Norwegian Transparency Act

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Transparency Act Statement 2026

This statement has been prepared in accordance with the Norwegian Transparency Act and provides a structured account of SAS's due diligence assessments in accordance with Section 5 of the Norwegian Transparency Act, including identified actual and potential adverse impacts, measures implemented, and the results of these measures, in relation to human rights and decent working conditions across its operations and value chain.

It describes the company's due diligence approach, including identified risks of adverse impacts and the measures implemented to prevent, mitigate, and address such risks during the reporting period.

In accordance with applicable disclosure requirements, SAS publishes supplementary information, including selected audit findings, follow-up actions, and supplier-related disclosures, on its website. The scope and level of detail are determined based on confidentiality constraints and data availability. These disclosures are intended to support transparency regarding the company's efforts to address human rights risks and promote responsible business conduct.

General information

About SAS

SAS Group ("SAS"), headquartered in Sweden, is an airline group operating primarily within Scandinavia and internationally, serving destinations across Europe, Asia, and the United States. During the reporting period, SAS transported approximately 30 million passengers. Core airline operations are conducted through SAS Scandinavia, SAS Connect, SAS Link, and associated production partners.

In addition to passenger air transport, SAS conducts activities within cargo services, ground handling, and technical maintenance. SAS Cargo provides air freight services to, from, and within Scandinavia, based on available cargo capacity within the SAS route network, supplemented by dedicated trucking operations.

SAS Ground Handling provides ground handling services at airports in Copenhagen, Oslo, and Stockholm, including passenger, cargo, and ramp services for SAS and third-party airline operators. SAS Maintenance Production delivers technical maintenance services for aircraft and engines at multiple locations in Scandinavia, serving both SAS and external customers.

SAS Oil, a wholly owned subsidiary of SAS, is responsible for the sourcing and supply of aviation fuel and related petroleum products for the SAS fleet.

Commitment to human rights and decent working conditions

SAS operates within the aviation sector, which involves global operations and complex supply chains. As a result, the company is exposed to risks of adverse impacts on human rights and decent working conditions affecting its own workforce, individuals within its value chain, and, in certain cases, communities affected by its activities.

SAS maintains policies and procedures intended to support respect for human rights and decent working conditions across its operations and supply chain. These are reflected in governing documents, including the Code of Conduct and whistleblowing framework, and are integrated into relevant business processes.
The company's approach is informed by internationally recognized standards. SAS has been a participant in the United Nations Global Compact since 2003 and seeks to align its operations with its ten principles relating to human rights, labor standards, environment, and anti-corruption. SAS also seeks to align its due diligence practices with the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

These frameworks inform the company's risk-based due diligence efforts, which are designed to identify, assess, and address actual and potential adverse impacts on human rights and working conditions in connection with its business activities.

Governance of human rights and decent working conditions

Responsibilities

Responsibility for the management of human rights and decent working conditions is allocated across relevant functions within SAS.

The Executive Leadership Team (ELT), in coordination with the Chief Legal Officer, holds overall responsibility for overseeing compliance with the Norwegian Transparency Act, including interpretation of regulatory requirements and alignment of internal practices with applicable legal obligations.

The Sustainability function, reporting to the Chief People Officer, is responsible for leading and coordinating the company's overall work related to the Norwegian Transparency Act, including the development of the due diligence framework, identification and assessment of risks and the preparation of the annual Transparency Act statement. This work is carried out in collaboration with the Legal function to support consistency, quality, and alignment with regulatory requirements.

Responsibility for the implementation of compliance-related measures is assigned to relevant operational functions. This includes establishing internal processes, allocating appropriate resources, facilitating communication channels, and supporting a culture of compliance. Human Resources and Procurement functions are responsible for the day-to-day implementation of due diligence activities within their respective areas, including supplier engagement and workforce-related measures.

The Board of Directors oversees the company's approach to human rights and working conditions based on reporting from management. This includes periodic review of relevant policies and governance frameworks to assess whether they remain appropriate in light of the company's risk profile, operations, and applicable regulatory requirements.

Policies and governing documents

SAS has established a set of policies and governing documents intended to support the management of risks related to human rights and decent working conditions across its operations and value chain.

The SAS Code of Conduct constitutes a central governance document and defines the standards of conduct expected of employees and representatives across the organization, including subsidiaries and controlled entities. The Code of Conduct applies irrespective of local legal requirements and is designed to provide a common framework for ethical business conduct.

In addition to the Code of Conduct, SAS has adopted supplementary policies addressing, among other areas, working conditions, health and safety, non-discrimination, and anti-corruption. These policies are intended to guide internal practices and support compliance with applicable legal and regulatory requirements.

For suppliers and business partners, SAS has established a Supplier Code of Conduct and relevant contractual requirements. These set out expectations related to human rights, labor standards, and business ethics, and are incorporated into procurement processes to support alignment with recognized international standards, including the principles of the United Nations Global Compact.

Relevant policies and governing documents in own operations include:

- SAS Code of Conduct
- Health and Work Environment Policy
- Diversity and Harassment Policy
- SAS Group People Policy
- Sustainability Policy

Relevant policies and governing documents applicable to the supply chain include:

- Supplier Code of Conduct
- Purchasing Policy
- General Terms and Conditions
- Supplier assessments, including third-party evaluations where applicable

SAS reviews its policies and governing documents on a periodic basis to assess whether they remain appropriate in light of identified risks, operational developments, and applicable regulatory requirements.

Whistleblowing mechanisms

SAS has established whistleblowing mechanisms intended to enable employees and other relevant stakeholders to report concerns related to potential human rights violations, breaches of internal policies, or other misconduct. Reports may be submitted through channels designed to support confidentiality and, where applicable, anonymity in accordance with internal procedures and applicable legislation.

In 2024, SAS introduced an additional communication channel to facilitate dialogue between employees and senior Human Resources representatives through a dedicated email function. This mechanism serves as a supplementary reporting and escalation channel and does not replace existing whistleblowing arrangements.

In accordance with Section 6 of the Norwegian Transparency Act, SAS has implemented procedures for receiving, processing, and responding to information requests from the public regarding how the company addresses actual and potential adverse impacts on human rights and decent working conditions.

SAS has established internal procedures for the registration, assessment, investigation, and follow-up of reported concerns. These procedures are intended to support consistent handling of cases and appropriate escalation where relevant.

SAS seeks to maintain a reporting environment in which individuals can raise concerns without fear of retaliation, in line with applicable legal requirements and internal policies.

During the fiscal year 2025, the whistleblowing channel was used on 16 occasions. Reported cases were assessed and processed in accordance with internal procedures; however, the nature, severity, and outcomes of these cases vary and are subject to internal documentation and confidentiality considerations.

Due diligence process

SAS applies a risk-based due diligence process structured in accordance with the six-step due diligence framework set out in the OECD Guidelines for Multinational Enterprises. The process is structured to:

(i) integrate responsible business conduct into policies and governance structures,
(ii) identify and assess actual and potential adverse impacts on human rights and decent working conditions,
(iii) implement measures to prevent and mitigate identified risks,
(iv) monitor the implementation and effectiveness of such measures,
(v) communicate relevant aspects of due diligence activities, and
(vi) facilitate remediation where adverse impacts are identified.

Where adverse impacts are identified, SAS applies remediation processes which may include:

- dialogue with affected parties,
- corrective action plans,
- contractual enforcement measures, and
- escalation or termination of supplier relationships where appropriate.

These due diligence activities are conducted on an ongoing basis and are intended to support the identification and management of risks across SAS's operations and value chain.

The assessment underlying this Transparency Act statement was conducted through a structured workshop process in May 2026. The assessment methodology was inspired by ISO 31000 principles and aligned with the OECD due diligence framework. The process involved cross-functional employee representatives and was coordinated with the Double Materiality Assessment conducted as part of the company's implementation of the Corporate Sustainability Reporting Directive (CSRD).

Based on the outcome of the assessment, a majority of previously identified risks have been retained, with certain risks consolidated to improve consistency and oversight. One additional risk area, partnerships with other airlines, was identified during the reporting period.

The continued inclusion of previously identified risks reflects their inherent nature within the aviation sector and does not indicate ineffective mitigation. Risk levels have been reassessed and remain unchanged in terms of severity and likelihood.

SAS applies a differentiated, risk-based approach to supplier and business partner engagement. Risk exposure varies depending on factors including geographic location, industry sector, and the nature of goods or services provided. Certain categories, such as textiles and catering services in higher-risk regions, may be associated with elevated risks related to labor standards and working conditions, whereas suppliers operating within highly regulated environments may present comparatively lower risk.

For business areas where SAS exercises a higher degree of operational control, such as SAS Oil, risks are assessed with reference to internal controls and governance mechanisms; however, such assessments remain subject to inherent limitations.

The company acknowledges the challenges associated with managing risks across a global and complex supply chain, including limitations in visibility beyond direct suppliers. Measures such as requiring supplier adherence to the Code of Conduct and incorporating contractual requirements are used to support baseline standards; however, these mechanisms alone may not provide full assurance of compliance in practice. SAS is in the process of reviewing and refining supplier documentation to improve clarity and enforceability of requirements.

As part of its due diligence approach, SAS conducts activities based on risk prioritization. This includes on-site audits of selected high-risk suppliers, while lower-risk suppliers are subject to proportionate oversight. The scope and frequency of such activities are determined based on risk assessments and available resources.

Training on risk-based supply chain due diligence is provided to relevant procurement personnel to support consistent implementation of the approach. These training activities are subject to ongoing development and refinement.

Method

The due diligence activities conducted during the reporting period form the basis for the company's assessment of relevant risks related to human rights and decent working conditions. Identified risks are assessed based on two primary dimensions: the severity of the potential or actual impact, and the likelihood of occurrence.

During the reporting period, the risk assessment methodology was aligned with the approach applied in the company's Double Materiality Assessment under the CSRD. This included the adoption of refined assessment criteria and a structured scoring system for evaluating both severity and likelihood.

Severity and likelihood are assessed using a five-point scale, supported by defined criteria intended to promote consistency in the evaluation of risks. The methodology distinguishes between actual adverse impacts and potential adverse impacts, in line with OECD due diligence principles.

Risks assessed as having high severity (levels 4 and 5), representing substantial or fundamental harm to individuals or groups, are prioritized for further assessment and the implementation of risk management measures.

Severity scale:
5 – Very serious: Impact resulting in fundamental harm, with significant and potentially irreversible effects on human rights or quality of life
4 – Serious: Impact causing substantial harm with clear and lasting effects
3 – Moderate: Impact causing measurable adverse effects affecting multiple individuals or locations
2 – Minor: Limited impact affecting a defined group with limited duration or scope
1 – Minimal: Negligible or no material impact

Likelihood scale:
5 – Actual: Adverse impact has occurred or occurs repeatedly within a given period
4 – Very likely: Impact is expected to occur on a recurring basis (e.g. annually)
3 – Likely: Impact may occur periodically (e.g. every 1–3 years)
2 – Possible: Impact may occur infrequently (e.g. every 3–5 years)
1 – Unlikely: Impact is not expected to occur under normal circumstances (e.g. less frequently than every 5–10 years)

No severe adverse human rights impacts were formally confirmed during the reporting period. However, the assessment is subject to inherent limitations, including constraints related to data availability and limited visibility beyond direct suppliers (Tier 1), which may affect the completeness of the analysis. The company therefore recognizes that certain adverse impacts may not have been identified through the current due diligence processes.

Own Operations

SAS employs a workforce of more than 10,000 employees across its operations. The company's activities expose its workforce to a range of occupational, operational, and environmental risks, including potential adverse impacts on human rights and decent working conditions.

SAS has established policies, procedures, and management systems intended to support the protection of employee rights and the provision of appropriate working conditions. These measures are designed to address risks associated with the nature of the company's operations, including work conducted in operationally demanding environments and across multiple jurisdictions.

Overall responsibility for the company's approach to human rights and working conditions rests with the Board of Directors and executive management. This includes setting strategic direction, approving relevant policies, and overseeing implementation based on reporting from management.

The ELT is responsible for the implementation and periodic review of relevant policies and procedures. Operational responsibility for the follow-up of human rights-related activities within the workforce is assigned to the relevant functions, including Sustainability and Human Resources, which monitor developments and support implementation of measures within their respective areas.

Activities related to human rights and working conditions are monitored through established internal reporting mechanisms, which may include regular reporting at operational, management, and Board level, depending on the nature and significance of the issue. Further information regarding the company's organizational structure and operational activities is available in the annual report published on SAS's website.

Health, Safety, and Environment (HSE) occupational risks

SAS operates in an industry with inherent occupational health and safety risks, particularly in operational and ground handling environments. The company has established safety procedures, quality standards, and internal controls intended to support safe working conditions across its operations and, where relevant, within its supplier network.

Safe and secure ground handling activities constitute a critical operational component, contributing to the reliability of flight operations and the proper handling of passenger baggage. Notwithstanding the implementation of safety measures, ground handling activities remain associated with an elevated risk of occupational incidents, including crushing injuries, falls, and vehicle-related accidents during baggage handling operations.

During the reporting period, the number of occupational accidents resulting in absence increased from 3 in 2024 to 7 in 2025. Total reported occupational injuries increased from 83 in 2024 to 101 in 2025 across the SAS group. This development is partially attributable to increased operational activity; however, it may also indicate limitations in the effectiveness of existing preventive measures.

In March 2024, the Norwegian Civil Aviation Authority (CAA) (Nw. Luftfartstilsynet) conducted an HSE inspection of SAS and identified non-conformities with the Norwegian Working Environment Act (Nw. arbeidsmiljøloven). The CAA imposed a corrective order and a running coercive fine for the violations. SAS has appealed the decision to the Norwegian Ministry of Transport and Communications (Nw. Samferdselsdepartementet).

Based on the company's risk assessment methodology, this risk is classified as having a high likelihood and high severity. Existing HSE measures are assessed as contributing to risk mitigation; however, the observed increase in reported incidents indicates a need for continued monitoring and further evaluation of the adequacy and effectiveness of these measures.

Discrimination and harassment

Ground- and airborne personnel and maintenance engineers are exposed to role-specific risks, including potential adverse impacts related to discrimination, harassment, workplace violence, and psychosocial working conditions. For ground- and flight crew in particular, interaction with passengers may give rise to incidents involving harassment, discriminatory behavior, or, in certain cases, physical or verbal aggression.

In addition, the nature of airborne work may present psychosocial risks, including stress related to operational demands, confined working environments, irregular working hours, and challenging interactions with passengers.

SAS has established policies and procedures addressing discrimination, harassment, and workplace conduct. These include company-wide policies, mandatory training programs, and operational protocols intended to support the prevention, identification, and management of such risks. Training initiatives include e-learning modules for all employees, role-specific training for crew members, and workshops for managers.

Notwithstanding the implementation of these measures, the company recognizes that risks related to harassment and discriminatory behavior, particularly from passengers, remain inherent to certain operational contexts. Based on the company's risk assessment methodology, this risk is assessed as having high severity and a likelihood of occurrence.

Existing measures, including training and established procedures, are assessed as contributing to the management of these risks; however, their effectiveness is subject to ongoing evaluation, and the nature of the risk implies that such incidents cannot be fully eliminated.

Trade Union rights

SAS recognizes employees' right to freedom of association and collective bargaining in accordance with applicable legal frameworks and internationally recognized standards. A significant proportion of the workforce is represented by trade unions, with multiple collective agreements in place across different jurisdictions.

Engagement with employee representatives and trade unions forms part of established governance and labor relations practices. Dialogue is typically conducted through structured processes at national level, involving unions that are party to collective agreements with SAS.

The company operates primarily within jurisdictions characterized by established regulatory frameworks supporting labor rights, including freedom of association. This regulatory context is taken into account in the company's risk assessment; however, it does not eliminate the need for ongoing monitoring and engagement.

SAS continues to maintain regular dialogue with trade unions as part of its efforts to manage labor relations and to identify and address potential issues at an early stage.Existing governance structures, collective agreements, and engagement mechanisms are assessed as contributing to risk mitigation; however, their effectiveness is subject to ongoing evaluation.

Supply Chain

SAS maintains an extensive and diversified supplier base consisting of more than 3,000 suppliers across multiple sectors. These include, among others, aircraft and engine manufacturers, airport and air navigation service providers, fuel suppliers, catering providers, IT suppliers, technical maintenance providers, regional production partners, and financial service providers.

The company's supply chain is geographically dispersed and reflects the international scope of its operations. This structure introduces complexity in terms of differing regulatory frameworks, operational practices, and levels of protection of human rights and working conditions across jurisdictions.

SAS seeks to align its supply chain practices with internationally recognized standards, including the principles of the United Nations Global Compact. Expectations regarding responsible business conduct are communicated through supplier-related policies, contractual requirements, and engagement processes.

The scale and complexity of the supply chain present inherent challenges in maintaining full visibility and control over supplier practices, particularly beyond direct (Tier 1) suppliers. These limitations may affect the company's ability to comprehensively identify and assess all actual and potential adverse impacts within the value chain. Enhancing supply chain transparency and traceability remains an identified area for ongoing improvement.

Based on the company's risk assessments, relevant risk areas within the supply chain include potential adverse impacts related to working hours, forced labor, child labor, human trafficking, occupational health and safety, discrimination and harassment, freedom of association, and remuneration practices. Certain sectors and geographic regions may present elevated risk due to weaker regulatory enforcement or differing labor standards.

The nature of some activities within the aviation supply chain may also involve hazardous working conditions, which could result in occupational injuries or other adverse impacts if not adequately managed. In addition, the ability to exercise labor rights, including unionization and collective bargaining, may be constrained in certain jurisdictions.

SAS applies a risk-based approach to supplier oversight, whereby procurement functions prioritize due diligence activities based on factors such as geographic risk exposure, the nature and criticality of supplied goods or services, and supplier performance history. This includes the use of audits, supplier evaluations, and follow-up measures where relevant.

While these measures are intended to support the identification and mitigation of supply chain risks, their effectiveness is subject to inherent limitations, including reliance on supplier-provided information and varying levels of transparency across different tiers of the value chain.

Service providers

SAS engages service providers across multiple jurisdictions, including in regions where risks related to human rights and working conditions may be elevated. Particular areas of focus identified during the reporting period include service provision in India, Thailand, Morocco, and ground handling operations in certain higher-risk jurisdictions.

Expectations applicable to service providers are communicated through relevant policies, contractual requirements, and onboarding processes. These include standards relating to working conditions, health and safety, non-discrimination, and respect for freedom of association. In certain cases, service providers may also be subject to training and compliance requirements aligned with SAS's internal policies.

The engagement of service providers in jurisdictions with varying regulatory frameworks and labor standards may give rise to risks related to working conditions, occupational health and safety, discrimination and harassment, and the ability to exercise labor rights. These risks are assessed as context-specific and may vary depending on the nature of the services provided and local operating conditions.

SAS is in the process of enhancing its mapping of service providers across operational areas and geographic locations in order to improve visibility and risk assessment capabilities.
Based on the company's risk assessment methodology, the identified risks are assessed as having the potential for high severity, while the likelihood of occurrence is assessed as moderate ("may occur").

Mitigation measures include supplier due diligence processes and contractual requirements; however, the effectiveness of these measures is subject to limitations, including restricted monitoring capabilities and limited visibility into local practices and conditions. As a result, the company's ability to fully verify compliance in practice remains constrained.

Use of wet lease providers

Wet leasing involves arrangements whereby SAS leases both aircraft and crew from third-party providers. Such arrangements may introduce risks related to working conditions, labor rights, and regulatory oversight, depending on the jurisdiction and operational practices of the provider.

During the reporting period, SAS reduced the number of wet lease providers, with the aim of simplifying oversight and enhancing consistency in supplier management. As of the end of 2024, all wet lease agreements were entered into with providers established within the European Union, primarily in Ireland.

Providers operating within the EU are subject to harmonized regulatory frameworks, including aviation safety and labor-related requirements. This regulatory context is taken into account in the company's risk assessment and is considered to contribute to a comparatively lower risk profile relative to providers operating in jurisdictions with less comprehensive regulatory oversight.

Based on the company's risk assessment methodology, the risk associated with wet lease arrangements is assessed as lower in likelihood compared to other supplier categories; however, potential impacts could be significant depending on the nature of the arrangements.

The company therefore continues to apply due diligence measures, including contractual requirements and supplier assessments, recognizing that regulatory compliance alone may not fully address all potential risks.

Product providers

SAS procures certain goods, including textiles and electronic equipment, through international supply chains that may involve production and sourcing in higher-risk jurisdictions. Identified areas of focus include textiles used in uniforms, with upstream production in Bangladesh and final assembly in Portugal, as well as electronic products sourced through global supply chains.

These procurement categories may be associated with elevated risks related to labor conditions, including working hours, wages, occupational health and safety, and other aspects of human rights and decent working conditions. In addition, the sourcing of raw materials may involve upstream supply chains operating in regions with limited regulatory oversight and increased exposure to adverse impacts.

SAS has conducted targeted due diligence activities in this area, including on-site visits to selected suppliers. For example, a site visit was carried out at a textile supplier in Bangladesh to assess, within the scope of the assessment, alignment with applicable local regulatory requirements and relevant standards. No material non-compliances were identified during the site visit; however, such assessments are limited in scope and may not capture all underlying risks or practices across the full value chain.

The company recognizes that visibility in upstream supply chains remains limited, particularly with respect to raw material sourcing and subcontracting arrangements. As a result, the ability to fully assess and verify working conditions across all tiers of the supply chain is constrained.

Based on the company's risk assessment methodology, the likelihood of adverse impacts in these procurement categories is assessed as lower relative to higher-risk supplier segments; however, the potential severity of such impacts is considered significant.

Existing due diligence measures, including supplier assessments and site visits, are assessed as contributing to risk management; however, their effectiveness is subject to limitations and may require further strengthening. Measures under consideration include increasing the frequency and scope of supplier engagement and verification activities.

Fuel procurement

SAS procures aviation fuel from suppliers operating across multiple geographic regions. This procurement category may be associated with risks related to human rights and working conditions, particularly in jurisdictions characterized by political instability, weaker governance structures, or limited regulatory oversight.

Geopolitical developments during the reporting period have further highlighted potential risks linked to sourcing practices, including exposure to higher-risk regions and compliance with applicable sanctions regimes, including those imposed by the European Union.

SAS engages with fuel suppliers through established procurement processes and applies relevant policies and contractual requirements intended to address aspects of responsible sourcing. The company maintains ongoing dialogue with suppliers as part of its efforts to understand sourcing practices and support alignment with applicable legal and regulatory obligations.

While the same overarching sourcing framework applies across procurement categories, the company acknowledges that upstream fuel supply chains may involve multiple tiers and intermediaries, resulting in limited transparency and reduced ability to verify conditions at origin.

SAS monitors geopolitical developments and considers diversification of supply as part of its risk management approach. However, such measures do not eliminate exposure to potential adverse impacts in upstream supply chains.

Based on the company's risk assessment methodology, the likelihood of adverse impacts in this category is assessed as lower relative to certain other procurement areas; however, the potential severity of such impacts may be significant. This assessment is subject to inherent limitations due to constrained visibility and reliance on supplier-provided information.

Overall risk for the aviation industry

Human trafficking

As an operator within the aviation sector, SAS may be exposed to risks associated with human trafficking, including situations where the company's services could be misused for the transportation of individuals subject to exploitation. While such risks are generally considered to have a low likelihood of occurrence in the company's operations, the potential severity of impact for affected individuals is significant.

SAS participates in industry-level initiatives aimed at addressing this risk. In June 2025, the Chief Executive Officer of SAS, together with other member airlines of the SkyTeam alliance, endorsed a joint declaration to support collaborative efforts to prevent and address human trafficking. As part of this initiative, SAS contributes to an internal working group within SkyTeam focused on information sharing, awareness, and coordination among member airlines.

The company has initiated measures to strengthen internal awareness and response capabilities, including the establishment of an internal working group focused on developing training and guidance for relevant personnel to support the identification and escalation of suspected cases. These measures are subject to ongoing development.

No confirmed cases of human trafficking were reported in connection with SAS operations during the reporting period. However, the nature of this risk implies that incidents may occur without detection. As a result, the absence of reported cases does not eliminate the possibility of occurrence.

Based on the company's risk assessment methodology, the likelihood of this risk is assessed as low, while the potential severity is assessed as high. The effectiveness of current mitigation measures is inherently difficult to assess, given the challenges associated with detecting such incidents. Continued focus on awareness, training, and collaboration is therefore considered necessary.

Mitigating Measures

Based on the company's due diligence processes, SAS has identified a range of risks related to human rights and decent working conditions. The company has implemented a number of measures intended to prevent, mitigate, and manage these risks within its own operations, including:

- mandatory contractual human rights clauses for all new suppliers,
- risk-based supplier audits,
- corrective action plans where non-conformance is identified,
- training of procurement personnel.

The scope and application of such measures vary depending on the nature of the risk and the operational context.

Own workforce

Based on the company's due diligence processes, SAS has identified a range of risks related to human rights and decent working conditions within its own operations. The company has implemented a number of measures intended to prevent and mitigate these risks, taking into account the nature of its activities and operational environment.
SAS has established procedures and operational controls aimed at supporting safe working conditions across its operations. These procedures vary depending on the nature of the work performed and reflect applicable regulatory requirements within the aviation sector.

Training forms a central component of the company's risk mitigation approach. This includes mandatory health and safety training for new managers and employees in designated roles, as well as training programs addressing human rights, prevention of harassment and discrimination, and conflict management.

SAS also facilitates structured forums and development activities, including professional development days, to support dialogue on workplace-related risks such as bullying, harassment, and psychosocial working conditions.

The company has established internal reporting mechanisms, including whistleblowing channels intended to enable the reporting of concerns related to misconduct or potential adverse impacts. These are complemented by additional communication channels, including direct contact points with Human Resources. For example, an internal email address provides an additional channel for dialogue, noting that this channel is not anonymous by default.

Engagement with employee representatives forms part of the company's approach to managing employment conditions. This includes consultation processes related to organizational changes and the application of collective agreements, as well as supplementary agreements where relevant.

Operational measures are also implemented to support clear reporting lines and communication within specific functions, including onboard leadership roles such as the Air Purser, and defined escalation procedures.

SAS has also implemented measures aimed at improving workforce planning and coordination, including increased local capacity in crew management functions, with the intention of supporting operational efficiency and workforce stability.

To address occupational risks, SAS conducts risk assessments, develops action plans, performs follow-up inspections, and monitors relevant indicators, including occupational injuries and sickness absence related to workplace conditions.

These measures are subject to ongoing monitoring and evaluation. While they are assessed as contributing to the management of identified risks, the company recognizes that further improvements may be required based on observed developments and risk trends.

Suppliers and business partner

SAS applies risk-based due diligence measures when engaging suppliers and business partners, including in connection with wet leasing and other contractual arrangements. The scope and intensity of these measures vary depending on the nature of the relationship, geographic location, and assessed risk profile.

Prior to entering into agreements, particularly with providers operating outside highly regulated markets, SAS conducts assessments intended to identify potential risks related to human rights and working conditions. These assessments may include, where relevant:

- Evaluation of working conditions, including wage levels, working hours, and occupational health and safety measures
- Review of the supplier's policies and practices related to human and labor rights
- Consideration of the regulatory environment in which the supplier operates

Following contract execution, SAS may perform follow-up activities, including inspections or other forms of engagement with suppliers and subcontractors, depending on the assessed level of risk and available resources.

For certain categories, such as wet lease providers, SAS currently engages providers that are subject to regulatory frameworks, including European Union Aviation Safety Agency (EASA) certification. While such frameworks are considered to contribute to risk mitigation, they do not eliminate all potential risks.

Contractual arrangements may include provisions related to minimum wage standards, working hours, and occupational health and safety requirements. The inclusion and enforcement of such provisions depend on the specific contractual context and applicable legal frameworks.

More broadly, SAS incorporates expectations related to responsible business conduct in supplier relationships through contractual provisions and supplier policies, including the Code of Conduct and Supplier Code of Conduct. These documents communicate expectations aligned with internationally recognized standards, including the principles of the United Nations Global Compact.

SAS maintains dialogue with relevant stakeholders, including employee representatives and, where appropriate, external parties, in order to support the identification and management of risks.

As part of its compliance-related processes, SAS monitors developments that may affect supplier risk profiles, including the listing of entities on applicable sanctions regimes, such as those established by the European Union. Follow-up actions may be taken where relevant.
While these measures are intended to support the identification and mitigation of adverse impacts, their effectiveness is subject to limitations, including reliance on supplier-provided information, contractual enforceability constraints, and limited visibility beyond direct business partners.

Effectiveness of measures in place

SAS has implemented a range of measures intended to prevent and mitigate risks related to human rights and decent working conditions. Based on current assessments, these measures are considered to contribute to the management of identified risks, including through employee training programs and supplier engagement activities.

Training initiatives implemented across the organization are intended to support awareness and capacity to identify and address human rights-related risks. In addition, the use of suppliers operating within established regulatory frameworks, including EASA-certified providers, is considered to support alignment with relevant industry standards. These measures are complemented by supplier audits and ongoing engagement processes, the scope and frequency of which are determined based on risk assessments.

Notwithstanding these measures, the company recognizes that the effectiveness of its due diligence activities varies across different areas and is subject to inherent limitations. In particular, challenges remain in systematically tracking the implementation and outcomes of measures related to human rights and labor conditions, as well as in verifying conditions across all tiers of the supply chain.

SAS has identified the strengthening of monitoring, documentation, and evaluation processes as an area for further development, with the aim of improving the ability to assess the effectiveness of due diligence measures over time.

The way forward

SAS has identified further development of its due diligence processes as an ongoing priority. This includes strengthening internal capabilities through continued learning, training, and the refinement of methodologies used to identify, assess, and manage risks related to human rights and decent working conditions.

As part of its broader regulatory preparedness, SAS has initiated work to align its sustainability-related processes with the requirements of the CSRD. Activities undertaken in 2025 have contributed to a more comprehensive risk assessment across relevant areas, including enhanced integration of due diligence considerations.

Ongoing CSRD implementation efforts are expected to include further development of due diligence processes, including improvements in data collection, risk assessment methodologies, and internal reporting structures. SAS also intends to improve the consistency and alignment of risk assessment and mitigation activities across different functions and projects within the organization.

In addition, SAS is progressing work related to environmental management frameworks, including certification under the IEnvA program. While primarily focused on environmental performance, such initiatives may also support the identification and management of risks with potential implications for human rights and working conditions.

SAS will continue to review and develop its approach to due diligence, taking into account evolving regulatory requirements, operational experience, and identified limitations. This includes efforts to strengthen risk management practices and enhance engagement with relevant stakeholders across its operations and value chain.

Signatures

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