@eurowings.com](mailto:legal@eurowings.com)

Further information is published on Eurowings GmbH website [↗ eurowings.com](https://www.eurowings.com)