OFFICE TRANSLATION

ETHICS, SOCIAL RESPONSIBILITY, AND DIVERSITY - CORPORATE POLICY

Valid date: 13 May 2025

Avinor manages significant assets on behalf of society, and its societal mission must be carried out with consideration for people, animals, communities, and the environment. Avinor therefore imposes strict requirements for ethics, social responsibility, and responsible business conduct. Avinor actively works to ensure that we respect fundamental human rights and decent working conditions within our own operations and throughout our value chain, both upstream and downstream.

We shall conduct our business in a manner consistent with international guiding principles for business and human rights, as well as national legislation, in accordance with:

- The Universal Declaration of Human Rights
- The UN Covenant on Economic, Social, and Cultural Rights
- The UN Covenant on Civil and Political Rights
- The ILO Declaration on Fundamental Principles and Rights at Work

The following principles, based on the above standards, form the foundation for sustainable and responsible business practices throughout Avinor's operations:

- Avinor supports the right to freedom of association and collective bargaining. Workers' wages for a normal workweek must at least comply with national minimum wage regulations or industry standards, whichever is higher. Working hours must comply with national laws or industry standards.
- Forced labor, slavery, or involuntary labor of any kind shall not occur. Child labor is not permitted.
- There shall be no discrimination in hiring, compensation, training, promotion, termination, or retirement based on ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation.
- Brutal treatment, sexual or other abuse, and other forms of humiliation are prohibited.
- Employees and workers shall have a safe and healthy working environment (HSE).
- Regular employment shall not be circumvented through the use of short-term engagements.
- Negative environmental impacts shall be reduced throughout the value chain. The production and use of natural resources must not contribute to the destruction of the resource and income base of indigenous peoples or other marginalized groups.
- Corruption and other prohibited business practices are not allowed.
- Animal welfare shall be respected. National and international animal welfare laws and regulations must be adhered to.

Due Diligence Assessments
Avinor shall conduct due diligence assessments for sustainable business practices. This means carrying out internal risk assessments of negative impacts on people, society, and the environment, and taking steps to stop, prevent, and mitigate such impacts. These measures will be monitored, their effectiveness evaluated, and the results communicated to those affected. If our activities cause or contribute to negative impacts on people, society, or the environment, we shall cease such activities and seek to remedy the harm. Where the supplier is responsible for the negative impact or harm, the supplier is also responsible for remediation.

Avinor shall fulfill its social responsibility by acting sustainably, safely, and efficiently in line with our values within the following prioritized areas:

Own Employees

- Leaders shall lead by example as good role models, promote our values in their leadership, and facilitate the development of the right competencies for employees and team members.
- All employees shall comply with the company's policies, guidelines, and applicable regulations related to ethics and social responsibility.
- We maintain an open culture where employees are encouraged to speak up about objectionable conditions.
- Avinor actively and purposefully works to promote equality and diversity and to prevent discrimination.
- At Avinor, human differences, both large and small, shall be valued as a strength.
- Everyone shall have equal opportunities at Avinor, and we have zero tolerance for discrimination and unequal treatment at all levels of the organization.
- Avinor has zero tolerance for corruption, including bribery, facilitation payments, and gifts that could influence decisions.
- Health, safety, and the environment shall be an integral part of how we think and work. Avinor systematically works to eliminate hazards and reduce the risk of personal injuries and work-related illnesses. Avinor has a zero vision for fatalities and life-altering injuries.
- Digital security and respect for privacy are becoming increasingly important as aviation becomes more digitalized. Employees and customers shall experience that Avinor acts with care and respect.

Workers in the Value Chain

- Avinor considers responsible procurement practices as one of our most important tools in promoting sustainable business practices. Avinor shall adapt our procurement practices to strengthen, rather than undermine, suppliers' ability to meet the requirements we set to ensure good conditions for people, society, and the environment. We shall strive for long-term supplier relationships with suppliers who demonstrate a strong willingness and ability to work towards positive development in the supply chain.

- Avinor shall continuously conduct risk and due diligence assessments both within our own operations and across the value chain to ensure social sustainability.
- Avinor shall use its influence with suppliers and business partners to help reduce potential negative impacts in value chains.
- Labor market crime shall be systematically prevented, detected, and addressed in all our operations and throughout the supply chain.
- Avinor shall avoid business partners with activities in countries subject to trade embargoes or sanctions.

Local Communities & Stakeholders

- Actively engage stakeholders who are potentially or actually affected by Avinor's operations. Stakeholders shall be involved in preventive and risk-reducing measures.
- The climate and environmental footprint shall be reduced by being a clear and proactive client who, together with our suppliers, minimizes negative environmental impacts and greenhouse gas emissions while developing innovative and sustainable solutions for Norwegian aviation.
- Biodiversity and animal welfare shall be considered to protect and minimize negative impacts.

The requirements set forth in this policy are minimum requirements. If stricter requirements are mandated by law or regulation, those shall take precedence. The Board of Directors and the CEO hold the ultimate responsibility for ethics and social responsibility at Avinor. The leader of each business area is responsible for ensuring compliance with this policy within their business unit and its underlying operations.

This policy applies to all business areas and companies within the group and is applicable to employees, temporary staff, contractors, and consultants representing these entities. The content of this policy is communicated to employees through the group's "Ethical Guidelines" and to contractual partners through the agreement requirements outlined in the "Agreement on Responsible Business Conduct."

Violations of this policy will result in actions appropriate to the nature and extent of the breach and may have consequences for the employment relationship or contractual relationship.

Signed by Avinor CEO Abraham Foss