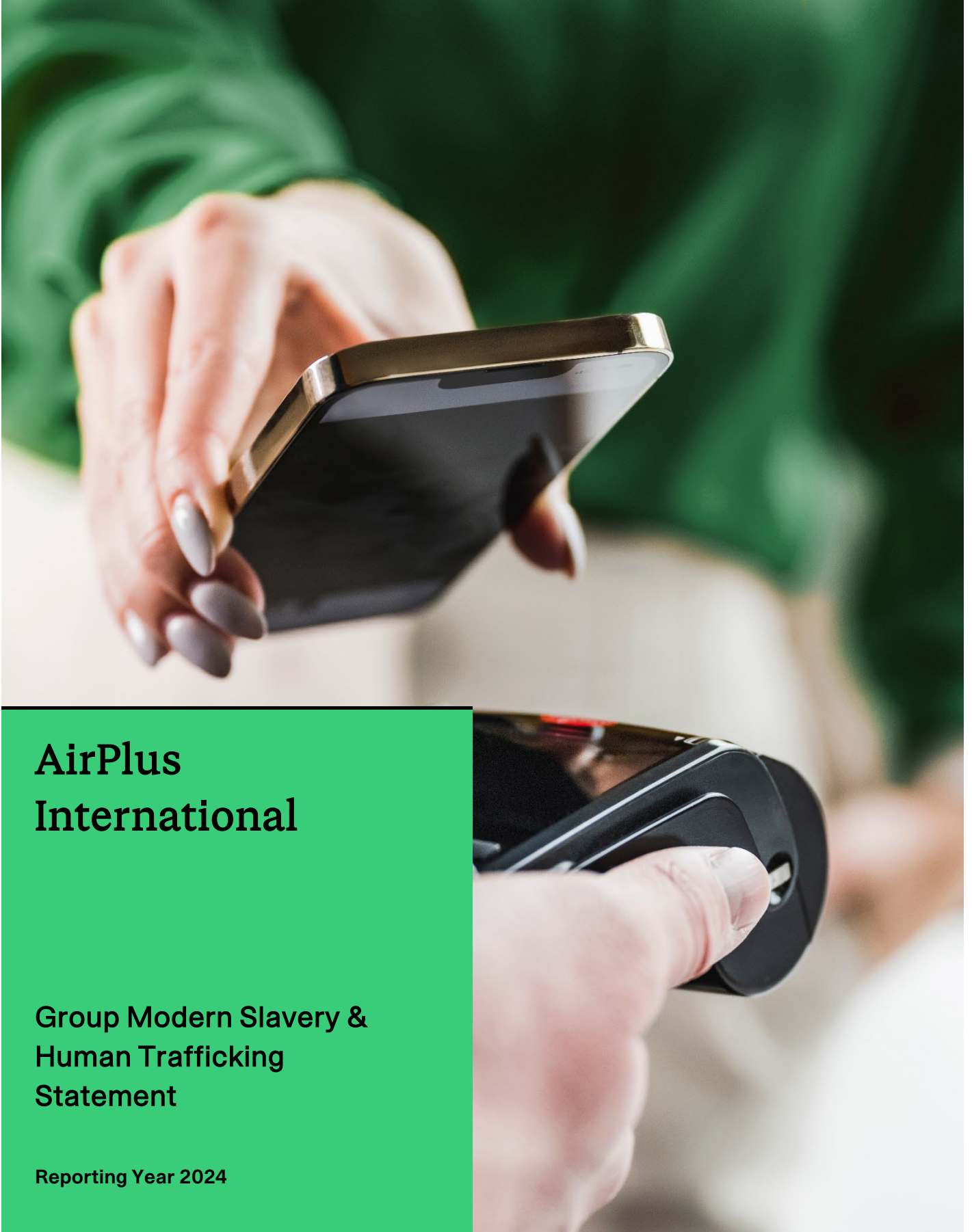


# AirPlus

## AirPlus International

### Group Modern Slavery & Human Trafficking Statement

Reporting Year 2024



## Tackling modern slavery and human trafficking

### **AirPlus International GmbH and its group companies**

#### **A. Introduction**

1. The respect for human rights is self-evident. It is an integral theme that runs throughout the day-to-day global operations and ways of working at AirPlus.
2. Modern slavery is a crime and a violation of fundamental human rights. AirPlus is committed to ensuring our business practices do not involve modern slavery and human trafficking. Our statement outlines the steps we have taken to prevent Modern Slavery within the AirPlus group and our supply chains, and how this remains under review at AirPlus.
3. This statement has been prepared in accordance with section 54 of the UK's Modern Slavery Act and constitutes the AirPlus group's statement on modern slavery and human trafficking for the financial year ending December 2024. In this statement, we report about:
  - i. The AirPlus International group structure
  - ii. Our policies regarding Modern Slavery & Human Trafficking
  - iii. Assessing risks of Modern Slavery & Human Trafficking
  - iv. AirPlus supply chains
  - v. The approval for this statement
4. All AirPlus group companies follow the same supply chain management policies and procedures. This statement reflects these policies and procedures and, therefore, applies to the entire AirPlus group.

#### **B. About AirPlus International GmbH**

##### *Our organisational structure*

5. AirPlus International GmbH is a German headquartered payment institution. We offer corporate payment solutions to help our customers manage their spending needs in areas such as travel management and procurement.
6. We currently have a global presence in over 20 countries, employing just over 1,200 staff members. We have subsidiaries in the UK, the USA, Italy, China, Switzerland and

Brazil. Additionally, we have branches, permanent establishments and representation offices throughout Europe and in APAC, South America and South Africa. Together, these form the AirPlus group ("AirPlus").

7. Until August 2024, AirPlus was a group company of Deutsche Lufthansa AG, the German headquartered airline. On 31 July 2024, AirPlus was acquired by SEB Kort AB, a Swedish headquartered financial institution that is part of the SEB Bank AB group.

## C. Group wide policies and ways of working

### *Risk management*

8. AirPlus policies are designed to establish and assess risk in our business and supply chains, monitor such potential risks areas, reduce the risk of slavery and human trafficking occurring, and to provide adequate protection for whistleblowers.
9. AirPlus adopts a risk-based and holistic assessment of suppliers that considers technical, financial, legal and other risk-related matters. Our suppliers have committed to complying with our sustainability guidelines either by the individual contract or by accepting general procurement regulations. We monitor supplier services closely using a risk-based approach, particularly for services classified as outsourcing.
10. A structured process involving specialised teams such as Compliance, Sustainability BCM, ITSCM, Data Protection and Risk & Legal protects AirPlus from operational, regulatory and reputational risks and ensures that the service provider offers real added value.
11. AirPlus conducts risk assessments, analyses, and monitoring on a regular basis. In 2024, as part of the Environmental, Social, and Governance (ESG) framework, the ESG risk assessment, including an AirPlus-ESG risk driver analysis, was carried out in accordance with the requirements of ZAG MaRisk. This involved analysis of various transmission channels and their impact on different AirPlus' risk categories and considered the prevention of modern slavery and human trafficking.
12. Risk assessments and analyses, including so called Risk Control Self-Assessment for review of operational and security risks, are conducted at least once per year with the objective to identify and address relevant risks. The results are regularly reviewed, updated, and monitored to identify potential new or change of existing risks at an early stage and take appropriate action in a timely and effective manner.
13. We do not consider that AirPlus is presented with high risks of modern slavery or human trafficking. This is due to the nature of our business activity, the business partners that we carefully select to form part of our supply chain, the laws and

regulations applicable to us which shape our policies and ways of working world-wide (as well as that of our suppliers), and analysis from relevant internal and external auditing regarding social and sustainability matters.

14. AirPlus' most recent assessments for the calendar year 2024 identified no significant risks related to modern slavery or human trafficking in our organisation or supply chain.

#### *Supply chain management and expectations of suppliers*

15. AirPlus procures services from third-party providers to increase efficiency, reduce costs and gain access to specialised expertise. The services include the following in particular – information and communications technology, payment and card processing, business process outsourcing, personnel training, professional consultancy, real estate facility management and marketing & services.
16. As a financial institution, we do not have a classic upstream and downstream supply chain like manufacturing companies, but we do procure goods and services to enable AirPlus solutions and services.
17. Becoming a supplier to AirPlus is subject to close co-operation and alignment with our supply chain standards, and compliance with current laws, guidelines and regulations concerning fair competition, integrity and responsible practice. This is reviewed as part of our “Business Partner Due Diligence process”.
18. AirPlus expects our suppliers, including their employees, agents, and subcontractors, to comply with the principles of the UN Global Compact and the fundamental principles of the International Labor Organization (“ILO”).
19. To this end, AirPlus' suppliers must:
  - i. Support and respect the protection of internationally proclaimed human rights in their own area of influence
  - ii. Ensure that they are not complicit in human rights abuses
  - iii. Uphold freedom of association and the effective recognition of the right to collective bargaining
  - iv. Be opposed to any form of forced and compulsory labor
  - v. Eliminate discrimination in respect of employment and occupation
  - vi. Support a precautionary approach to environmental challenges
  - vii. Support initiatives to promote greater environmental responsibility
  - viii. Encourage the development and diffusion of environmentally friendly technologies
  - ix. Be opposed to corruption in all its forms, including extortion and bribery

## *The employment experience at AirPlus*

20. AirPlus has policies and ways of working in place to ensure we offer our employees a positive working environment in areas of health & wellbeing, promoting talent, reconciliation of family and working life, and transparent remuneration. AirPlus is committed to complying with all local laws and regulations concerning these matters, as is reflected in our local Employment Manuals and Employment Agreements.
21. AirPlus employees can expect the following types of experiences:
  - Promotion of wellbeing of employees through offering and arranging medical and health related benefits.
  - Employment opportunities ranging from work experience, entry level, professional level to executive level, with a comprehensive induction program.
  - Various in-person web-based training and peer-to-peer coaching and support.
  - Flexible working conditions to fit employees' current circumstances, such as flexible working hours, hybrid working, part time opportunities, parent-child office, sabbatical opportunities and up to 30 days mobile working within the EU.
22. AirPlus commits to aligning its policies and ways of working with internationally recognised standards. For example, standards such as UN Global Compact and UN Guiding Principles on Business and Human Rights. We do this by adopting and following policies and a Code of Conduct applicable to us through our past and present parent organisations. AirPlus adopted SEB Group's Code of Conduct in September 2024 which can be found on our website.
23. AirPlus maintains a robust whistleblowing system. We encourage all employees or external whistleblowers to report any suspected misconduct and compliance violations involving AirPlus' business. We provide protective measures to enable individuals to make a disclosure of such conduct or violation without fear of reprisal. Employees can access the relevant channels and information on AirPlus' intranet. More information is also available on our external website.
24. Furthermore, in accordance with the German Co-Determination Act, AirPlus also has a Works Council – an employee body that represents the interests of all employees towards the management and senior executives. Through different sub-committees, the Works Council collaborates with global Human Resources Managers to ensure the workplace is safe, equal, and fair. Works Council and Human Resources publish the process for anonymously addressing any conditions which would threaten a safe

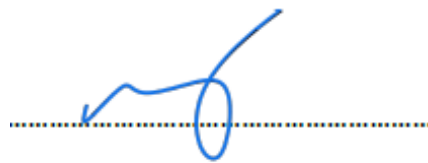
workplace. Employees have access to the Works Councils on AirPlus' internal communications platform.

## **D. Further steps to prevent Modern Slavery and Human Trafficking**

25. Following the acquisition of AirPlus by SEB Kort, we continue to work closely with our new shareholder to adopt common policies and ways of working. This includes alignment and strategy development on all areas of corporate compliance and sustainability, including the prevention of modern slavery and human trafficking.

## **E. Approval of this statement**

26. This statement was approved by the Managing Directors' Board of AirPlus International GmbH on 20 February 2025 in respect of the Financial Year 2024.



Mads Krumhardt Enggren, Chief Executive Officer

On behalf of AirPlus International GmbH