

OFFICE TRANSLATION

ETHICS, SOCIAL RESPONSIBILITY AND DIVERSITY GROUP POLICY

Effective from: 13.05.2025

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

We shall conduct our business in a manner consistent with international guiding principles for business and human rights, and 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 free association and collective bargaining. Workers' wages for a normal workweek shall at least comply with national minimum wage regulations or industry standards, whichever is higher. Working hours shall comply with national laws or industry standards.
- Forced labor, slavery, or involuntary labor shall not occur in any form. Child labor is not permitted.
- Discrimination in hiring, compensation, training, promotion, termination, or retirement based on ethnicity, religion, age, disability, gender, marital status, sexual orientation, union activity, or political affiliation shall not occur.
- Harsh 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 impact shall be reduced throughout the value chain. The production and use of natural resources shall not contribute to the destruction of the resource and income base for indigenous peoples or other marginalized population groups.
- Corruption and other prohibited business practices are not allowed.
- Animal welfare shall be respected. National and international animal welfare legislation and regulations shall be adhered to.

Due Diligence Assessments

Avinor shall conduct due diligence assessments for sustainable business practices. This means conducting its own risk assessments of negative impacts on people, society, and the environment, and stopping, preventing, and reducing such impacts. Measures shall be monitored, their effectiveness evaluated, and communicated to those affected.

Where our activities cause or contribute to negative impacts on people, society, or the environment, we shall stop the activity and seek to remedy the harm. Where the supplier is responsible for the negative impact/damage, the supplier is also responsible for remediation.

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

Own Employees

- Leaders shall act as good role models and promote our values in their leadership, facilitating that employees and colleagues have the right competence.
- All employees shall comply with the group's policies, guidelines, and applicable regulations on ethics and social responsibility.
- We have an open culture where employees speak up about critical issues.
- Avinor actively and purposefully works to promote equality and diversity and to prevent discrimination.
- At Avinor, human differences, 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 may influence decisions.
- Health, safety, and environment shall be an integrated part of how we think and work. Avinor works systematically to eliminate hazards and reduce the risk of personal injury and work-related illness. Avinor has a zero vision for fatalities and life-changing injuries.

- Digital security and respect for privacy are increasingly important as aviation becomes more digitalized, and employees and customers shall experience that Avinor acts cautiously and respectfully.

Workers in the Value Chain

- Avinor considers responsible procurement practices as one of its most important tools in promoting sustainable business practices. Avinor shall adapt its own procurement practices to strengthen, not 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 show particular willingness and ability to work on positive development in the supply chain.
- Avinor shall continuously conduct risk and due diligence assessments both in its own operations and 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, uncovered, and followed up in all our operations and in the supplier chain.
- Avinor shall avoid trading partners with activities in countries subject to trade boycotts or sanctions.

Local Communities & Stakeholders

- Actively involve stakeholders who are potentially or actually affected by Avinor's operations. In preventive and risk-reducing measures, stakeholders shall be involved.
- Climate and environmental footprint shall be reduced by being a clear client who, together with our suppliers, reduces negative environmental impact and greenhouse gas emissions, and develops innovative and sustainable solutions for Norwegian aviation.
- Biodiversity and animal welfare shall be considered to preserve and reduce negative impact.

The requirements set out in this policy are minimum requirements. If stricter requirements follow from law or regulation, these shall be followed. The Board and the CEO have the ultimate responsibility for ethics and social responsibility at Avinor. The head of each business area is responsible for compliance with this policy in their business and underlying entities.

The policy applies to all group business areas and companies and applies to employees, temporary staff, hired personnel, and consultants representing these. The content of this policy is conveyed to employees through the group's "Ethical Guidelines" and to contractual parties through agreement requirements in the "Agreement on Responsible Business Conduct." Breaches of the policy will be met with responses appropriate to the nature and extent of the violation and may have consequences for employment or contractual relationships.

Abraham Foss

CEO

Avinor AS