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APPROVED

*By the Decision of Board of Directors of Avia Solutions Group (ASG) PLC
No. 2024/09/25-1 on 25 September 2024*

Avia Solutions Group (ASG) PLC
Stakeholders Engagement Policy
(the **Policy**)

1. Introduction

Avia Solutions Group (ASG) PLC (the **Company**) and its affiliated companies (all together the **Group** or **we**) recognize that Stakeholders' (as defined below) engagement is an integral part of our business operations. To this end, it is vital to develop an understanding of the Stakeholders' demands, interests and expectations.

As part of our Environmental, Social and Governance (**ESG**) strategy, we are committed to build greater trust in the Group's relationship with its Stakeholders by adopting, encouraging, and promoting transparent behavior.

Through this Stakeholder Engagement Policy (the **Policy**), we strive to provide long-term value to our Stakeholders and external parties, including, but not limited to, employees and other workers, business partners, customers, suppliers, regulators and government agencies, media, industry associations, local communities, non-governmental organizations, shareholders and other investors, trade unions and vulnerable groups.

2. Purpose

The purpose of this Policy is to outline the principles and practices that guide the Group's interactions with Stakeholders. The goal is to build and maintain effective relationships, foster trust, and ensure transparent, inclusive, and meaningful engagement with all parties who are impacted by or have an interest in Groups operations.

3. Scope of application

All employees of the Company, including, but not limited to, executives, members of management bodies and those who under any legal ground whatsoever represent the Company (the **Employees**), must adhere to the Policy. Moreover, appropriate efforts shall be made in order to transfer to suppliers, customers, and other Stakeholders the aim of this Policy and, including the Company's commitments towards ESG related matters, and thus to extend them to the value chain.

This Policy also applies to Tier 1 and Tier 2 companies of the Group as per list, set forth in the Group's Entity Management System "ROCK", and updated from time to time. This Policy is also applicable to the companies within the Group that, according to the laws of their respective countries of establishment, are obligated to implement policies similar to this Policy.

Without prejudice to the provisions of the preceding paragraph, companies within the Group, based on their own special framework of strengthened autonomy, may establish an equivalent policy, which must be in accord with the principles set forth in this Policy and in the other ESG and regulatory compliance policies effective within the Group.

4. Key definitions

For better and appropriate understanding of the Policy, the definitions described below are essential:

- **Stakeholders** are individuals or groups with interests that are or could be affected by an Group's activities. Common categories of Stakeholders include Employees and other workers, business partners, customers, suppliers, regulators and government agencies, media, industry associations, local communities, non-governmental organizations, shareholders and other investors, trade unions and vulnerable groups.
- **Key Stakeholders** shall be understood as individuals or organizations that can reasonably be expected to be significantly affected by the Group's activities, products and / or services, or which actions can reasonably be expected to affect the ability of the Group to implement its strategies and achieve its objectives.
- **Categories of Key Stakeholders:**
 - a. **Internal stakeholders:**

- Employees: Individuals employed by the Company or companies of the Group who contribute to its operations and success.
- Management: The leadership team responsible for making strategic decisions and overseeing the Group's activities.
- Shareholders/Owners: Individuals or entities that own shares in the Company and/or Group companies and have a financial interest in its performance.
- Trade unions are organized associations of workers formed to protect and advance their rights and interests. They operate as collective bargaining agents for their members, negotiating with employers on issues such as wages, working conditions, benefits, and workplace safety. Trade unions also provide legal and professional support to their members and advocate for labor rights and social justice.

b. External stakeholders:

- Customers/Clients: Individuals or organizations that purchase or use the Group's products or services.
- Suppliers: Businesses or individuals that provide goods or services to the Group.
- Business partners are individuals, companies, or entities that collaborate to achieve mutual business objectives. These partnerships can take various forms, including formal alliances, joint ventures, strategic alliances, and informal collaborations. Business partners share resources, expertise, and risks to enhance their capabilities and achieve goals that might be difficult to accomplish independently.
- Investors: Individuals or entities that invest capital in the Company or Group companies and expect a return on their investment.
- Regulators/Government Agencies: Authorities that establish regulations and policies the Group must comply with.
- Local Communities: Residents and organizations in the geographical areas where the Group operates, who may be affected by its activities.
- Non-Governmental Organizations (NGOs): Advocacy groups or non-profit organizations that may have an interest in the Group's impact on social, environmental, or economic issues.
- Industry Associations: Groups of representing organizations within the same industry, which may influence industry standards and practices.
- Media: Organizations and platforms responsible for producing and distributing news, information, and entertainment to the public such as social media platforms, regulatory bodies, advertising agencies, etc.
- Vulnerable groups: Populations that, due to various social, economic, physical, or environmental factors, face heightened risks and barriers that impact their well-being and participation in societal processes. These groups often require special consideration and support to ensure their voices are heard, their needs are met, and their rights are protected within the context of organizational and societal activities.

5. Key principles of Stakeholders' engagement process

The identification and analysis of Stakeholders shall adhere to **key principles** to ensure the process is carried out properly. These principles are:

- **Inclusiveness**: We are committed to identifying and engaging a diverse range of Stakeholders to ensure all relevant perspectives are considered.

- **Transparency:** We will communicate openly and honestly with Stakeholders about our activities, decisions, and performance.
- **Responsiveness:** We will actively listen to Stakeholders' concerns and respond in a timely and effective manner.
- **Collaboration:** We seek to build collaborative relationships with Stakeholders to achieve shared goals and create value.
- **Continuous Improvement:** We are dedicated to continuously improving our Stakeholder engagement practices based on feedback and changing circumstances.

The Company shall establish communication channels to promote the foregoing basic principles and involve its Stakeholders in its activities, as well as to strengthen their engagement and identification with the Group. These channels may be general, such as the corporate website, social media, digital media and applications and consultation procedures, or specific, i.e. for interaction with a particular Stakeholder.

The Company disseminates significant and reliable information on its performance and activities and annually prepares and publishes financial and non-financial information on its activities, following a generally accepted method in the case of non-financial information, and subjecting such information to independent external verification, if appropriate.

6. Stakeholders' identification and analysis process

As an integral component of our ESG strategy, the relevance of engaging with Stakeholders is crucial. The insights and opinions of diverse Stakeholders are essential for the long-term success of the Group.

The process of identifying and analyzing Key Stakeholders follows the steps described below:

a. Identification of Key Stakeholders by business activity.

- **Business activity specifics:** Since the Group may be involved in multiple business activities, it is necessary to identify different Stakeholders for each activity. This identification should focus on the most relevant Stakeholders for the Group.

b. Classification of Key Stakeholders previously identified.

The classification of Stakeholders shall be done in accordance with the following definitions:

- **Affected Stakeholders:** individuals or groups whose interests are affected or could be affected — positively or negatively — by the Group's activities and its direct and indirect business relationships across its value chain.
- **Users of sustainability statements:** primary users of general-purpose financial reporting, including existing and potential investors, lenders, and other creditors (such as asset managers, credit institutions, and insurance companies). Other users include the Group's business partners, trade unions and social partners, civil society and non-governmental organizations, governments, analysts, and academics.

c. Identification of engagement methods.

- **Engagement implementation:** Once the most significant Stakeholders are identified and classified, their engagement should be carried out. Stakeholder engagement involves the Company or the respective companies of the Group in identifying, understanding, and responding to sustainability issues and concerns, and reporting, explaining, and answering to Stakeholders for decisions, actions, and performance.
- **Communication methods:** Various communication methods can be used to engage Stakeholders. Each Stakeholder group should have at least one efficient communication channel, defined as a method through which the Group can effectively communicate with

and hear from a specific group of Stakeholders regarding their concerns, questions, and needs. Examples of communication channels include:

- i. Surveys to customers, suppliers, and Employees
- ii. Brainstorming sessions
- iii. Review meetings
- iv. Solution assessments
- v. Periodic audits
- vi. Grievances mechanisms through our whistleblowing program ([Trust Line](#))

d. Standardized engagement method.

- **ESG Material Topics Survey:** To ensure a minimum level of input and consistency in criteria, it is mandatory to launch the ESG Material Topics Survey to the identified Key Stakeholders. Additional information can be found in the Environmental, Social and Governance Policy of the Company.

Identifying who Key Stakeholders are and what their interest, level of expertise, and level of influence is crucial to successful Stakeholder engagement and to allocating the Groups resources as efficiently as possible. Therefore, we assess and prioritize stakeholders using the following criteria:

- Stakeholder's interests
- Stakeholder's expertise on material issues
- Stakeholder's level of influence
- Stakeholder's willingness to engage with the Group
- Stakeholder's expectations of engagement with the Group
- Stakeholder's dependence on the Group, and
- Value for the Group of engaging with this Stakeholder.

Because Stakeholders can change – due to new technologies, regulations, markets, and customers – Stakeholder mappings should be conducted on a regular basis.

The selection of specific communication methods is open and flexible, allowing to choose the most appropriate methods. However, the **ESG Material Topics Survey** ensures a baseline of engagement and standardized feedback from Key Stakeholders.

7. Roles and responsibilities

Effective Stakeholder engagement requires clear delineation of roles and responsibilities within the Company of companies within the Group to ensure accountability and successful implementation of this Policy. Below are the key roles and their associated responsibilities:

- **Board of Directors**
 - Approval and oversight: Approve the Policy and any significant updates as well as ensuring that the Policy is aligned with the Group's overall business strategy. The Company's Board of Directors may approve other corporate policies addressing specific Stakeholders.
- **Chief Executive Officer of the Company (regardless of the exact position occupied) (the CEO)**
 - Oversight: Provide annually reviews and assesses process against the Policy.
 - Reporting: Provide regular updates to the Board of Directors on the progress and outcomes of Stakeholder engagement efforts, if deemed necessary.
 - Amendments: Regularly reviews and amends the Policy as deemed necessary.
- **ESG Department**

- Policy implementation: Oversee the implementation of the Policy.
 - Integration: Ensure that Stakeholder engagement is integrated into the Group's overall ESG strategy and operations.
 - Coordination: Coordinate with different departments to ensure consistent and coherent Stakeholder engagement across the Company and the Group for ESG topics.
 - Reporting: Provide regular updates to the CEO on the progress and outcomes of Stakeholder engagement efforts, if deemed necessary.
- **Department Heads and Managers**
 - Implementation: Implement Stakeholder engagement activities within their respective departments, in line with the Group's strategy.
 - Identification: Identify Key Stakeholders relevant to their department's operations and ensure their engagement.
 - Collaboration: When referring to ESG aspects, work collaboratively with the ESG Department to ensure alignment and coherence in engagement efforts.
 - Feedback Management: Collect, analyze, and respond to Stakeholder feedback, ensuring that concerns and suggestions are addressed appropriately.
 - Monitoring: Monitor and report on Stakeholder engagement activities and outcomes within their departments.
 - **Employees:**
 - Awareness: Be aware of the Policy and understand its relevance to their roles.
 - Participation: Actively participate in Stakeholder engagement activities as required.
 - Communication: Communicate Stakeholder concerns and feedback to their managers.

By clearly defining these roles and responsibilities, the Group aims to ensure a systematic and effective approach to Stakeholder engagement, fostering trust, transparency, and long-term value creation for all Stakeholders involved.

8. Engagement risks

The person engaging the Stakeholder on behalf of the Group shall assess potential risks associated with the engagement, prior to selecting the Stakeholder, and the scope and method of the engagement. Based on such assessment, the person engaging the Stakeholder will determine whether the engagement is in the interest of the Company and the Group. If it is not, the engagement will not be entered into.

Potential Stakeholder engagement related risks may include, without limitation, participation fatigue, having expectations that the Group is unable to fulfil, lack of trust, unwillingness to engage, conflicting interests between the Stakeholders and technical or other practical barriers. Group related risks may include, without limitation, damage to reputation, waste of human and financial resources, loss of control of issues, creation of conflicts of interest, raising expectations that the Group is unable to fulfil, and non-compliance with legal requirements and internal policies and standards.

9. Disclosure of information

To ensure an effective engagement and in order to assure that the engaged Stakeholder receives sufficient, consistent and timely information, the person engaging the Stakeholder shall disclose

information in an accurate, transparent and comprehensive manner. The engaged Stakeholder shall be requested to adhere to the same principles with regard to the disclosure of information to the Group. Disclosure of information by the person engaging the Stakeholder shall at all times be in compliance with legal requirements and internal policies and standards of the Group.

The person engaging the Stakeholder shall not disclose inside information as referred to in article 7(1) of the Market Abuse Regulation, commercially sensitive information or information that is confidential for other reasons to the Stakeholder.

10. No third party rights

Nothing expressed or referred to in this Policy will be construed to give any person any legal right or claim under or with respect to this Policy.

11. Final provisions

The Company's Employees are encouraged to ask questions regarding this Policy. Any question or uncertainty about a specific situation relating in any way to this Policy (or related policies or procedures) should be addressed to the Employee's managers before taking action.

This Policy supersedes all previous policies and may be amended from time to time as deemed necessary to reflect changes in best Stakeholders engagement practice.

This Policy shall not impose exact and precise requirements for engagements carried out at each company within the Group and shall not establish detailed and comprehensive processes, and these shall be set up internally by each company within the Group so that the goals of the Policy would be duly met.

The Board of Directors of the Company has approved this Policy and is responsible for Company's overall commitment to adhere to it.

This Policy will be reviewed once every two (2) years to ensure its relevance and effectiveness in guiding Groups efforts in maintaining a continuous and meaningful dialogue with its Stakeholders. The Board of Directors hereby delegates to the CEO to make amendments to this Policy as he/she deems necessary for reaching of overall goals set in this Policy.