

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Swiss International Air Lines Ltd.

The respect for human rights is self-evident and forms an integral part of the corporate culture of Lufthansa Group¹ as a group of companies that acts with responsibility and integrity. Modern slavery is a crime and a violation of fundamental human rights. We are committed to improve our practices to combat modern slavery and human trafficking. Our statement outlines the steps we have taken to prevent Modern Slavery within our Group and our supply chains and sets out our plans for future improvements.

This statement corresponds to section 54 (1) of the Modern Slavery Act 2015 (United Kingdom) and constitutes our Group's slavery and human trafficking statement for the financial year ending December 31st, 2022.

In conformity with section 54 of the Act, in this statement we report about:

1. Swiss International Air Lines Ltd. and Lufthansa Group – our organizational structure
2. Our Supply Chains
3. Our policies regarding Modern Slavery and Human Trafficking
4. Our Human Rights Project Group
5. Due Diligence and Risk Assessment
6. The IATA resolution on Human Trafficking
7. Our further steps to prevent Modern Slavery
8. Approval for this statement

1 About Swiss International Air Lines Ltd. – our organizational structure

Swiss International Air Lines Ltd. ("SWISS"), with registered office in Basel, Switzerland, is part of the Lufthansa Group. The Lufthansa Group is an aviation group with worldwide operations and 96,677 employees and over 400 Lufthansa Group companies and facilities within own business division as of December 31st, 2023. The purpose of SWISS is the operation of an airline for the transportation of passengers, cargo and mail.

2 Our Supply Chains

Taking ESG aspects in the supply chain into account is an important element of acting responsibly. In addition to economic aspects, impacts on human rights and the environment are taken into consideration during the procurement process. To meet the standards the Lufthansa Group sets for the sustainability of its own products and services, the Lufthansa Group relies on close collaboration with suppliers who share and implement these standards. This also forms part of the Lufthansa Group's Code of Conduct. The Lufthansa Group's expectations of its suppliers regarding social,

¹ Lufthansa Group means Deutsche Lufthansa AG and its related bodies corporate, as defined in Section 18 of the German Stock Corporation Act (Aktiengesetz).

“We want to promote human rights worldwide. We aim to anchor this expectation in the companies of the Lufthansa Group and their supply chain. Human rights include, in particular, prohibition of both child and forced labour and slavery, compliance with occupational health and safety obligations, respect for freedom of association, working conditions that are adequate and humane, and refraining from environmental pollution, land deprivation, torture and cruel, inhuman or degrading treatment.”

Our suppliers are additionally subject to the Lufthansa Group's Supplier Code of Conduct, which build on the Lufthansa Group Code of Conduct and specifically mentions:

“Suppliers of the Lufthansa Group must not use or tolerate any form of (modern) slavery, servitude, forced or compulsory labour, human trafficking or comparable forms of exploitation, oppression or humiliation (ILO core labour standards 29 and 105). They must ensure that their employees carry out their work of their own free will and without restrictions to their freedom of movement. Our suppliers should actively campaign for the elimination of all forms of forced labour or slavery.”

Moreover, in line with the German Act on Corporate Due Diligence Obligations in Supply Chain (Lieferkettensorgfaltspflichtengesetz - LkSG), which since 2023 has created an additional binding framework for compliance with human rights and environmental standards, the Executive Board of the Lufthansa Group has published a policy statement on respect for human and environmental rights. The Lufthansa Group seeks to prevent, minimize, and/or end risks and violations related to human and environmental rights within our own business area as well as our supply chain through preventive and remedial measures.

Whistleblowing procedures

Companies are obliged to identify human rights risks and report the type and number of suspicious incidents. Employees of the Lufthansa Group as well as external third parties, such as customers or suppliers, have several options to file a complaint, also anonymously.

In 2021, Lufthansa Group established an electronic whistleblower system available in a variety of languages, in addition to the existing ombudsman system to facilitate the submission of compliance related hints. Lufthansa Group expanded this system in 2022 also to human rights and environment- related hints. Lufthansa Group employees can also contact the Lufthansa Group Human Rights and Non-Discrimination Team, their supervisors, human resources management or the co-determination bodies directly. A works agreement with regard to grievance procedures is already in place for all employees in Germany.

An overview of all our whistleblowing channels and the Lufthansa Group's Rules of Procedure pursuant to Section 8 of the German Supply Chain Due Diligence Act is available on our website².

4 Our Human Rights Working Group and further safeguarding measures

A Human Rights Project Group was established within the Human Resources and Legal Affairs Division of the Executive Board in 2017 and comprises of representatives from all relevant corporate functions and Group companies based on the risk assessment. The project group monitors and discusses any potential high and critical risk areas, incidents, and actions in relation to human rights with the specific field of modern slavery. The Working Group meets generally twice a year to monitor the Group's progress in human rights advancements. In 2022 the role of a Human Rights Officer was

² [Whistleblowing System - Lufthansa Group Investor Relations](#)

aware of the importance of this topic and recognizes that as an aviation company it can play a significant role in identifying potential criminal offences. It has therefore implemented a reporting process for flagging suspected cases of human trafficking that has been coordinated with the authorities.

Moreover, the Lufthansa Group has developed a web-based training in order to integrate these issues into regular training for flight personnel, in accordance with IATA recommendations. These employee groups are made particularly aware of potential signs of human rights violations. A review is currently under way as to whether this training needs to be updated. If necessary, it will be revised in the following year. The ongoing development of the management approach for combating human trafficking is managed by the Lufthansa Group Human Rights and Non-Discrimination Team in close cooperation with the Lufthansa Group's Passenger Airlines and the relevant Group functions.

7 Our further steps to prevent Modern Slavery

The Lufthansa Group, as a globally operating group of companies, sees it as its responsibility to contribute. Companies do not control political developments in the countries they operate in; however, they have a responsibility in the sphere of their work, especially towards their employees and suppliers worldwide. In the coming year, the Group will look to further improve its structures, practices, and trainings to fight Modern Slavery and Human Trafficking.

8 Approval for this statement

On 28 May 2024, this statement was approved by the Management Board with respect to the Financial Year 2023.



Dennis Weber, 28 May 2024

Chief Financial Officer
Member of the Management Board