

# Environmental, social, and governance

Report 2024





# CEO Statement

## Dear Stakeholders,

I am pleased to present the **2024 ESG report for Avia Solutions Group**. As one of the world's leading ACMI providers, with a fleet of 220 aircraft and a global team of more than 14,000 professionals, we remain committed to the highest standards of safety, ethics, operational excellence, and sustainable growth.

2024 has been a pivotal year, marked by strategic milestones that have strengthened our leadership in global aviation. We expanded our presence in Brazil, Indonesia, Thailand, and Malaysia, while our ecosystem now spans over 60 countries with 11 Air Operator Certificates (AOCs), offering a comprehensive range of aviation services.

A key highlight this year is our first **direct order with Boeing for 80 737 MAX aircraft** — 40 firm orders and 40 purchase rights — with deliveries beginning in 2030. This investment advances our fleet modernization strategy and complements our current fleet. The 737 MAX's fuel efficiency and lower emissions will support our clients in reducing their carbon footprint and enhancing passenger experience.

Our sustainability strategy also extends beyond fleet investments. In partnership with **NorSAF**, we are supporting the development of a **SAF production facility** at the Port of Liepaja, Latvia. Using locally sourced bioethanol, green hydrogen, and biogenic CO<sub>2</sub>, the project will contribute to the decarbonization of aviation and strengthen Europe's SAF supply chain.

These focused actions have directly contributed to the significant improvement of our ESG performance. In 2024, our **S&P Global ESG score rose by 35% to 43/100**, while our **Sustainalytics ESG Risk Rating remained at a strong 14.8**, keeping us firmly in the **low-risk category**. These achievements reflect how targeted investments in fuel efficiency, operational excellence, and sustainable technologies translate into measurable ESG progress.

**Our people are another cornerstone of this success.** Building a diverse, skilled, and empowered workforce not only strengthens our business but also enhances our social impact — a critical pillar of our ESG strategy. This year, we launched **Spread Her Wings: Women Aviation Mentorship, an initiative designed to support and empower women pursuing careers in aviation**. Through these initiatives, along with our educational and development programs, we are building a workforce that embodies our values and is ready to thrive in an ever-changing aviation industry.

Looking ahead, we will continue to embed ESG principles across our operations, modernize our fleet, and advance sustainability through innovation and collaboration. Guided by our values and driven by our people, we are shaping a more responsible and sustainable future for aviation.

**Jonas Janukenas**

CEO, Avia Solutions Group





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# About Avia Solutions Group





# 1. Avia Solutions Group Highlights 2024

## Our ESG Values

### Environment

Protect and take care of the environment.



100%

of our logistics operations in Lithuania run entirely on renewable diesel/biodiesel.



- Rollout of annual ESG workshop
- Implementation of key sustainability initiatives across the Group
- Improved operational efficiency through data-driven management

### Social

Respect every human being and ensure a safe working environment.

- Received a strong response to the annual Employee Engagement survey
- Launched **Spread Her Wings: Women’s Aviation Mentorship Initiative**
- Implementation of new training modules
- Introduction of additional employee well-being benefits



627

promotions were achieved at Group level.



### Governance

Strengthen our governance structure through ethical and transparent business conduct.

In the past two years, **zero** incidents or reports of corruption have been received.

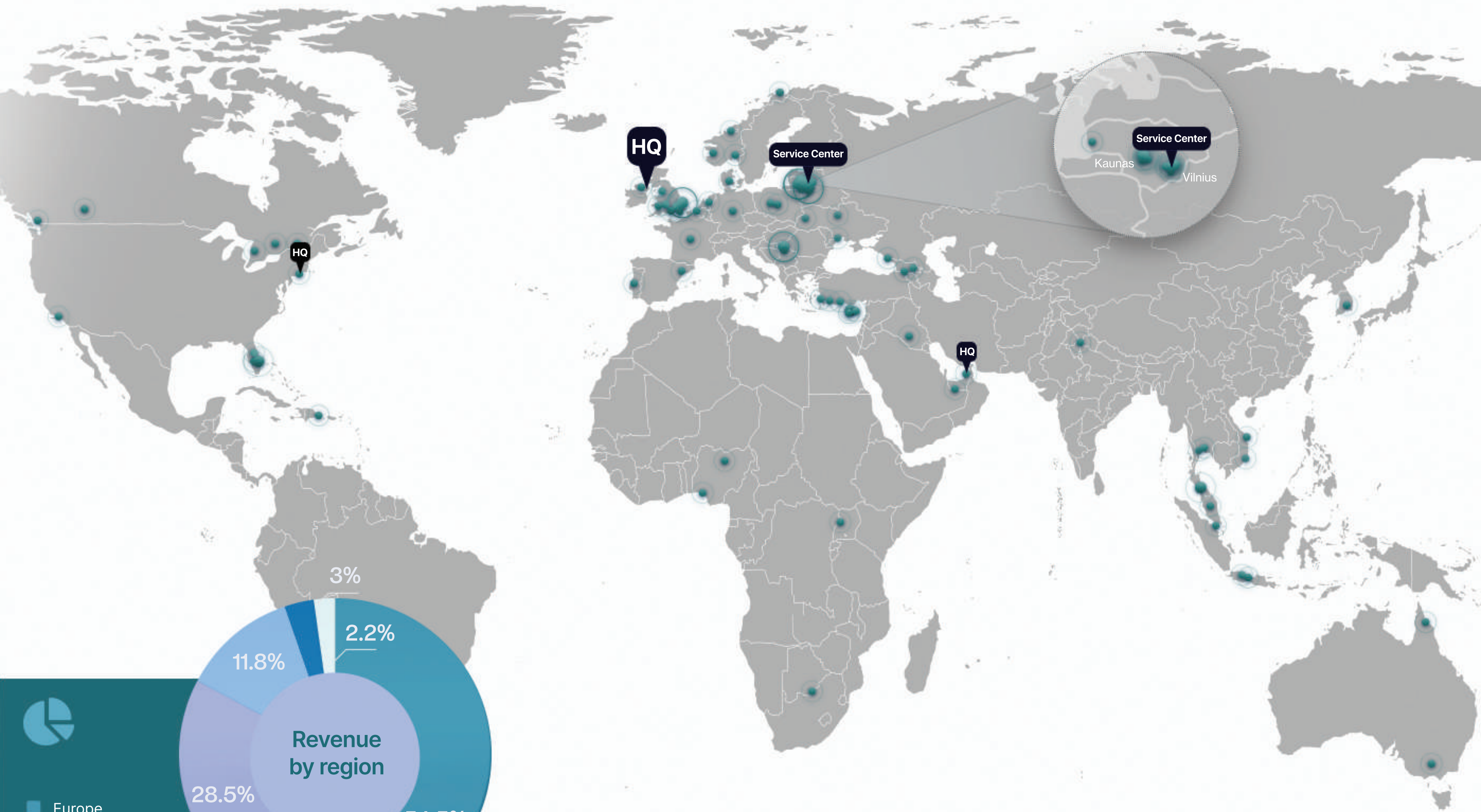


- New Cybersecurity policies approved
- Strengthened IT infrastructure security
- Corporate Compliance Framework rollout
- Launched LEAN transformation initiatives



## 2. Business model

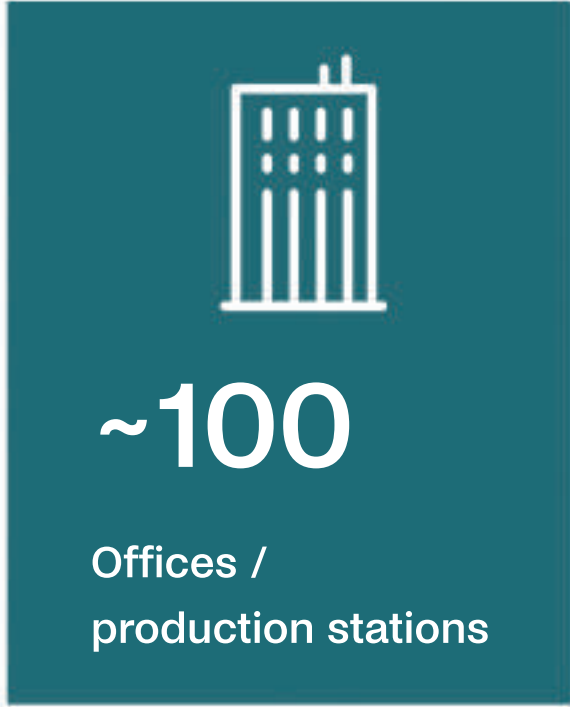
Avia Solutions Group (hereinafter, the Group), one of the world’s largest providers of flexible outsourced capacity solutions for passenger and cargo aviation, was founded in 2010 with its legal headquarters (hereinafter, HQs) in Ireland. Avia Solutions Group’s service centre is located at the HQ in Vilnius, Lithuania, where the majority of employees are based. The Group manages over 100 offices and production facilities worldwide on 5 continents. Our professionals are serving more than 2,000 clients and customers across Europe, Asia, North America, Africa, and Australia .



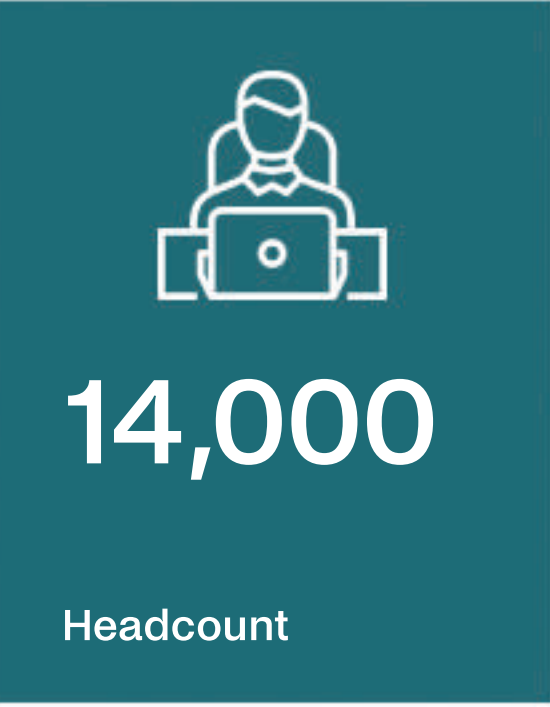
### 2024 statistics



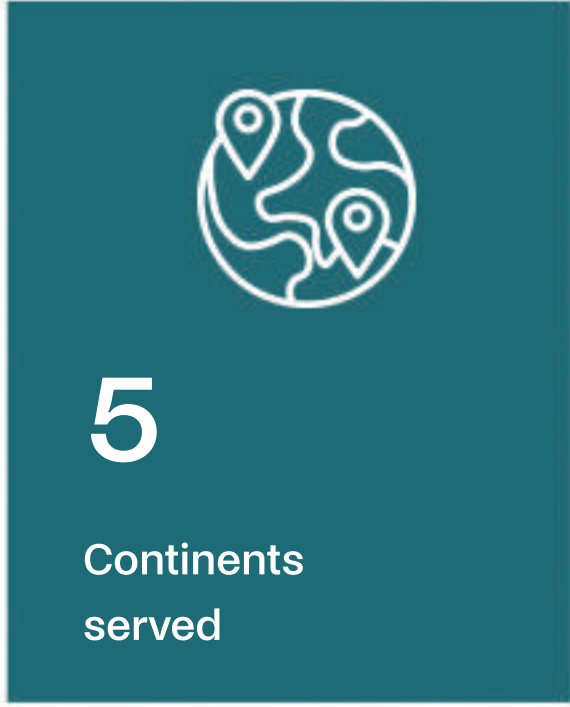
Business lines



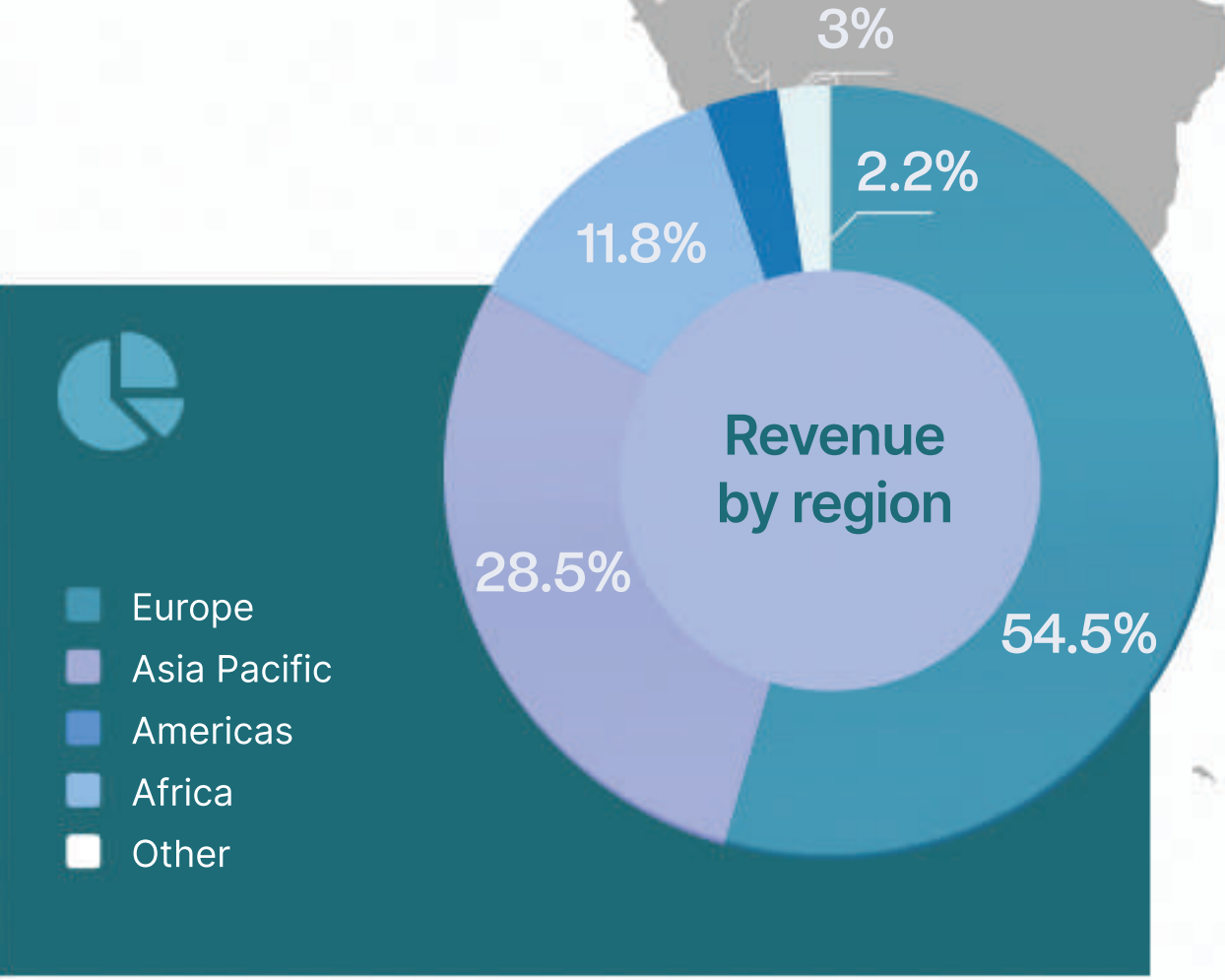
Offices / production stations



Headcount



Continents served

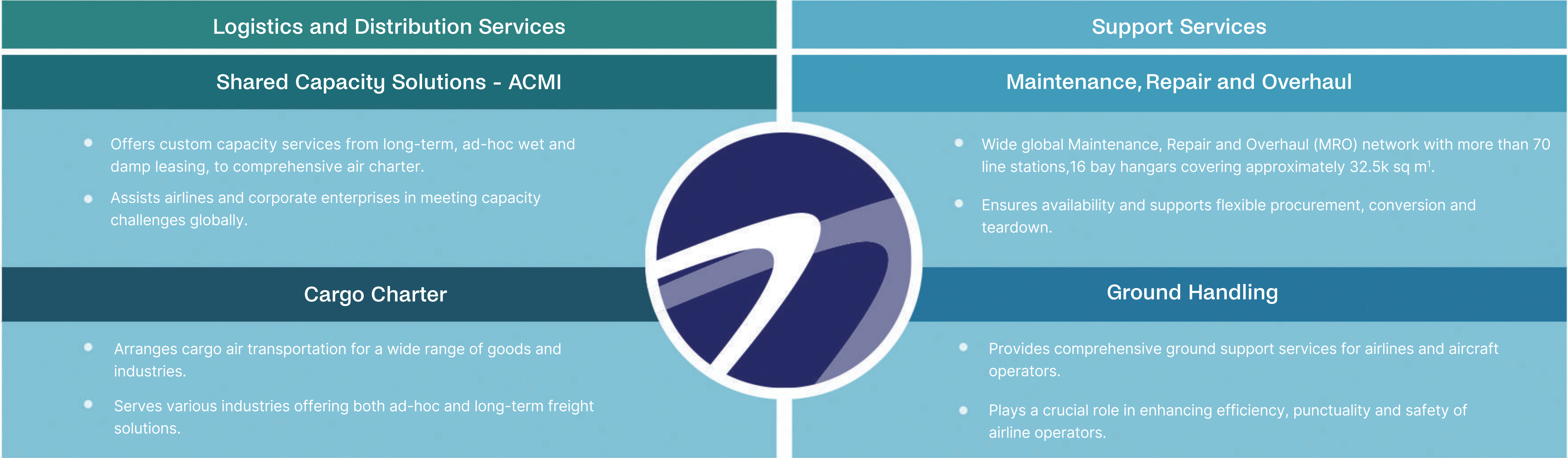




## 2. Business model

Avia Solutions Group and its subsidiaries have created a strong and diversified business, uniting a wide variety of aviation services under one global network.

We offer a broad portfolio of services which fall under two main service offerings within aviation: logistics and distribution services, and support services. Logistics and distribution services includes shared capacity solutions – passenger and cargo wet lease (Aircraft, Crew, Maintenance, and Insurance (ACMI)) services, air charter and cargo solutions. Support services include Maintenance Repair Overhaul (MRO) operations, aviation training and recruitment, as well as aviation ground support. In 2024, the Group recorded an adjusted EBITDA of EUR 459.9 million, up by 17.3% from EUR 392.1 million in 2023. The consolidated revenues have increased to EUR 2 692.21 million, or by around 19% as compared with EUR 2 262.8 million in 2023.



Some of the industry associations of which we are members:



1. Online revenues accounted for 0.02% of total revenues in 2024, compared with 0.01% in 2023, 0.01% in 2022, and 0.02% in 2021. The proportion of customers utilizing the Company's online services and sales platform was 84% in 2024, 97% in 2023, 96% in 2022, and 97% in 2021; the latter figures reflect only companies offering online services and exclude those without such platforms.



### 3. ESG journey and strategy

In 2024, we continued to strengthen our commitment to environmental, social, and governance objectives, advancing strategic initiatives across the Group.

#### ESG strategy

Our ESG strategy establishes Group-wide commitments and is coordinated by the ESG Department in close collaboration with each subsidiary's appointed representatives to ensure effective integration into daily operations.

This year, we have been working on the development of our ESG strategy through the ongoing elaboration of a **Double Materiality Assessment aligned with the Corporate Sustainability Reporting Directive (CSRD)**. This process, which will define the next steps of our strategy, includes an extensive ESG survey involving employees, customers, suppliers, and business partners across the Group.

We also hosted our annual ESG Workshop, bringing together our ESG ambassadors from key business units. The event, officially kicked off by our CEO **Jonas Janukėnas**, highlighted the strategic importance of ESG matters for the Group. It served as a platform for knowledge sharing and practical problem-solving, with expert-led sessions on sustainability certifications, renewable energy, and aviation-specific ESG challenges. During the workshop, we also presented the **ESG Awareness Strategy**, aimed at strengthening understanding and engagement with ESG principles across all levels of the organisation.

As part of our broader engagement and inclusion initiatives, the ESG Department launched the Spread Her Wings: Women's Aviation Mentorship Initiative. This program connects female colleagues from across the Group to foster mentorship, leadership development, and gender equality — empowering women to advance their careers and cultivating a culture of inclusivity across the organisation.

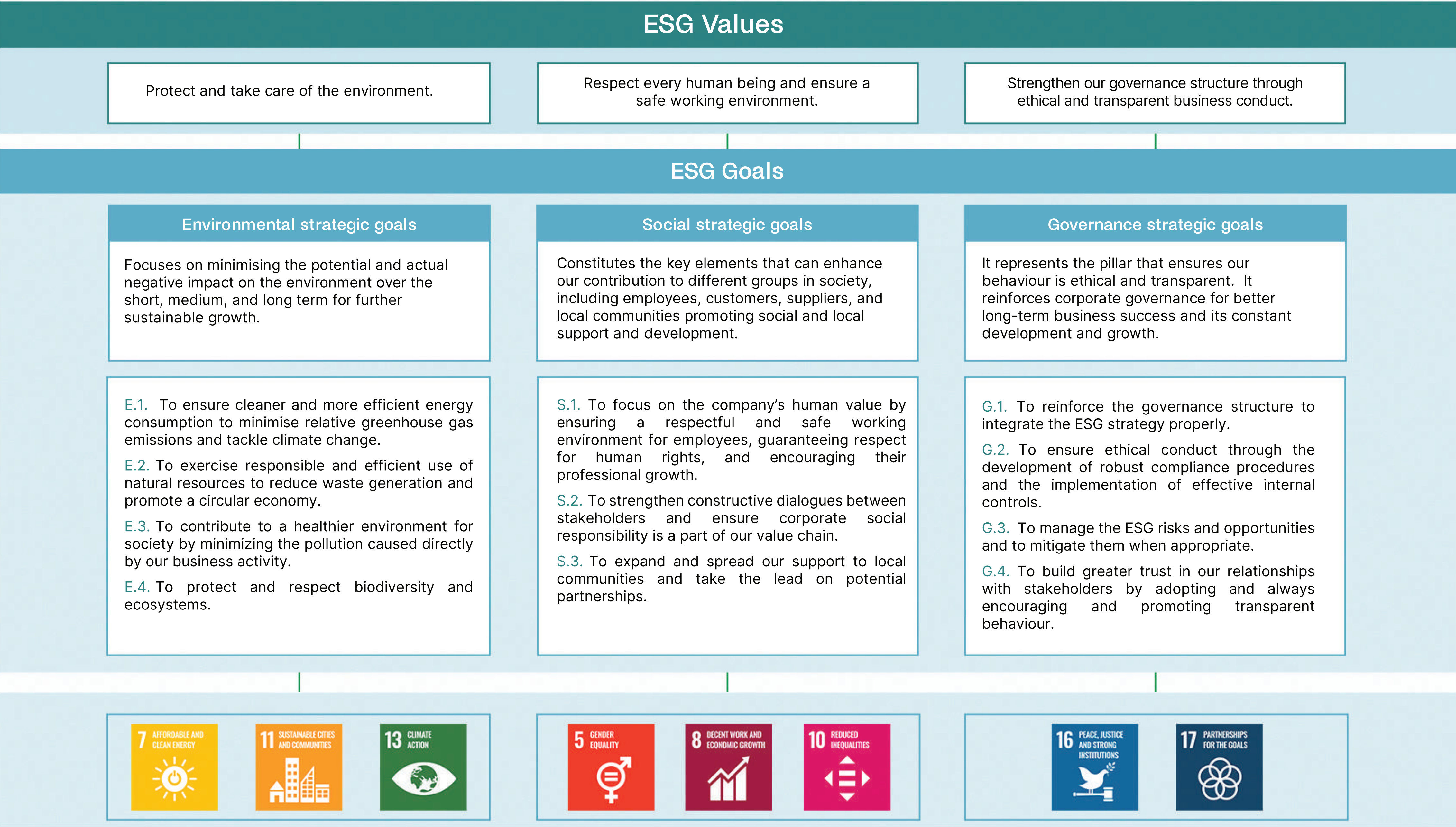


Jonas Janukėnas, CEO of Avia Solutions Group, opens the ESG Workshop 2024.

#### ESG goals and values

Our environmental, social, and governance strategy and goals are centered around ESG values. Consequently, the ESG objectives encompass three primary strategic goals, each of which is further subdivided into strategic directives. These commitments have been formed based on the results of the initial materiality analysis. Simultaneously, in line with the 2030 Agenda for Sustainable Development established by the United Nations, the Group has identified the specific Sustainable Development Goals (SDGs) in which we can generate a greater impact and contribute to a larger extent to their objectives.







# 4. ESG ratings and performance

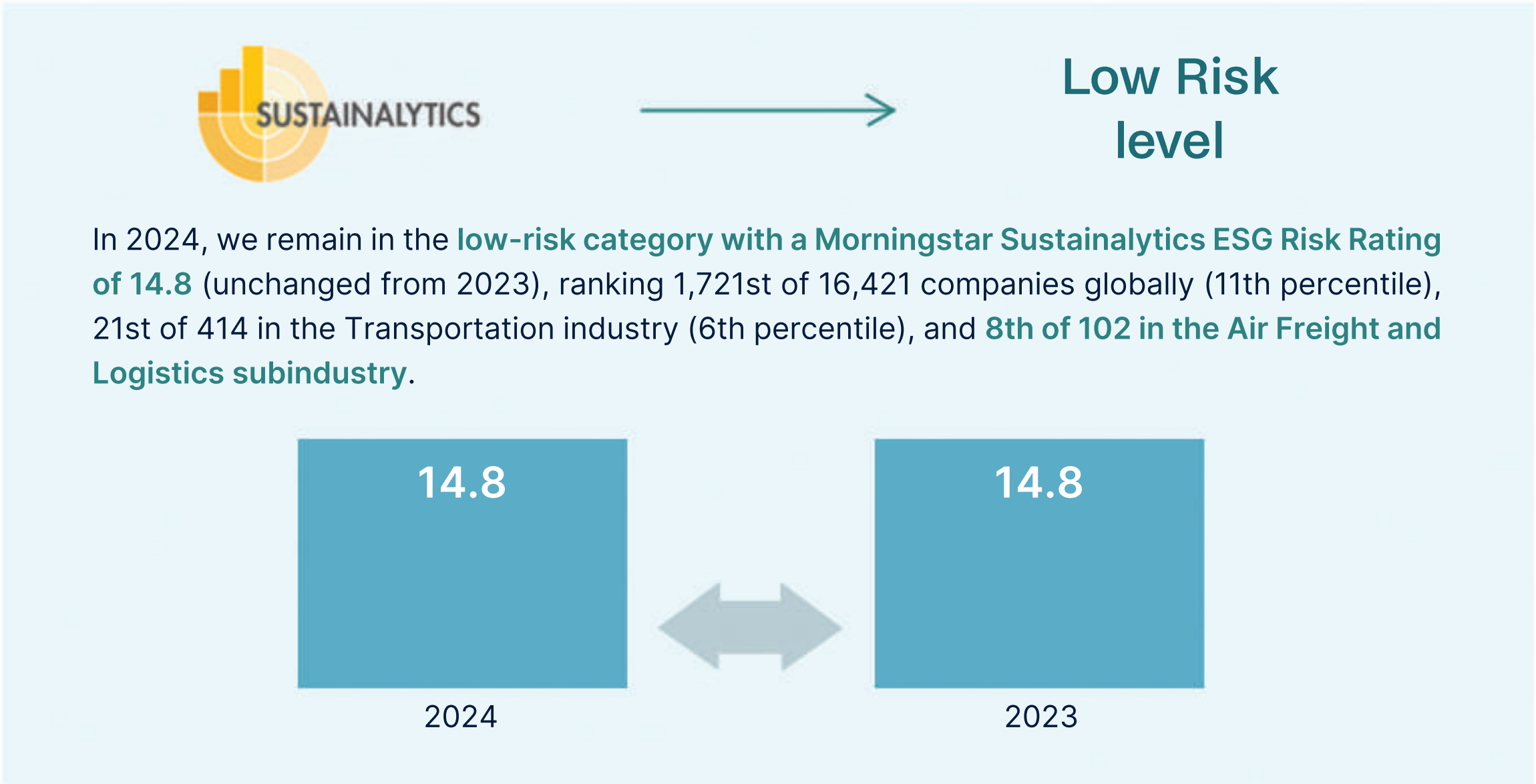
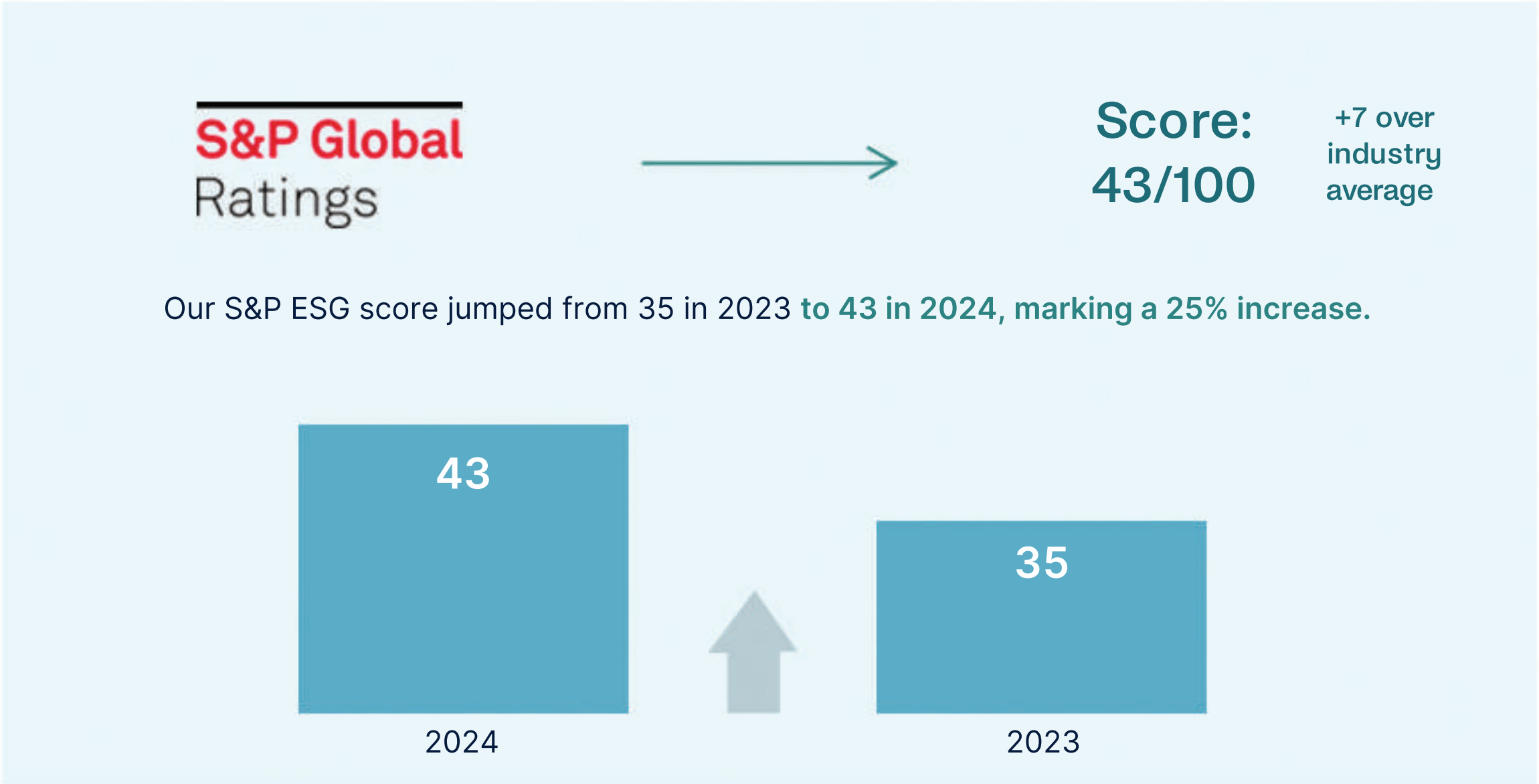
ESG rating agencies help evaluate our performance in areas such as environmental impact, social responsibility, and governance. As we continue our sustainability journey, these ratings remain an important tool for guiding our progress and measuring our impact.

## Engagement with ESG agencies

Rating agencies evaluate performance across key ESG areas, providing benchmarks that help companies, and their stakeholders understand their status and potential areas for improvement. Since each agency uses its own methodology, knowing how they evaluate performance is key to shaping an effective ESG strategy. Avia Solutions Group is assessed by two leading agencies — S&P Corporate Sustainability Assessment (CSA) and Morningstar Sustainalytics. S&P offers a detailed look at our ESG practices, while Sustainalytics provides an overview of our risk profile. Together, these assessments give a well-rounded view of the Group’s sustainability progress.

## ESG ratings improvement

Transparency and a strong commitment to ESG values are key to improving our ratings. Since the first evaluation, we have increased transparency by publishing detailed ESG reports and sharing information publicly, highlighting both progress and areas for growth. We have also introduced new policies to strengthen our environmental, social, and governance practices, which have contributed to better ratings. Moving forward, we remain focused on implementing strategies that will further enhance our ESG performance.





# Our environmental performance





# 2024 Highlights



**Annual ESG Workshop** held across the Group with designated ESG personnel to align on sustainability goals and initiatives.



Placed first-ever direct order with Boeing for up to 80 fuel-efficient 737 MAX aircraft, supporting future growth and reduced carbon emissions.



In 2024 and early 2025, **global office locations implemented key sustainability initiatives** focused on energy efficiency, renewable energy integration, waste reduction, and green building practices.



**Operational efficiency** improved through data-driven fuel management and flight optimisation, supported by systems like ACARS AOC, FLIGHTKEYS5D, SkyBreathe, and AMOS.



In 2024, **100% of the 1,987 tonnes of CO2 from On-Board Courier (OBC)** services were offset, continuing progress on scope 3 emissions.



Over the past year, our ground logistics have used nearly 700,000 litres of Neste MY Renewable Diesel, helping to reduce our fleet’s GHG emissions by over 2 million kg CO2e across the fuel’s life cycle compared to fossil diesel.



Photo source: shutterstock.com



# 1. Introduction

In 2024, we built on the strong recovery of 2023, maintaining growth that exceeded pre-pandemic levels. As operations expanded, Scope 3 emissions—our largest emissions category—remained a key focus due to the nature of our business. This underscored the importance of robust data collection and analysis to guide our sustainability strategy and enable effective climate action across our value chain.

## 2. GHG emissions and the actions taken to tackle climate change

### 2.1. Emissions calculation approach

We continued calculating our CO<sub>2</sub> emissions in accordance with scope 1, 2, and 3 divisions as defined by the Greenhouse Gas Protocol – Revised Edition, 2015 (GHG Protocol)<sup>1</sup>. Additionally, some of our business units calculated emissions based on the European Union Emissions Trading System (EU ETS) and the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) regulations. These were audited by an external party to ensure compliance with such regulations. Consequently, 74.4% of scope 1 emissions in 2024, as defined by the GHG Protocol, were under external assurance due to EU ETS, and 72.4% due to CORSIA. Consistent with previous years, the primary source of scope 1 emissions was aircraft fuel consumption, accounting for 97.6% (compared to 96.8% in 2023).

Scope 2 emissions contributors remained relatively stable in 2024. Our MRO hangars, covering approximately 60,000 m<sup>2</sup>, accounted for 40.9% (compared to 43% in 2023) of the Group's total energy consumption. Our aviation training services also contributed significantly, driven by the energy demand of their flight simulators. To support more accurate and consistent reporting, we strengthened our data collection processes in 2024, improving traceability and enabling more detailed disclosures of energy use across entities. However, due to varying levels of data readiness, particularly within office rental agreements, some estimations were applied where direct data was not available.

Scope 3 emissions cover a wide range of activities, with the majority for the Group being driven by our primary operations: ACMI services, aircraft leasing, and cargo and passenger brokerage. Compared to the previous year, our scope 3 emissions increased by 31% in 2024, driven primarily by the growth of our ACMI services and longer flight distances.



1. Consolidation approach for emissions chosen – operational control.



## 2.2. Total emissions and scope 1

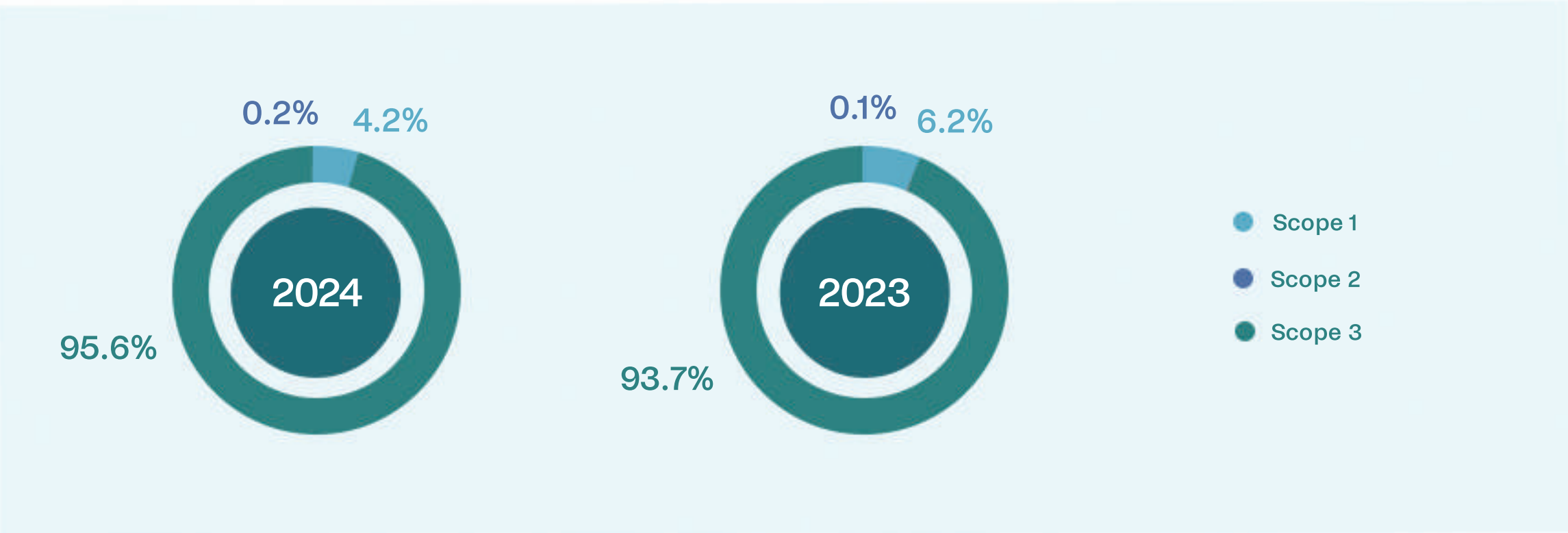
As the aviation industry has returned to pre-pandemic levels and demonstrates a strong trend of continuous growth, we are dedicated to diligently monitoring our emissions data and adopting the most effective tools and practices to minimise our environmental impact.

Since our first year of Group-wide reporting, we have progressively expanded the scope of companies included in our emissions disclosures. This broader coverage in 2024 provides a more complete and accurate picture of our environmental footprint.

In 2024, our scope 1 emissions decreased by 12.16% compared to 2023. This reduction was primarily driven by our strategic shift towards ACMI operations, which are accounted for under scope 3 emissions, and by the expanded use of biofuels in our ground handling and logistics activities, which significantly lowered our scope 1 footprint.

Total emissions (tonnes CO <sub>2</sub> e <sup>1</sup> )	2024	2023
Scope 1 – Total <sup>2</sup>	210,045	239,111
Scope 2 – Electricity (location-based method <sup>3</sup> )	4,618	3,420
Scope 2 - Heat (location-based method)	1,851	1,536
Scope 3 - Total	4,760,181	3,632,813
Scope 3 - Upstream leased assets <sup>4</sup>	1,771,147	1,947,668
Scope 3 - Downstream leased assets <sup>5</sup>	2,944,519	1,658,035
Scope 3 - Business travel <sup>6</sup>	22,058	14,281
Scope 3 - Purchased goods and services <sup>7</sup>	9,209	11,751
Scope 3 - Employee commute <sup>8</sup>	13,248	1,077

See Endnotes page for clarifications.



Scope 1 emissions (tonnes CO <sub>2</sub> e <sup>1</sup> )	2024	2023
TOTAL	210,045	239,111
Logistics and distribution services <sup>9</sup>	205,041	231,685
Support services <sup>9</sup>	4,955	7,375
Unallocated <sup>10</sup>	49	51



Photo source: shutterstock.com



2.3. Our fleet

Enhancing aircraft fleet efficiency

As part of Avia Solutions Group’s commitment, we are continuously investing in aircraft that offer superior fuel efficiency and operational flexibility across all operations.

In a major step towards enhancing fleet efficiency, we placed the first direct order with Boeing for 80 737 MAX aircraft, comprising 40 firm orders and 40 purchase rights. Deliveries will begin in 2030, complementing our current fleet of 220 aircraft, including 14 Boeing 737-8s. The 737 MAX is renowned for its fuel efficiency and lower emissions, aligning with our strategic focus on efficiency, fleet growth and operational flexibility. The fuel-efficient 737 MAX will help client airlines minimise their carbon footprint while enhancing passenger experience.

Our existing fleet also includes aircraft from the Airbus A321 family, serving both passenger and cargo operations, further strengthening our versatility and commitment to efficient aviation solutions.

Looking ahead, we are planning the acquisition of a Boeing Business Jet (BBJ) in 2024 to strengthen our private and business jet charter services. The BBJ offers outstanding operational efficiency, with extended range, advanced aerodynamics, and lower fuel burn per seat than smaller private jets. Its ability to transport more passengers and cargo over long distances with fewer stopovers makes it an ideal solution for both luxury travel.

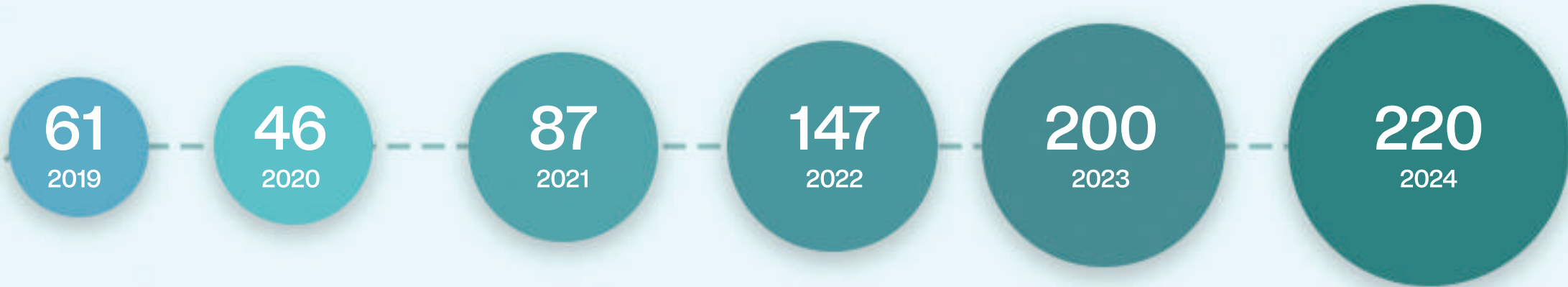
In our regional operations in Australia, we continue to rely on a specialised fleet of De Havilland Dash 8 aircraft, comprising five DHC-8-100s, two DHC-8-200s, and two DHC-8-300s. These turboprops have been specifically selected for their proven performance in remote and infrastructure-limited areas. The Dash 8 family consumes approximately 30–40% less fuel than comparable regional jets, significantly reducing emissions and operating costs. Their ability to operate from short, unpaved runways, combined with onboard Auxiliary Power Units (APUs) for battery starts, ensures reliable and self-sufficient service, making them an optimal choice for Australia’s geographically dispersed regions.

Aircraft fleet:

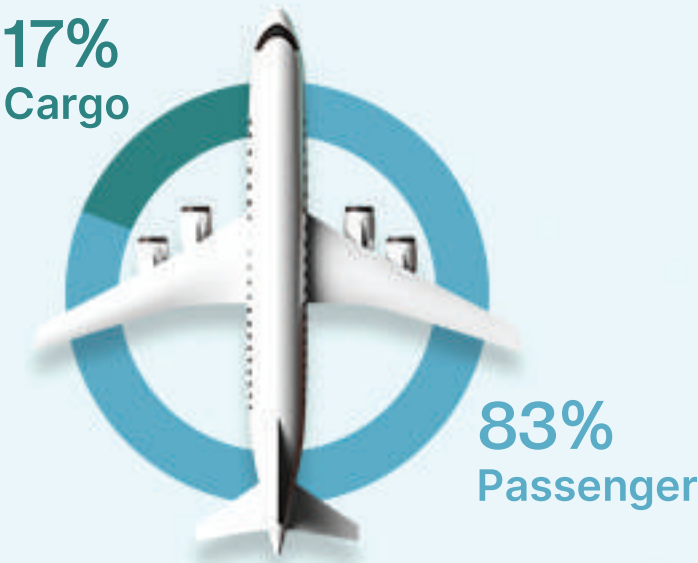
As of Q4 2024, our fleet<sup>1</sup> consisted of 220 aircraft, reflecting an increase of 20 aircraft (10%) compared to the previous year. This growth is attributable to our consistent business expansion through the acquisition and development of new companies.



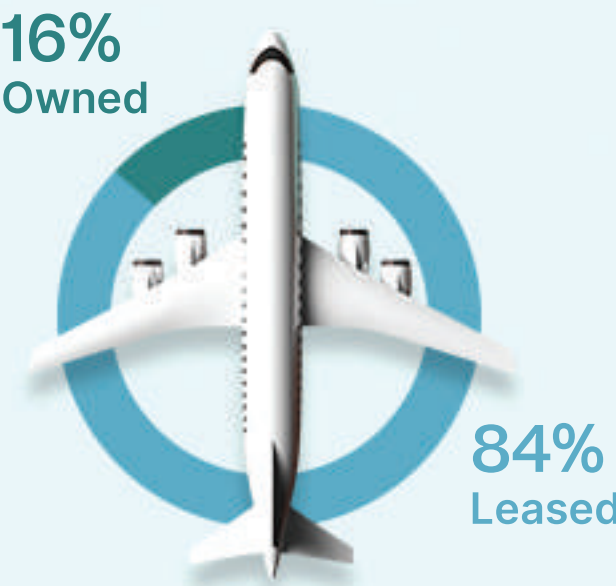
Fleet growth over time:



By type



By ownership<sup>2</sup>



1. Aircraft number without Letter of Intent (LOI).  
2. “Owned fleet” refers to aircraft in the inventory leased from an external lessor for more than a year. “Leased fleet” refers to aircraft under an operating lease or owned lease from an external lessor for less than a year.



## Ground handling

The Group's ground handling operations are taking proactive steps to reduce dependence on fossil fuels and transition towards more sustainable, energy-efficient vehicle fleets.

Our business unit serving the Nordic region—covering Norway, Sweden, Denmark, and Finland—is targeting carbon neutrality in Scope 1 operations by 2026<sup>1</sup>. This objective is supported by a robust Vehicle Renewal Plan and an emissions reduction roadmap that prioritizes the use of electric and low-emission vehicles, as well as the integration of biodiesel to significantly lower emissions. **In 2024, our ground handling operations in the Nordics operated a fleet composed of 57% electric vehicles (EVs).** These efforts are expected to reduce emissions to approximately 1kg of CO<sub>2</sub> per aircraft turnaround, with any remaining emissions offset. This business unit also aims to achieve full carbon neutrality across Scope 1 and 2 operations by 2030, guided by a clearly defined decarbonization strategy. As of the latest reporting year, **Scope 1 CO<sub>2</sub> emissions in the Nordic region have already been reduced by 31% compared to the previous year.**

In parallel, our business unit, operating primarily in the Baltics, is implementing its Environmental Policy with a strong emphasis on replacing hazardous and fossil fuel-based ground equipment with energy-efficient alternatives powered by electricity, hydrogen, or biofuels. Priority is given to electric or other low-emission vehicles in all procurement decisions, with sustainability alignment required before any acquisition or lease is approved. These principles are formalised in the **Vehicle Management and Renewal Plan introduced in 2024, which sets clear, standardised guidelines for fleet modernisation and environmental impact reduction.**

Complementing these initiatives, our aircraft interior and exterior refurbishment services also employ electric ground handling equipment, including a fully electric aircraft tug.

1. Link to [Aviator Sustainability Report 2023](#).

## Company cars

Within our Group, company cars are relatively limited; however, we remain committed to transitioning to cleaner mobility solutions wherever feasible, with a focus on electric and hybrid vehicles. For example, several MRO line maintenance stations across Europe have already adopted electric vehicles, with others scheduled to follow over the next 3 to 6 years, in alignment with current leasing cycles and technical requirements. Additionally, starting in 2026, our MRO division will initiate the development of a structured transition plan aimed at replacing ground support vehicles with electric alternatives.

It is important to note that some specialised vehicles, particularly those used in our equine, livestock, and exotics air charter services, must comply with strict safety and animal welfare regulations. These vehicles, due to their size and unique operational requirements, currently have no viable alternative fuel options.

For business units operating airside in restricted zones, the advancement of sustainability efforts is intrinsically tied to the evolution of airport infrastructure. To accelerate this progress, we actively engage with stakeholders to advocate for the deployment of critical resources such as EV charging stations, recycling facilities, and other supporting infrastructure. Collaboration and open dialogue are vital, and our active participation in industry associations such as LAVIA plays a key role in driving these initiatives forward.



By the end of 2024, **56% of the ground handling fleet consisted of electric vehicles.**





## 2.4. Enhancing operational efficiency

### Flight operations

Operational efficiency plays a vital role in our strategy. By reducing fuel consumption, emissions, and resource use, these initiatives support long-term resilience, cost-effectiveness, and a lower environmental footprint across our aviation activities.

#### Data-driven fuel efficiency and flight optimisation

Several of our airlines are leveraging digital tools and operational strategies to enhance flight performance and reduce operational costs.

Our private jet business activities run a dedicated fuel efficiency program that monitors flight performance and continuously identifies areas for improvement. Crew logistics are also optimised to reduce positioning flights, ensuring pilots are stationed near departure airports to minimise unnecessary travel emissions.

To improve efficiency across our ACMI, charter, and cargo operations, a customised **Aircraft Communications Addressing and Reporting System – Aeronautical Operational Control (ACARS AOC)** has been fully implemented within SmartLynx, one of our operating units. This digital communication system enables real-time data transmission between aircraft and ground stations, significantly enhancing data collection capabilities. The increased access to operational data supports more informed decision-making, for instance, by facilitating predictive maintenance and enabling more efficient flight plan adjustments.



Real-time weather updates which minimize fuel burn by avoiding adverse conditions.



Access to optimized flight data which allows route selection, altitude, and speed for fuel efficiency.



Real-time engine and fuel data which leads to prompt adjustments to save fuel.



Fast in-flight fault notifications which prevent excessive fuel use with timely repairs.



Streamlined data transmission which leads to quicker clearances, efficient turnarounds.





**Further advancements were made in flight planning systems across our operations.** Throughout 2024, one of our operating units continuously enhanced its digital flight planning tool, improving both fuel planning accuracy and end-user experience. These updates were supported by expanded post-flight fuel analysis, which enabled more data-driven decision-making. As a result, dispatch of unnecessary extra fuel was significantly reduced by relying strictly on justifiable operational risks. Additionally, the system improvements allowed for better control of fuel loads, helping to prevent overload scenarios and further optimise fuel efficiency.

In late 2024, SmartLynx also initiated the transition to **FLIGHTKEYS 5D**, an advanced flight planning system that enables greater automation and improved efficiency. The system is expected to go live in May 2025.

During the same year, our **global brokerage aircraft operations** introduced targeted initiatives to improve fuel efficiency:

- **Reduction of contingency fuel from 5% to 3%** to improve overall fuel efficiency
- Development and future investment for **SkyBreathe reporting**
- Initiation of **Single Engine Off Taxi** use to reduce fuel consumption
- **Delay of APU** start to minimise unnecessary fuel burn

The next phase of efficiency improvements, scheduled for implementation in 2025, includes:

- Adoption of **Continuous Descent Approach (CDA)** to reduce fuel burn and noise
- Application of **Two-Engine Taxi** where feasible, based on aircraft weight and terrain
- Optimisation of **take-off thrust and acceleration procedures** to lower fuel consumption

### SkyBreathe: AI for Fuel Efficiency

SkyBreathe uses big data, AI, and inputs from flight data recorders, weather, air traffic control, and maintenance records to generate actionable insights for pilots and operations teams. It enables up to a 5% reduction in fuel consumption without any modifications to the aircraft.

### Maintenance Optimisation with AMOS

The Group is beginning the implementation of **AMOS software**, which is expected to help identify potential maintenance issues early on, preventing unplanned downtime of aircraft. AMOS streamlines and automates many of the currently manual processes, resulting in more efficient operations, time savings and reduced effort for various tasks. This allows the focus of the team to shift to more value-added activities.





## Ground-handling operations

Over the past years, significant progress has been made to modernise ground transportation and support equipment with the aim of improving operational efficiency. In 2022, one of our business units replaced older diesel buses with newer and more fuel-efficient models.

Building on this progress, 2023 saw the successful testing of fully electric apron buses. This pilot initiative supports the ongoing evaluation of integrating electric vehicles into the ground support equipment fleet. These efforts complement Lithuanian local airport authorities' plans to transition to fully electric passenger bus fleets by 2026, reinforcing our broader sustainability commitments.

Since 2021, our operations at the Malmö base in Sweden have been fully fossil fuel-free, relying exclusively on hydrotreated vegetable oil (HVO) as a renewable fuel source. In early 2023, additional Swedish bases, including Gothenburg-Landvetter, also transitioned to fossil-free operations. At Arlanda Airport, where we maintain a strong presence, approximately 98% of activities are now fossil fuel-free, with a full transition expected by the end of 2025.

Green turnaround procedures have been a key focus in our ground operations across the Nordic regions since 2021. These procedures encompass the coordinated ground handling activities that take place from aircraft arrival to departure and are critical for minimizing delays and reducing emissions. The adoption of electric vehicles and equipment, including electric boarding stairs has been integral to these efforts. Fully electric turnarounds have become a standard part of operations, highlighted by the **successful execution of the first 100% electric turnaround for a major airline flight in 2023**.

In recognition of these achievements, **Aviator** was honoured with the **Sustainability Award 2024** from a leading airline group. The award acknowledges the milestone of achieving 100% fossil-free turnarounds powered by renewable energy and maintaining a 60% electrified GSE fleet.

## Logistics operations

Our logistics operations have taken a major step towards sustainability by fully transitioning to **100% renewable diesel Neste MY for all transportation activities in Lithuania**. This fuel, produced from renewable raw materials such as used cooking oil, animal fat, and vegetable oil processing waste, is used without blending with conventional diesel. Implemented in partnership with Neste, a global leader in renewable fuels, this initiative significantly reduces the environmental impact of ground transport and reflects our strong commitment to sustainable practices. Over the past year, our ground logistics have used nearly 700,000 litres of Neste MY Renewable Diesel, helping to reduce our fleet's GHG emissions by over 2 million kg CO<sub>2</sub>e across the fuel's life cycle compared to fossil diesel<sup>1</sup>.

Complementing the transition to renewable fuels, we continuously optimise logistics efficiency through targeted **driver training programs and route planning improvements**. These measures are designed to reduce unnecessary distances, lower fuel consumption, save time and costs, and therefore minimise emissions.

To further enhance operational efficiency, logistics activities are monitored via a comprehensive network of video cameras. This remote oversight allows for real-time management of logistics stations, reducing the need for on-site travel and contributing to lower greenhouse gas emissions.



1. Greenhouse gas (GHG) emissions (measured in CO<sub>2</sub>e) over the entire life cycle of a fuel. This percentage is calculated in accordance with Directive (EU) 2018/2001 of the European Parliament and of the Council (RED II) and depends on the mix of raw materials used and the production method. Fossil diesel produced only from oil without bio-additives. In Lithuania, fossil diesel available at fuel stations contains bio-additives, with variations in type, production method, and final product. Therefore, the actual GHG emission value of each batch (shipment) of diesel will differ.



## 2.5. Sustainable Aviation Fuel: Accelerating aviation decarbonization

Sustainable Aviation Fuel (SAF) is a critical enabler in the decarbonization of the aviation industry, offering up to an 80% reduction in lifecycle carbon emissions compared to conventional jet fuel—depending on the feedstock, production method, and supply chain logistics. Certified for blending at up to 50% with traditional jet fuel, SAF meets all existing quality and safety standards, making it a drop-in solution for current aviation infrastructure.

### Regulatory landscape and market demand

As of **2025**, **EU regulations mandate** that a minimum of **2% of aviation fuel** used at regional airports must be SAF. This requirement will increase to **at least 5% by 2030**, significantly accelerating demand for both SAF and eSAF (electro-fuels). In anticipation of these changes, our organization and partners have proactively positioned themselves to support this transition.



For more information: [About NorSAF: Leading SAF & Synthetic Fuel Developer in Baltics](#)

### NorSAF: strategic SAF production in Latvia

Our SAF supply partner, **NorSAF**, is strategically located at the **Port of Liepaja, Latvia**, with optimal access to global logistics and regional feedstock networks. NorSAF's facility will produce high-quality SAF using **bioethanol, green hydrogen, and biogenic CO<sub>2</sub>**, all sourced locally within a 100 km radius, supporting both environmental and economic sustainability.

The terminal is designed for **high-efficiency, multi-modal transshipment**, capable of handling a wide range of liquid bulk products. With state-of-the-art infrastructure and flexibility, NorSAF supports storage and logistics for **liquid chemicals, vegetable oils, and petroleum products**, making it a critical hub for clients in the chemical and energy sectors. The production facility is scheduled to begin operations in **2030**, further reinforcing the European SAF supply chain.





## Proactive stakeholder engagement and certification

Anticipating these legislative changes, our fuel supplier's business unit began stakeholder engagement in 2023, initiating consultations with aviation authorities, airlines, and fuel suppliers to prepare for SAF integration across its operations. These efforts were designed to ensure regulatory readiness, facilitate operational adaptation, and support market transformation. As part of this roadmap, our subsidiary company, BGS, is working toward ISCC EU certification, ensuring full traceability and compliance with EU sustainability criteria across its SAF supply chain.

### SAF integration strategy

In addition, our subsidiary SmartLynx has launched an internal assessment of SAF suppliers and infrastructure availability across its operational network. This assessment will inform strategic procurement decisions and enable SAF integration at selected base airports. These steps are aligned with ReFuelEU's progressive blending targets and reflect the company's commitment to embedding sustainability into its long-term fuel sourcing strategy.



### Client-Facing SAF initiatives and offsetting

In early 2024, Chapman Freeborn (US) subsidiary signed an agreement with 4AIR, specialists in aviation emissions reduction, including SAF initiatives. Through this partnership, carbon emissions from JetCard flights are offset, and clients have the option to select direct SAF or utilize the book-and-claim mechanism. 4AIR calculated the emissions footprint of Chapman Freeborn's flights, 133mtCO<sub>2</sub>, and credits were bought to support new renewable energy projects to offset it. Following the successful rollout of this initiative, other regional brokerage services at Group operations are finalizing similar agreements to be implemented within 2024.





## 2.6. Efficient energy use and renewable sources - scope 2

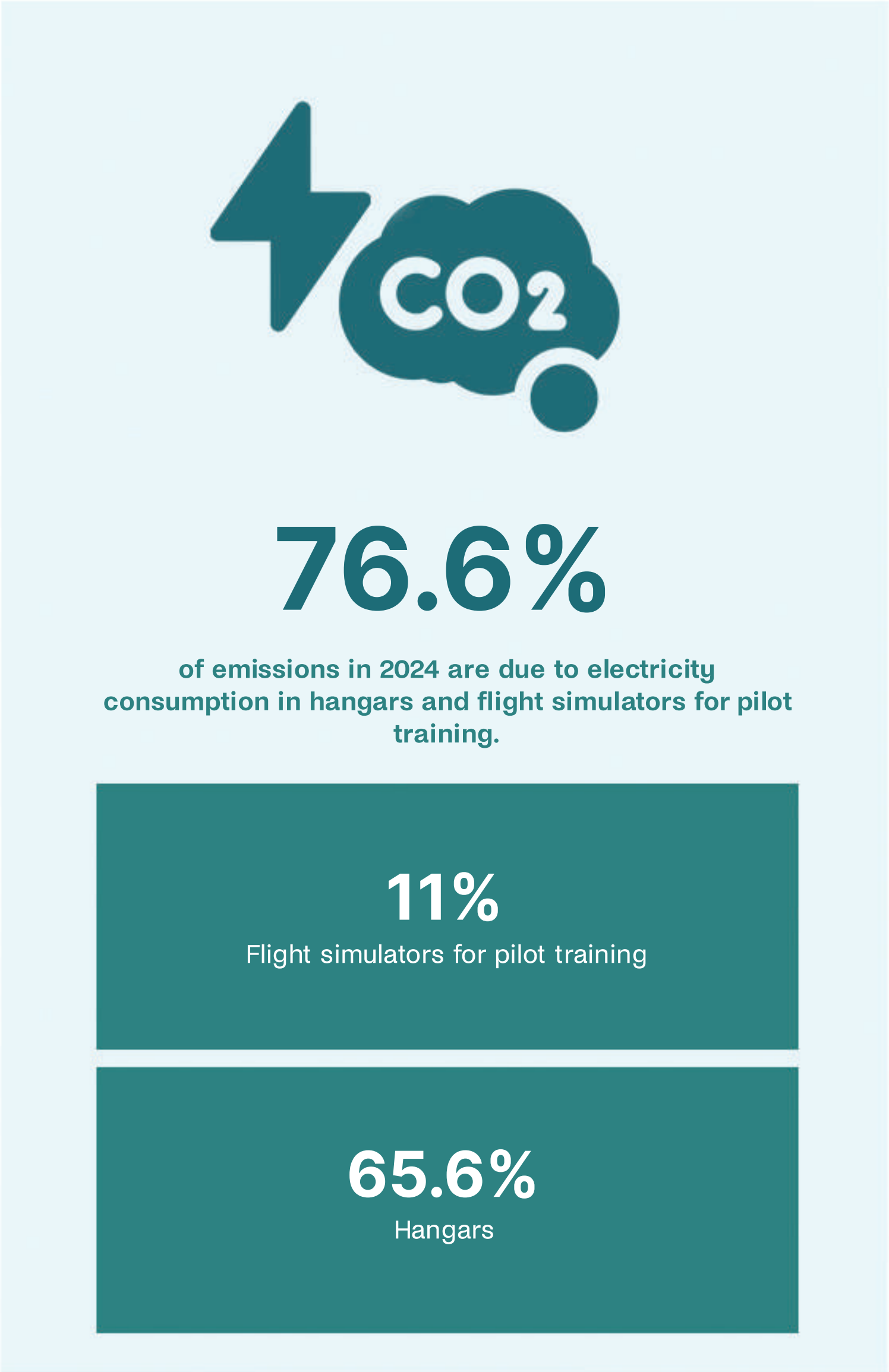
### Hangars:

65.6% of the total scope 2 emissions in 2024 originated from our MRO service, since its main business activities take place in hangars where electricity and heating are essential. Our MRO service has hangars and shop facilities in Lithuania, Indonesia, and the United Kingdom, as well as an extensive network of line maintenance support stations across Europe, Africa, Asia Pacific, the CIS, and Canada. Furthermore, the Group’s aviation training service is another notable electricity consumer - due to the essential flight simulators used for pilot and crew training, they generated 11% of our scope 2 emissions during the reporting period.

Our MRO activities remain committed to achieving zero emissions in scope 2 by 2028 using 100% renewable sources of purchased energy at its owned facilities. In 2024, the Group focused on analytical groundwork and strategic planning to support effective implementation in the coming years. Additional initiatives are also being developed for efficient energy consumption, such as the gradual replacement of old-style, resource-intensive lighting and wiring systems in hangars, warehouses, and commercial premises with LED luminaires and modern energy-saving solutions. In addition, to gain energy efficiency, wherever possible, premises will be reconstructed for better insulation. The installation of solar panels is also being considered.

In respect of MRO leased premises, we are in constant dialogue with lessors and counterparties involved to raise environmental awareness and emphasise the importance of more efficient energy solutions, considering circumstances in separate geographies.

Furthermore, leased hangar premises have completed their refurbishment. The premises were refurbished and modernised to reduce heating consumption and ensure energy efficiency.



Total emissions (location-based method, tonnes of CO <sub>2</sub> e)		
	2024	2023
Electricity	4,618	3,420
Heat	1,851	1,536





## Offices:

While the majority of scope 2 emissions originate from aircraft hangars and maintenance facilities, we also need to pay attention to the consumption of our offices around the world. In 2024 and early 2025, we advanced several key initiatives across office locations worldwide, focusing on energy efficiency, renewable energy integration, waste reduction and sustainable building practices.

### Energy efficiency improvements

Energy efficiency has been a key focus across all office locations, particularly in aviation training centres, maintenance sites, and administrative headquarters:

- **Over 90% of lighting systems across our MRO network were converted to LED** by the end of 2023, significantly lowering electricity consumption. In addition, energy monitoring systems were implemented in Lithuanian offices, enabling detailed analysis of energy usage to inform future efficiency strategies.
- Our aviation training centres are nearing full transition to LED lighting and have introduced motion sensor systems to reduce unnecessary power usage. Where possible, workspaces have been redesigned to maximise the use of natural daylight, further reducing reliance on artificial lighting.
- **Renewable Energy Integration** efforts to shift toward clean energy sources are underway across several key sites. In Bratislava, photovoltaic panels were installed at one of our major flight operations headquarters in 2024, contributing renewable electricity to the building's power. In Sweden, ground handling offices located within Swedavia-operated airports are powered entirely by renewable energy, reflecting the country's strong infrastructure support.
- In early 2025, a remote solar energy lease agreement was signed to supply clean energy to part of our aviation training operations, further increasing the proportion of renewable energy in our electricity consumption.

### Sustainable building standards and policy development

Recognising the importance of long-term impact, we began formalising our approach to sustainable office environments:

- In 2024, a **Green Building Policy** was initiated to guide new office leases and refurbishments within our brokerage business offices. The policy defines standards for energy performance, water conservation, waste reduction, pollution control, and responsible sourcing. In 2025, the focus shifted to applying these standards to both new and existing tenancy agreements, enabling the establishment of measurable building performance targets across the organisation.
- In Australia, our South Brisbane office earned a **5-star NABERS (National Australian Built Environment Rating System) rating**, reflecting exceptional performance in energy efficiency.



of the electricity consumed across the companies is sourced from renewable energy.





New internal certification program for energy and waste strategy

In 2025, we launched a **Group-wide Energy Efficiency and Waste Strategy Certification Program**, aimed at embedding a consistent and measurable approach to environmental performance across all offices and administrative sites. This internal program is designed to:

-  Track and evaluate the implementation of energy-saving technologies and waste management practices.
-  Establish minimum environmental standards for office operations.
-  Recognise and certify locations that meet or exceed performance benchmarks in areas such as energy use reduction, renewable integration, waste sorting efficiency, and the elimination of single-use items.
-  Create a common internal reporting framework that will support year-over-year performance comparisons and inform Group-level ESG disclosures.

As part of the upcoming internal certification program for Energy and Waste Strategy, the organization will implement a comprehensive approach that will include quantified targets to address energy savings, specific actions to reduce energy use, and regular evaluation of progress in lowering energy consumption.

The program will also promote the use of clean or green energy, support investments in innovation and research to decrease energy demand and provide energy efficiency training to employees to raise awareness. It will serve as both a compliance and engagement tool, encouraging all business units to actively contribute to the Group’s sustainability goals, while promoting knowledge sharing and the standardisation of best practices across regions.

Standards and our certifications

As part of our ongoing commitment to environmental responsibility and operational excellence, the Group continues to implement and uphold internationally recognised standards across our diverse business activities.

MRO services

The MRO services provider within the Group holds ISO 14001 certification, covering operations across multiple sites, including facilities in Vilnius, Lithuania. These certifications demonstrate the organisation’s ongoing commitment to minimising environmental impact while maintaining high standards of service and safety.

In 2023, FL Technics was **recognised by the national Manufacturers and Importers Association (GIA)** for fulfilling waste management obligations, highlighting the company’s focus on responsible resource use and environmental compliance.

Air charter and brokering services

Air charter and brokering activities have received ISO 14001 certification for their Environmental Management System ([Chapman Freeborn UK](#)), specifically covering brokering, leasing, and flight support services based at the company’s operations centre in **Gatwick, United Kingdom**. Environmental initiatives are actively implemented in alignment with the certification requirements and in accordance with local regulations.





## Ground handling services

Ground handling services across the Group are ISO 14001 certified for their Environmental Management Systems (EMS), with certification covering the full scope of operations. These certifications are regularly renewed through external third-party audits and are supported by locally compliant environmental initiatives in each country of operation.

In 2024, our operations also reached significant quality and safety milestones, earning ISO 9001 (Quality Management Systems) and ISO 45001 (Occupational Health and Safety Systems) certifications across all locations. In Lithuania, we marked **16 consecutive years of IATA Safety Audit for Ground Operations (ISAGO)** certification — continuing a legacy that began when BGS became the first independent ground handling provider in Europe to receive ISAGO, and remains the only ISAGO-certified ground handling company in Lithuania. Building on this track record, BGS is advancing our ESG credentials through the EcoVadis certification process, reinforcing our commitment to sustainable, responsible, and future-focused operations.

## ACMI leasing operations

Within the ACMI leasing segment, [Avion Express](#) launched an **Environmental Protection campaign in 2022** in collaboration with a strategic partner. A comprehensive Environmental Management Policy was developed, and key environmental performance indicators were evaluated. These assessments help inform sustainability initiatives and operational improvements. The company aims to have a **fully functional Environmental Management System in place by 2025**.

Meanwhile, [SmartLynx](#) continues to focus on **operational efficiency and fuel optimisation**, particularly through the timely rectification of **Minimum Equipment List (MEL)** items that influence fuel consumption. A dedicated **Power BI dashboard** is used to provide real-time maintenance insights to operational teams, supporting data-driven and efficient decision-making.





## 2.7. ACMI services – scope 3

As a Group primarily engaged in ACMI services, aircraft leasing, and brokering for both cargo and passenger aircraft, the majority of our greenhouse gas emissions fall under scope 3, specifically categorised as downstream leased assets. These emissions stem from aircraft operated by clients and are therefore largely influenced by customer preferences and operational decisions, limiting our direct ability to reduce their impact. Nonetheless, we continue to implement optimised flight procedures to reduce fuel consumption and actively monitor CO<sub>2</sub> emissions to contribute to improved environmental performance where feasible.

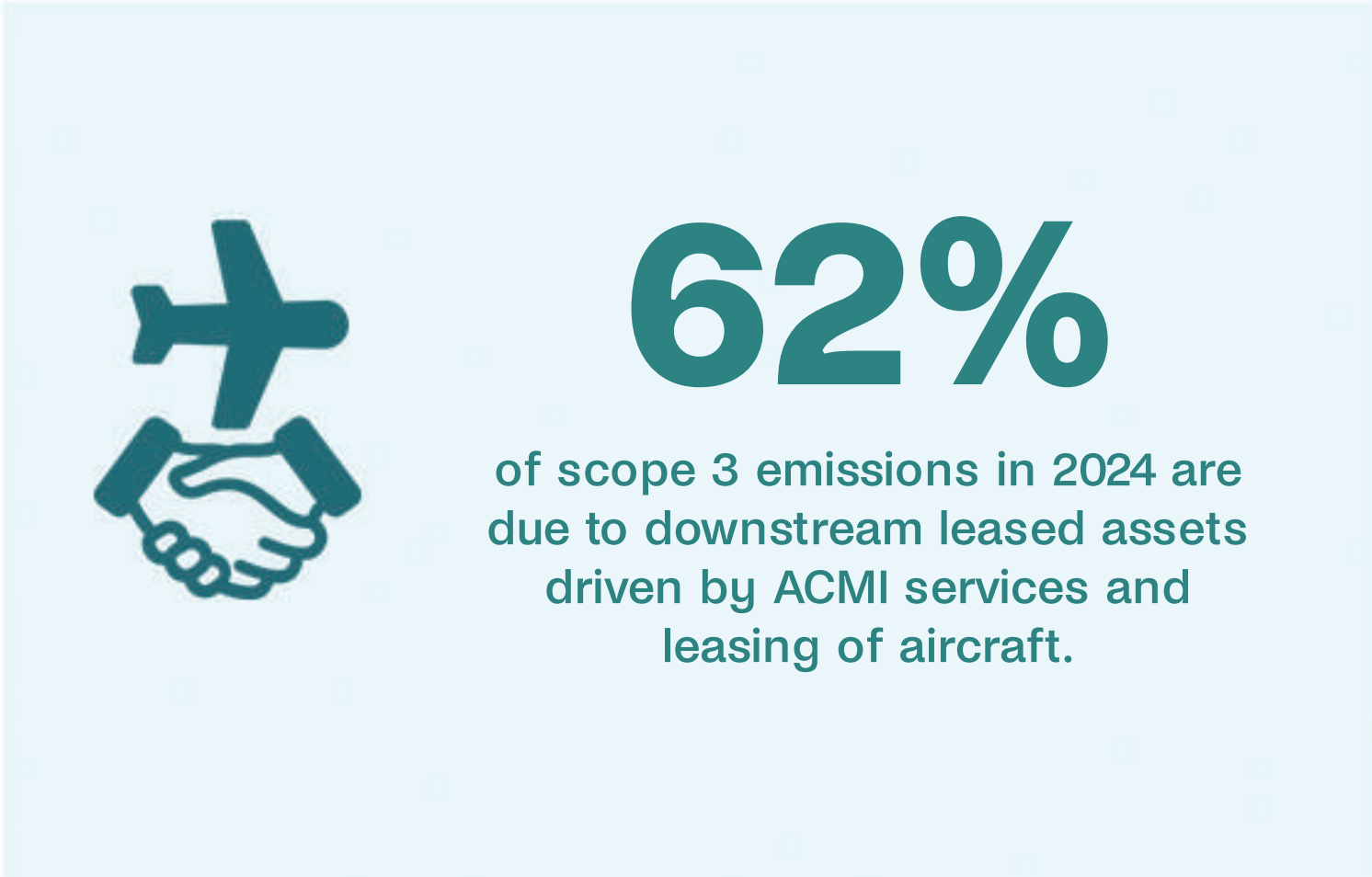
Our **On-Board Courier (OBC)** services have taken a proactive approach to emissions responsibility. In 2024, we successfully **offset 100%** of the 1,987 tonnes of CO<sub>2</sub> generated by our OBC activities, following the 1,832 tonnes already offset in the previous year. To further strengthen these efforts, we have partnered with a new carbon offset provider to improve transparency and ensure access to high-quality carbon credits. This collaboration prioritises renewable energy and carbon removal projects, selected through a rigorous screening and verification process.

Additionally, in 2024, we continued engaging with suppliers and clients to gather scope 3 emissions data, marking the second consecutive year of such collaboration. While levels of readiness and data availability varied, enhancements in our data collection methodology enabled more accurate tracking. Compared to 2023, scope 3 emissions in 2024 rose by 31%, primarily due to the continued expansion of ACMI services and increased average flight distances across our leased fleet.

### Scope 3 emissions:

Total emissions (tonnes CO <sub>2</sub> e)	2024	2023
Scope 3 - Total	4,760,181	3,632,813
Upstream leased assets <sup>1</sup>	1,771,147	1,947,668
Downstream leased assets <sup>2</sup>	2,944,519 <sup>a</sup>	1,658,035
Business travel <sup>3</sup>	22,058 <sup>b</sup>	14,281
Purchased goods and services <sup>4</sup>	9,209	11,751
Employee commute <sup>5</sup>	13,248	1,077

See Endnotes page for clarifications.







## 2.8. Business travels and employee commute – scope 3


Business travel remains a key enabler of development and expansion. As our global operations grow, the frequency of business travel naturally increases. Nevertheless, we avoid unnecessary trips and promote efficient alternatives and digital solutions that support seamless remote collaboration.


To minimise travel for internal audits, our ground handling services—particularly BGS—are equipped with advanced **Closed-Circuit Television (CCTV) systems**. These systems allow for remote quality assurance while maintaining consistently high operational standards. A recent upgrade enhanced video resolution, further improving the effectiveness of these remote assessments. As a result, **in 2024 alone, approximately 262 business trips were avoided**, contributing to a significant **reduction of 23 tonnes of CO<sub>2</sub> emissions**.

We have also launched initiatives to better understand and minimise emissions related to employee commuting. Data collection and surveys on commuting patterns are underway to inform targeted actions in the coming years. In support of this, several concrete measures have been implemented to reduce Scope 3 emissions related to commuting:

- 

**Flexible working arrangements:** Employees can work remotely between 1 and 5 days per week, depending on their role and location.
- 

**EV-friendly infrastructure:** Offices in Vilnius, Bratislava, and Riga are equipped with electric vehicle charging stations. Secure storage for bicycles and e-scooters is also available to encourage greener transport options.
- 

**Support for sustainable commuting:** Initiatives such as biking, walking, car sharing, and public transportation are actively promoted. Notably, from September 2023 to September 2024, Chapman Freeborn subsidiary Magma Aviation ran the Greenly Step Challenge. This program tracked participants' daily steps towards a 5,000-step target. Each successful day resulted in the planting of a physical mangrove tree, verified and planted by Veritree. The challenge achieved 20.3 million steps, resulting in the planting of 3,217 mangrove trees – removing approximately 990,800 kg CO<sub>2</sub>e from the atmosphere over their growth lifecycle.
- 

**Free public transport:** All Avia Solutions Group PLC employees are eligible for unlimited-use public transportation passes, further supporting low-emission commuting.

Additionally, online-based logistics and ground handling training programs have been implemented in Brisbane, Australia, allowing both internal and external trainees to participate without the need for in-office attendance. Aviation training services are also increasingly offered online, with regular updates to ensure global accessibility for all employees and students.





## Other emissions in scope 3

### Recycled Glycol in De-icing Procedures

To ensure flight safety, aircraft wings must be free of ice and snow before departure. Our ground handling teams carry out de-icing procedures using glycol-based fluids. While necessary, these procedures contribute to emissions primarily through the production of glycol.

To mitigate this impact, our ground handling operators have implemented measures such as sourcing de-icing fluids that contain **30%** recycled monopropylene glycol (MPG). The use of recycled glycol is a key element in reducing the carbon footprint of our de-icing activities and supports our broader commitment to minimising environmental impacts across operations.

# 30%

of the glycol used by Aviator for providing de-icing services to our consumers was sourced from recycled glycol.

### Nitrous oxide (N<sub>2</sub>O) in MRO operations

Nitrous oxide (N<sub>2</sub>O) is an essential input for various industrial processes within our MRO operations. While its use is necessary to ensure the efficiency and effectiveness of critical maintenance procedures, N<sub>2</sub>O is also a highly potent greenhouse gas, capable of having a significant climate impact even when used in small quantities. Due to its gaseous state and the nature of handling

processes, fugitive emissions, such as unintended leaks or releases during storage, transfer, or use, can occur. In 2024, our N<sub>2</sub>O purchases resulted in an estimated 5,732 tonnes of CO<sub>2</sub>e emissions, reported under the Purchased Goods and Services category (scope 3). By monitoring and reporting N<sub>2</sub>O usage, we aim to better understand and manage the environmental impact of specialty gases across our supply chain, reinforcing our commitment to responsible, transparent emissions accounting — even in areas where the use of such materials remains operationally essential.

## 2.9. Noise pollution

While many of our operations take place in remote areas, reducing noise pollution at airports remains a priority. The ongoing modernisation of our fleet, including the acquisition of more technologically advanced vehicles and aircraft contributes significantly to noise reduction. In addition, our MRO facilities in Lithuania and Indonesia have introduced regular noise and air pollution testing, reinforcing our commitment to environmental safety and the protection of human rights for employees and surrounding communities.

In 2023, one of our ACMI units experienced an **isolated noise compliance** issue when a single freighter aircraft unintentionally breached the night curfew at a regional airport in western France. The case was reviewed by the French airport noise authority in 2024, resulting in a €415,000 fine. The Group promptly implemented corrective measures to prevent recurrence and strengthen its noise compliance framework.



**OPS System Alerts:** Integrated alerts in the operational planning system now prompt coordinators to verify aircraft noise certifications before approving schedule changes.



**Targeted Training:** Network planning teams received focused training on noise regulation compliance and certification awareness.



**Checklist Revisions:** The scheduling change checklist was updated to include mandatory noise certification verification for all aircraft.





### 3. Climate-related risks

In recent years, the effects of climate change have become increasingly evident, including rising temperatures, elevated sea levels threatening coastal regions, more frequent floods and forest fires, and freshwater scarcity. As a result, various consequences can emerge, presenting a challenge that businesses must proactively address.

Since 2022, the ESG and Risk Management departments have worked jointly to integrate climate-related risks into the company's Enterprise Risk Management (ERM) framework. The assessment of climate-related risks, conducted in 2022, followed the categorisation of transitional and physical risks, as suggested by international frameworks such as the Task Force on Climate-Related Financial Disclosures (TCFD).

Detailed information on climate-risk assessment, its results, and implications can be found in the [ESG Report 2022, page 24](#). Currently, the Group is conducting a Corporate Sustainability Reporting Directive (CSRD)-aligned Double Materiality Assessment (DMA), which will provide a broader view of our impacts, risks, and opportunities. The resulting documents and findings are expected to be published in the near future.





# 4. Responsible use of natural resources

## 4.1. Initiatives to reduce waste generation

Across the Group, entities are aware of the importance of reducing waste and actively implement strategies to minimise waste generation wherever possible.

### Office-based initiatives

Implemented initiatives
<div>Aviation training services</div> <ul style="list-style-type: none"><li>A digital client file storage system has been implemented, eliminating the need for paper records and significantly reducing paper consumption across aviation training operations.</li><li>Procurement teams prioritise purchasing products made from recycled materials and those with minimal or sustainable packaging, supporting circular economy practices.</li><li>Electronic signatures and cloud-based storage solutions are used to streamline documentation processes and enable paperless document management.</li></ul> <div>As a result of utilising digital document management systems and electronic signatures, <b>BAA Training</b> managed to save 138,580 sheets of paper, which converts to approximately <b>8 trees</b>.</div> <ul style="list-style-type: none"><li>During events, reusable dishes and glassware are used instead of single-use plastics, actively reducing plastic waste and promoting sustainable practices.</li><li>In 2023, our aviation training activity was enhanced by the implementation of new software solution “MOMook”. The software is designated to organise the entire training system for aviation training centres without using any paper documentation.</li></ul>
<div>Global air charter services</div> <ul style="list-style-type: none"><li>Our passenger and cargo air charter service provider, Chapman Freeborn, has ensured that all offices have a paperless office system in place to eliminate the need for storing hard copies.</li></ul>
<div>Ground handling and logistics services</div> <ul style="list-style-type: none"><li>Logistics services have upgraded their systems to manage all documents electronically. Internal processes now rely exclusively on digital documents. This development enhances efficiency, streamlines document management, and significantly reduces the need for printed materials.</li></ul>

Initiatives in development
<div>Aviation training services</div> <ul style="list-style-type: none"><li>Our aviation training services are currently developing a fully digital student registration system, marking a key step towards the complete digitisation of training records. The system is scheduled for implementation by the end of 2025.</li></ul> <div>By adhering to Digital ATO principles and utilising IT systems during the training process, <b>BAA Training</b> has successfully reduced paper usage by approximately <b>79% per Type Rating student in 2024</b>.</div>
<div>Head office sustainability initiatives in Lithuania</div> <ul style="list-style-type: none"><li>In 2023, the ESG department at Avia Solutions Group developed an <b>Office Waste Reduction and Recycling Program</b> at the main headquarters in Lithuania. The program addresses one of the environmental goals outlined in the Group’s ESG strategy and aims to reduce the environmental impact of office operations, while encouraging sustainable practices among employees.</li></ul> <div><b>Targets of the Office Waste Reduction and Recycling Program at HQ1 and HQ2</b><ul style="list-style-type: none"><li>Achieve 100% recycling</li><li>Zero use of single-use plastics</li><li>Increase the use of more sustainable office materials</li><li>Ensure waste management awareness and education for all employees</li></ul></div> <ul style="list-style-type: none"><li>As a part of the program, an <b>awareness campaign</b> was launched in 2024 to encourage employees to use reusable food containers when purchasing take-out meals from the company’s canteen in Vilnius.</li></ul>
<div>Global air charter broker services</div> <ul style="list-style-type: none"><li>To support efficient waste management and reduce food waste, Chapman Freeborn plans to introduce compostable waste bins in its offices.</li></ul>



Implemented initiatives

Ground handling and logistics services

- Recycling bins have been installed to ensure proper waste separation and collection. In Lithuania, waste sorting training is mandatory for all employees, and individual desk bins have been removed to encourage centralised recycling and minimise overall waste generation.



Photo source: shutterstock.com

Initiatives in development

Ground handling services

- Our ground handling subsidiary, BGS, is in the process of transitioning all training records and certificates into fully digital formats. These documents will be accessible via tablets and other electronic devices. Scheduled for completion by the end of 2025, this initiative aims to streamline document management, improve accessibility, and reinforce the company's commitment to sustainable operational practices.

MRO services

- We are actively working towards establishing a fully paperless office environment through the development of dedicated policies, the replacement of physical documents with cloud-based storage, the adoption of digital applications, and the implementation of electronic signature solutions. Significant progress has already been made – FL Technics has successfully introduced an electronic signature tool for its personnel.



Initiatives across hangars airports, and warehouses

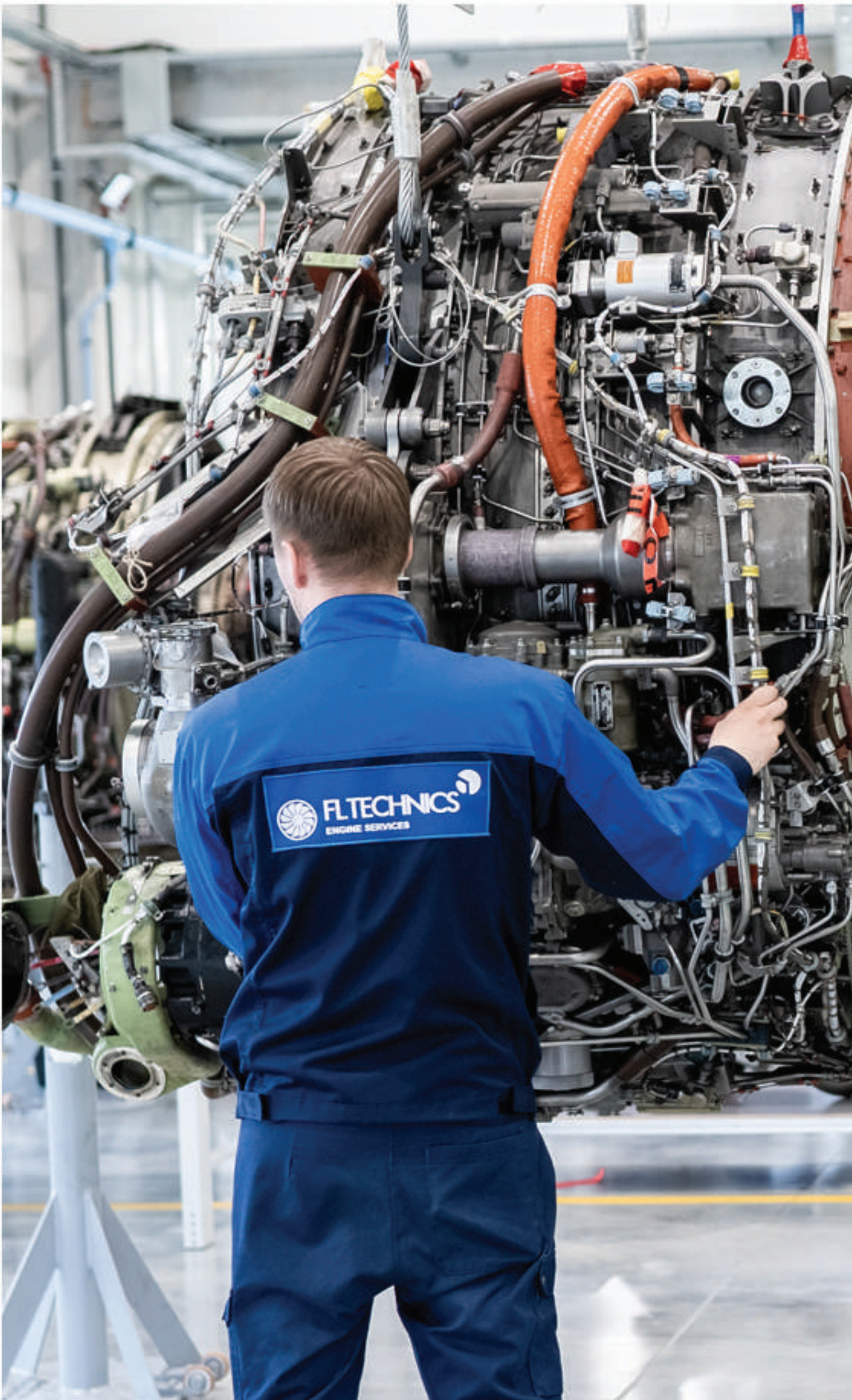
Implemented initiatives

Ground handling services

- At Copenhagen Airport, the Aviator business lounge menu has been enhanced with more sustainable catering practices, including reducing meat consumption and increased plant-based options in line with an 80/20 target. Additionally, over 40% of ingredients are now organically sourced, and problematic plastics have been replaced with fully recyclable or compostable packaging. The team has also achieved a 7% reduction in food waste. Goals for 2025 include exceeding 50% organic sourcing, further cutting meat use, expanding local supplier partnerships, improving lounge recycling, and introducing new targets for biodiversity and animal welfare.
- Our partnership with CPH Kitchen in Copenhagen, established in 2018, has led to a notable 50% reduction in food waste within their business lounges.

MRO services

- Environmental efforts have been strengthened by removing individual office bins and installing centralised waste sorting stations, as well as eliminating single-use cups in break areas. These measures promote proper recycling, reduce mixed waste, and encourage the use of reusable alternatives.
- Packaging materials at MRO warehouses and production facilities for major parts are carefully collected, tracked, and reused whenever possible. When reuse is not feasible, materials are properly recycled.
- Hazardous materials and waste generated during maintenance processes are collected and stored separately in compliance with ISO 14001 standards and local regulations. The disposal and utilisation of these materials are managed by specialised third-party providers.
- The use of absorbent fabric materials has been replaced with reusable mats in hangars, contributing to waste reduction and overall sustainability.
- Hazardous substances from laundry processes associated with MRO activities are treated responsibly by a partner committed to social responsibility and sustainability. This partner holds ISO 9001 certifications for quality management and textile care, has received a Gold sustainability rating from EcoVadis, and operates exclusively using green energy.





In-flight sustainability initiatives

Implemented initiatives	Initiatives in development
ACMI, charter, and cargo services	ACMI, charter, and cargo services
<ul style="list-style-type: none"><li>In 2023, SmartLynx launched the eCabinLog8 project to improve cabin maintenance by replacing paper-based Cabin Defect Record (CDR) books with an electronic platform that logs detailed defect information, including locations and photos. This digital system speeds up repairs and reduces operational disruptions, significantly cutting paper usage, while paper CDRs are retained as a backup.</li><li>Several airlines have adopted electronic flight bags, with SmartLynx pioneering the shift in the Baltics by eliminating paper cockpit documentation as early as 2015.</li><li>On select charter flights, food and beverages at Avion Express are packaged in paper or non-single-use plastics in accordance with legal requirements, and plastic tableware has been eliminated on private and business jet services. Passenger amenities, such as blankets, cushions, slippers, travel kits, as well as cabin crew uniforms, are made from recycled materials.</li></ul>	<ul style="list-style-type: none"><li>To support circular waste management, ACMI provider Avion Express plans to implement waste sorting on charter flights, ensuring that mixed plastics and deposit bottles are collected and handed over to ground handlers for recycling and a second life cycle.</li></ul>





Targets:

Timeline	Initiatives	Description	Status	
Launched in 2023		Recycling training launched across all Lithuania-based companies; now conducted annually.	Achieved 72% completion rate by April 2024; ongoing annual training to increase awareness and engagement.	Ongoing
Implemented in 2024		Removal of all office bins at HQ1 and HQ2 to minimise waste	Part of the Office Waste Reduction and Recycling Program, promoting centralised sorting and reducing individual waste output.	Completed
Launch planned for 2025		Development of a comprehensive ESG training program.	Group-wide ESG Training Program to cover ESG essentials, recycling, greenwashing, sustainable aviation, and more.	Ongoing
Progress through 2024; Target 2025		Reduction of paper usage by ~79% per Type Rating student in aviation training services.	Paper use reduced significantly; however, the full 90% reduction goal set for 2024 was delayed due to digitisation gaps.	Ongoing
Completion expected by end of 2025		Digitalisation of the student registration process in aviation training.	Key milestone in the full digital transformation of training documentation and processes.	In progress
Campaign underway in 2025		Reduction of mixed waste bins and elimination of disposable cups in MRO offices.	Responsible waste sorting campaign launched, with a focus on replacing single-use items and improving recycling behaviour.	In progress





## 4.2. Initiatives developed to reduce water consumption

### NORDIC DINO ROBOTICS - aircraft exterior cleaning robot

Nordic Dino specialises in advanced cleaning robots designed for automated aircraft washing and cleaning services. Equipped with sensors and cameras, these robots assess an aircraft’s exterior condition in real-time, targeting areas needing attention. They use minimal water and eco-friendly cleaning agents, reducing the environmental impact of cleaning operations.

Dirty aircraft exteriors contribute to higher emissions and increased air pollution due to accumulated hazardous substances and particulate matter. This pollution significantly impacts air quality, especially near airports and busy flight paths. Therefore, thorough aircraft cleaning is essential.

#### Benefits of a clean aircraft:

-  Fuel savings due to lower aerodynamic drag
-  Reduced use of water and aircraft cleaning products
-  Improved aircraft availability
-  Improved health and safety conditions
-  Extended paint life
-  Fewer corrosion issues
-  Reduced man-hours







# Our social performance








# 2024 Highlights


- 

This year, our annual "Have Your Say!" survey saw a strong response, with 74% of employees engaging and 69% actively participating.
- 

The **Global Ambassadors Project** was relaunched. The primary purpose of our brand ambassadors is to embody and communicate the core values of Avia Solutions Group, share their genuine passion for aviation, and engage with the community through authentic, relatable content.
- 

The launch of **Spread Her Wings: Women's Aviation Mentorship Initiative**. This initiative aims to connect experienced women professionals with aspiring mentees across Avia Solutions Group.
- 

**Introduction of new well-being benefits** such as, birthday leaves and gifts, flexible and part-time work options, and milestone-based incentives.
- 

**Annual Prevention of Violence and Harassment at Work training.**
- 

**Implementation of new training modules**, expanding learning and development opportunities for all employees.



Photo source: shutterstock.com



# 1. Our people

## 1.1. Introduction

At Avia Solutions Group, we emphasise and encourage ethical behaviour based on core human values. The Group prioritises developing initiatives that safeguard the health, safety, and overall welfare of our entire workforce while actively promoting diversity and inclusion within our teams. Furthermore, we are committed to continually investing in the professional development of our employees, as it not only attracts new talent but also serves to retain our valuable people. By doing so, we ensure that our company remains a hub for exceptional talent and a place where individuals are respected and can thrive both personally and professionally.

From 2023 to 2024, there was a **17% growth in our employees, with a total of 14,000<sup>1</sup> professionals** during the reporting period (12,000 in 2023).

The Group began developing a **Human Capital Management System** aimed at digitalising the employee data collection process across all business units. By 2025, the initial testing version has been launched with two companies: Avia Solutions Group and FL Technics.



1. The number includes all professionals within the entire scope of Avia Solutions Group.



## 1.2. Well-being of our employees

### Occupational health and safety

The Group considers health and safety a fundamental priority across all its operations. We recognize that our employees are our most valuable asset, and we extend this focus to contractors and other individuals under the company’s supervision. Ensuring a safe and healthy working environment is non-negotiable.

At the Group level, we formally **commit** to promoting **occupational health and safety (OHS)** throughout the organization. This commitment is implemented at the business-unit level, where each subsidiary develops and maintains its own OHS policies in line with local regulations, operational requirements, and risk profiles. In some units, dedicated personnel are responsible for overseeing compliance and the effective application of these policies.

All relevant internal procedures and documents are systematically introduced to new employees during onboarding. Mandatory OHS training is delivered and monitored via a dedicated e-learning system, ensuring that employees, contractors, and individuals under the Group’s supervision are equipped with current knowledge of workplace safety standards and procedures.

The Group is committed to continually improving the performance of the OHS management system. Prioritization and action plans are established, supported by quantitative targets to monitor, evaluate, and enhance OHS performance metrics continuously. Compliance with international OHS standards, local regulations, voluntary programs, and collective agreements is strictly observed.

To reinforce OHS governance, the following procedures and documents have been formally approved and implemented across business units:

- Procedure for internal OHS control
- Employee action plan in the event of a fire
- Procedure for the registration and investigation of workplace incidents, accidents, and commuting accidents
- Procedure for OHS risk assessment at the workplace
- Fire safety instructions and training procedures
- Employee safety and health instructions
- Mandatory health checks
- Occupational safety and health training program

In the event of a workplace incident, a dedicated **OHS Committee in collaboration with the relevant Occupational Health and Safety agency** conducts thorough investigations to determine root causes and recommend corrective actions. This structured process helps ensure timely response, accountability, and the continuous improvement of safety protocols across the organisation.

Since 2023, our MRO services have implemented an **Employee Well-being Strategy** designed to foster a safe, healthy, and inclusive work environment. This initiative prioritises physical and mental health, upholds gender equality, and actively works to prevent discrimination. The strategy includes regular monitoring of employee well-being, and the implementation of targeted support measures based on evolving needs.

## Health training for our employees

**100% of our employees are provided with access to online courses covering occupational health, safety, and well-being.** Additionally, continuous and tailored training sessions are conducted with local teams in different countries to ensure the effective implementation of health, safety, and well-being management systems. Furthermore, as part of the onboarding process, all newcomers at each subsidiary company are required to complete essential online training modules on health and occupational safety. This ensures that every new employee is well-informed and familiarised with these important aspects before starting their roles.

## Health insurance and vaccinations for employees

Avia Solutions Group PLC continues to offer annual health insurance, providing employees with comprehensive medical coverage and access to a wide range of health services. In addition to regular flu vaccinations and periodic health checks, employees in specific locations are also offered relevant vaccinations, such as tick-borne encephalitis vaccines in Lithuania. Our MRO services further support employee well-being by providing a 24/7 worldwide accident insurance package, which includes coverage for incidents resulting in injury, disability, or death.



100%

% of our employees are covered by the undertaking’s health and safety management system.



# Employee benefits and well-being

The Group is committed to offering diverse employee benefits that help attract top talent, support retention, and foster motivation. These programs are designed to promote a flexible and supportive work environment, aligned with the evolving needs of our people. **To better understand employee expectations, we conduct an annual engagement survey**, which provides valuable insights into emerging priorities. Based on this feedback, we continuously refine and expand our benefits offerings, ensuring they remain relevant, inclusive, and responsive to our employees’ well-being. We believe that treating people with fairness and respect is the foundation of a thriving workplace. In addition to these initiatives, we are committed to paying a living wage that supports a decent standard of living, preventing excessive working hours by setting healthy limits, and avoiding unnecessary overtime. We value equality, seeking men and women receive the same pay for the same work, and we honor the importance of rest by providing paid annual leave. When difficult decisions such as workforce reductions must be made, we provide fair notice and open consultation, because every person deserves dignity, transparency, and care in how they are treated.



Well-being benefits introduced in 2024:

Annual birthday leave time and gifts

Flexible working hours



Well-being benefits:

Part-time working options

Additional vacation days granted based on length of service

Work anniversary gifts

Remote work flexibility

Annual Health Insurance

Mindletic mental gym app to promote emotional balance

MELP app to personalize employee benefits

On-site children’s day care center

Free on-site gym

Monthly bus e-ticket or parking provided free of charge



Social and internal activities:

Electric car parking lots

Fresh fruit days

Assigned prayer room

Employee of the Year Awards

High Flyers program, which recognises high performing employees each quarter

Yoga classes and sports teams


## Long-term incentives for employees


The Employee of the Year awards are an annual initiative that honor the outstanding performance of Group employees, providing both economic rewards and public recognition across the organization. To further foster employee loyalty and acknowledge long-term commitment, Avia Solutions Group PLC also implements incentives that celebrate key milestones and achievements. In 2025, the recognition program was expanded to include additional vacation days and commemorative gifts for employees reaching significant work anniversaries.




# 1.3. Aviation Safety Management

## 2024 Highlights

- 

Maintaining IATA Operational Safety Audit (IOSA) for Airlines and IATA Safety Audit for Ground Operations (ISAGO) certifications.
- 

For the third consecutive year, **the Group successfully hosted the Aviation Safety Forum: Collaboration for Excellence**, bringing together aviation professionals to exchange knowledge and strengthen safety performance across the organisation.
- 

In 2024, the Group implemented a **unified software platform, allowing all airlines to centrally upload and analyse flight data** — enhancing insights into fuel efficiency, environmental impact, and safety performance across operations.





## Aviation Safety Management

Operational safety is of paramount importance in the aviation industry, as it directly impacts passengers, crew members, environment, the Group's reputation and all third parties involved. Recognising the critical importance of safety, we are fully committed to maintaining the highest international standards across all areas where our services are delivered.

To strengthen this commitment, Avia Solutions Group PLC established the **Aviation Safety Committee** in 2022. The Committee is responsible for monitoring all activities that influence aviation safety within the Group and ensuring full compliance with applicable laws, regulations, and internal policies.

In 2023, the Committee introduced **Safety Performance Indicators** for all subsidiaries, alongside a mandatory 72-hour reporting mechanism for serious incidents or high-risk events. This process also applies to any significant non-conformity identified within a company, ensuring the Group is promptly informed and can take immediate corrective action.

In 2024, the Committee further enhanced safety oversight by deciding that all newly established or onboarded companies within the Group must obtain IATA certification. This requirement reinforces our commitment to consistent and rigorous safety standards throughout Avia Solutions Group.

Aviation safety risks are currently being managed autonomously on the level of each separate entity via an implemented **Safety Management System (SMS)**, which requirements and applicability are in accordance with **International Civil Aviation Organization (ICAO) Standards** and recommended practices. We are also participating in voluntary certification programmes such as **IATA's Operational Safety Audit (IOSA)** and **Safety Audit for Ground Operations (ISAGO)**. In 2024, our subsidiary SmartLynx Malta completed the onboarding process to the International Air Transport Association (IATA) Member-

ship and was officially accepted as an IATA member airline. This achievement signifies the company's aim to contribute to continued growth and high safety standards in aviation. Our subsidiaries, KlasJet and BBN Airlines Türkiye, have received IOSA certificates in 2024.

## Mitigation actions for main aviation safety risks

### Fatigue Risk Management:

Fatigue is included in our risk management, with crew members reporting their alertness levels after each flight. In 2024, dedicated personnel for fatigue management were appointed across the Group. This initiative broadens the focus beyond flight crews to include Operational Control and aircraft engineering teams. It also enables a proactive approach to identifying fatigue-related risks, monitoring trends, and implementing measures to prevent fatigue-induced incidents across the organisation.

### Crew Mental Assistance Programs:

We have confidential and independent Peer Support programs for flight and cabin crew members to seek emotional support or assistance with mental health concerns.

### Systematic Alcohol and Drug Screening:

This standard process is uniformly implemented across the Group, with each company maintaining compliance with the internal policies and procedures.

**The SMS goal is to proactively identify, monitor and mitigate aviation safety risks before they lead to incidents or accidents.** One of the key initiatives led by the Aviation Safety Committee is the development of a unified SMS Framework, aligned with cross-integrated standards set by ICAO and European Union Aviation Safety Agency (EASA). In 2024, efforts continue to standardise safety reporting and risk management across the Group. The aim is to implement a single, integrated Group-wide system by 2025. This initiative will establish a robust foundation for proactive risk management, safety assurance, and the promotion of a strong safety culture across the organisation.





## Industry engagement

The Group actively participates in both national and international discussions focused on aviation efficiency, safety, and environmental issues. Several key subsidiaries are members of the **National Aviation Association (LAVIA)**, which plays a vital role in shaping Lithuania's aviation strategy and representing industry interests at various levels. Through this platform, Group representatives regularly engage with other aviation stakeholders to address shared challenges and priorities, including aviation safety, fuel efficiency, training, and regulatory compliance.

In addition, we are involved in a range of global conferences dedicated to aviation safety and operational efficiency, with growing attention given to Sustainable Aviation Fuel (SAF) and fuel management practices. Reflecting this commitment, the Group has launched a comprehensive evaluation of its operational performance in fuel usage.

As part of this effort, a unified software solution was implemented in 2024, enabling all Group airlines to upload and analyse flight data centrally. This platform provides valuable insights into fuel efficiency, environmental impact, and safety performance, while also supporting the standard benefits of flight data monitoring programs.

Furthermore, airline companies within the Group have begun participating in IATA's global data exchange programs, thus contributing to the advancement of worldwide aviation initiatives.

## Safety training for our employees

For the third consecutive year, we proudly hosted the **Avia Solutions Group Aviation Safety Forum: Collaboration for Excellence**. This annual event brought together aviation professionals from across our Group as well as industry partners, including representatives from EASA, Eurocontrol, and others. The expanded agenda covered a wide range of topics, from safety and regulatory compliance to emergency response planning and aviation security. The forum emphasised collaboration, knowledge sharing, and the exchange of best practices to further strengthen safety performance throughout the Group.

At Avia Solutions Group PLC basic safety management training is a mandatory requirement for all new employees. Additionally, each aviation-related subsidiary within the Group maintains an approved training program that includes both initial and recurrent SMS training. The scope of training is adapted to employees' specific roles and responsibilities within the organisation.





# Operational safety statistics

In 2024, the average safety reporting rate across the Group remains at a high level of 7.5%, including new AOCs established within the Group. We strive to achieve operational safety by improving proactive employee engagement across all business units. As part of our safety assurance program, employees are encouraged to identify and report potential hazards or threats through the company’s established reporting systems. This wider participation across departments is critical to maintaining a responsive and preventative safety culture.

Our priority remains to reduce work-related incidents to a level that is as low as reasonably practicable. This is achieved through continuous promotion of safety awareness and the development of a strong safety culture at every level of the organization from operational teams to top management.

The Group concluded 2024 with **zero aircraft-related accidents or fatalities** across all air operations. Notably, this marks the **fifth consecutive year without an aircraft accident**, underscoring the Group’s strong and ongoing commitment to aviation safety and risk prevention.

In 2024, the Group recorded **117 work-related incidents, none of which resulted in high-consequence injuries**. However, we deeply regret reporting **one employee work-related fatality**<sup>1</sup> at one of our ground handling stations. The incident remains under formal investigation, and an internal review was conducted in collaboration with the Regional State Administrative Agency to identify contributing factors and determine corrective actions.

In response, the Group implemented a series of immediate and preventive measures, including:

- Strengthening operational risk assessments across all tasks
- Revising and clarifying work instructions to improve compliance with safety protocols

- Enhancing oversight and monitoring, particularly during night shifts
- Reinforcing a culture of intervention and adherence to safety guidelines
- Exploring additional technical solutions, such as improved visibility measures and warning systems
- Strengthening the Health & Safety organization to further enhance risk management processes

The Group remains firmly committed to continuous improvement in workplace safety. Our goal is to achieve a zero-harm culture, supported by robust safety management systems and a shared responsibility for the wellbeing of all employees across our operations.



# Group Safety Overview: 2024

General	
	183 490 sectors flown
	391 642 flight hours
	5 950 042 man-hours (MRO)
	191 367 departures (GH)
Safety	
	14 666 safety reports
	7.5% reporting rate
	81% voluntary reports
	91% flights in FDA program
	0 accidents
Quality	
	721 internal audits
	4,5 findings/audit
	217 supplier audits
	193 client audits

1. This data covers employees and contractors.



# 1.4. Diversity, equality, and inclusion

## Equality and mutual respect in our Group

Avia Solutions Group is firmly committed to providing equal opportunities and fostering an environment completely free from discriminatory practices for all its employees. We seek to ensure the psychological safety of employees in the workplace. Three essential elements integrated into our process are key to ensuring equality and mutual respect throughout our Group:

### Equal opportunities

Our **Equal Opportunities Policy** ensures the Group's recruitment process is based solely on a person's individual characteristics, education, and work experience, and not on any discriminatory criteria.

The Group ensures **equal rights for all employees** by providing uniform working conditions that are tailored to individual responsibilities and roles. Retraining and equitable benefits are extended without regard to factors such as gender, race, nationality, language, origin, social status, religious beliefs, age, sexual

### Prevention of Violence and Harassment at work

In 2024, the Group mandated the **annual Prevention of Violence and Harassment at Work training** for all employees, reinforcing the understanding of what constitutes appropriate workplace behaviour. This initiative aligns with the **Violence and Harassment Policy**, which outlines a comprehensive framework of preventive measures including prioritising psychological safety, clear communication channels, and a robust system for reporting and investigating workplace misconduct.

**Additionally, two cases of discrimination were reported during the year, compared to a single incident in the previous year**, and was thoroughly investigated in accordance with the Group's internal protocols. Through these measures, the Group continues to reinforce a culture of dignity, equality, and mutual respect.

### Compensation

We strive to make efforts toward gender equality in terms of employee remuneration. In 2023, the average pay gap between male and female at Avia Solutions Group PLC's employees in equal-value positions stood at 1%, reflecting ongoing efforts to ensure fairness in compensation practices. To support this goal, the company collaborates with an external research firm to conduct market-based compensation analysis, enabling data-driven decisions that promote equitable pay. These efforts are further reinforced by the Group's Equal Opportunities Policy, which underpins our commitment to non-discrimination and equal treatment.

In addition, transparency in compensation practices remains a priority. **In 2024, the ratio of the CEO's total annual compensation to that of the average employee was 4.4:1, showing a slight increase from 4.1:1 in 2023.**



Photo source: shutterstock.com



# Diversity and inclusion within the company

Diversity and cultural variety are a widespread reality in our Group, reflected by operating in multiple countries across five continents. Our international synergy is one of our greatest strengths, enabling us to create innovative solutions and foster a vibrant global community of aviation enthusiasts.

Nonetheless, the aviation industry remains predominantly male on a global scale, with women significantly underrepresented in aviation and aerospace professions, particularly in leadership roles, commercial piloting, and maintenance technology. To address this disparity, we are actively working toward enhancing diversity by advocating for an increased female presence in aviation and by championing aviation as a viable field for women.

## Diversity, Equity, and Inclusion (DEI)

Avia Solutions Group remains committed to fostering an inclusive, equitable, and respectful workplace through ongoing diversity, equity, and inclusion (DEI) initiatives. Since the launch of its dedicated Diversity and Inclusion training in 2023, the program has been conducted annually for Group employees, aiming to:

- Raise awareness of DEI principles.
- Equip employees with tools to recognize and address inappropriate workplace behaviors.
- Strengthen the Group’s culture of dignity, respect, and inclusion.

Building on this foundation, **2024 saw the introduction of new training modules covering cultural differences and communication styles.** These sessions explored how culture influences communication, identified the diverse communication styles present in a multicultural workplace, and provided practical strategies for effective cross-cultural collaboration.

## Integration with ESG Strategy

The Group’s ESG Awareness Strategy continues to serve as a key framework for promoting environmental, social, and ethical responsibility among employees and external stakeholders. This strategy encourages active participation in environmental initiatives, social projects, and volunteering activities, while aligning with international observance days that promote inclusivity, diversity, gender equality, and sustainability.

In 2024, a yearly communication plan was introduced to align awareness campaigns with these observances, fostering greater employee engagement around ESG topics. As part of this effort, the **ESG Training Package was launched in January 2024**, providing employees with accessible digital resources to deepen their understanding of ESG principles.

## Additional Initiatives

Employees are also encouraged to engage in environmental actions, social impact projects, and volunteer work. **These initiatives are reinforced by commemorating key international days through programs, campaigns, and educational activities that highlight inclusivity, diversity, gender equality, and sustainability.**

In the area of operations, the Group’s MRO services are advancing inclusion and diversity practices. By the end of 2025, an Inclusion and Equality Calendar will be introduced, identifying relevant DEI topics based on employee survey feedback.

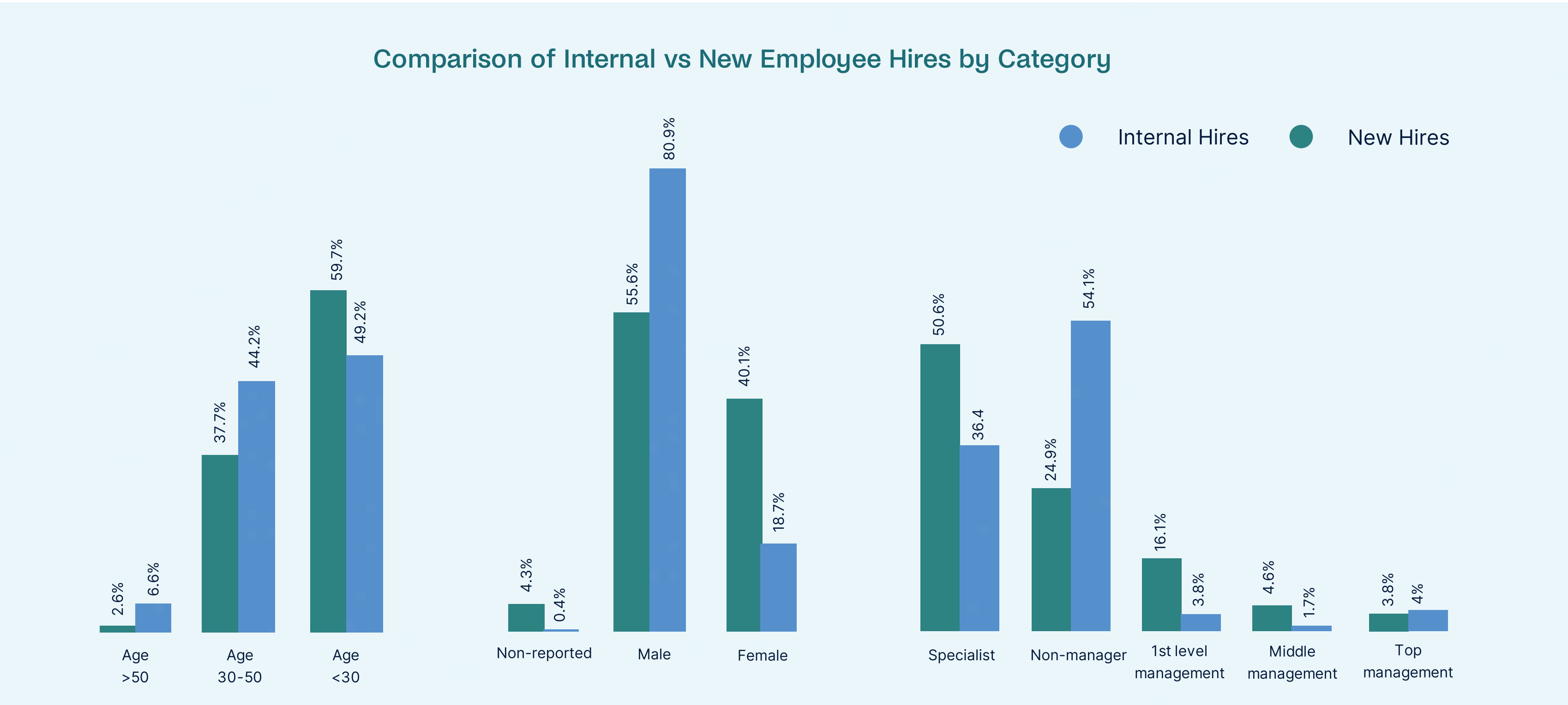
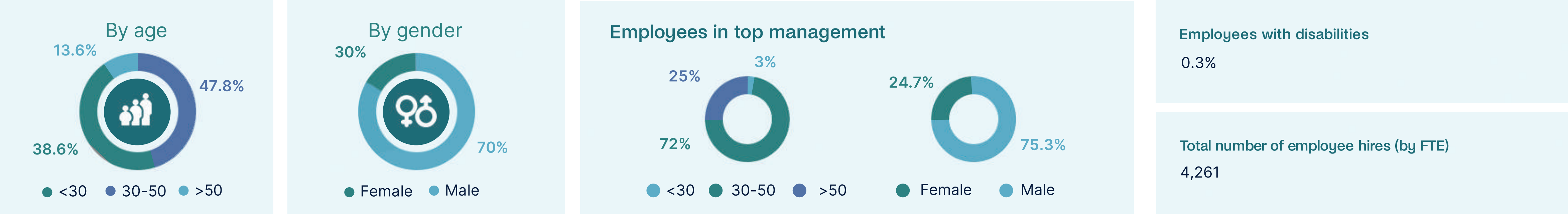
These initiatives collectively ensure that all employees experience a workplace culture built on inclusivity, safety, and equality.



Photo source: shutterstock.com



Diversity KPIs 2024\*



Open positions filled by internal candidates

13.6%



\* The scope of social data has been expanded to include additional companies: AirExplore, Ascend Airways, BBN Indonesia, BBN Turkiye, AeroClass, AeroTime Hub, Busnex, Sensus Aero, Abu Dhabi LLMC, Skytrans, and Universali Arena. This expansion is due to these companies having a greater impact on social factors and the availability of relevant data.

Photo source: shutterstock.com



# Diversity and inclusion within the company

The value of diversity is realised when supported by inclusive practices. Inclusion is a key component of leadership development, ensuring our leaders are equipped to strengthen respectful, equitable, and diverse workplaces. To incorporate these values, Avia Solutions Group implements dedicated leadership training programs that are designed to enhance awareness of diversity, equity, and inclusion, while providing practical tools for addressing biases, promoting inclusive communication, and empowering every employee.

A key initiative under this commitment is the **Leadership Internal Academy, launched twice a year, with each cohort comprising 18–20 participants.** The program includes seven core modules covering: The Role of a Manager, Progress Dialogues and Feedback Skills, Finance Basics, Public Speaking, Lean, Computer Literacy, and Corporate Networking. A blend of internal and external lecturers lead the sessions, offering both practical insight and subject matter expertise. Through this initiative, we aim to develop ethical, culturally aware leaders who can drive positive change across the organisation.



## Understanding unconscious bias

Inclusive leadership training starts with recognising unconscious biases and their impact on decisions and teams. Leaders then learn to challenge assumptions for better, fairer choices.



## Cultural competence

Leaders are educated on cultural competence, enabling them to understand and appreciate different cultural backgrounds, perspectives, and communication styles. This fosters an environment of respect and openness.



## Empathy and active listening

Leaders learn the importance of empathy and active listening in understanding the experiences and needs of team members. By actively listening, leaders can create a supportive and inclusive atmosphere where everyone's voice is heard.



## Inclusive decision-making

Leaders are encouraged to involve a diverse range of perspectives in the decision-making process. This can lead to better decisions and more innovative solutions, as diverse perspectives bring varied insights.



## Conflict resolution and fostering collaboration

Inclusive leaders are trained in conflict resolution techniques that promote understanding and collaboration among team members from different backgrounds and who may have varying viewpoints.



## Accountability and measuring progress

Leaders are taught to hold themselves and their teams accountable for promoting inclusivity and measuring progress toward diversity and inclusion goals.



## Talent management and recruitment

Inclusive leadership training guides leaders in adopting fair and inclusive practices in talent recruitment, development, and advancement. This ensures that opportunities are accessible to all employees based on merit and potential.



Photo source: shutterstock.com



# Promoting women in aviation

Empowering women in aviation is essential to inspiring future talent and building a more inclusive, accessible industry. In early 2024, as part of our Group-wide commitment to gender equality, we launched **Spread Her Wings: Women’s Aviation Mentorship Initiative**—a program designed to connect experienced women professionals with aspiring female colleagues across Avia Solutions Group.

Through personalised guidance, knowledge-sharing, and career development opportunities, the initiative aims to strengthen gender diversity, foster professional growth, and help close inequality gaps within the aviation sector. It also aligns with the **United Nations Sustainable Development Goals (SDGs)**, particularly those focused on gender equality, and reduced inequalities.

## Spread Her Wings: Women’s Aviation Mentorship Initiative

Open to all female employees, Spread Her Wings welcomes up to **70 participants each year—35 mentors and 35 mentees**. Participants are invited to consider whether they would benefit more from receiving mentorship or from sharing their expertise as a mentor. To serve as a mentor, employees must have at least one year of team management experience and tenure within the Group.

The program provides a well-structured mentorship journey, featuring **regular one-on-one sessions—conducted either online or in person—and bi-monthly presentations delivered by both internal and external speakers**. These sessions are designed to nurture personal growth, sharpen professional skills, and inspire fresh perspectives. Complementing these are interactive webinars aimed at enhancing leadership and mentorship capabilities, ensuring both mentors and mentees are fully equipped to grow, lead, and inspire.

Through Spread Her Wings, Avia Solutions Group is fostering a culture of empowerment—enabling women to excel in their careers, embrace leadership opportunities, and help shape a stronger, more diverse future for the aviation industry.





## Promoting women in aviation

Moreover, we actively engage women through our social media channels to foster their interest in aviation. We celebrate the remarkable achievements of women in the industry and empower more women to enter this traditionally male-dominated sector. A notable example is our subsidiary, SmartLynx, which upholds principles of equal opportunity and maintains a **40/60 gender balance** within the company. While women currently make up 44% of SmartLynx personnel, there remains progress to be made, particularly within the flight and cabin crew roles, to achieve greater gender balance. In 2021, SmartLynx committed to increasing female representation through participation in **IATA's #25by2025 initiative**, aimed at enhancing diversity, equity, and inclusion in aviation. Since then, **SmartLynx has seen an increase in female employees and anticipates continued growth.**

Notably, there has been a promising **rise in female pilots at SmartLynx**, a sector historically underrepresented in aviation, particularly within the ACMI sector.





# 1.5. Training and professional development

In the aviation sector, prioritising the training and professional development of employees is paramount. It not only ensures a skilled and capable workforce but also upholds safety, operational excellence, and the industry’s commitment to delivering exceptional services. **In 2024, the Group’s employees completed over 156,419 training and development hours.** On average, each employee undertook 16.4 hours of training. Additionally, the Group invested **€ 5,134,378 in training and development**, with an average expenditure of €588 per employee. Furthermore, there were **627 promotions at the Group level**, representing a 59% increase compared to the previous year.



**100% of employees**  
were invited to participate in our engagement survey.



**627 promotions**  
were achieved at the Group level.



**156,419 training hours**  
were offered and completed by employees in 2024.



On average, employees completed **16.4 hours of training.**



**€ 5,134,378<sup>1</sup>**  
was invested in training and development in 2024.



Average training and development expenditure per employee  
**€588**

1. The number covers the entire scope of Avia Solutions Group.



To enhance employee performance, the Group is consistently engaged in ongoing development initiatives. Recognising the diverse skill sets requiring refinement, each subsidiary employs a range of training methods tailored to their employees' needs, covering:

Leadership programs

The Group has in-house talent academies that provide continuous learning opportunities for both experienced and younger leaders. This allows them to refresh their skills and expand their knowledge.

The Leadership Academy encompasses leadership that is typically aimed at young professionals, recent graduates, or emerging leaders who show potential and interest in taking on leadership roles in their careers or communities. **The Academy contributes to enhanced talent retention, fosters innovation through fresh perspectives, and builds a strong pipeline of future leaders in the Group. Each year, around 50 young leaders participated in the program across the Group.**

In addition, tailored leadership programs have been introduced for employees at various experience levels throughout the Group. These customised initiatives provide targeted development to equip future leaders with the specific skills needed to excel in their roles.

Complementing these initiatives, the Group also operates the **Smart Leaders Club** — a leadership development program dedicated to strengthening the skills and capabilities of managers and key personnel through continuous training and targeted skill-building activities.

Additional training

To further support employee development and well-being, the Group continues to expand its learning and development offerings through the introduction of targeted training programs. In 2024, new training initiatives were implemented to address evolving workplace dynamics and individual growth needs. These included:



**Mobbing and Workplace Harassment Training,** aimed at raising awareness and prevention of inappropriate workplace behaviour;



**Cyber Security & Risk Management,** equipping employees with the knowledge to identify and respond to digital threats;



**Building Career Agility and Resilience in the Age of AI,** focusing on adapting to future work trends and navigating change;



**Foreign Language Club,** supporting cross-cultural communication and continuous learning;



**Festive Balance: Supporting Each Other Through Holiday Stress,** promoting mental well-being and empathy during the holiday season;



**Effective Feedback,** designed to strengthen communication and performance management within teams.

Looking forward, the Group remains committed to enhancing its training portfolio in 2025, with plans to build on these programs and continue offering diverse, relevant, and inclusive learning opportunities that meet the changing needs of our workforce.



Photo source: shutterstock.com



## Knowledge sharing sessions

Fostering knowledge sharing across our extended Group is key to our performance. This commitment is demonstrated through quarterly company-wide knowledge sharing sessions, integrated into our continuous education program. Additionally, annual Group-wide gatherings and meetings on market updates further solidify this practice.

Employee development is closely tied to our performance appraisal and management sessions approach. We celebrate employee achievements and share valuable lessons in dedicated team settings. Performance is assessed through a range of indicators, including management by objectives, peer feedback, teamwork, and daily interactions. As part of this process, motivational and personal development goals, along with career paths, are discussed with the manager, ensuring alignment with individual aspirations under the management objectives framework. While formal appraisals are conducted at least once a year, more frequent evaluations are common, depending on the team and area.

To strengthen communication and development, regular one-on-one meetings between employees and their direct managers enable continuous feedback, foster open dialogue, and support ongoing professional growth. Engagement surveys are also conducted to evaluate team dynamics and improve cooperation across the Group.

In support of long-term knowledge retention and onboarding, the company implements a structured **Mentors Program that pairs experienced professionals with new team members**. As part of the onboarding process, each new joiner is assigned a mentor who provides guidance and support, helping them navigate everyday questions to better understand the company's operations. Additionally, the Group's **"Day with a Colleague" initiative** allows employees to explore different roles across the organisation, promoting cross-functional collaboration and a broader awareness of how teams work together.





## 1.6. Talent attraction and retention

Retaining skilled and experienced employees fosters organizational memory, leading to higher operational efficiency, smoother knowledge transfer, and decreased training costs. It also enhances team cohesion, as established employees often serve as mentors, nurturing the development of newer team members. This continuity of talent helps maintain a consistent company culture and ensures the seamless execution of projects and initiatives. In 2024, the Group’s overall employee turnover was 23.9% (22.6% in 2023).

We also conducted our annual “**Have Your Say!**” survey, inviting **100% of our employees to participate**. As part of our ongoing efforts to enhance employee engagement, the company set a target to maintain or improve upon the previous year’s engagement rate. **In 2024, we exceeded this goal, achieving a 74% engagement rate**, up 1% from 73% in the previous year—with 69% of employees providing responses.

While we value the experience of long-term employees, we also welcome the fresh perspectives and diverse skills that external hires bring. This blend of talent fosters creativity, driving the company to explore new opportunities and adapt to evolving market trends.

### Relaunch of the Global Ambassadors Project


Our brand ambassadors play a crucial role in advancing Avia Solutions Group’s mission by connecting with our audience and championing the aviation spirit. The main goal of our ambassadors is to personify and communicate the core values of Avia Solutions Group, share their genuine passion for aviation, and engage with the community through authentic and relatable content. **We have approximately 180 employees from various Group subsidiaries serving as true brand ambassadors.** They participate in training sessions and periodic meetings to enhance both personal and Group branding, and they receive exclusive merchandise representing the project.

### Top Employer 2023: enhancing talent


In 2024, our MRO division, **FL Technics**, once again earned the **prestigious Top Employer certificate**, recognising its commitment to creating an excellent work environment and ensuring employee well-being both in Lithuania and globally. Awarded by the Top Employers Institute, this recognition underscores our excellence in workforce management across its global MRO hubs and offices. It highlights the company’s success in attracting and retaining top talent while reinforcing the Group’s ongoing commitment to cultivating a high-performing and people-centred workplace across its subsidiaries.




## Elevating the employee experience



Presenting compensation packages and employee benefits.



Providing comprehensive onboarding for new staff members.



Engaging in frequent performance evaluations to foster employee growth.



Introducing various specialised initiatives aimed at attracting fresh talent. Refer to the "Employee benefits and well-being" or "Training and professional development" sections for more details.



# Retaining our talent



### Engaging with our people

“Have Your Say!” is an engagement survey launched for all employees, with 74% actively participating. The insights gained from this year’s survey revealed that employees most value their team and colleagues, the global and multinational environment, opportunities for growth and learning, challenging and interesting work, and work-life balance and flexibility. These findings help guide efforts to enhance the overall employee experience and reinforce significant aspects in the company of people across the Group. Overall, this approach recognises that engaged employees are more likely to stay with the company and contribute positively to its success. The involvement of all leaders and managers in the process plays a crucial role in employee engagement and retention.



### Taking action

We analyse the “Have Your Say!” survey results to identify areas where employee engagement is strong and where improvements are needed. As a result, action plans are put in place to implement specific initiatives and measures within the Group.



### Tracking our progress

Human resources metrics are tracked and monitored across the Group, with turnover rates being a key element in measuring progress and results.




### Learning from those who have left

All companies within the Group now conduct exit interviews with employees who have decided to leave. The valuable information obtained from these interviews allows the talent attraction process to be more personalised and effective.






# Attracting top talent




### Dedicated global hiring teams

Around the world, our dedicated teams are diligently engaged in the mission of identifying and recruiting highly experienced professionals. This effort aligns with the overall growth of the aviation industry, particularly in the ACMI business and the aviation logistics sector. Within these areas — covering both cargo and passenger services — there has been significant hiring at the middle management and senior specialist levels.



### Transforming talent management

Avia Solutions Group is now using the recently launched **Applicant Tracking System**. This software helps manage and control the process of recruiting and hiring potential employees, making it smoother and more efficient.



### Global Careers Expo

For the fourth consecutive year, we hosted the Global Careers Expo to strengthen our global presence and attract top talent to our Group. Speakers from Avia Solutions Group gave insights into their business operations and shared the exciting career opportunities available within their companies. This initiative plays a vital role in promoting aviation careers and attracting both professionals and aspiring aviators.





## 2. Customer satisfaction and stakeholder engagement

Customer input plays a key role in shaping both our success and sustainability efforts. Their feedback offers valuable insights that guide business decisions and ensure operations align with evolving ESG expectations. As our Group serves various customer segments across the aviation industry, we adopt a tailored approach to customer engagement, reflecting the priorities of the clients we serve.

### Customer questionnaires and surveys

Gathering customer feedback and maintaining client engagements remain a priority in understanding customers' satisfaction and overall experience. The insights collected are analysed and evaluated internally, allowing the Group to identify areas for improvement and implement necessary changes to continuously enhance operational performance.

Furthermore, the different business segments use customised systems and tools to collect feedback on specific services provided. This year, our MRO services conducted a **comprehensive customer satisfaction analysis** to gain deeper insight in client expectations and enhance service quality across its business units. The study consolidated structured feedback to identify opportunities for improving the customer experience. Based on gathered insights, targeted actions have been launched. Moving forward, the company plans to conduct this assessment annually, reinforcing its long-term commitment to customer focus and continuous performance improvement.

### Meetings and visits

The commercial departments regularly engage with customers through face-to-face or online meetings, covering negotiations and operational and quality-related discussions. In-person interactions are mostly preferred to ensure better collaboration and strengthen client-customer relationships.

In addition, customers are often welcome and regularly invited to visit our facilities or headquarters to discuss current cooperation, customer satisfaction survey results, and future development plans in a formal and informal environment. These ongoing activities help identify potential challenges early on, align expectations, and foster transparent communication.

### Advancing customer satisfaction: a refined measurement approach

Client satisfaction is essential to how we deliver and ensure enhanced business operations. While official customer satisfaction measurement tools are not yet applied across all operations, several business units have adopted structured methodologies, most commonly the **Net Promoter Score (NPS)**, **Customer Effort Score (CES)**, and **Customer Satisfaction Score (CSAT)**. These are often collected through post-service surveys and annual feedback cycles, offering immediate insights and long-term trend data.

In areas where tools are still being introduced, strong customer relationships are maintained through close operational collaboration and continuous engagement.

Several strong practices within our Group exemplify our commitment to customer satisfaction. Notably, FL Technics developed and implemented a comprehensive customer satisfaction measurement framework in 2022, centred on two key indicators: the **On-Time Delivery Index** and the **Client Feedback Index**. This approach was further refined based on audit outcomes and aligned with Airbus standards and ISO 9110 certification requirements.

As a result, FL Technics has enhanced its competitiveness, increased operational transparency, and gained access to more actionable customer insights.

Similarly, Skytrans demonstrates effective stakeholder engagement through its ongoing collaboration with the Queensland Government on the Local Fares Scheme Subsidy. This initiative supports eligible residents in regional communities, who are also primary service users. Their feedback provides valuable insights into the scheme's performance and impact. Continuous engagement ensures the program remains responsive to community needs, improves accessibility, and strengthens regional connectivity, enabling Skytrans to make informed, customer-focused enhancements.





## Industry engagement and events participation

Group representatives consistently participate in a diverse range of global industry events — including trade shows, exhibitions, and conventions, while engaging in professional dialogue and strengthening relationships with clients and stakeholders across the aviation sector.

In 2024, we demonstrated our ongoing commitment to industry collaboration and visibility by attending several prominent aviation events. These include the annual **IATA Ground Handling Conference (IGHC)** and multiple **International Society of Transport Aircraft Trading (ISTAT)** gatherings. Our representatives also contributed to broader industry discussions at events such as the **World Travel Market Conference**, **AVIADEV Africa**, and **Airline Economics Growth Frontiers**.

Our ground handling services in the Baltics played an active role in advancing conversations on sustainability within aviation. At the **third Sustainable Aviation Fuels Forum**, the focus centred on the vital role of Sustainable Aviation Fuel (SAF) in reducing carbon emissions. Additionally, at the **Aviation Energy Forum (AEF)**, we presented our progress in sustainability, including our participation in the **EcoVadis** assessment at BGS and efforts toward developing SAF supply capabilities — underlining our dedication to greener aviation energy solutions.

Meanwhile, our ACMI operations in Indonesia strengthened our regional presence across Asia by attending **ISTAT Asia** and **Routes Asia 2024**, expanding commercial networks and reinforcing their position as the region's leading ACMI provider. We also took part in Cargo Facts Asia, engaging with global air cargo stakeholders and supporting our strategic growth in the cargo segment.

As in previous years, our aviation training and maintenance services maintained a strong presence at major industry events. Our aviation training providers regularly participate in events such as **Pilot Career Live**, **EATS**, **APATS**, school fairs, and international air shows. Simultaneously, our MRO services remain actively involved in key maintenance-focused events, including the **World Cargo Summit**, **MRO BEER**, **MRO Europe**, and exhibitions across Latin America, the Middle East, and Africa.



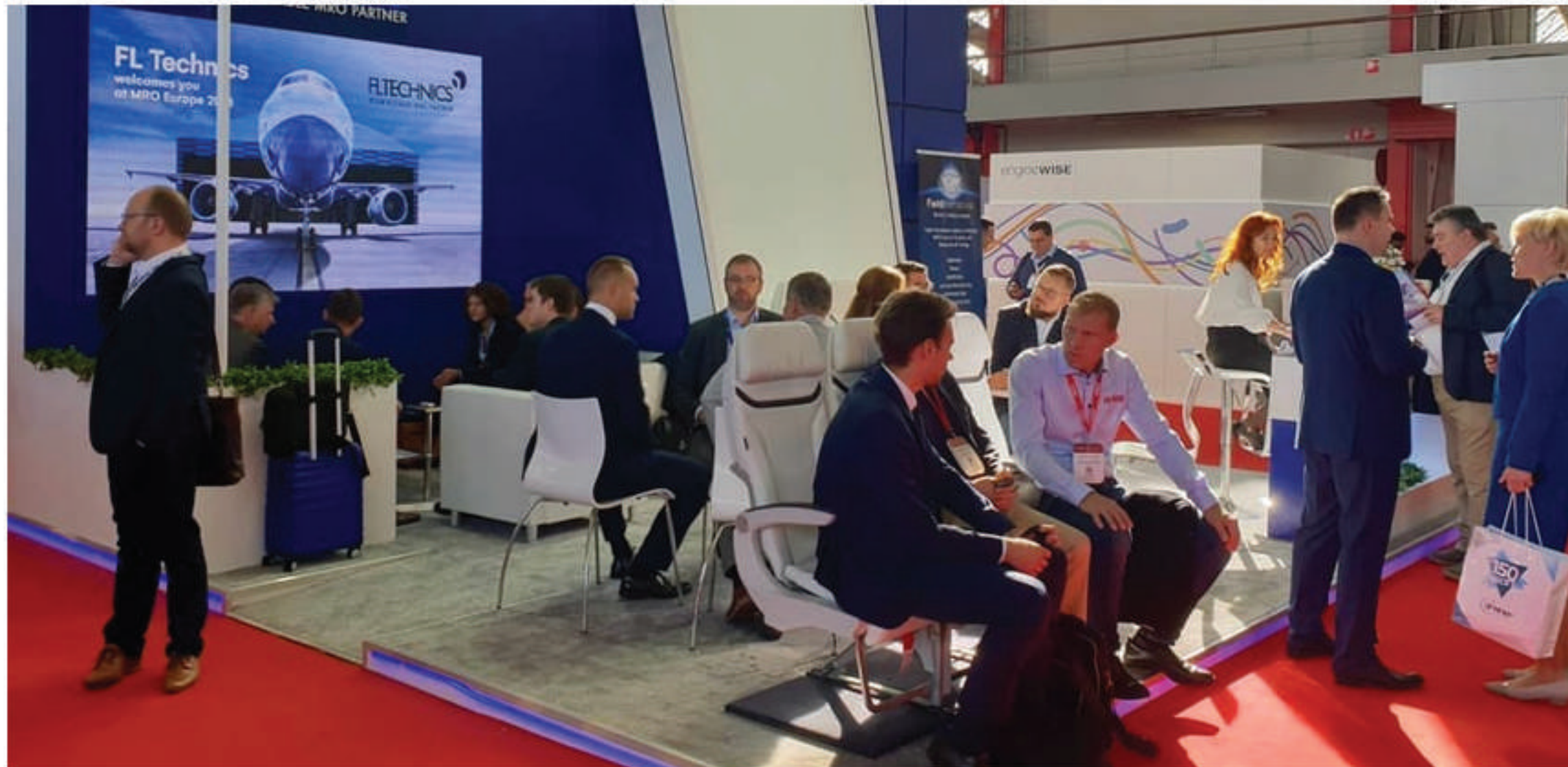


## Industry engagement and events participation

We also remain committed to academic collaboration and talent development. Each year, our private jet operations organise student engagement sessions at **Kazimieras Simonavicius University** and **Kaunas University of Technology** in Lithuania, contributing to local academic communities and fostering dialogue with future aviation professionals. Likewise, our aircraft maintenance teams take part in annual career fairs such as those hosted by Vilnius Tech and Career and Study events.

Moreover, the Head of our ESG Department, represented Avia Solutions Group at the Faculty of Economics and Business Administration of **Vilnius University**. She delivered a focused lecture titled “ESG in Large Organisations: The Case of Avia Solutions Group,” sharing the Group’s sustainability journey and provided insights into sustainability reporting, double materiality, and the implementation of proactive ESG practices. The session engaged future business leaders on the evolving role of ESG in corporate strategy.

The Group continues to showcase its close collaboration with educational institutions by promoting aviation careers, sharing industry knowledge, supporting curriculum development, establishing scholarships, and providing internship opportunities. Strategic cooperation agreements are in place with all universities and vocational institutions in Lithuania offering aviation-related programs.





## Achievements and recognition

Throughout 2024, our businesses continued to gain international recognition for excellence, innovation, and impact across multiple sectors of aviation. From air charter brokerage and ACMI operations to ground handling and aircraft maintenance services, our teams were acknowledged by industry leaders, partners, and institutions for their outstanding performance, commitment to safety and sustainability, and dedication to fostering progressive workplace cultures. The following highlights reflect the breadth of our achievements across regions and specialties, underscoring the strength of our global aviation network.

Our air charter broker services continued to receive international recognition for excellence throughout the year. Chapman Freeborn was named **International Air Cargo Charter Broker of the Year** at a prestigious industry awards ceremony in Mumbai and later received the **Air Cargo Charter Broker** of the Year title at the Aviation Achievement Awards in Dubai, further solidifying its leadership in the cargo charter sector. In October, we were again honoured as **Air Charter Broker of the Year** at the Payload Asia Awards. Earlier in the year, the business received the Specialised Charter Services Award from a major cargo airline during an inaugural gala event in Dubai, recognising our outstanding service and partnership. Expanding our recognition beyond cargo, Chapman Freeborn was also named **Best Air Charter Company** for our passenger charter services at the PA Show Summer Summit & Supplier Awards in July.

In the Asia-Pacific region, our ACMI and charter airline operator, BBN Airlines Indonesia, achieved a significant milestone by earning certification under the **Basic Aviation Risk Standard (BARS)** from the **Flight Safety Foundation**. This globally recognised certification, awarded through a rigorous independent audit, affirms our commitment to international safety and risk management standards. The achievement further strengthens our position as a trusted and reliable carrier in the safety-critical Asia-Pacific market, supporting continued growth and operational excellence.





## Achievements and recognition

Our ACMI and charter airline operations, represented by Avion Express, were honoured with the **Future Organization 2024** award in Lithuania—an accolade based on the results of a comprehensive employee engagement survey.

Our ground handling operations received multiple recognitions for their performance and commitment to operational excellence and sustainability. Most notably, Lufthansa Group recognised the Aviator team with the **Sustainability Award 2024** at a key Scandinavian airport in recognition of **our achievement in delivering 100% fossil-free turnarounds powered by renewable energy and maintaining a 60% electrified ground fleet**. Additional honours included being named **Outstanding Ground Handling Agent** by Sichuan Airlines and was among the recipients of Station of the Year by Japan Airlines, showcasing our consistent performance and high service standards.

**FL Technics** once again earned the prestigious **Top Employer certification** for 2024 from the Top Employers Institute. This recognition reflects the company's continued investment in employee well-being and development, both in Lithuania and across its global operations. With a presence spanning multiple regions around the globe, FL Technics remains dedicated to maintaining excellence in people practices throughout its growing international network.





### 3. Contributions to society

#### Supporting Ukraine and its people

The Group goes beyond our core business operations and supports various programs and initiatives that can make a positive impact on society, aid development of local communities, and enhancing employee engagement.

In 2024, the Group deepened its support for Ukraine through a series of meaningful initiatives, many of them inspired by the compassion and dedication of employees across AeroCity. From donating via SMS and phone calls to providing essential goods, colleagues found diverse ways to offer help. Some supported Ukrainian families living in Lithuania, while one employee personally travelled to Ukraine with a volunteer organisation to deliver critical supplies.

At an organisational level, the company contributed to the Lithuanian charity **VŠĮ Mėlynai Geltona Šalis**, and, in collaboration with suppliers, coordinated **donations to children’s homes in Kharkiv**. These efforts culminated in a major initiative led by FL Technics: raising funds supplemented by company support to purchase, prepare, and deliver **37 specialised drones requested by the Ukrainian military**.

Together, these actions reflect not only a continued commitment to stand with Ukraine, but also a shared sense of responsibility, purpose, and solidarity that runs throughout the Group.



#### Response to humanitarian crisis

In a world facing increasing humanitarian challenges, Avia Solutions Group aims to proactively provide support to humanitarian causes. Through strategic donations and partnerships, we provide relief and foster resilience in communities affected by crises worldwide.

In 2024, our ACMI providers, particularly Air Explore and BBN Airlines Indonesia, continued to demonstrate their dedication to humanitarian aviation through a series of impactful missions across multiple regions. One such mission was carried out by AirExplore, which **operated two medical evacuation flights transporting young patients from Kabul, Afghanistan, to Germany**, where they received critical medical care not available in their home country. These missions were part of an ongoing partnership with the international humanitarian organisation **Das Oberhausener Friedensdorf**. The initiative highlights how the airline continues to leverage its operational expertise in support of vulnerable communities.

Meanwhile, **60 tons of essential aid including food, medical supplies, and logistics equipment were delivered to Port Moresby, Papua New Guinea**, in a large-scale mission launched by President Joko Widodo. This operation, conducted in collaboration with the Indonesian National Disaster Management Authority (BNPB) and the Indonesian government, was executed by BBN Airlines Indonesia. The mission demonstrated the airline’s ability to manage complex and time-sensitive logistics under high-impact conditions.

Further demonstrating its regional humanitarian leadership, BBN Airlines Indonesia supported a third disaster relief effort this time in Vanuatu. Utilising its Boeing 737-800F (PK-BBN) with a 21-ton payload capacity, **the airline transported emergency supplies to assist recovery operations in the crisis-affected area**.

These missions reflect how we as a Group continue to integrate purpose-driven action into our business



## Health and well-being

Promoting health and community care has long been part of Avia Solutions Group PLC's social impact efforts. In 2024, the Group continued to lead and expand initiatives across its subsidiaries that support both public health systems and the well-being of employees and communities.

A long-standing initiative has been the **organisation of regular blood donation** drives, developed in partnership with local Blood Centres. These events provide employees with meaningful opportunities to give back and directly support life-saving healthcare services. In 2024, employees participated in both on-site and external blood donation campaigns, including visits to local hospitals strengthening a culture of social responsibility throughout the Group.

**Health awareness also remained a key focus of the company.** Avion Express marked its tenth consecutive year participating in the Pink Run, a national event aimed at raising breast cancer awareness, with the company covering registration fees to encourage employee involvement. Additionally, the company promoted participation in the Usai Bëga event, which highlights prostate cancer awareness. In addition, FL Technics launched a **Skin Cancer Prevention Initiative** in Vilnius and Kaunas, providing on-site dermatologist consultations to support early detection and spread awareness. **The company also expanded access to first aid training**, covering essential topics such as CPR, AED use, choking response, bleeding control, and sunstroke care, reinforcing its commitment to prevention and emergency preparedness across the workplace.

As part of our commitment to inclusive travel and improving passenger well-being, AirExplore, in collaboration with Bratislava Airport, organised an **aircraft walkthrough experience for visually impaired passengers**. This aims to reduce travel-related anxiety by offering familiarity with both the airport and in-flight environment. A member of

the cabin crew also participated, gaining firsthand insights into accessibility needs to help improve future support for passengers with visual impairments.

In addition, Air Explore launched a mental well-being program that provides employees with access to discounted psychological support, helping them manage both personal and professional challenges. At BAA Training, employees are supported through the Mindletic app, a platform that enables emotional health tracking, guided reflection, and direct access to licensed mental health professionals. Meanwhile, Skytrans actively engages in national mental health campaigns, including its participation in the 'R U OK? Day', an event that promotes open dialogue and reduces stigma around mental health. The company also strengthens employee morale through initiatives that celebrate personal milestones, fostering a culture of care, connection, and inclusivity across the organisation.



**Furthermore, various initiatives to promote physical activity and a healthy work-life balance were also implemented.** Air Explore launched FlyFit and SkyCulture programs, offering financial support for employees to engage in sports and cultural activities of their choice, encouraging both physical health and personal enrichment. At BAA Training, employees participated in Alfa Run 2024, an event that highlights fitness, teamwork, and engagement while contributing to the rehabilitation efforts of the Public Institution "Alfa Centre" in Vilnius, which aids those suffering from alcoholism and drug addiction. FL Technics relaunched its Walk15 Challenge, motivating employees to incorporate more walking into their daily routines, promoting movement as a tool for both physical and mental wellness. Similarly, SmartLynx introduced a walking challenge where employee steps are converted into charitable donations.



## Empowering Children and Youth Through Education, Sports, and Mentorship

We remain deeply committed to supporting the development of children and youth across our global footprint. In 2024, this dedication was reflected in a broad range of educational, athletic, and social initiatives designed to foster opportunity, growth, and well-being.

**Youth outreach efforts included career talks, school visits, sponsorships, and financial support** for organisations focused on education and social welfare. One flagship initiative reached over 150 schools across Lithuania, Slovakia, and Romania, through the “Pilot Runway” program by BAA Training. The initiative introduced students to careers in aviation and offered hands-on experiences including flight simulator sessions. We also supported the National Aviation Sports Championship in Lithuania by sponsoring a children’s aviation event, awarding the winning team with an Airbus A320 flight simulator experience. Further engagement included participation in the Lithuanian Air Scouts’ camp, reinforcing our dedication to inspiring future aviation professionals through direct mentorship and involvement.

Across our Australian operations, we remain committed to youth development through active regional community engagement. Employees volunteered at local school and community events, while also participating in student outreach programs such as the Flight Centre Training Academy session, which helped students explore real-world aviation careers. Additionally, Skytrans proudly sponsored the **Cairns junior rugby league team, the Razorbacks**, encouraging active lifestyles and inclusivity among youth.

In addition, SmartLynx also contributed to youth welfare by supporting **Mentor Latvia**, an organisation assisting socially at-risk young people. Through financial support and employee-led volunteering, the company helped create safer solutions to access education materials and employment for vulnerable youths.

Promoting academic development and professional readiness, FL Technics maintained strong collaboration with universities and vocational schools in Lithuania and Romania. The company regularly **attends career fairs and hosts meetings with students** from institutions such as Vilnius Tech and Kaunas University of Technology. In addition, FL Technics offered scholarships, internship opportunities, and contributed to local charitable causes, including raising funds for **SOS vaikų kaimas**, a children’s welfare organisation. AirExplore hosted a university lecture on aviation safety and participated in youth-focused athletic events like the Black Swans Garmin Triathlon, reinforcing and spreading awareness for active lifestyle among young people.



Our long-standing partnership with the **Mashimoni Child Care Program** in Kenya was further strengthened in 2024 by Aviator, continuing vital support for the education of children from disadvantaged backgrounds. Instead of traditional client gifts, donations were made to the **Mashimoni Children Centre**. Additional contributions funded the construction of new classrooms at the junior secondary school, helping to create a safer and more supportive learning environment. To deepen employee engagement, a post-New Year competition was launched, offering selected team members the opportunity to visit the program and witness the real-world impact of their collective contributions.





# Helping animals and nature

Across Avia Solutions Group, employees continue to lead by example through compassionate, hands-on volunteering and sustainable initiatives that benefit both animals and the environment.

Volunteer initiatives included a visit to **Tautmilės Globa Dog** Shelter by BAA Training’s employees, where team members braved adverse weather to care for and walk shelter dogs, providing attention and companionship. In another recurring effort, volunteers supported Horse Valley, a non-profit sanctuary for rescued horses, by grooming, feeding, and assisting with daily care. Educational sessions during these visits further deepened their understanding of equine rehabilitation and welfare.

The annual **“Good Deed Month” campaign** once again mobilised teams to contribute to animal welfare. Employees from Avion Express donated to the organization Lesė, volunteered at the Keturkojo Draugas shelter, and provided both material and financial support to enhance the well-being of rescued animals.

Ongoing efforts from our colleagues at BGS also included regular **volunteering at animal shelters, as well as donation drives to gather food, hygiene products, and medicine for animals in need.** Financial and in-kind contributions to local shelters further demonstrated a steadfast commitment to animal protection by employees at SmartLynx.

Merging sustainability with social impact, an environmental fundraising initiative encouraged employees from FL Technics to collect and sort refundable containers gathered from company events. Proceeds were donated to **SOS Gyvūnai** and other local animal welfare organisations, reinforcing a workplace culture grounded in environmental responsibility and community care.

Environmental care was also promoted through grassroots efforts. At AeroCity, employees organised an annual neighbourhood clean-up near the Atlas co-living residence, strengthening community ties and encouraging urban sustainability through hands-on engagement.



These initiatives across the Group demonstrate how small, collective efforts from local clean-ups to hands-on animal care continue to make a positive impact on the environment and the lives of animals in the communities where we operate.





# Our governance performance





# 2024 Highlights

**Zero incidents of corruption and zero incidents of money laundering activities have been recorded in 2024.**

**Corporate Compliance Framework Rollout:** 98% of Avia Solutions Group companies fully implemented the Corporate Compliance Framework by year-end, with the remaining 2% in progress due to recent acquisitions. A centralized compliance tracking system was launched to improve oversight, transparency, and accountability.

**Monitoring & Enforcement of Ethical Standards:** Building on 2023 efforts, the focus in 2024 shifted to monitoring compliance, assessing training effectiveness, and enforcing Group-wide ethical standards to strengthen trust and long-term value creation.

**Cybersecurity Governance Expansion:** 15 new cybersecurity policies were approved by the Board, covering key areas such as password management, remote access, secure development, incident response, and encryption.

**Strengthened IT Infrastructure Security:** The Group enhanced its cybersecurity systems by expanding threat detection coverage to 99% of all managed devices, extending log monitoring to 56%, and improving access control security to 40%, significantly boosting overall resilience and monitoring capabilities across the organization.

**Phishing Defence Improvements:** Phishing simulations were upgraded with new techniques, including OAuth access request tests. Unified data sources enabled better consistency and automation in reporting.

**Progress in Vulnerability Management:** Vulnerability scanning of the Group’s Configuration Management Database (CMDB) was launched, with critical findings reported to subsidiaries to support faster remediation and improved risk posture.

**Lean Transformation to Drive Operational Governance:** The Group launched Lean transformation initiatives across ACMI and aviation units as part of its continuous improvement and performance accountability. Key activities include piloting the Daily Management System, developing standardised KPIs, and reviewing core processes such as pilot scheduling and material flow to enhance efficiency, transparency, and decision-making.





# 1. Corporate governance at Avia Solutions Group

## Board of Directors

### Board responsibilities and structure

The Avia Solutions Group PLC Board of Directors (referred to as the Board of Directors, the Board) is committed to fostering sustainable growth, ensuring financial integrity, and upholding high governance standards. The Board plays a crucial role in supervising the Group's operations, which includes:

- **Strategic Guidance:** Defining and endorsing the Group's strategy and objectives, ensuring alignment with the company's values and culture.
- **Performance Monitoring:** Overseeing performance to ensure competent and prudent management that adheres to the Group's strategy, risk tolerance, and budgetary constraints.
- **Project Direction:** Leading major projects and steering the Group's organizational development.
- **Risk Management:** overseeing the Group's risk management to safeguard the company's long-term success and resilience.



### Stakeholders

The highest governance body of Avia Solutions Group PLC engages with stakeholders to support due diligence and manage the organisation's impact through various communication channels. Major events are shared on the [website](#). Financial reports are also available online, allowing interested parties to ask questions and interact with the [company](#). For further inquiries, stakeholders can reach out through the investor relations contact [page](#).

\*For more detailed information on the BoD members experience and expertise, please refer to [ESG Report 2022](#)

### Composition

The Board consists of six members, including the Preference Share Majority Director. Directors are appointed by a majority shareholder vote at the Annual General Meeting, with the exception of the one nominated by the preference share majority shareholder. The Board includes one executive director, who holds executive position within the Company, and five non-executive directors

Board members are elected individually and do not rotate out of their positions. They exercise their voting rights independently, prioritising the best interests of the Group in line with their fiduciary duties. All members adhere to the Company's Conflict-of-Interest regulations, ensuring that no director votes on, or is counted in the quorum for any resolution involving a matter in which they have a material interest or duty that conflicts, or may conflict, with the Company's interests.



**Gediminas Ziemelis**  
Founder and Chairman of the Board of Directors of Avia Solutions Group (ASG) PLC since 2005. Non-executive.



**Jonas Janukenas**  
Chief Executive Officer (CEO) of Avia Solutions Group (ASG) PLC, member of the Board of Directors since 2017. Executive Director.



**Thomas Klein**  
Member of the Board of Directors since 2021. Non-executive.



**Linas Dovydenas**  
President — IMEA of Chapman Freeborn Group, member of the Board of Directors. Non-executive.



**Zilvinas Lapinskas**  
Member of the Board of Directors and CEO of UAB "FL Technics", a direct subsidiary of Avia Solutions Group (ASG) PLC, since 2013. Non-executive.



**Pascal Jean Alexandre Picano**  
Member of the Board of Directors. Non-executive.




# Board Committees


Avia Solutions Group PLC delegates powers to established committees as outlined in the Company’s Articles of Association. Executive committees are comprised exclusively of Board members, who adhere to the rules set by the Board when exercising delegated powers. Additionally, the Company may establish non-executive committees without decision-making authority to provide advice, consultation, recommendations, or expert reports on specific matters requested by the Board. These committees must include at least one Board member, with additional members appointed at the Board’s discretion.

The Board of the company establishes the following committees:


Executive Committee



**Gediminas Ziemelis**  
Chairman of the Committee




**Jonas Janukenas**  
Deputy Chairman of the Committee




**Zilvinas Lapinskas**  
Member of the Committee


Nomination Committee



**Gediminas Ziemelis**  
Chairman of the Committee




**Linas Dovydenas**  
Deputy Chairman of the Committee




**Thomas Klein**  
Member of the Committee

Aviation Safety Committee




**Linas Dovydenas**  
Chairman of the Committee




**Ugne Maciejauskaite**  
Group Aviation Safety Manager, Deputy Chairman of the Committee


Remuneration and Compensation Committee



**Gediminas Ziemelis**  
Chairman of the Committee




**Jonas Janukenas**  
Deputy Chairman of the Committee




**Inga Staniune**  
Chief Human Resources Officer, member of the Committee


Fleet Management Committee (est. 2023)



**Gediminas Ziemelis**  
Chairman of the Committee



**Jonas Janukenas**  
Deputy Chairman of the Committee



**Pascal Jean Alexandre Picano**  
Member of the Committee



## ESG governance within the Group

Effective governance is crucial for the successful implementation of the Group's ESG strategy at all levels.

The **ESG Department** at Avia Solutions Group, led by the Head of ESG and reporting directly to the CEO, is responsible for the development and execution of the Group's ESG strategy. To ensure effective implementation across the organization, each subsidiary appoints **ESG Ambassadors** — key individuals responsible for driving local ESG initiatives and ensuring alignment with the Group-wide strategy. These Ambassadors play a vital role in shaping and advancing ESG actions throughout the Group. Additionally, during quarterly Board meetings — and whenever necessary — the CEO provides comprehensive updates on major developments on ESG priorities and progress.



## Decisions-making and quarterly board meetings

The Board of Directors of Avia Solutions Group plays a central role in guiding the Group's strategic direction and overseeing all significant matters, including major transactions, funding, and risk management—either through Board meetings, formal resolutions, or the Executive Committee decisions. Board meetings are held quarterly at the corporate headquarters in Ireland, where the financial position, key projects, and other critical business and compliance matters are thoroughly reviewed. Decisions are taken by majority vote at duly convened meetings, in accordance with the procedures set out in the Articles of Association. Demonstrating a strong commitment to governance, the average attendance at Board meetings is 100% in 2024. Furthermore, in line with Irish Companies Act 2014 provisions as well as the company's Constitution, the appointment of Board members requires formal approval by shareholders, ensuring full transparency and accountability in corporate decision-making.

## Conflict of interest management

Avia Solutions Group is committed to upholding the highest standards of integrity and ethical conduct at all levels of the organisation. In line with the Group's Anti-Corruption and Anti-Bribery (ABC) Policy, employees in key roles are expected to act responsibly, objectively, and without personal bias to avoid actual or perceived conflicts of interest.

To strengthen its governance framework, the Group introduced the **Procedure for Declaring Interests and Managing Conflict of Interests** in March 2023. This Procedure outlines clear responsibilities for identifying, disclosing, and managing potential conflicts. It applies to designated roles across the Company and reinforces transparency and trust with clients, partners, and stakeholders.

In **2024**, the Group implemented a **digital declaration system**, streamlining the submission, monitoring, and reviewing conflict-of-interest disclosures. This transition enhanced oversight and promoted consistency across our operations.

Declaring Persons are required to proactively disclose any actual, potential, or perceived conflicts of interest, including those related to financial interests, external affiliations, or personal relationships that may impair objectivity. Disclosures must be submitted electronically through the system according to the following timelines:

- Within five business days of onboarding
- Annually by the 15th of February
- Within five business days of any relevant change in circumstances

All declarations must be accurate, complete, and fully aligned with the ABC Policy and the Procedure for Declaring Interests and Managing Conflict of Interests. Declaring Persons are expected to actively prevent, report, and manage conflicts in compliance with these requirements.

Following the Group's digital transformation in 2024, a total of **1,042 declarations** were submitted, of which **141 potential interests** disclosed. **No material conflicts of interest were identified**. In 2023, no conflicts of interest were reported.

The Board of Directors follows a separate conflict-of-interest process and Board members are required to disclose any direct or indirect interest in stakeholder matters to the relevant Board or Committee Chair. All such declarations are formally recorded in the Board meeting minutes and maintained by the Company Secretary.



# Communication of critical concerns

## Whistleblowing Policy

Our Group’s Whistleblowing Policy outlines the process for communicating critical concerns to the highest governance body to ensure transparency, accountability, and timely resolution of issues. The Policy allows employees to make disclosures about perpetrated or suspected infringements through Company whistleblowing channels without concern of victimization, subsequent discrimination, disadvantage, or dismissal. When an employee or stakeholder raises a critical concern through the Group’s anonymous whistleblowing mechanism, [Trust-Line](#), a case is created and a stringent process is carried out.

### About Trust-Line – our whistleblowing mechanism

What concerns can be reported?

Trust-Line allows stakeholders to report a wide range of ethical, legal, and policy violations, including:

- Fraud, corruption, bribery, and financial misconduct
- Discrimination, harassment, and workplace abuse
- Breaches of the Group’s Code of Conduct or compliance policies
- Human rights violations and unethical behaviour
- Health, safety, or environmental breaches
- Data privacy or security concerns
- Violations of internal rules or regulatory obligations

Who is eligible to report?

It is available to both internal and external stakeholders, ensuring comprehensive accessibility across the Group. This includes employees and management, contractors, temporary workers, consultants, suppliers, vendors, service providers, business partners, and customers.

Moreover, Trust-Line is available in **over eighty languages**, making it accessible to our global workforce and stakeholders. The system typically auto-detects browser settings to present the platform in the user's preferred language. This multilingual access supports inclusivity and ensures all voices can be heard regardless of location or language.

**Other notable key features** of the system include 24/7 access through a secure online platform and supports fully anonymous reporting. It enables two-way encrypted communication for follow-up discussions while ensuring data protection through GDPR and ISO 27001 compliance. Access to case information is strictly limited and securely managed. This mechanism forms a vital part of our ethical governance structure, helping ensure transparency, accountability, and compliance across all levels of the organisation.





## Communication of critical concerns

### Whistleblowing Case Management system

As part of our commitment to transparency and accountability, all reported cases are documented and managed through the Whistleblowing Case Management System by a designated specialist within the Company's Risk Management Department.

**1. Initial assessment:** Upon receiving a critical concern, designated personnel perform an initial assessment to determine its severity and validity. If the concern is deemed critical, it may be escalated to the relevant individuals or units.

**2. Confidentiality and protection:** The Group is committed to creating a safe and trustworthy environment where employees and stakeholders feel empowered to speak up. Throughout the process, the confidentiality of the whistleblower's identity is strictly protected, with measures that are in place to prevent and address any form of retaliation.

Key measures include:

- Anonymous and secure reporting
- Confidential handling by trained compliance officers
- Zero tolerance for retaliation
- Regular Group-wide compliance training
- Consistent monitoring and oversight

**3. Investigation and verification:** In consultation with relevant internal or external experts, the designated personnel will initiate an investigation to verify the concern's accuracy and gather additional evidence.

**4. Communication to highest governance body:** Once the investigation is completed, a comprehensive report is prepared summarising the critical concern, findings, and any recommended actions communicated to the highest governance body for review.

**5. Review and decision:** The highest governance body reviews the report, evaluates the seriousness of the concern, and decides on the appropriate course of action. This may include implementing corrective measures, disciplinary actions, or policy changes.

**6. Communication of actions:** The decisions and actions taken by the highest governance body are communicated to relevant stakeholders.





## 2. Business and corporate ethics

At Avia Solutions Group, we are committed to cultivating a strong corporate culture rooted in integrity, accountability, and ethical conduct. Our global operations are guided by robust governance structures, transparent policies, and a proactive approach to preventing bribery, corruption, and unethical behaviour.

In 2024, our focus expanded beyond compliance enforcement to include the active promotion and evaluation of ethical culture. This included leadership engagement, employee participation, performance monitoring, and continuous improvement initiatives that align with the expectations of the upcoming **Corporate Sustainability Reporting Directive (CSRD)**.

In 2024, ASG once again reported **zero incidents of corruption or bribery**, maintaining the clean record first achieved in 2023 and demonstrating the continued effectiveness of its strengthened compliance framework. The company also reported **no fines** and **no convictions** related to corruption or bribery during the year.

This follows the implementation of a new Whistleblowing Policy in response to the 2022 risk assessment, which had identified limitations in reporting channels.

Anti-Corruption Training was delivered to Avia Solutions Group employees and over fifty plus executives in 2024, extending to Tier 1 subsidiary Chief Executive Officers and Executives. This mandatory annual training will continue in 2025.

High-risk companies within the Group, identified in the Risk Assessment, received additional online Anti-Corruption training tailored to management or all employees. This initiative aims to reinforce ethical business practices and equip employees to combat bribery effectively.

Furthermore, the Group evaluates counterparties' exposure to bribery and corruption risks during onboarding, employing a unified Onboarding and Due Diligence Procedure that includes Know Your Customer (KYC) and Know Your Supplier (KYS) processes. High-risk entities are re-evaluated every four months to mitigate potential corruption risks effectively.





# Business and corporate ethics

## Establishing and upholding our corporate culture:

- **Clear ethical foundations:** Our Anti-Corruption Policy sets the tone for acceptable behaviour, outlining expectations regarding gifts, entertainment, conflicts of interest, and third-party relationships - including a strict prohibition on political contributions. This policy is embedded in the onboarding process and reinforced through ongoing communication and training.
- **Leadership and accountability:** In 2024, senior management continued to lead by example, with visible support for compliance initiatives and direct involvement in ethics awareness and group-wide training efforts.
- **Training and awareness:** Annual mandatory Anti-Corruption, Anti-Fraud, Whistleblowing, Anti-Money Laundering (AML) training was delivered in 2024 to all Group employees and executives using the Group E-Learning platform.

The content was tailored to reflect risk exposures, with specialised modules for high-risk subsidiaries and role-specific training for senior management. The training emphasised individual responsibility and the importance of speaking up.

- **Employee engagement and participation:** We foster open dialogue through internal communication with compliance representatives across the organisation, case studies, and Q&A sessions led by the Group Head of Compliance and Chief Compliance Officer.

- **Monitoring and evaluation:** Our internal audit and compliance monitoring processes track adherence to policies and evaluate the effectiveness of ethics-related initiatives. In 2024, follow-up audits were conducted in entities previously identified as high-risk, highlighting positive results and improved compliance maturity.
- **Reporting and whistleblower protection:** The Trust-Line, launched in 2023, is now fully operational across the entire Group as a confidential, multilingual whistleblowing tool. Independent case managers handle reports to ensure objectivity and trust. No incidents of corruption or bribery were recorded in 2024, confirming continued effectiveness and increased employee confidence in the system.
- **Continuous improvement and external alignment:** We continuously review our practices against international benchmarks and legal developments. In 2024, we began updating our Onboarding and Due Diligence Procedures to strengthen our approach in identifying and managing corruption risks among third parties. High-risk entities continued to undergo reviews every four months.





## Supplier screening, assessment, and development process

Avia Solutions Group has a supplier assessment and development process which is conducted by the company's central Risk Management department. The team conducts a comprehensive assessment of potential and current suppliers to ensure they meet the company's standards and requirements. This assessment is part of the Group's onboarding and due diligence program, commonly referred to as Know Your Customer (KYC).

During the assessment, suppliers are evaluated for various risks, including anti-money laundering, fraud, corruption, and bribery. This evaluation ensures that suppliers are not engaging in illegal or unethical activities that could harm Avia Solutions Group's reputation or operations.

Suppliers are also required to adhere to the Group's Supplier Code of Conduct, which outlines ethical standards and practices such as labour rights, environmental regulations, and fair business practices. Compliance with this publicly available document helps the Group maintain high ethical standards and promote responsible business practices throughout its supply chain.

The supplier assessment process includes both desk assessments and on-site assessments. Desk assessments, carried out by the Group, involve systematic verification of evidence, regular audits, reviews of relevant documentation, and online footprint assessments to ensure adherence to the Supplier Code of Conduct. On-site assessments are conducted and regulated by subsidiaries working with major suppliers. These visits help ensure that suppliers continuously comply with the required standards and address any areas of non-compliance promptly.

Overall, Avia Solutions Group's supplier assessment process is a thorough review designed to ensure all suppliers meet the company's stringent requirements, mitigating potential risks and upholding the Group's commitment to ethical and responsible business operations.

For further details, kindly explore the [Corporate Compliance page](#) on our website.





# Human rights

The Group respects everyone’s human rights and recognises humans’ inherent dignity, equality, and freedom. It is required and expected that each employee of the Group treats others with the highest respect, trust, and equality, without favouritism or discrimination, both within and outside the Group.

The **Human Rights Statement Policy** ensures greater protection and respect for human rights, such as non-violence and non-harassment at work, child labour and modern slavery, including human trafficking, forced labour, equity through equal treatment opportunities, non-discrimination, freedom of association, and collective bargaining, among others.



Photo source: shutterstock.com

## Human rights in the Supplier Code of Conduct

The Group’s **Supplier Code of Conduct (SCOC)** includes a strong emphasis on human rights, ensuring that all suppliers adhere to the highest ethical standards. Suppliers must uphold and respect the fundamental human rights of all individuals, as outlined in international human rights standards. This includes ensuring safe and humane working conditions and treating all workers with dignity and respect.

### The SCOC also enforces:

- Prohibition of Forced Labor
- Prohibition of Child Labor
- Non-Discrimination
- Freedom of Association
- Fair Wages and Benefits
- Health and Safety in the workplace

The Group’s **Prevention of Violence and Harassment Policy** establishes measures to foster a safe workplace. This includes registering and investigating incidents of violence and harassment to prevent their occurrence. The policy emphasises respect for all employees' dignity and aims to maintain a professional environment, which is free from hostility, unethical conduct, and humiliation.

Since 2023,  
Avia Solutions Group  
supports the Ten  
Principles of the UN  
Global Compact  
as a participant.



United Nations  
Global Compact



### 3. Enterprise Risk Management

The aviation industry is governed by stringent regulations, particularly in areas such as safety, maintenance, and operational standards. In this highly regulated environment, comprehensive risk oversight is essential for ensuring both compliance and operational excellence.

Our Enterprise Risk Management (ERM) framework provides a structured, proactive approach to identifying, assessing, and managing risks across all areas of our business. By safeguarding the Group's assets and reputation, ERM supports informed decision-making, enhances business continuity, and fosters a culture of transparency, accountability, and continuous improvement—key drivers of safety, operational efficiency, and stakeholder trust.

#### Enterprise Risk Management Framework (ERMF)

Aligned with COSO 2017 and ISO 31000:2018, the ERMF ensures proactive, cost-effective risk management at all organizational levels, with clearly defined roles and responsibilities for employees, subsidiaries, and leadership.



Photo source: shutterstock.com

#### Risk identification and assessment

We maintain dynamic risk assessments through regular updates, using stakeholder workshops, historical data, and market analysis to identify and prioritize key risks based on their likelihood and potential impact. Tailored mitigation strategies and controls are developed for each priority risk, and progress is reported annually to senior leadership to ensure alignment with organizational objectives.

Our risk review process also involves:

- **Company-specific risk exposure analysis:** Assessment of identified risks, considering their likelihood and potential magnitude of impact on the Group's operations, financial performance, and reputation.

- **Determination of risk appetite:** Risk appetite is defined through the ERMF, balancing regulatory compliance, financial sustainability, and operational performance. This process considers both quantitative thresholds (e.g., Key Risk Indicators) and qualitative factors (e.g., stakeholder expectations).

- **Mitigating actions:** Operational safety risks are mitigated through preventive maintenance programs, enhanced training for technical staff, and real-time monitoring systems. Fuel price volatility is managed through hedging strategies, supplier diversification, and adaptive route planning.

#### Dual-Layered Reporting Methodology

- **Top-down:** major risks are discussed at the Group management level and passed down to the subsidiary level.

- **Bottom-up:** operational and subsidiary level risks are identified using a unified risk taxonomy and aggregated into a consolidated Group risk register.



Photo source: shutterstock.com





# Risk monitoring


Ongoing monitoring ensures that mitigation measures remain effective and aligned with organizational goals. This includes tracking Key Risk Indicators (KRIs) against predefined tolerance thresholds and evaluating the ERMF’s performance. Findings from framework revisions are integrated to drive continual improvement in risk governance.

## Risk Management Process Audit

Within the last two years, we have conducted an internal audit to evaluate the effectiveness of our risk management approach. The Group is implementing a “three lines of defense” model to ensure clear distribution of responsibilities:

**First Line:**  
Operational teams, represented by each company’s Risk Champion or CFO, are responsible for identifying and managing risks, maintaining a control framework, and escalating risk events to Group-level functions.

**Second Line:**  
Establishes the limits, rules, policies, and constraints under which the First Line operates, ensuring alignment with the Group’s defined risk appetite. Monitors First Line performance against these parameters.

**Third Line:**  
The Internal Audit department provides independent assurance over governance, risk management, and control effectiveness, addressing current, systemic, and emerging risks.

## ESG risk integration

Sustainability-related risks are proactively managed through dedicated ESG assessments, including annual climate impact evaluations. The results are integrated into the ERMF, ensuring that environmental and governance considerations inform enterprise-wide risk decisions.



Photo source: shutterstock.com



## Cultivating a risk-aware culture

We prioritize employee engagement and organisational culture as cornerstones of our ERM strategy. By fostering risk awareness, we ensure teams recognize potential threats and are empowered to make decisions that protect operations and drive sustainable success. To support this, we provide comprehensive resources and training to enable proactive risk identification and reporting.

### Key resources and initiatives:



**Annual risk assessments:** Regular evaluations to identify emerging risks and update mitigation strategies.



**Targeted training programs:** Workshops on risk recognition in critical areas such as operations, cybersecurity, fraud prevention, anti-corruption, and anti-money laundering compliance.



**ERM framework support:** Ongoing guidance for subsidiaries to implement and refine ERMF.



**Confidential reporting:** A secure whistleblowing channel for anonymous risk disclosures.

Risk management culture is also integrated into new service development. Our subsidiaries assess key financial, regulatory, operational, and subsidiary- specific risks when creating new services. This ensures business resilience, safeguarding assets and reputation, while enhancing operational efficiency, regulatory compliance, and long-term growth.

## Key risks and their impact

This section outlines the most significant emerging risks which, as of the date of this document, could have a long-term impact on the Group's business results, financial situation, and reputation. The risks described below arise from outside Avia Solutions Group and are beyond its influence and control.

### Geopolitical volatility driving economic uncertainty

Due to the international scope of operations and continuous expansion, the Group is subject to several political, economic, and social challenges associated with operating in foreign and developing countries. These risks include:

- War, civil disturbance or acts of terrorism.
- Political, social, and economic instability.
- Changes in government policies and regulations, notably those related to international trade, taxation, or security measures.
- Taking of property by nationalisation or expropriation without fair compensation.
- Devaluation and fluctuations in currency exchange rates.
- Imposition or increase of investment and other restrictions or requirements by foreign governments.
- Specific tensions with worldwide and local communities and authorities.

**Key risk drivers and business impact.** The organisation faces several critical risk drivers with significant business implications.

- Regulatory and compliance burdens have intensified, particularly following Russia's invasion of Ukraine, prompting the EU, UK, US, and other nations to impose sweeping sanctions on Russia and Belarus. Non-compliance with these evolving sanctions could lead to substantial fines, legal proceedings, reputational damage, or even the loss of essential approvals, licenses, or permits to operate.

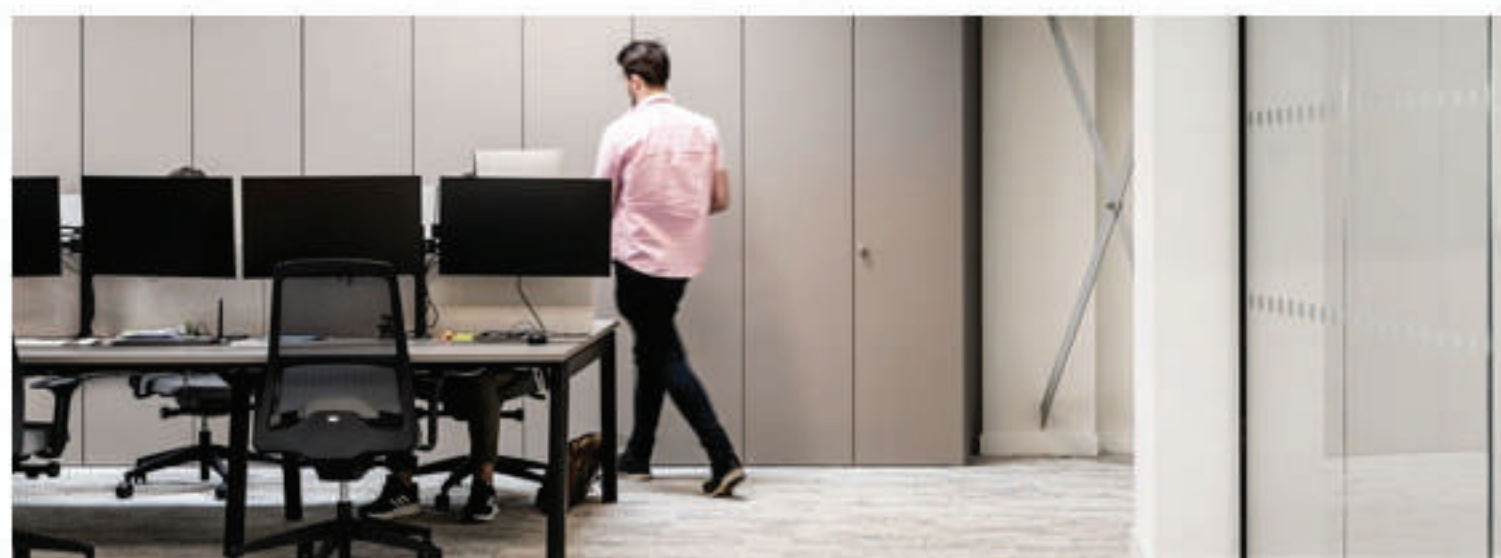
- A global economic downturn could result in reduced air travel demand, leading to a decline in aviation services revenue. Operational costs are also under pressure due to fuel price volatility, with fuel representing a major component of expenditures. Geopolitical conflicts, particularly in regions like Eastern Europe and the Middle East, continue to disrupt supply chains and refining capacity, driving regional fuel prices — such as those in Europe — above global averages. Compounding these challenges are airspace restrictions and route disruptions, as conflicts necessitate detours around areas including Russian and Iranian airspace. This rerouting leads to longer flight times, increased fuel consumption, and require real-time adjustments to flight paths, crew scheduling, and passenger logistics.





**Mitigation plan.** Geopolitical developments, including ongoing wars and tensions, remain a pressing concern, therefore close monitoring and dynamic adaptation of operations are essential due to the current geopolitical situation.

- Other measures are present such as **stress testing**. Modelling impacts of worst-case scenarios and pre-approving contingency responses.
- **Regular review of strategy and economic situation.** The Avia Solutions Group Management team conducts regular reviews of the Group's strategic plans and the broader economic environment to ensure alignment with current market conditions. These reviews involve ongoing evaluation of cost structures, with a focus on optimising the balance between fixed and variable costs, managing capital expenditures prudently, and implementing measures to strengthen liquidity.
- **Group-wide client onboarding & due diligence procedure:** The Group has implemented tools to screen contracting partners for ethics and trade sanctions.
- **KRI tracking.** Monitoring of fuel price trends, regional conflict escalations, and currency exchange rates as leading indicators.



## Cyber threats compromising business continuity

The frequency and sophistication of cyberattacks are increasing worldwide, posing growing challenges for organisations across all sectors. As the Group continues to expand its digital business processes, our exposure to cyber risks also rises. With ongoing digitalisation, the potential impact of cyber threats is expected to intensify, making cybersecurity an increasingly critical focus in our risk management strategy.

**Key risk drivers and business impact.** Inadequate vulnerability management can significantly increase Avia Solutions Group's exposure to cyber threats including data breaches, financial losses, regulatory penalties, and reputational harm. A successful attack could disrupt critical systems, leading to operational delays and service outages. The exposure of sensitive customer, employee, or operational data may result in legal liabilities and loss of stakeholder trust. Over time, cybersecurity breaches could damage the Group's reputation, potentially driving customer attrition and reducing future business opportunities.

**Mitigation plan.** Avia Solutions Group is strengthening its cyber governance through targeted enhancements in identity and access management, vulnerability management, disaster recovery planning, and internal controls, all with a strong focus on protecting critical IT assets. The Group recognizes that ongoing development and investment are essential to address evolving cyber threats and meeting emerging regulatory requirements. Key elements of this strategy include continuous system monitoring, regular reinforcement of security controls, end-user education, and the proactive threat mitigation — all coordinated by the Security Operations Centre. This comprehensive strategy is supported by a dedicated team of cybersecurity professionals who ensure the resilience and sustainability of the Group's digital infrastructure.





## Dynamic regulatory landscape for sustainability and climate change

In recent years, the regulatory landscape for climate change and sustainability has evolved rapidly, resulting in a wave of new legislation and policy measures. This shift is compelling companies to increase transparency and adapt their business models to align with heightened expectations for environmental responsibility from both society and customers. Avia Solutions Group is actively navigating these changes to ensure ongoing compliance and to maintain its competitive edge.

**Key risk drivers and business impact.** Governments are introducing policies that directly address the environmental impact of aviation, such as revisions to the EU Emissions Trading System (ETS) and the implementation of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). These measures are expected to drive up costs in coming years, primarily due to stricter emissions caps, the gradual elimination of free emissions allowances, and the requirement to purchase carbon credits. Additionally, mandates for the use of sustainable aviation fuels (SAF) will increase operational and supply chain costs, as SAF remains significantly more expensive than conventional jet fuel and production capacity must be rapidly scaled up to meet regulatory targets.



Photo source: shutterstock.com

The complexity of the regulatory environment is further heightened by the introduction of new global and national policies, which may lack standardization and impose varying timelines and reporting requirements. This creates additional operational challenges and could further increase costs for Avia Solutions Group, particularly as the company operates across multiple jurisdictions.

Compliance with emerging ESG reporting standards, such as the EU's Corporate Sustainability Reporting Directive (CSRD), will require expanded administrative resources. As reporting expectations evolve and differ by geography, the Group faces the risk of overlapping obligations and increased administrative burden.

Overall, while these regulatory developments are driving the aviation sector toward greater sustainability with the adoption of SAF, improved air traffic management, and efficient technologies — they also present significant operational, financial, and compliance challenges that Avia Solutions Group must proactively manage to ensure resilience and continued growth.

**Mitigation Plan.** Addressing the evolving regulatory landscape at the intersection of climate change and sustainability is critical. To mitigate associated challenges, Avia Solutions Group ensures adequate resources and measures are in place. This includes evaluating climate-related risks and their financial impacts, such as rising operational costs. The ESG team actively monitors regulatory developments, maintains compliance, and allocates resources, systems, and processes to meet emerging requirements.

To strengthen sustainability governance, the Group regularly reviews and updates reporting procedures at both operational and management levels. Responsibility for environmental compliance and reporting is assigned to designated internal functions, which report risks and mitigation strategies to the management. This proactive approach underscores commitment to leading in regulatory compliance and embedding sustainability into core operations and strategic decision-making.

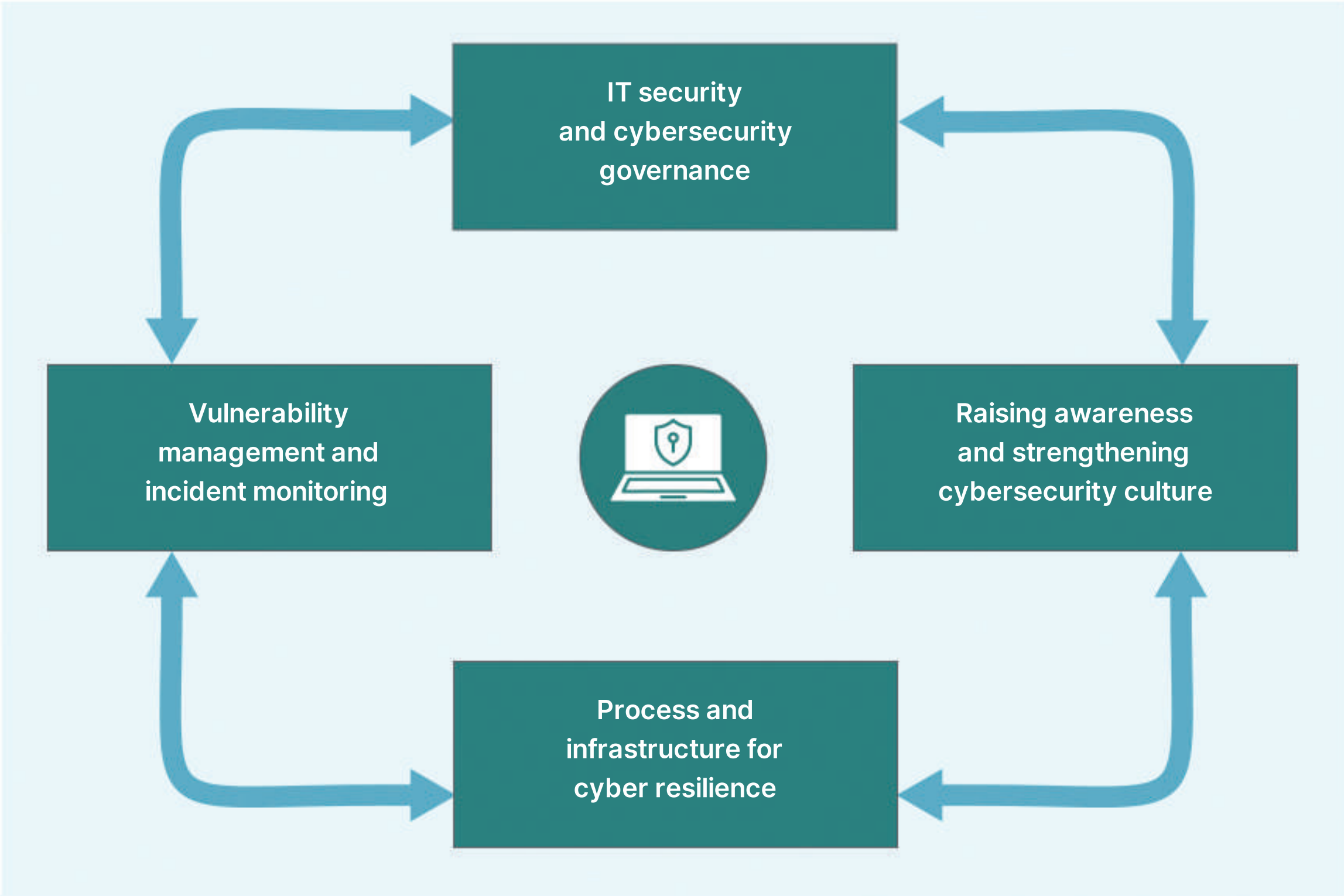
Additionally, the Group systematically identifies, assesses, and manages all material risks across operational, financial, strategic, compliance domains. Risk owners are tasked with proactive monitoring, integrating risk management into planning and control processes, and adhering to the Board-approved risk management guidelines, which establish standardised methodologies and organisational practices.



# 4. IT governance and cybersecurity

## 4.1. IT and cybersecurity

In today’s digital landscape, the Group prioritises robust cybersecurity and IT resilience to ensure seamless operations. As a global company, we heavily rely on advanced IT infrastructure to manage operations, transactions, and critical data. To mitigate any disruptions, the Group ensures cybersecurity measures, and incident response procedures to safeguard its systems and data. The organisation’s ability to proactively prevent security breaches and respond to incidents is essential in maintaining operational stability and customer trust.



### IT security and cybersecurity governance

At Avia Solutions Group, cybersecurity is a key priority, ensuring the protection of critical systems, data, and operations. The Head of Cybersecurity is responsible for overseeing IT security and cybersecurity within the Group, directly reporting to the Chief Digital Technologies Officer, who, in turn, reports to the CEO. This structure underscores the strategic importance of cybersecurity at the highest levels of the organisation.

### Raising awareness and strengthening cybersecurity culture

To ensure that all Avia Solutions Group employees across our global operations are aware of cybersecurity risk and understand the importance of IT security, the Group implemented and continuously improves appropriate processes, policies, and comprehensive measures, including at least:

**Information Security Policy:**

Outlines key security principles and procedures.

**Cybersecurity awareness training program:**

Is mandatory for all employees and conducted annually through our e-learning platform or on-line newcomer cybersecurity training.

**Cybersecurity incident management process:**

Is supported by internal procedures and is inevitable for proper reporting, managing and mitigating cyber threats.

**Procedure for the use of information and communication technology and employee monitoring:**

Integrates IT security compliance into performance evaluations, with potential disciplinary actions for violations.

Continuous improvement of cybersecurity culture is an ongoing process. In 2025 we are planning to improve supply chain cybersecurity, vulnerability management, and visibility within the IT environment to ensure compliance with mandatory requirements of Lithuanian Cybersecurity Law, EASA part-IS and commonly known Cybersecurity Frameworks (like NIST CSF 2.0, CIS benchmark).



Process and infrastructure for cyber resilience

Avia Solutions Group successfully obtained ISO/IEC 27001:2022 (Information Security Management Systems) certification during November. This certification strengthens our ability to be more cyber resilient, reach easier compliance with laws, and regulations, streamline internal processes, improve security practices, and clarify responsibilities.

We have also established procedures to prevent IT system disruptions and cyberattacks while ensuring rapid response and recovery in the event of an incident. Our business continuity and contingency plans are tested annually to confirm their effectiveness. Key documents guiding our cybersecurity strategy include:

- The **Cybersecurity Incident Register**, which informs security breaches and incidents tracking procedure.
- The **Disaster Recovery Policy**, detailing response procedures to restore operations swiftly and minimise impact.

Vulnerability management and incident monitoring

To maintain the highest security standards, the Group conducts regular vulnerability scanning and penetration testing for web or internal perimeter to identify and address potential risks in our IT infrastructure and information security management systems.

Additionally, as part of our **Security Incident Response Policy**, we continuously monitor and document cybersecurity incidents.




4.2. Data governance and privacy compliance


Our primary objectives for handling personal data are to ensure its protection, uphold individual privacy, comply with legal data protection requirements, demonstrate regulatory compliance to our stakeholders, and cultivate a strong culture of data protection across the organization. To achieve these objectives, we implement the following measures:


**Data Protection Officer (DPO):** All companies have a designated DPO, or a person appointed to be responsible for the implementation of data protection requirements within the Group. The DPO assists the company with any issues related to the protection of personal data.


**DPO of Avia Solutions Group PLC:** The DPO of the Group provides the subsidiaries with advice and monitoring services relating to the protection of personal data according to the context of each subsidiary.


**Policies:** Every company enforces essential policies, including but not limited to:

- 

**Privacy Policy:** Outlines how client personal data collected through digital channels is managed and protected. This policy is embedded within the group-wide risk and compliance management framework to ensure alignment with overall governance practices and to support consistent, organisation-wide data protection efforts.
- 

**Personal Data Processing Policy:** Regulates the processing of personal data by employees, covering data related to employees, clients, and suppliers.
- 

**Procedure for Managing Personal Data breaches:** Details the steps for breach response, outlines responsibilities of involved employees, and sets criteria for assessing the severity of a breach. Applicable to the identification and handling of breaches by employees.
- 

**Employee Personal Data Protection Policy:** Governs the internal administrative use of personal data related to employees and job candidates.
- 

**New in 2024:** Introduced guidelines on the Use of Generative AI, direct marketing, use of access cards, and handling of accidental email mis-delivery, further strengthening data protection and operational compliance.



Avia Solutions Group requires all employees to adhere to the principles and requirements set out in the Employee Personal Data Protection Policy and the Personal Data Protection Policy. Any breach of these policies is considered a serious violation of job duties and may lead to disciplinary action, in line with the Labour Code and applicable laws.

To ensure accountability, all employees must confirm — either by acknowledgement or signature — that they have read and understood the policies.

The Group also enforces a strict zero-tolerance approach to data protection violations and conducts regular internal audits to monitor compliance.

- **Data Breach Register:** Internal platform designed to document breaches and findings from investigations. It also facilitates the input of the preventative measures taken by the company before the recorded breach (such as backups, encryption, and training).
- **Employee trainings:** Within the first 3 months, all employees are required to complete e-training on personal data processing where they become familiar with key policies, procedures, and guidelines regulating the processing of personal data.
- **Awareness campaigns:** Throughout the year, educational articles and posts on privacy issues are prepared and published on the Group's internal communication sites or via email.
- **Data Protection Impact Assessment ("DPIA"):** To manage the risks and implement risk mitigation measures to the rights and freedoms of individuals arising from the processing of personal data, we have designed a DPIA process. DPIA is a reporting tool that allows the company to be in compliance with the General Data Protection Regulation (GDPR), as well as to demonstrate that appropriate measures are taken to ensure compliance with GDPR.

National Data Protection Authorities, together with the European Data Protection Board, provide lists of cases where a DPIA would be required.

- **Implementing privacy rights of data subjects:** Each company guarantees the implementation of data subjects' rights and the provision of any related information upon request or in case of a query.
- **Managing personal data breaches:** The rules for the investigation, assessment, management, and administration of data breaches are established by the Procedure for Managing Personal Data Security Breaches.

In 2024, **16 personal data incidents were registered on the Data Breach Register platform**, compared to seven incidents last year. All the complaints were thoroughly investigated and effectively addressed. In addition, Avia Solutions Group PLC conducts internal audits of subsidiary companies' Privacy Policies and carries out periodic reviews each year. Most data breaches are due to human error; thus, the focus has been centred on organisational security measures such as guidelines on steps to follow when sending an email to the wrong recipient and short training sessions on how to deal with human error. Several breaches have also occurred due to social engineering (phishing), which has led not only to organisational security measures, but also the introduction of technical solutions to prevent anonymous emails from entering the Group's network.

In 2023, the Group launched a second Data Breach Awareness Survey dedicated to understanding the data privacy status across companies located in Lithuania. The survey concluded that existing data protection measures should be maintained including: regular training, intranet articles on data protection, and a privacy manager channel within each subsidiary company. As a result, all planned actions were successfully implemented. These included the regular distribution of relevant privacy-related materials, the establishment of an internal communication channel for privacy managers across subsidiaries, monthly meetings with each privacy manager, and the formal obligation to share key resources. Additionally, ongoing support is provided in the event of data breaches to ensure effective incident response.





# 5. Business excellence approach

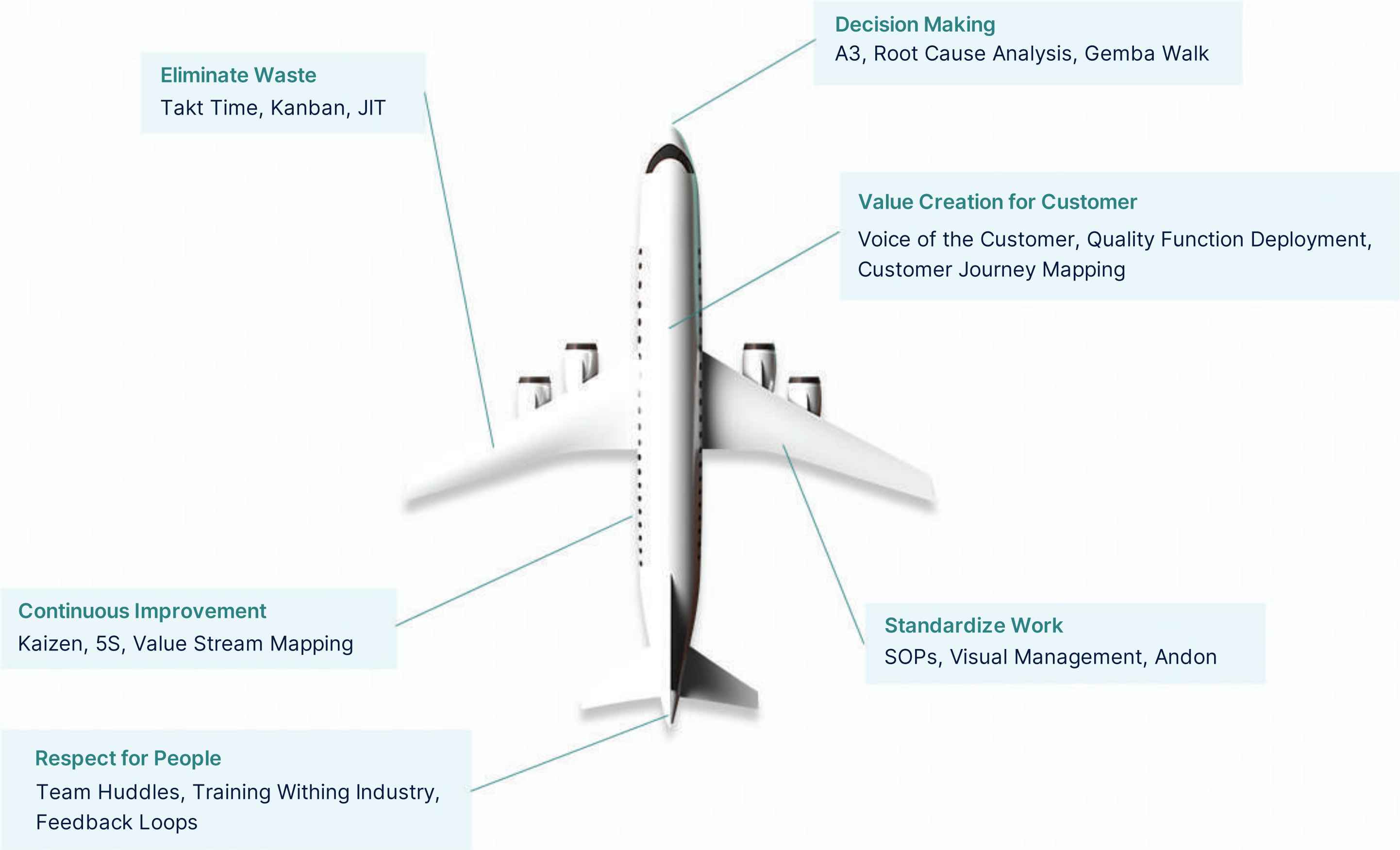
As part of our Group’s commitment to business excellence, we are embracing Lean principles to drive continuous improvement across our operations. Lean is a practical approach that focuses on reducing waste and increasing efficiency, all while delivering more value to our customers. In the aviation industry, applying Lean practices helps us enhance safety, streamline processes, and improve the overall customer experience.



- Improving safety
- Reducing waste and improving efficiency
- Enhanced customer satisfaction

Our Lean Plane, also known as the Lean House, is a visual tool used to represent the foundational principles and tools of Lean. Each part of the plane represents a specific aspect of the Lean methodology:

## Key Resources & Initiatives:





# Operational excellence through Lean transformation

In 2024, the Group initiated foundational Lean transformation projects across its ACMI and aviation business units. The goal is to embed a culture of operational excellence, standardisation, and continuous improvement as part of its governance and performance framework. The initiative supports ESG goals by fostering accountable performance structures and cross-functional process transparency.



### Daily Management System (DMS) Rollout

The rollout of the Daily Management System introduces standardised tier-based routines across selected subsidiaries, emphasising visual performance tracking and issue escalation. This initiative strengthens governance by improving accountability, transparency, and cross-level communication. The framework has been defined, and pilot sites have been selected to begin implementation.



### KPI structure development

A structured KPI framework has been developed to establish baseline indicators across key operational areas including Flight Operations, Technical, Safety, Crew, and Ground Handling. These KPIs are being aligned with the DMS tiers to support fact-based decision-making and ensure performance consistency. Draft KPI libraries and pilot dashboards have also been created as part of the initial phase.



### Pilot scheduling process review

This initiative focuses on reviewing crew scheduling processes through targeted workshops aimed at identifying inefficiencies. The goal is to optimise crew utilisation, reduce fatigue risks, and improve punctuality.

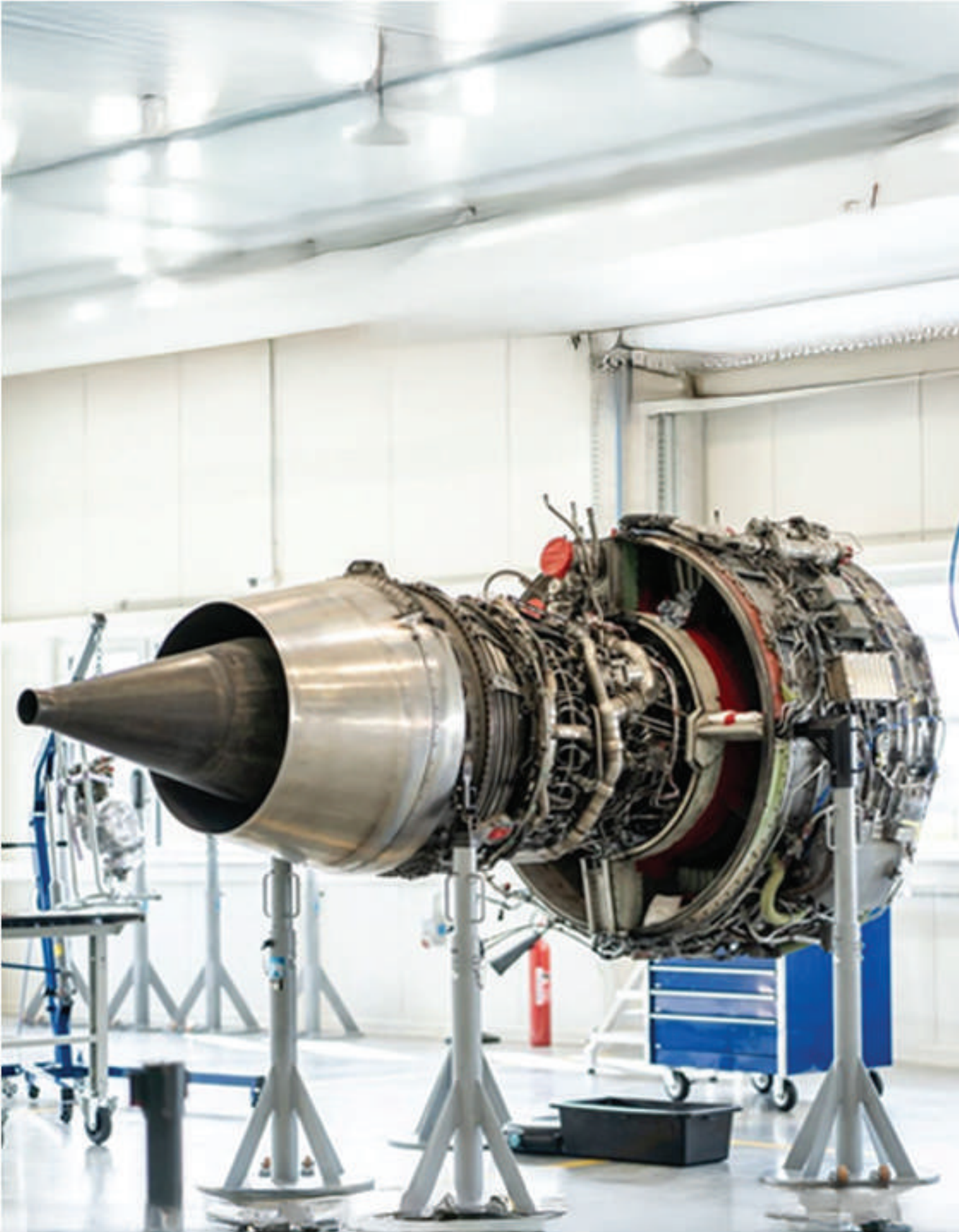


### Material flow process review (CAMO and MRO)

The review of material flow processes in Continuing Airworthiness Management (CAMO) and Maintenance, Repair and Overhaul has been initiated to enhance maintenance readiness. It aims to reduce Aircraft on Ground (AOG) incidents and improve turnaround times, supporting governance by strengthening inventory planning and control.

# Advancing Lean operations in 2025

Avia Solutions Group will expand the Daily Management System (DMS) across more departments and regions, finalising and implementing standardised KPIs, while launching targeted Lean pilot projects in pilot scheduling and CAMO-MRO material flows. Efforts will also focus on training mid-level managers in continuous improvement tools and building data infrastructure for real-time performance visibility.





# Digital enablement of governance and compliance

To uphold further governance integrity, in addition to several governance and compliance policies, the Group also utilised digital tools and developed specific applications.

- **The Entity Management Application** securely stores critical corporate data for the Group's entities. It serves as a central repository for legal entity information, crucial for Group governance and reporting. Continuous monitoring ensures timely updates to corporate changes within each subsidiary company, maintaining accurate and up-to-date information. Widely acknowledged as the definitive source within the Company, the application supports various corporate functions effectively.
- **Compliance apps.** Comprising of three key platforms designed to streamline essential processes:



**Counter-party onboarding and due diligence:** The GENESIS app assess risks such as money laundering, corruption, bribery, and sanctions among Avia Solutions Group's counterparties. It streamlines onboarding and due diligence, offering risk-based analysis and compliance guidance for potential clients.



**Whistleblowing Reporting and Case Management (Trust-Line):** Facilitates the reporting and management of whistleblowing cases.

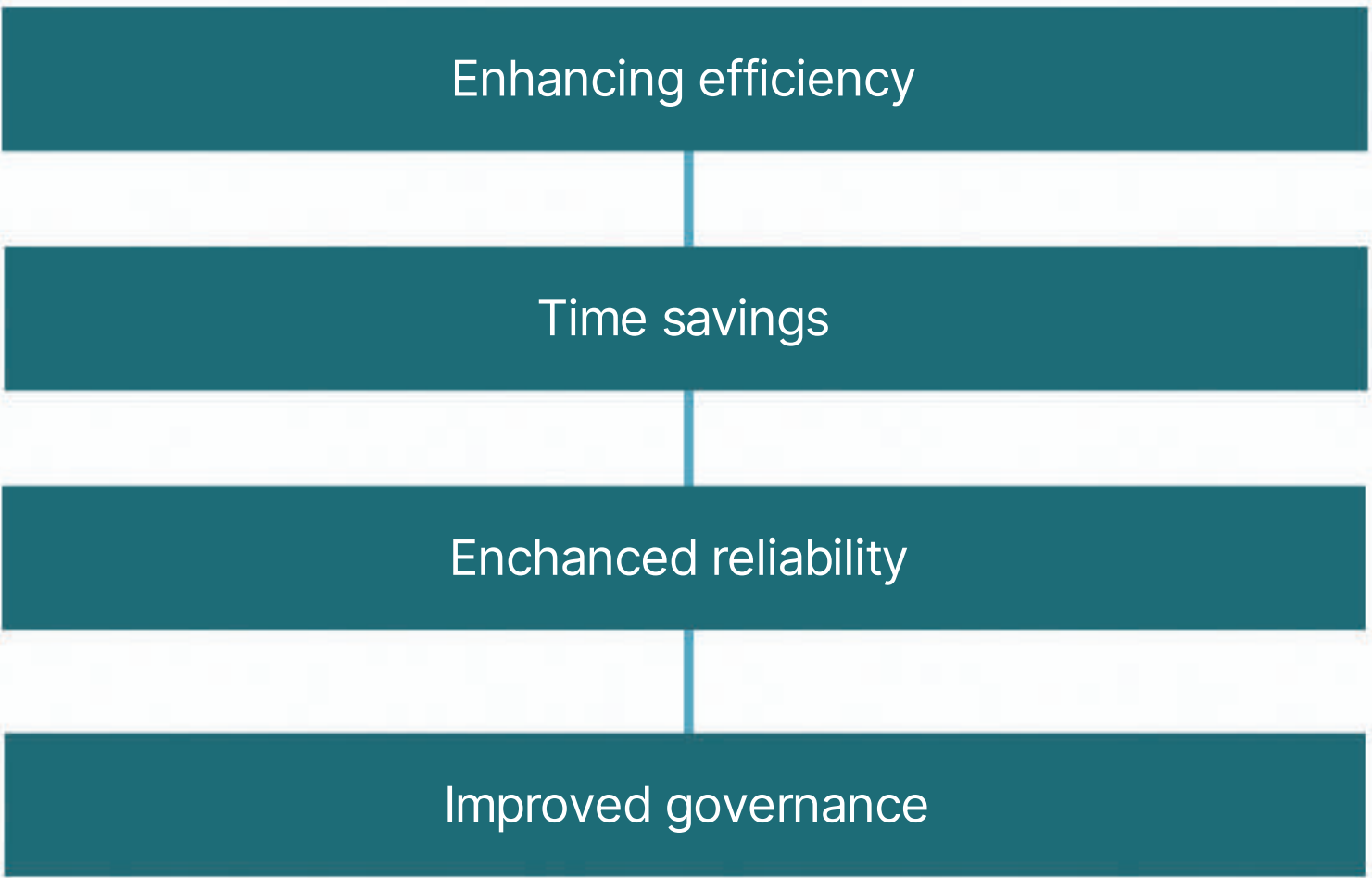


**Conflict of Interest Declaration and Management:** A digital declaration process, empowering employees to disclose and manage potential conflicts of interest, bolstering transparency and organisational integrity.

- **Environmental, Social, and Governance (ESG) app** has been designed to track our data collection process, making it more convenient and secure. Through this platform, all data is securely stored, automatically preserved, and conveniently accessible for interaction. The ESG app also ensures transparency and origin of the data and is a vital tool in keeping the data organised. Currently, users can collect environmental and social data as well as access relevant sustainability documents, policies, regulatory information, and templates.

To further ensure effective governance and adherence to company-wide policies, the Group is moving forward with implementation of digital tool for our subsidiary companies to effectively access the Group wide policies and perform self-assessment to identify relevant policies and other frameworks. The Assurance Screening Process has also been initiated to independently assess the transposal and effectiveness of Avia Solutions Group wide policies.

For further details, kindly explore the [Corporate Compliance page](#) on our website.





# 6. Responsible tax strategy and compliance

Due to the Group's diverse geographical presence and numerous business units, tax matters are initially managed at the business unit level. Primary responsibility for tax compliance is delegated to the Chief Financial Officers (CFOs) and their respective finance departments within the Group.

The CFOs together with local finance departments are responsible for preparing, reviewing, signing-off tax returns and daily management of tax affairs. The central tax team, based at Avia Solutions Group PLC, is responsible for the development of general tax specifics for Group-wide tax policies and oversight of Group-wide tax matters.

Our philosophy on tax risk management is to balance the prevention of unnecessary disputes with the tax authorities that may give rise to reputational risk and to preserve investors' value. The central tax team is partnering with all our Group businesses to ensure tax risk management. The Group also aims to utilize tax incentives where applicable and possible. The Group's tax strategy is to ensure compliance with applicable tax legislation and adequate coordination of tax practices followed by Group companies, with the goal of pursuing corporate interest and supporting a long-term business strategy that avoids tax risks and inefficiencies in the execution of business decisions.

## The Tax Code of Conduct for the Group is as follows:

- To comply with tax regulations and disclosure requirements as diligently as possible in the countries in which the subsidiaries of the Group operate.
- To support businesses to avoid tax risks and tax inefficiencies in the execution of business decisions.
- To maintain cooperative relations with tax administrators in the countries that the subsidiaries of the Group operate.
- To analyse and manage tax impacts of current and future business operations and transactions based on genuine business rationale.
- To ensure that all tax positions are taken for commercial and business purposes and are duly supported and documented.

The Tax Policy is in place to set the key principles for tax governance across the entirety of the Group. The unified principles are important in ensuring the avoidance of underpayment of taxes as well as any tax inefficiencies. The Group has also submitted a Country-by-Country (CbC) report in compliance with Action 13 to address Base Erosion and Profit Shifting (BEPS).





## About this report

**Reporting period:** For the year 2024, from 01.01.2024 to 31.12.2024.

### Contacts of interest:

- For Environmental, Social, and Governance (ESG) matters: Silvia Rodriguez Boza, Head of ESG Department; [silvia.rodriguez@aviasg.com](mailto:silvia.rodriguez@aviasg.com)
- For investors: Ricardas Laukaitis, Treasury Department Director; [ricardas.laukaitis@aviasg.com](mailto:ricardas.laukaitis@aviasg.com)
- For media: Silvija Jakiene, Director of Communications; [silvija.jakiene@aviasg.com](mailto:silvija.jakiene@aviasg.com)

### Reporting approach and global reporting standards:

Avia Solutions Group has reported the information cited in this Global Reporting Initiative (GRI) content index for the period 01.01.2024 to 31.12.2024 with reference to the GRI Standards. See GRI index table in page number 87.

### Reporting approach and Board of Directors:

The highest governance body for Avia Solutions Group, the Board of Directors, is responsible for reviewing and approving the reported information in the Environmental, Social, and Governance (ESG) report 2024. The report, including the material topics identified, is reviewed and approved by the CEO of the Group and thereafter presented to the Board of Directors for additional and final approval.

### Stakeholder dialogue and engagement

From our initial materiality assessment, we identified our primary stakeholders and the most effective engagement methods, fostering mutually beneficial relationships. Details on our stakeholder interactions and identification are included within the 2021 ESG report, with additional customer engagement practices in the “Customer satisfaction and stakeholder engagement” chapter. In 2024 and 2025, we are conducting a double materiality assessment, which may update our stakeholder engagement practices.

### Materiality assessment

Since 2022, we have been working on developing the Group’s first materiality assessment, a process of identifying material aspects within the Group. We have identified the main stakeholders within the Group and the list of material topics that have been evaluated and prioritised. The detailed description of our materiality assessment and its results are included in the 2021 ESG report.

Currently, we are working on a CSRD-aligned double materiality assessment, which will provide our Group with a well-rounded understanding of our impacts, risks, and opportunities, as well as helping us to make informed decisions that align with our sustainability goals and stakeholder expectations. The results of the double materiality assessment will be shared in the near future.

### Scope:

In 2010, Avia Solutions Group PLC was established as the parent company of the Group and focuses primarily on the management of the Group’s constituent companies. By 2024, the Group consisted of multiple subsidiaries from across Europe, Asia, North America, Africa, and Australia.

The 2024 ESG report refers to the largest and most impactful of all of the subsidiary companies within Avia Solutions Group. The companies covered in this report account for 97% of the total 2024 revenue.

Additionally, the scope of social data in this report has been expanded to include additional subsidiaries: Abu Dhabi LLMC, AeroClass, Aerotime Hub, AirExplore, Ascend Airways, BBN Indonesia, BBN Türkiye, Busnex, Sensus Aero, Skytrans, Universali Arena. This inclusion is due to these companies having a greater impact on social factors and the increased availability of relevant data.

This report provides data on the major subsidiaries within the Group presented here.





GRI content index

Statement of use	Avia Solutions Group has reported the information cited in this GRI content index for the period 01.01.2024 to 31.12.2024 with reference to the GRI Standards.	
GRI 1 used	GRI 1: Foundation 2021	
GRI STANDARD	DISCLOSURE	LOCATION
GRI 2: General Disclosures 2021	2-1 Organizational details	Section “About Avia Solutions Group” chapter “Business model”, page 2.
	2-2 Entities included in the organization’s sustainability reporting	Chapter “About this report”, page 86
	2-3 Reporting period, frequency and contact point	Chapter “About this report”, page 86.
	2-4 Restatements of information	In the Endnotes, page 91.
	2-5 External assurance	Avia Solutions Group is analyzing the possibility of being assured by an external party for certain information.
	2-6 Activities, value chain and other business relationships	Section “About Avia Solutions Group” chapter “Business model”, page 3.
	2-9 Governance structure and composition	Section “Board of Directors” in chapter “1. Corporate governance at Avia Solutions Group”, page 65. The average tenure of members of Avia Solutions Group PLC is 8.3 years.
	2-10 Nomination and selection of the highest governance body	Chapter “1. Corporate governance at Avia Solutions Group”, page 68. Chapter “1. Corporate governance and Board members” in our previous ESG Report 2021, page 52.
	2-11 Chair of the highest governance body	Chapter “1. Corporate governance at Avia Solutions Group”, page 65. Key roles within the Board of Directors (Board/BoD): -The Chairman of the Board is responsible for leading the BoD and representing both the Board and the company. The Chairman takes a leading role in medium and long-term strategic planning as well as in the selection of senior management. -Chief Executive Officer (CEO) is appointed by the BoD as the delegated person to manage the Group, the implementation and execution of the strategy approved by the BoD, and for the management of the day-to-day Group’s operations, except where Irish law or the Company’s Articles of Association provide differently. Together with the Chairman, CEO is responsible to establish values, ethics and culture of the Group.
	2-12 Role of the highest governance body in overseeing the management of impacts	Section “Board of Directors” in chapter “1. Corporate governance at Avia Solutions Group”, page 65.
	2-13 Delegation of responsibility for managing impacts	Chapter “1. Corporate governance at Avia Solutions Group”, page 65.
	2-14 Role of the highest governance body in sustainability reporting	The BoD reviews the reported information included in this document. Chapter “About this report”, page 86.
	2-15 Conflicts of interest	Section “Conflict of interest management” in chapter “1. Corporate governance at Avia Solutions Group”, page 67.
	2-16 Communication of critical concerns	Section “Communication of critical concerns” chapter “1. Corporate governance at Avia Solutions Group”, page 68.
	2-17 Collective knowledge of the highest governance body	Section “ESG governance within the Group” in chapter “1. Corporate governance at Avia Solutions Group”, page 67.
	2-21 Annual total compensation ratio	Chapter “1.4. Diversity, equality, and inclusion”, page 42.
	2-22 Statement on sustainable development strategy	CEO statement.
	2-26 Mechanisms for seeking advice and raising concerns	Chapter “2. Business and corporate ethics”, page 70.



## GRI content index

	2-28 Membership associations	Chapter “2. Business model”, page 2.																																																																																
	2-29 Approach to stakeholder engagement	Chapter “2. Customer satisfaction and stakeholder engagement”, page 54; Chapter “1. Our people”, page 35. Chapter “About this report”, page 86. Chapter “5. Stakeholder dialogue and engagement”, page 13 in previous ESG Report 2021.																																																																																
	2-30 Collective bargaining agreements	35 % of our employees are covered by freedom associations, encompassing collective bargaining, trade unions and social dialogues.																																																																																
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Chapter “About this report”, page 86. Detail information is included on page 10 in EGS Report 2021, chapter “2. Materiality assessment and key topics”																																																																																
	3-2 List of material topics	Chapter “About this report”, page 86. Detail information is included on page 10 in EGS Report 2021, chapter “2. Materiality assessment and key topics”																																																																																
	205-2 Communication and training about anti-corruption policies and procedures	Chapter “2. Business and corporate ethics”, page 70.																																																																																
	205-3 Confirmed incidents of corruption and actions taken	Chapter “2. Business and corporate ethics”, page 70. During 2024, no incidents of corruption have been recorded.																																																																																
GRI 207: Tax 2019	207-1 Approach to tax	Chapter “6. Responsible tax strategy and compliance”, page 85.																																																																																
	207-2 Tax governance, control, and risk management	Chapter “6. Responsible tax strategy and compliance”, page 85.																																																																																
GRI 302: Energy 2016	302-1 Energy consumption within the organization	<table><tr><td></td><td>2023</td><td>2024</td><td></td></tr><tr><td>Total energy consumption</td><td>4,864,221</td><td>2,972,915</td><td>GJ</td></tr><tr><td>Total fuel consumption</td><td>4,783,329</td><td>2,891,527</td><td>GJ</td></tr><tr><td>Fuel consumption from non-renewable sources</td><td>4,775,836</td><td>2,841,176</td><td>GJ</td></tr><tr><td>Aviation fuel</td><td>4,758,687</td><td>2,793,952</td><td>GJ</td></tr><tr><td>Diesel</td><td>6,178</td><td>44,049</td><td>GJ</td></tr><tr><td>Motor gasoline</td><td>5,535</td><td>3,174</td><td>GJ</td></tr><tr><td>Stationary combustion</td><td>5,435</td><td>n.a</td><td>GJ</td></tr><tr><td>Fuel consumption from renewable sources</td><td>7,493</td><td>50,351</td><td>GJ</td></tr><tr><td>Biodiesel</td><td>7,493</td><td>20,646</td><td>GJ</td></tr><tr><td>NESTE MY</td><td>0</td><td>29,705</td><td>GJ</td></tr><tr><td>Electricity consumption*</td><td>54,158</td><td>58,207</td><td>GJ</td></tr><tr><td>Heating consumption</td><td>26,734</td><td>23,181</td><td>GJ</td></tr><tr><td>Electricity consumption</td><td>15,044</td><td>16,169</td><td>MWh</td></tr><tr><td>Renewable energy</td><td>5,562</td><td>3,408</td><td>MWh</td></tr><tr><td>Non-renewable energy</td><td>9,482</td><td>12,760</td><td>MWh</td></tr><tr><td>Heating consumption*</td><td>7,426</td><td>6,439</td><td>MWh</td></tr><tr><td>Renewable energy</td><td>647</td><td>750.42</td><td>MWh</td></tr><tr><td>Non-renewable energy</td><td>6,779</td><td>5,689</td><td>MWh</td></tr></table>					2023	2024		Total energy consumption	4,864,221	2,972,915	GJ	Total fuel consumption	4,783,329	2,891,527	GJ	Fuel consumption from non-renewable sources	4,775,836	2,841,176	GJ	Aviation fuel	4,758,687	2,793,952	GJ	Diesel	6,178	44,049	GJ	Motor gasoline	5,535	3,174	GJ	Stationary combustion	5,435	n.a	GJ	Fuel consumption from renewable sources	7,493	50,351	GJ	Biodiesel	7,493	20,646	GJ	NESTE MY	0	29,705	GJ	Electricity consumption*	54,158	58,207	GJ	Heating consumption	26,734	23,181	GJ	Electricity consumption	15,044	16,169	MWh	Renewable energy	5,562	3,408	MWh	Non-renewable energy	9,482	12,760	MWh	Heating consumption*	7,426	6,439	MWh	Renewable energy	647	750.42	MWh	Non-renewable energy	6,779	5,689	MWh	Total energy consumption decreased in 2024 due to a decrease in flights under our call signs, as the business focused on ACMI, while renewable fuel use increased with the introduction of Neste MY.
			2023	2024																																																																														
		Total energy consumption	4,864,221	2,972,915	GJ																																																																													
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	303-5 Water consumption	Avia Solutions Group main offices, hangars and training centers consumed 37,587,960* liters of water in 2024. In 2023, 49,549,729* liters of water were consumed. *Some estimations were applied to determine water consumption data due to subsidiaries' external agreements or locations.
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Section "2.2. Total emissions and scope 1" in chapter "2. GHG emissions and the actions taken to tackle climate change", page 11.
	305-2 Energy indirect (Scope 2) GHG emissions	Section "2.6. Efficient energy use and renewable sources – scope 2" in chapter "2. GHG emissions and the actions taken to tackle climate change", page 19. Total scope 2 emissions, (location-based method) = 6,459 tonnes CO2e Total scope 2 emissions, (market-based method) = 9,141 tonnes CO2e
	305-3 Other indirect (Scope 3) GHG emissions	Section "2.8. Business travels and employee commute – scope 3" in chapter "GHG emissions and the actions taken to tackle climate change", page 24.
GRI 306: Waste 2020	306-3 Waste generated	Avia Solutions Group main offices, hangars and training centers generated 2891.9 metric tons of waste. The significant reduction compared to last year is linked to the improved methodology and narrower reporting scope, as last year's figures included more extensive estimations and external data sources.
	306-4 Waste diverted from disposal	Avia Solutions Group main offices, hangars and training centers recycled 46.6 metric tons of waste. The significant reduction compared to last year is linked to the improved methodology and narrower reporting scope, as last year's figures included more extensive estimations and external data sources.
	306-5 Waste directed to disposal	Avia Solutions Group main offices, hangars and training centers directed to disposal 2845.2 metric tons of waste. The significant reduction compared to last year is linked to the improved methodology and narrower reporting scope, as last year's figures included more extensive estimations and external data sources.
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Total number and rate of new employee hires by age: Under 30 – 1,643; Percentage: 38.57% Aged 30 to 50 – 2,037; Percentage: 47.80% Over 50 – 581; Percentage: 13.63%  Total number and rate of employee hires by gender: Female – 1,277; Percentage: 29.97% Male – 2,984; Percentage: 70.03%
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Section "1.3. Aviation Safety Management" in chapter "1. Our people", page 38.
	403-3 Occupational health services	Section "1.2. Well-being of our employees" in chapter "1. Our people", page 36.
	403-4 Worker participation, consultation, and communication on occupational health and safety	Section "1.3. Aviation Safety Management" in chapter "1. Our people", page 38.
	403-5 Worker training on occupational health and safety	Section "1.2. Well-being of our employees" in chapter "1. Our people", page 36.
	403-6 Promotion of worker health	Section "1.2. Well-being of our employees" in chapter "1. Our people", page 36.
	403-9 Work-related injuries	Section "1.3. Aviation Safety Management" in chapter "1. Our people", page 38.



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GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	The average hours of training that the organization’s employees have undertaken during the reporting period is 16.4 hours. In total 156,419 training and development hours were offered and completed by employees.
	404-2 Programs for upgrading employee skills and transition assistance programs	Section “1.5. Training and professional development” in chapter “1. Our people”, page 48.
	404-3 Percentage of employees receiving regular performance and career development reviews	75.7% of our employees receive regular performance and career development reviews. In our performance appraisal sessions for all employees, achievements and valuable lessons are shared during dedicated team sessions, encouraging mutual growth.
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Diversity of governance bodies – chapter “1. Corporate governance at Avia Solutions Group”, page 65. Our BoD is entirely composed by males, with 67% of them falling between the ages of 30 and 50, while the remaining 33% are over 50 years old. Diversity of employees – section “1.4. Diversity, Equality, and Inclusion”, page 42. Within our workforce, 70.03% are male and 29.97% are female. In terms of age distribution – 38.57% are under 30 years old, 47.80% fall within the 30 to 50 age range, and 13.63% are over 50 years old.
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	During 2024, two discriminatory incidents were recorded and investigated. Section “1.4. Diversity, Equality, and Inclusion” in chapter “1. Our people”, page 42.
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Chapter “4. IT governance and cybersecurity”, page 79.



# Endnotes

## Page 11, 2.2. Total emissions and scope 1

1. Carbon dioxide equivalent (CO<sub>2</sub>e) is a standard unit used to compare the emissions of various greenhouse gases based on their global warming potential (GWP). This measure includes carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O). Emission factors used in the calculations are sourced from the GHG Protocol tools and the UK Department for Environment, Food & Rural Affairs (DEFRA), which publishes internationally recognised GHG emission factors to support consistent emissions reporting.
2. Scope 1 includes fuel combustion from company-owned vehicles, operated flights, or aircraft operating under our call sign.
3. Scope 2 emissions (location-based method) are calculated using the average grid emission factors for each country or region where electricity is consumed. This approach reflects the carbon intensity of the local electricity mix and aligns with the GHG Protocol guidelines for location-based reporting.
4. Scope 3 – Upstream leased assets: leased assets by the supplier. For the cargo segment, 2023 data was used as a reference for reporting purposes, as 2024 information was not available due to a system transition.
5. Scope 3 – Downstream leased assets: ACMI services.
6. Scope 3 – Business Travel: Emissions from air travel were estimated based on flight distance and classified by flight type, as short-haul, medium-haul, or long-haul.
7. Scope 3 – Purchased goods and services: includes glycol used for de-icing services and N<sub>2</sub>O used in maintenance procedures.
8. Scope 3 – Employee commute from home to workplace: information on these emissions has been collected through an employee survey. Based on the results of the survey, some assumptions and estimates have been made.
9. Detailed description of the segments is included in Section 2: Business model.
10. Holding, asset management, financing services and other non-aviation-related activities.

## Page 23, 2.7. ACMI services - scope 3

1. Scope 3 – Upstream leased assets: assets leased by the supplier. For the cargo segment, 2023 data was used as a reference for reporting purposes, as 2024 information was not available due to a system transition.
2. Scope 3 – Downstream leased assets: ACMI services.
3. Scope 3 - Business travel: part of the emissions included in this division have been estimated, as some of the subsidiaries have collected this information for the first time.
4. Scope 3 – Purchased goods and services: includes glycol used for de-icing services and N<sub>2</sub>O used in maintenance procedures.
5. Scope 3 – Employee commute (home to work and back): emissions from commuting were estimated based on an employee survey, with certain assumptions and estimates applied.
  - a. The significant increase in downstream leased assets is due to active business development and improved methods of data collection and emissions calculation.
  - b. The significant increase in business travel is also due to active business development and improved data collection and calculation methodologies.