SUSTAINABILITY REPORT

September 2022

AVIAPARTNER

Table of contents

Preamble

We are delighted to share with you our second Communication of Progress.

As part of our commitment to the 10 principles of the United Nations Global Compact (UNGC), this report represents a milestone on our road to becoming a responsible leader within our industry and to contributing to a sustainable future. We are determined to be a source for good to support sustainable travel for generations to come.

Over the past year, with COVID continuing to affect our businesses and the aviation industry severely, we have set steps in motion to formalise our systems, in digitalization of our operations and electrification of our GSE.

We published our first Communication of Progress which we have updated and enhanced with reference to the Global Reporting Initiative (GRI) Standards.

In this report we share, our implemented measures and relevant Key Performance Indicators (KPI) for 2021. We are proud of the progress we have made, and we emphasize that now, more than ever, we are aware that we are only at the beginning of our sustainability journey to have a measurable impact on the environment, our stakeholders and society. We believe every step matters if it is in the right direction. Success is only possible if we work together collaboratively with employees, airlines, suppliers and airport partners across our value-chain and beyond.

High quality, safe, secure and sustainable ground handling services continues to be our main goal.

This past year has allowed us a clearer view on the future and we have set an intermediate target of 100% electric GSE by 2027 to support our goal for carbon neutrality by 2030.

We invite all stakeholders to provide us with feedback about this report or to contact us with any questions, comments or suggestions for improvement. We look forward to working with you and to contributing to making the aviation industry more sustainable.

Brussels, September 2022
Laurent Levaux
Aviapartner Chairman

About Aviapartner

Founded in 1949, Aviapartner is the leading European independent provider of Ground Handling Services.

The Aviapartner Group is the leading independent ground handling service provider in Europe. We deliver safe, reliable and ontime airport operations for more than 100 million passengers per year across 52 airports in France, Italy, Spain, Belgium, Germany and The Netherlands. Aviapartner is headquartered at Brussels National Airport in Belgium, the capital of the European Union.

1.1 Company Values

Our DNA consists of six core values which reflect our approach to doing business. In early 2010, these were extended to care for the environment, making sure to embed environmental focus in our business. With our training programs and the Aviapartner Training Academy we focus strongly on human capital. It is our company philosophy to treat all our staff, customers and suppliers with warmth and respect. This enables us to care for each other, our internal and external stakeholders as well as the environment. Our company values are :

Environmental Sustainability

Investing in processes and technology which are key to ensuring environmental sustainability for generations to come is our commitment to the environment.

Customer and Passenger Focus

Customer satisfaction through the safe delivery of bespoke handling solutions. Partnerships and trust with airlines are the cornerstone of our growing organization

People's Business

Our people make the difference. Commitment and flexibility, strong team spirit, dialogue and mutual respect are the engines of our company. This is also the reason why training, job opportunities, dialogue with our employees and respect for each other's work are so important within the company. These are the priorities we have in mind when serving our customers.

Quality & Safety

In our business Quality and Safety go hand in hand. Safety always comes first and we never compromise on safety. New standards in quality handling processes and procedures are incorporated into our daily activities. Certifications are drivers of our continuous improvement strategy.

Creativity and Innovation

Pioneering our way to success. Active stimulation of new business ideas and practices. We encourage pro-active and dynamic approach to ground handling solutions for our customers. New technologies form the backbone of our efficient and streamlined organization.

Competitiveness

In an ever-changing environment, quality, safety and customers come first. Aviapartner, together with our customers actively seek to identify new dynamic ways of approaching aircraft handling logistics resulting in sustained competitive advantages.

In numbers

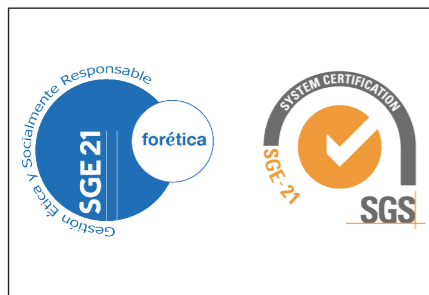*Year 1949* :
Aviapartner is founded

Aviapartner is one of the European leaders

Aviapartner is active at 52 airports

Structure with 8 000 employees

100 million passengers per year

1.2 Certifications

Aviapartner holds multiple external certifications including ISAGO, ISO9001 and ISO14001, IS-BAH and IATA-CEIV. Certifications are considered a valuable tool for continuous improvement and the set of certifications therefore are regularly evaluated and adjusted. In 2021 our improvement program was oriented more than ever toward our most important material topics.

Since 2009, we have been ISAGO registered as the first network handler in Europe. Thanks to regular objective audits of our procedures and processes, our certifications support us to keep progressing further. Despite the pandemic continuing, in 2021, along with the support of IATA, thirteen (13) of our stations were ISAGO audited, including stations which had not been audited by IATA before. All have been officially registered since.

In addition to these certifications, Aviapartner Spain embarked on an R&D&I Management System (Research & Development & Innovation) - certified UNE166002;2021, UNE166006:2018 and UNE166008;2012 in April 2022 - to systematically improve R&D&I and ensure surveillance and intelligence is focused on R&D activities including technology transfer.

Aviapartner also embedded Social and Ethical Responsibility into our existing management system which was successfully certified SGE21 by Forética in March 2022 after audit of seven (7) commercial stations in Spain. This certification ensures that Aviapartner's management system meets high ethical and social responsibility standards. It is Aviapartner's first certification in this area and serves as a steppingstone for the network.

ISO 9001

ISO 14001

IS-BAH

IATA ISAGO

IATA CEIV Pharma

SGE21

UNE166002

UNE166006

UNE166008

1.3 Partnerships

Strong partnerships with distinct actors across our supply chain and with other stakeholders such as airports and customer airlines, are crucial in creating the base for our sustainable approach. We believe we can only contribute to a sustainable future and a more sustainable industry when we create aligned partnerships to tackle sustainability issues together.

This is expressed by Aviapartner's Environmental Policy which we have shared with our staff, customers, suppliers, airports and passengers. One of its key objectives is to "encourage the adoption of similar principles by our suppliers and other stakeholders".

In building partnerships with our suppliers, we have implemented several measures to further our sustainability agenda. For some suppliers, this includes staff environmental awareness training or support with their corrective actions after an environmental audit, to name a few. We aim to achieve a win-win relationship.

Aviapartner is continuously developing new partnerships with airports. Following the successful introduction of the first electric bus in Spain, at Seville airport, in cooperation with AENA, Yutong and Air Rail in 2019, in 2021 Aviapartner worked closely together with Rotterdam/The Hague Airport in the Netherlands, in their goal to improve existing measures and reduce overall environmental impact. It is the ambition of the airport to become completely waste and emission-free by 2030 at the latest. To contribute to this, Aviapartner invested in new environmentally friendly solutions, deploying our first electrical ground power unit (eGPU). In addition, Aviapartner will participate in a 3-month Pilot project to replace the fuel of its other Ground Support Equipment by HVO100 (Hydrotreated Vegetable Oil). As described further in this report, strong collaborative efforts have also been built with Paris airports to reach 100% electric GSE by working with GSE suppliers.

Partnerships also extend in and beyond the aviation industry. To ensure that sustainability efforts at the Paris airport, where Aviapartner starts operations in May 2022, are implemented efficiently, Aviapartner France has drafted a Green Policy that involves all the airport's key stakeholders. Aviapartner consulted with the ground support staff to ensure new technology upgrades would not hinder daily operating practices and that the airport invests in unified technologies across its operations. Aviapartner will share the Green Policy with the appropriate authorities and the Airport management and will work together with all parties in finding solutions to align the goals of all stakeholders. Currently, the Paris airport is on track to become carbon neutral by 2030.

1.4 Governance

Sustainability is part of our organisation at all levels. Impact is identified and managed with a top-down approach throughout the organisation according the "Plan-Do-Check-Act" continuous circle whereby strategy is determined, measurable targets are agreed and followed up by means of a Monthly Board report and reviewed at regular intervals with the stakeholders.

- On the Corporate level, an Annual Senior Management meeting is organised to discuss group priorities, sustainability, innovation, targets, profitability, and industry challenges as input to country strategic meetings. For specific topics linked to the overall strategy, separate Business Reviews are organised to take decisions and review impacts.

- On the Country level, country teams organise Annual Country Strategic Review meetings and Bi-Annual Strategy Update meetings as follow-up. Monthly Opscom meetings ensure performance is evaluated versus plan and corrective actions are taken where needed to reach the company goals.

- On the Station airport level, Executive Managers and their teams translate this to the station level.

Overall, our Board of Directors is responsible for decision-making and overseeing the management of the organization's impacts on the economy, environment, and people. We aim to embed sustainability even further into our daily operations and encourage all employees to be involved in initiatives, training and other projects contributing to a more sustainable business.

Aviapartner's Sustainability Approach

It is Aviapartner's goal to be a partner for creating a sustainable future. We want to lead by example and support our employees and partners to enable a more sustainable work environment, which not only benefits the planet, but also benefits our business and its stakeholders.

Aviapartner benefits from an early start in 2010 consciously choosing to embed respect for the environment in its way of doing business. In 2013 this dimension of sustainable development was gradually extended to include the social dimension, Ethics and Sustainable procurement. Today it has become such an important driver for the world we live in, for our current and future partners, customers and employees, that we strongly believe it is the only way forward for Aviapartner.

We now focus on a more holistic way of thinking and address various aspects linked to the different sustainability dimensions.

2.1 Stakeholder Engagement

In our operations, we interact with multiple categories of stakeholders. Below, is a non-exhaustive list of our main internal and external stakeholders :

- Customers
- Passengers
- Crews
- Employees
- Airport authorities
- Suppliers
- Trade unions
- Shareholders
- Regulatory authorities
- Airport services/external partners at airports
- Industry associations
- Competitors
- Local communities
- Universities and schools

Stakeholders are categorised as internal and external based on their influence on our operations. In our materiality process, we make sure to include both categories to be able to count on a full perspective of the topics that are most relevant for all our stakeholders.

While our engagement with each stakeholder can change based on the type of relationship and the influence of such relationship on our operations, we maintain an honest and strong collaboration. At Aviapartner, it is important to conduct all business relationships following the highest ethical standards and ensuring that the collaboration is fruitful for both parties. Stakeholder engagement allows us to strengthen our working relations with our partners, explore innovative solutions together and respond to new needs/request in a timely and efficient manner, preferably predicting them beforehand.

Our adherence and respect of legislative requirements in the different countries where we operate is regulated through our policies, Code of Business Conduct and Ethics and employee guidelines. These documents serve the purpose of detailing how to remain current and comply with the relevant laws and regulations applicable to our sector.

Our focus in stakeholder engagement is on our employees which are the fundamental pillar of our activities. At Aviapartner, we aim to give all employees a voice creating opportunities to share their experiences with their management, as well as presenting any issues or challenges they are encountering daily. The employees can express their opinions and concerns in surveys organised locally, through our whistleblowing channels/open door policy, and anytime to their line manager or HR.

When working with our clients, we strive for full transparency of our operations and always aim for the highest quality level of services in line with their needs. To do so, we monitor customer satisfaction through frequent meetings, perception assessments, complaint management and customer satisfaction surveys (suspended during COVID). These measures help us in understanding our clients' changing needs and expectations and allow us to continue delivering the best services and solutions possible.

Our suppliers and more specifically our subcontractors, play a fundamental role in our operations. We believe that it is only through a strong collaboration with them that we can reach our sustainability goals. To do so, we carry out an attentive selection process when choosing new partners to work with. Suppliers are asked to sign our Supplier Code of Conduct, committing to support our sustainability development plans and engaging in various material topics ranging from environmental practises to human rights. Once the supplier is on boarded, we continue our engagement through self-assessments and /audits. Should a supplier not be performing as required by our standards, we engage in a corrective action plan to continue in our long-lasting collaboration.

Aligned with SDG Goal 17 "Partnership for the Goals", Aviapartner considers collaborating with all different actors in our supply chain as well as with other stakeholders such as airports and airlines crucial for creating a sustainable future. The collaborative approach is incorporated into the structure of Aviapartner's continuous improvement procedure. A series of meetings calls and reports, on station and network level, assure the continuous evaluation and review of performance and effectiveness of processes and systems. Frequent meetings with customers, airport authorities and the airport community are part of this collaborative approach.

Based on this Continuous Improvement vision, the collaboration with other ground handlers is also considered and promoted whenever this can improve the operations. Meetings with customers and airport authorities enhance the collaborative approach with other handlers, above all in the management of scarce or critical airport resources such as safety cones or aircraft chocks, pooling equipment etc.

When we work together with other ground handlers we make sure that in our operations we do not engage in any anti-competitive practice but always strive for a fair competition and step away from unethical behaviour.

2.2 *Materiality*

Aviapartner's material topics are derived from the 10 United Nations (UN) Global Compact Principles and the activated criteria from our yearly EcoVadis assessment. The material issues cover sustainability topics including Environment, Labour and Human Rights, Business Ethics and Sustainable Procurement. Initially listed early 2021 with the support of Nexio consultants, these topics were also reviewed and confirmed with the Board, Senior Management and the CSR Committee in Spain in Q4.

Next to an already existing Environmental analysis, to complement this process, a Social & Ethical Impact Analysis was conducted in 2021 to measure and manage the most prominent social & ethical positive and negative impacts to our stakeholders and business.

Furthermore, by continuously engaging with our stakeholders, we assess on a daily- basis sustainability topics that are material for our supply chain.

Aviapartner's main material topics per pillar Include :

ENVIRONMENT

- **Energy consumption & GHG's** - Energy consumption from our equipment, in warehouses and offices, direct and indirect emissions.

- **Waste Management :** Non-hazardous and hazardous waste generated from operations.

- **Local pollution** - E.g. accidental pollution by spills and leaks and impact from operations on local environment : noise emissions, fine particles, etc.

LABOUR PRACTICES & HUMAN RIGHTS

- **Diversity & Inclusion** - Discrimination and harassment prevention at the workplace.

- **Working Environment** - Working hours, remunerations and social benefits granted to employees.

- **Child labour and forced labour** - child, forced or compulsory labour issues within the supply chain as well as human trafficking.

- **Career Management** - Main career stages i.e. recruitment, evaluation, training and management of layoffs.

- **Employee Health and Safety** - Health and safety issues encountered by employees and workers during operations.

- **Social dialogue** - Structured social dialogue i.e. social dialog deployed through recognized employee representatives and collective bargaining.

BUSINESS ETHICS

- **Privacy and data security** - data protection and privacy

- **Anti-competitive practices :** anti-competitive practices e.g. related to pricing, monopolies, the non-respect of intellectual property, etc.

- **Anti-corruption :** preventing all forms of corruption issues, including among other things extortion, bribery, conflict of interest, fraud, money laundering.

SUSTAINABLE PROCUREMENT

- **Supplier environmental practices** - Deals with environmental issues within the supply chain i.e. environmental impacts generated from the suppliers and subcontractors' own operations and products.

- **Supplier social practices** - Deals with labour practices and human rights issues within the supply chain i.e. labour practices and human rights issues generated from the suppliers and subcontractors' own operations or products.

2.3 Sustainable Development Goals

In line with its core values, Aviapartner has identified which Sustainable Development Goals (SDG) have an impact on our business, how our business impacts the SDG and how we can maximize the contribution to sustainable development.

The following table outlines an overview of our achievements during 2021 and where possible a comparison to 2020. It also includes references to our SDG contribution. It is our mid-term goal to analyse how our core business influences the SDG as well as to assess our impacts on the environment and society in accordance with the SDG.

SUSTAINABLE DEVELOPMENT GOALS

Sustainability Aspect	UNGC	Achievements 2020	Achievements 2021	SDG contribution
Human Rights	Principles 1, 2, 4, 5	▸ 0 human rights related incidents ▸ 96% of our employees were trained on preventing discrimination during Safety Training ▸ 28% of workers from minority groups and/or vulnerable workers in relation to the whole organization (<26/>50years, persons with disabilities and other nationalities) ▸ 70% of targeted suppliers that have gone through a CSR assessment covering human rights aspects	▸ 6 human rights incident (1 discrimination, 1 harassment, 4 GDPR) ▸ 98% of our employees were trained on preventing iscriminationduring Safety training ▸ 30% of workers from minority groups and/or vulnerable workers in relation to the whole organization (<26/>50years, persons with disabilities and other nationalities) ▸ 12,5% of targeted suppliers (extended group) that have gone through a CSR assessment covering human rights aspects	5 GENDER EQUALITY 10 REDUCED INEQUALITIES 16 PEACE, JUSTICE AND STRONG INSTITUTIONS
Labour	Principles 3, 6	▸ 36% women employed in relation to the whole organisation ▸ 32% of women in management positions (excl. Boards of Directors) ▸ 98% of the total workforce represented in joint management-Worker Health & Safety Committees ▸ 98% of the total workforce who are covered by formal collective agreements concerning working conditions ▸ 98% of the total workforce who are covered by formally-elected employee representatives	▸ 37% women employed in relation to the whole organisation ▸ 35% of women in management positions (excl. Boards of Directors) ▸ 98% of the total workforce represented in joint management-worker Health & Safety Committees ▸ 98% of the total workforce who are covered by formal collective agreements concerning working conditions ▸ 98% of the total workforce who are covered by formally-elected employee representatives	3 GOOD HEALTH AND WELL-BEING 4 QUALITY EDUCATION 5 GENDER EQUALITY

Sustainability Aspect	UNGC	Achievements 2020	Achievements 2021	SDG contribution
Labour	Principles 3, 6	▸ 18% of the total workforce who received regular performance reviews ▸ 51% of part-time employees ▸ 70% of targeted suppliers that have gone through a CSR assessment covering labour aspects	▸ 9% of the total workforce who received regular performance reviews ▸ 52% of part-time employees ▸ 12,5% of targeted suppliers (extended group) that have gone through a CSR assessment covering labour aspects	8 DECENT WORK AND ECONOMIC GROWTH 10 REDUCED INEQUALITIES
Environment	Principles 7, 8, 9	▸ 36% of vehicle and equipment fleet electric ▸ 70% of targeted suppliers that have gone through a CSR assessment covering environmental aspects ▸ 63% of targeted suppliers with contracts that include clauses on environmental requirements	▸ 39% of vehicle and equipment fleet electric ▸ 12,5% of targeted suppliers (extended group) that have gone through a CSR assessment covering environmental aspects ▸ Not measured in 2021.	7 AFFORDABLE AND CLEAN ENERGY 13 CLIMATE ACTION
Anti-corruption	Principle 10	▸ 10% of the target group trained on business ethics issues ▸ 100% of operational sites working with an ISO 27000 certified IT Provider ▸ 17 audits on GDPR	▸ 92% of the target group 2021 trained on business ethics issues ▸ 100% of operational sites working with an ISO 27000 certified IT Provider ▸ 12 audits on GDPR	16 PEACE, JUSTICE AND STRONG INSTITUTIONS
Core Business		▸ Provision of ground handling services ▸ Strong partnerships	▸ Provision of ground handling services ▸ Strong partnerships	9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 17 PARTNERSHIPS FOR THE GOALS

Table 1 : Overview of UN Global Compact Principles in relation to our achievements in 2021 and our contribution to the Sustainable Development Goals (SDG).

Stakeholder recognition

We have committed to contributing to a more sustainable future by conducting business responsibly and putting in great effort in implementing new approaches, strategies and measures. Our achievements are reflected by several awards we have received including :

3.1 Sustainability rating

Gold Rating by EcoVadis for Sustainability Performance (2021)

Aviapartner improved its Sustainability Management System compared to the previous year. Aviapartner improved its score significantly across all sustainability criteria evaluated by EcoVadis with the score for Sustainable Procurement in particular, nearly doubling in total points. Aviapartner's total score is in the 95th percentile of all companies evaluated by EcoVadis.

3.2 Awards

Air Nostrum (2021)

Customer **Air Nostrum** also recognized Aviapartner Lanzarote's efforts and attention to their flights in 2021 with two performance certificates for achieving 100% Punctuality and zero incidents.

Ahead of the Curve Award (2021)

One year after receiving an Ahead of the Curve Award, in June 2021, Air Cargo Belgium (ACB) awarded a Duty Supervisor in charge of IT Support from Aviapartner Cargo N.V in Brussels with an **"Ambassador of the Year"** award for always being open to new ideas to further optimize the operational side of airfreight.

FP Dual first Prize (2021)

In November 2021 Aviapartner Lanzarote won the **FP Dual first Prize** awarded by the Chamber of Commerce Spain to a company for its good work in Dual Vocational Training. This is a pioneering award for the Chambers of Commerce, which is part of the Dual Vocational Training in Business Programme and aims to highlight best practices within business organisations.

FP Dual award (2021)

The Best Ground Handling Agent (2021)

Aviapartner Cargo B.V.,in Brussels received a recognition as **"The Best Ground Handling Agent 2021"** for its ramp and cargo handling from Sichuan Airlines.

Relevant recognition of previous years includes :

Pride of Ground Handling Awards (2019)

Two out of Aviapartner's four entries to the Ground Handling International Awards have made it to the finals of the Pride of Ground Handling Awards. Aviapartner Girona won the **Award** in the Category **"Best station"** while Aviapartner Nice was nominated in the Category "Ramp Safety". Girona station has proved in the entry submitted that the station has gone above and beyond expectations in term of safety, KPI delivery and customer satisfaction. The team described their successful FOD campaign in cooperation with AENA (Aeropuertos Espanoles y Navegacion Aérea), the exemplary reporting culture, the highly customized services, the collaboration with airports and competitors and the great results achieved in terms of Customer satisfaction as well as the excellent relationship with customers and the strong results in terms of safety and quality.

Safety Award (2019-2020)

Safety Award 2019-2020 for Aviapartner Rome in recognition of our robust Safety Management System and reporting.

Safety award (2019-2020) Aeroporti di Roma

Brussels Airport Environment Award (2019)

Aviapartner won the award for a second time (initially in 2012). This Airport Aviation award was a valuable recognition for the electrical renewal of the fleet of vehicles on handling and for the Green Partner Charter that encouraged the environmental awareness of its suppliers.

Despite these encouraging results we are determined to achieve even more. Continuous improvement is our priority in meeting the growing needs of our customers, passengers, local communities and other stakeholders. Constantly raising the bar and improving our results makes us a responsible business member driving us to optimise our potential in creating a sustainable business.

Brussels Airport Environment Award (2019)

Human Rights

➡ **Principle 1 :** Businesses should support and respect the protection of internationally proclaimed Human Rights

➡ **Principle 2 :** Businesses should make sure that they are not complicit in Human Rights abuses

➡ **Principle 4 :** Businesses should uphold the elimination of all forms of forced and compulsory labour.

➡ **Principle 5 :** Businesses should uphold the effective abolition of child labour.

➡ **Principle 6 :** the elimination of discrimination in respect of employment and occupation

We as Aviapartner are responsible for treating our internal and external stakeholders as human beings regardless of regardless of nationality, sex, national or ethnic origin, colour, religion, language, or any other status. Aviapartner aims to provide a work environment that empowers diversity, inclusion, and equal opportunities for all employees. We ensure that all forms of forced and compulsory work as well as child labour are eliminated. Aviapartner commits to protect the dignity and rights of its staff members and of any individual with whom it conducts business. All individuals with whom Aviapartner conducts business are treated with respect, fairness and dignity.

These principles are manifested in our Policy on Human Respect which alerts to the fact that harassment is prohibited under the laws of the European Community and all European countries where we are operating. It also provides remedies to complainants in recognition of the impact of harassment and outlines responses and consequences where harassment has occurred. Additionally, the principle of being an equal opportunity employer is integrated into our Human Resources Strategy and Procedures and forms part of our recruitment process.

As part of our day-to-day operations, we have implemented several measures to prevent any Human Rights breaches.

Our Human Resources Strategy and Procedures, for instance, demands age checks upon recruitment on new employees. Our stance on child and forced labour is also clearly outlined in our Supplier Code of Conduct launched in 2021 which every new supplier is invited to sign. This is also checked on during our regular supplier audits.

The importance of diversity and anti-discrimination is discussed in our mandatory safety training which is undergone by all staff members. This ensures a broad reach on all levels of the company.

In 2021, a working forum of employee representatives in Belgium created a charter on respect defining how employees wish to be treated by other employees.

We are currently investigating a more extensive training on this topic for specific target groups such as management and supervisors for 2022.

Our Human Resources Strategy and Procedures describes the recruitment process and the actions taken to prevent discrimination as it involves several people in the process and is based on clear competence profiles per function. Also, our collective labour agreements specify there will be no discrimination on age or gender. To underpin our efforts in 2021 both France and Spain signed up to the Diversity Charters in their respective countries, while other countries are preparing to follow. France and Spain also introduced pay gap analysis, respectively in 2019 and 2021.

In case of any Human Rights incidents, employees can refer to our Policy on Human Respect which describes the procedure to follow when someone believes discriminatory, harassing or offensive conduct or retaliation has occurred. The increase in Human Rights incidents from zero in 2020 to four (4) in 2021 is the result of more accurate reporting.
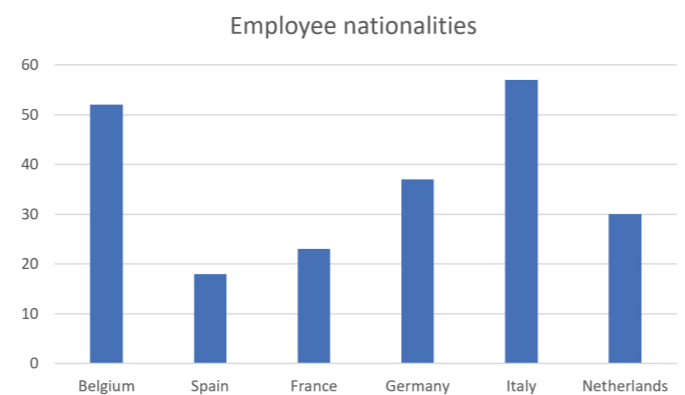
4.1 Gender equality

To under-line our commitment to SDG 5, Gender Equality, on April 9th, 2021, Aviapartner joined the IATA Diversity & Inclusion Initiative called "25by2025" as first ground handler among the 62 signatories, to promote gender balance in the aviation industry. Aviapartner strongly believes in the importance of divergent thinking to create a culture for innovation. Moreover, pandemic-related uncertainties have made it even more challenging than before to attract staff to follow the increase in airline traffic. In this context it is vital to create a more woman-friendly environment to attract more women for airside operations jobs such as loading baggage and driving specialised equipment around the aircraft, currently perceived as typically male. Big changes start with small steps, so two targets of 25% increase were set.

- increase women in management functions to 48% by 2025. A 3% increase versus 2020 was noted end 2021.

- increase the number of women in airside operations which are currently predominantly male from 10% to 13%.

A Gender Equality Dashboard was introduced to monitor the results and stimulate actions. This tool contributes to learning and getting inspired thanks to group best practices.

Lastly, the diversity of our teams demonstrates that our policies and measures are having a positive impact with more than 100 different nationalities represented in our workforce.

Employee nationalities

In December 2021, Spain launched an employee survey to assess gender equality in the workplace. The survey responses have been used to develop an Equality Plan with the goal of promoting equal opportunities for our employees.

Labour Principles

5.1 Social Dialogue

➡ *Principle 3 : Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining*

Over the last 70+ years of providing ground handling services, Aviapartner has formed close relationships with its partners. The Aviapartner Management Team takes great care of fostering social dialogue daily as a positive social climate is considered crucial for providing upscale services to our customers.

Our Human Resources Strategy and Procedures outline our approach to structured social dialogue and our working conditions are summarised in collective labour agreements.

As a multinational company with operations across Europe, Aviapartner has established a European Works Council (EWC). The purpose of this European Works Council is to bring together employee representatives from different European countries. During the EWC meetings (4 in 2021), these representatives are informed and consulted by central management on transnational issues of concern to all Aviapartner employees.

The impact of the above-mentioned actions is clear : our employees can enjoy the freedom of association and negotiate related to company agreements. Furthermore, a fair remuneration is enabled by collective agreements. This is also reflected by our Social Dialogue related KPI.

No.	KPI	2020	2021
1	Human rights related incidents	0	**6**
2	% Staff trained on preventing discrimination during Safety training	96%	**98%**
3	% of workers from minority groups and/or vulnerable workers employed in relation to the whole organization (<26/>50years, persons with disabilities and other nationalities)	28%	**30%**
4	% of women employed in relation to the whole organization	36%	**37%**
5	% of women in in management positions (excl. Boards of Directors)	32%	**35%**

Table 2 : Human Rights related KPI

No.	KPI	2019	2020	2021
1	% of the total workforce represented in joint management-worker Health & Safety Committees	Not measured	98%	**98%**
2	% of the total workforce who are covered by formal collective agreements concerning working conditions	Not measured	98%	**98%**
3	% of the total workforce who are covered by formally elected employee representatives	Not measured	98%	**98%**

Table 3 : Social dialogue related KPI

5.2 Working Conditions

Our Human Resources Strategy and Procedures serve as main guidance for any working conditions related matter. As Aviapartner is a customer-oriented service company, we consider our employees our most important asset. In turn, each individual employee is responsible for transmitting the core values of the company towards our customers and the communities that we serve. The selection, development and motivation of its employees is crucial to us. We continuously strive to be a great place to work at by fostering creativity, learning and promoting cross-functional and cross border teamwork.

As per our Salary Policy and collective agreements, fair renumeration is deemed essential for staff motivation. To determine a fair salary, we consider the qualification of the position within the organisation and the individual's performance. This leads to a minimum salary and a minimum-maximum range for each position to tie in the remuneration.

Sector Agreements in the different countries specify the annual leave policy. On top of that, in some countries we offer additional leave for staff to accommodate personal circumstances and allow for a better work-life-balance. Older employees for instance, can request extra days off and special arrangements are made for breastfeeding mothers. For certain positions within the company, flexible time is part of the job conditions. During the Covid-19 pandemic we have increased the number of staff being eligible for working from home arrangements. In Italy a Remote Working Policy has been implemented. This is not yet the case for Belgium and Germany. In Spain individual agreements are made with the staff concerned, while in France it is not considered relevant at present as very few staff are concerned. Our employees also benefit from health care benefits which are classified as additional salaries as per our Salary Policy.

We encourage our stations to communicate working conditions and policies openly to all employees during staff information meetings. We actively seek feedback from our staff members by conducting regular satisfaction surveys. Over the past years, we rolled out work-pressure and social risk analysis studies in every country except Germany to gain insights into how our employees perceive their job satisfaction.

In December 2021, Spain launched a survey to assess psychosocial risks among our employees, a predefined checklist from the Spanish authorities was used.

In October of 2021, Aviapartner hosted a "rebound meeting" with the top 25 managers to discuss strategy and environmental and social practices across the group. The purpose of the meeting was for managers to share insights from their experiences and align on best practices across the group. To be transparent about the strategic decisions discussed during the meeting, managers were encouraged to share insights with their local direct reports. The rebound meeting was an important step to ensure that all Aviapartner locations follow best practices related to supporting our workforce and reducing our impact on the environment.

To promote open communication among all our employees, we use an internal tool called Yammer. The tool allows employees to start group conversations (or "communities") about specific topics, and employees are free to join specific conversations that interest them. In 2021, we measured 1 in 4 e-mail users regularly visit the Yammer platform which consists of 17 communities.

With these measures we strive to impact our employees' job satisfaction in a positive way.

5.3 Occupational Health and Safety

The Safety and Security of our staff, the customer's aircraft and their passengers and baggage, freight and mail are a top priority for Aviapartner. We are committed to continuous improvement of our performance, complying with applicable Health, Safety and Security laws and regulations as well as the requirements of our stakeholders.

As per our Safety Policy, Aviapartner strives for zero labour and aircraft accidents and reviews its performance versus its long-term objectives and targets continuously with the aim to take appropriate corrective actions where required. We promote a Just Culture where people are encouraged to report all accidents, incidents, risks and operational hazards or other deficiencies. Reporting is used to learn from such events and no disciplinary action are taken for omissions, or decisions by staff that are considered reasonable given their experience and training. However, deliberate neglect, wilful violation, repetitive misconduct, unlawful conduct, destructive acts or intentionally not reporting an accident are not tolerated.

Our core guidance document for Health and Safety matters is our Safety Management System (SMS) Manual. The SMS is specific to operational safety including all safety around the aircraft, safety and security of staff, passengers, subcontractors, airline crew and cargo but also features general Health & Safety aspects. As such, our Safety Management System goes beyond what is required by law and is tailored to the current safety needs and future requirements (e.g. EASA regulation) in the aviation industry. In 2021, the SMS was also reviewed entirely to include additional relevant Occupational Health & Safety topics.

Accountabilities and responsibilities for Health & Safety are well defined from top to bottom in the organisation. The Aviapartner Safety Governance Structure is as shown below :

Any Health & Safety related issues are discussed during weekly Group Safety Management calls. Safety results and KPI are reviewed with the Country Safety Managers in monthly meetings and quarterly safety reviews undertaken by the Safety Review Board which is spearheaded by the CEO.

As part of our SMS, we continuously analyse and manage Health &Safety risks. Risk management is crucial for preventing incidents and is based on predictive, proactive, and reactive methods. The identified risks and mitigation measures are then captured in our risk evaluation document which is updated regularly and each time a change is introduced and the risks are communicated to all employees during safety training. Our training program is subject to the Aviapartner Corporate Training Policy and the Aviapartner Corporate Training Manual and is documented in the Aviapartner Academy on the Aviapartner intranet. The Aviapartner Safety Training is completely aligned with ISAGO Safety Training Specifications and considers EU regulations, local country and airport procedures. In September of 2021, Aviapartner hosted a training for safety managers from the company's various countries of operation to ensure consistency in our occupational health and safety measures.

To ensure our safety standards described in the SMS are adhered to, we have put several Standard Operating Procedures and Working Instructions in place. These are based on legal requirements and industry standards and are translated in languages spoken by employees locally and made available to all staff via our intranet.

Of course, Aviapartner also provides Personal Protective Equipment (PPE) to all staff performing functions which require the use of PPE. Our stations provide PPE to all staff before they start to work, and we ensure the replacement of worn-out PPE. In Rome Fiumicino a PPE dispenser is used for delivering the necessary protective equipment such as high visibility jackets, ear protection and protective gloves for loading and unloading. We continuously seek to improve the comfort of PPE such as for instance individually moulded hearing protection for all staff working on the ramp in France. During the COVID-19 pandemic, we provided face masks and sanitising gel to all our staff.

As part of our Safety Management System we also have an Emergency Response Plan (ERP) to be prepared in the event of any emergencies. All staff undergo ERP training which is conducted in cooperation with other stakeholders such as airlines and airports. Managers and Dispatchers receive an online training course on Aviapartner's ERP which explains the active practical organisation at station level within the framework of the Safety Management System. All ERP documentation is elaborated per station and available online in Aviapartner intranet for east access by staff. During numerous emergency situations such as the terrorist attack at Brussels Airport, the fatal Germanwings crash, and the Malaysia Airlines MH17 tragedy, Aviapartner staff have put their ERP training into practice handling the situations to their best possibilities.

As part of our Safety Assurance Program, we regularly undertake audits and inspections, Ramp Safety Checks and safety reviews at station, country and at network level to identify the causes of substandard performance and possible corrective actions. In 2021, Aviapartner carried out over 10,000 safety inspections across the company. Since 2009, Aviapartner has used ISAGO, IATA's Ground Operations Safety Audits, and IS-BAH (International Stand/ard for Business Aircraft Handling) since 2018, as a means of promoting safety in its network. More than for its certification, this tool is used for continuous improvement to deploy Aviapartner procedures, all aligned with IATA as a minimum requirement base, consistently across the entire network. The implementation process, the initial audit and the renewal audit every two years, are essential tools in maintaining high levels of safety awareness.

A station's performance is evaluated by means of Safety Performance Indicators (SPIs) and is published on the internal QualityNet and reviewed monthly with Country Management.

Apart from the operational safety management measures, we also actively manage general health and safety matters. Our Safety Review Board meets quarterly to facilitate the co-operation between management and employees in developing and promoting controls and initiatives. These controls and initiatives include :

- Employee Health & Safety detailed risk assessment ;
- Health & Safety Training including safety flashes, intranet, campaigns ;
- A Fatigue Risk Management program ;
- A psychosocial risk assessment undertaken by external experts ;
- Active preventative measures for noise including training on the consequences of noise, and the provision of hearing protection ;
- Radiation protection measures to protect staff operating near X-ray generators ;
- Procedures and DGR training to handle dangerous goods during loading and offloading ;
- Lone working procedure ;
- Training for the prevention of musculoskeletal troubles ;
- Medical checks in all countries except the Netherlands. In Spain, where this is not required by law for all staff, Aviapartner has chosen to offer it to staff anyhow ;
- Management of Change procedure with specific instructions to follow in case of changes impacting Health and Safety.

Our Health and Safety measures not only apply to our own employees but also to anyone working with or for us. We therefore conduct Health and Safety Training for our subcontractors when necessary and have prevention plans in place in alignment with all subcontractors, airport authorities and customer airlines. Subcontractors are also audited on a regular basis to/ensure they comply with our Health and Safety standards.

In recognition of our efforts, we received ISAGO and IS-BAH certifications. In 2020 we were rewarded with the Safety Award 2019-2020 at Aviapartner Rome for our robust Safety Management System and reporting.

5.4 Our response to COVID-19

Like 2020, 2021 brought numerous pandemic-related uncertainties which proved to be particularly challenging for Aviapartner. With air traffic picking up slowly, the Covid-19 pandemic has had a notably negative impact on our business. To navigate the storm and get safely back into business, we prepared a detailed risk assessment in 2020 implementing an extensive Covid action plan with measures that were maintained in 2021. To ensure continuity to keep our employees safe while at work and that aircraft could depart safely, we adjusted and updated as the situation evolved paying high attention to the local circumstances in every station. These were communicated to all staff and included amongst others :

SAFETY
- Covid-19 sanitary measures (masks, distance, frequent sanitisation etc.)
- Online medical assistance in France and psychological assistance for staff
- Ground Support Equipment (GSE) measures for storage and return to operation
- Responsible use of GSE & vehicles
- Ramp Safety Checks (RSC) inspections updated with COVID-measures on a country level
- Risk assessment restart
- Local COVID-19 procedures prepared per country with corporate support
- Follow-up per country due different safety requirements/legislations/progress of the virus (such as e.g. safety distance, masks...)

QUALITY
- Quality measures
  - Certification audits were postponed (e.g. several ISAGO audits) in 2020 but restarted in 2021
  - The internal audit plan for Quality & Safety was adapted in 2021 to continue, after having been paused abruptly due to the pandemic in 2020
  - The validity of Subcontracting audits was extended to end 2022
  - The validity of auditor qualifications was extended to end 2022 while new auditors were trained.
  - On Time Performance follow up was facilitated with automatic reports
- Communication with staff via existing channels

TRAINING
- Revision of the Corporate Training Manual (CTM) and training procedures following risk assessment.
- Focus on alternative methods of training such as : online web training, virtual training followed by an online test, training provided via mobile devices and other types of distance learning.

With the ambition to improve all these measures continuously, we strive to reduce negative impacts associated with Health & Safety issues. By tracking relevant KPI we are committed to improving our Health & Safety performance.

See table 4 below

5.5 Career Management

As our employees are considered our most important asset, it is our goal to continuously promote their professional development. We provide technical training for our employees to have the opportunity to develop and upgrade their professionalism and skills throughout their career. Our Corporate Training Manual (CTM) explains training criteria and organisation used by Aviapartner to meet legislative standards and to respond to customer requirements.

To implement the guidelines set out in our Corporate Training Manual, we have a dedicated "Euro Training Team" (ETT). This team consists of specialist Training Managers in each country. The team manages the training plan, organises training seminars and workshops, exchanges best practices and co-ordinates the roll-out of training initiatives in the network. Individual training needs and programs are identified and are arranged on an annual basis and whenever changes in legislation or stakeholder needs require this. For specific training such as training in ISO standards, auditing, IOSH (Institution of Occupational Safety & Health) safety training, social dialogue etc., we also engage external trainers to provide inhouse training. The "Aviapartner Academy", our virtual training academy ensures a consistent high-quality level in training throughout the network and improves efficiency by learning from each other and avoiding rework and duplication.

Highlights of the last years include :

- Intensive IOSH Safety training (Risk Management etc. from the Institution of Occupational Safety & Health) with support of our insurance company. This was a major investment to embed safety more into the operation and give more tools to management and key functions to run their station.

- Roll out and fine-tuning of a new e-learning training system, Moodle. A further upgrade is planned for 2022.

- Disruptive Passenger Training to protect staff from aggressive and/or unruly passengers in France. Aviapartner also increased reporting on disruptive passengers to help protect our staff, crews, and aircraft safety.

To further foster mutual learning across our network, we actively promote lateral rotations. We believe job rotation is a key contributor to the development and motivation of our employees. Besides offering more flexibility, lateral rotation is typical between operational departments.

On a voluntary basis employees can be transferred, permanently or on a temporary basis, from one station to another within the Aviapartner network. Several examples of lateral rotation have occurred in the Netherlands, Italy and Spain, where staff are given the opportunity to work in other stations for the summer, during calmer periods with less work, during COVID, operational needs, etc.

At Aviapartner, we give priority to internal recruitment. Vacancies are published internally first and are filled with internal candidates where possible. This also includes career opportunities for internal staff to move up a level. Our own staff are encouraged to bring in valid candidates and even offered a reward when a referred candidate is successfully hired. Close cooperation with schools is another valuable tool in promoting the aviation business towards students and attracting young potential employees, offering them apprenticeships in our organisation. In 2021, Aviapartner Lanzarote received an award from the Chamber of Commerce in Spain for its efforts in this area.

Aviapartner Spain organises and participates in "Open Days" for potential staff where they are invited to join our management team for an information session followed by games.

In the event of us needing to part with an existing employee, we have implemented measures to reduce negative impacts associated with layoffs. Depending on the collective labour agreement, an outplacement service can be considered.

See table 5 below
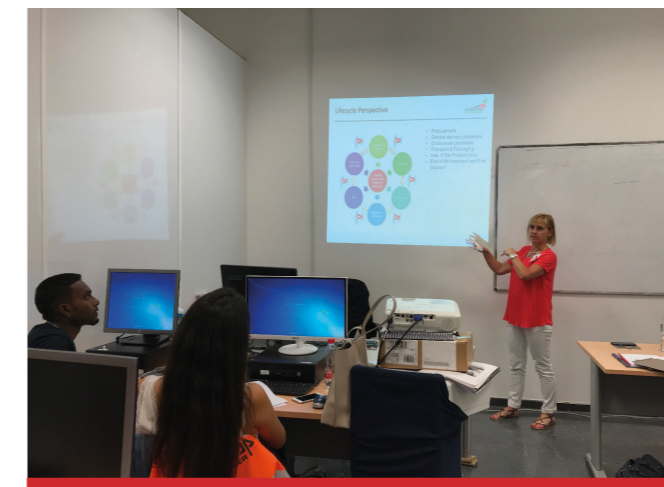
Environment

➡️ **Principle 7 :** Businesses should support a precautionary approach to environmental challenges.

➡️ **Principle 8 :** Businesses should undertake initiatives to promote greater environmental responsibility.

➡️ **Principle 9 :** Businesses should encourage the development and diffusion of environmentally friendly technologies.

We are fully committed to minimising the impact of all our activities on the environment and to comply with all legal and other environmental requirements applicable to our business. We have set long-term strategic environmental objectives and targets and aim to become a truly sustainable ground services provider. Continuous improvement is part of our DNA. We therefore go beyond reducing the impacts of our own operations by leading by example and supporting our employees and partners to do the same.

We have developed an impactful environmental strategy. The key points of this strategy are :

- Protection of the environment
- Prevent pollution at all levels
- Minimise our waste by eliminating single use plastics
- Reuse or recycle as much as possible
- Minimise greenhouse gas emissions focusing on GSE replacement, energy consumption and innovative technologies
- Encourage the use of alternative means of transport and car sharing
- Encourage the adoption of environmental principles by our suppliers and other stakeholders

We monitor all our environmental impacts very closely as we firmly believe that you cannot manage what you do not measure. All our stations are required to report regularly on a wide range of environmental KPI including fuel, electricity, water, paper-usage and waste. Furthermore, we put emphasis on equipping our employees with the knowledge and skills they need to help us achieve our environmental targets and objectives. Every staff member undergoes Environmental Awareness Training during onboarding and is refreshed every three years. In 2021 77% of the staff was trained which was a 7% increase versus 2020. For our experts on environment additional training such as Environmental Monitoring and Reporting, ISO14001 standards and internal auditor training are organised, to ensure that our Environmental Management System is implemented and managed correctly.

No.	KPI	2019	2020	2021
1	Employee Health&Safety frequency of injuries	64.95	47.87	**51.24**
2	Employee Health&Safety severity of injuries	1.70	1.91	**1.7**
3	Number of days lost due to accident	16.584	7.422	**8.547**
4	% of Ramp Safety Checks performed	4%	5%	**5%**

Table 4 : Occupational Health & Safety related KPI

No.	KPI	2019	2020	2021
1	Staff who received career- or skills-related training	81%	78%	**94%**

Table 5 : Career management related KPI

6.1 Our Environmental Objectives

We have identified a set of minimum requirements to which all stations must comply :

- Zero unidentified legal compliance issues
- 100% legal audits and inspections performed timely
- No overdue non-conformances regarding environment
- Maintain ISO14001 certification
- Setting clear targets to achieve Aviapartner's climate goals to transition to electric Ground Service Equipment (GSE) and achieve carbon neutral operations by 2030
- Increase % of employees using alternative means of transport year on year
- Reduce fuel consumption per 1000 flights year on year
- Reduce the use of paper and increase the % of FSC 70gm/m² paper used, year on year
- Ban single-use plastic
- 100% paper waste recycling by end 2022
- 100% of staff trained on Environmental Awareness

6.2 Energy Management and Greenhouse Gases

As a key player in the aviation industry, we are keenly aware of the pressures that airlines and airports face to reduce their carbon footprint. We consider it our shared responsibility to reduce and help minimise the impact from this industry. We have implemented numerous measures to reduce our carbon footprint, not only from our fleet of vehicles and ground support equipment, but also in offices, warehouses, and other areas in our operation. We continuously look further for innovative ways to reduce our emissions, for example during regular audits in our operations and partnerships with our suppliers and manufacturers. This is an on-going process.

6.3 Our Ground Support Equipment Fleet

As a leading provider of airport ground handling services, our contribution to the Sustainable Development Goals (SDG) is particularly relevant to SDG 13 Climate Action due to the carbon emissions from our fleet of Ground Support Equipment which are directly linked to the volume of the flights handled. For years, we have consistently chosen to electrify our basic GSE (tractors, beltloaders, etc.) and vehicles where possible. This transition has been intensified and we have now set an ambitious goal to electrify all GSE by 2027 and achieve carbon neutrality by 2030. The timeline of this electrification project is extended over several years and paced in line with the requirements of our stakeholders, including airports and customer airlines. A technology watch is performed at the manufacturer level. It is our aim to procure GSE propelled with electric engines the moment the supplier can offer a product that is suitable for our operations. Close cooperation with the relevant airport partners is essential to ensure infrastructural needs, such as charging points, and adequate spaces are available.

To date, we have electric equipment in use throughout our network in various airports :

- Small cars (at multiple airports)
- Vans (Nice Executive Aviation)
- Beltloaders (at multiple airports)
- Passenger stairs (at multiple airports)
- Forklifts (at multiple airports)
- Transport slave pallets (Brussels)
- Baggage tractors (at multiple airports)
- Nosewheel lifters (Amsterdam, Brussels, Ibiza, Marseille, Nice, Palma, Seville)
- Pushback trucks (Lille, Seville, Tenerife)
- Buses (Seville)
- Loaders (Tenerife, Bordeaux)
- Heater (Amsterdam)

This list includes 37 electric GSE & vehicles added in 2021. More are ordered for 2022. We are proud of being at the forefront of the electrification of ground support equipment. In 2019 we presented the first electric bus in a Spanish airport in Seville in partnership with AENA and Air Rail and we were the first handling operator to use an electric pushback truck at Tenerife airport. Additionally, in 2018 we introduced 48 electric cars and vans for our operations at Brussels Airport, allowing us to achieve our goal of reducing greenhouse gas emissions by 14% by 2025 within their first year of operation. Currently, 39% of Aviapartner's fleet is electric. We will continue increasing this percentage as vehicles reach their end-of-life or when it makes environmental and economic sense for us and our our partners to do so.

To reduce energy and fuel consumption we also use Adveez, a Fleet Management Platform for planning and optimisation of routes to minimise distances travelled, continuous monitoring of fuel consumption, and identification of inefficient driving habits.

A prominent example of Aviapartner's efforts to electrify GSE is our work with Paris Airport. Aviapartner is working with the airport to reach 100% electric GSE. This is a challenging task for several reasons :

- Paris Airport is large, and a robust charging system needs to be developed to ensure electric GSE can run all day for all the handlers.
- Batteries require between 4 and 6 hours to fully charge. New generation batteries could be recharged more quickly, but these technologies are expensive.
- The GSE provider must balance the cost of investments for new equipment with their ability to remain competitive on the costs of their services.
- The airport must comply with many laws when making sustainability improvements to its infrastructure.
- The airport must invest in heavy infrastructure works to provide enough electricity for all these new needs.

Aviapartner has made significant progress in helping the airport navigate these challenges. For example, we proposed to invest in hybrid GSE (equipment that has both electric and fuel components) as transitional technology that will later be phased out by fully electric equipment, Aviapartner proposed to test the possibility of using electricity from the airport to power parked aircrafts that otherwise use kerosene generators, and some of the equipment at the airport is already fully electric. In Paris, all our towable passenger stairs are solar powered.

Additionally, Aviapartner is working with a French start-up company to refurbish used batteries and give them a new life. This saves money and reduces overall environmental impact.

6.4 Reducing our internal footprint

Although our GSE fleet represents the largest share of our emissions, we continuously work on reducing the impact on other parts of our operations. Measures we have undertaken include :

- Regular energy audits throughout our network to identify additional measures and to quantify the potential reduction of our impact. In the past 2 years few measures have been implemented because of the focus on the COVID crisis, but 84% of the lights in Aviapartner Cargo N.V offices at Brussels have been equipped with LED lighting (100% expected by end 2022). Glass separation walls allow preferred natural light in as much as possible. LED is equally being installed in the warehouses.

- Throughout our network, surface space for offices was also reduced because of the drop in operative flights during the crisis.

- Surveys and studies revealed that currently only 8% of our staff are using alternative means of transport such as train, bus, or bike for home-work commuting. Although results vary depending on country and station, this baseline help our organisation determine an action plan. We aim to encourage alternative forms of transport for employees.

- Use of renewable energy sources where possible. At Amsterdam, Rotterdam 100% Dutch wind energy is provided by the Royal Schiphol Group for the offices and the charging of electric Ground Support Equipment. The cooperation with Brussels Airport has allowed us to power our electric cars with energy from renewable sources. It is our intention to switch to renewable energy where possible as part of our carbon neutrality ambition.

- For 2021, all stations reported on their footprint, apart from two airports in our lounge business (at Paris and Cagliari). The Environmental Management System is rolled out in our entire network but in these lounges, which were closed for a long time due to the pandemic, the implementation has not yet started. However, the system was implemented in 2021 at our lounges in Rome and will be rolled out further to our other lounges.

6.5 Waste Management

Since 2010 our Go Green program promotes the waste hierarchy of Reduce, Reuse and Recycle. The best waste is waste that is not produced. We also ensure that all unavoidable waste is managed in the most environmentally friendly way. The waste hierarchy image on the following page highlights some of the actions that we have taken within each level.

Firstly, we always strive to prevent waste. In 2021 major efforts were undertaken to digitalise the existing paper flows surrounding turnaround documentation and to move to electronic inspections.

A positive impact was achieved when our Spanish stations donated all their rainboots that would otherwise have been discarded to an organisation that leads gardening activities for individuals with disabilities.

We also aim to extend the life of products repairing or re-using things like paper or electronic equipment such as laptops and PC's which are no longer suitable for needs but can be wiped clean and re-used by other. At the end of 2021, in France, together with a local start-up company, we started trials to regenerate batteries used for electric conveyor belts instead of replacing them.

We have sorting bins in place in most locations and staff is trained during environmental training to recycle waste properly (paper & carton, wood, plastic etc. - including packaging). Residual waste which cannot be recovered is disposed of accordingly. In this category waste from aircraft is still the most challenging waste. We can only solve this working closely together with our airport partners, customers and waste management providers. In 2019 we signed the Brussels Airport Waste Charter which aims to reduce 50% of waste at the airports and double the recycling ratio. In 2021 working together with a key customer and supplier 1 ton of plastic waste originating from inbound flights was recycled.

While for a long-time monitoring of waste streams was limited to some stations with a certified Environmental Management System, in 2021 Aviapartner started collecting waste streams data - where available - more consistently. There is still work to be done, but considerable progress has been made in this area and will continue in 2022. We believe we can only manage what we measure.

Since 2012 specific waste provisions are included in our Green Partner Charter, extended in 2021 to a Supplier Code of Conduct, described in the chapter on Sustainable Procurement.

We strongly believe in the need for society to move from a linear to a circular economy and are implementing waste reduction measures to improve the circularity of our own operations. In March 2021, Aviapartner signed a Circular Economy Commitment with different parties within and beyond the aviation sector : Brussels Airport, customer airlines, our energy supplier, etc. This peer-to-peer learning network is part of the Antwerp Management School's Sustainable Transformation Groups, whose commitment aims to create closed-loop systems and lead the transition to a low-carbon economy. It offers us a safe space to learn and discuss.
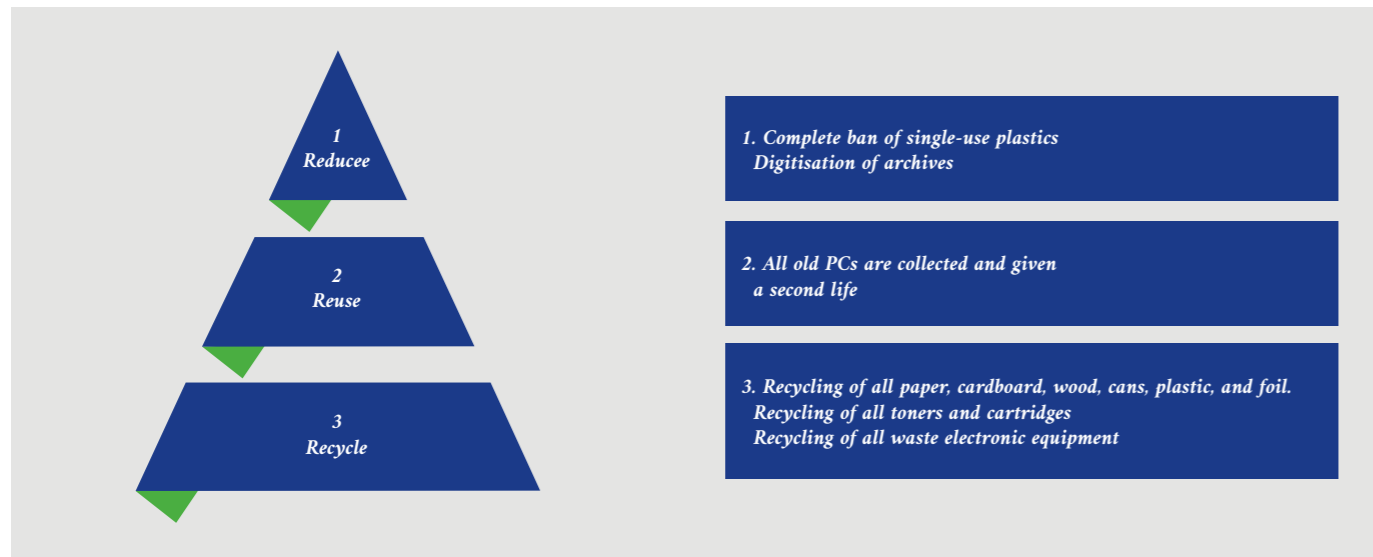
Environmental KPI

During the COVID-19 crisis, lockdowns and flight restrictions worldwide resulted in a significant drop in the number of operational flights that took place throughout 2020 and 2021. Although we continuously strive to reduce our environmental impact, the evolution of the indicators in the table below is strongly affected by the fact that our data collection process has become more formalised allowing for a more accurate picture of the situation.

No.	KPI	Unit	2019	2020	2021
1	Diesel consumption	L	3 192 561	1 510 423	**1 837 403**
2	Gasoline consumption	L	117 797	52 906	**60 363**
3	Jet Fuel consumption	L	3 085	659	**174**
4	Natural gas consumption	m³	307 010	179 513	**286 773**
5	Fuel consumption per 1000 flights (Handling)	L	6 903 (small correction)	7 617 (small correction)	**7 279**
6	Total electricity usage	kWh	7 168 122	5 192 652	**8 254 509**
7	Total scope 1 CO2 emissions	Tonnes CO2	9 372	4 520	**5 925**
8	Total scope 2 CO2 emissions	Tonnes CO2eq	1 253	856	**1 543**
9	Total scope 1 and 2 CO2 emissions	Tonnes CO2	10 625	5 376	**6 078**
10	Total waste produced	kilos	1 260 332 (incomplete data)	443 725 (incomplete data)	**2 360 380**
11	Waste produced per 1000 flights (Handling)	kilos	2 154 (incomplete data)	1 424 (incomplete data)	**9 519**

Table 6 : KPI focused on the environment

Compliance and Business Ethics

7.1 Anti-corruption

➥ **Principle 10 :** Businesses should work against corruption in all its forms, including extortion and bribery

Our Code of Business Conduct and Ethics serves as a guideline on how we conduct business ethically as part of our daily operations. To prevent corruption and bribery, the Code of Conduct provides guidance on sensitive transactions specifically with respect to gifts.

The Code of Conduct is available on the Aviapartner intranet for all staff. In 2021 89% of management signed off this policy by means of our online Read& Sign tool (Sunrise). We aim to extend this to more staff. End 2021 Spain kicked off extending this procedure to all their staff with 67% signature rate.

To raise awareness of our Business Ethics principles amongst staff, the target group identified to participate in a Human Respect and Business Ethics training including anti-corruption and bribery, has been extended gradually from only Senior management to managers and key staff. For Senior Management the training is yearly and occurred in 2021 during the Rebound Meeting, a company strategy conference for the top 25 managers at Aviapartner. 92% of this group was trained in 2021. In 2022 the extended target group will be trained.

A whistle blower mechanism to report irregularities is part of the Code of Conduct. At the end of 2019 an online mechanism was added to report specifically any incidents related to corruption, bribery, money laundering or fraud, using a QR code to access our QPulse Web Reporting. This tool is also used for reporting of other incidents. In 2021 zero reports were submitted. In 2022 a specific whistle blower policy is planned with communication to all stakeholders.

Any reported incidents are investigated immediately and if any behaviour that is either unethical, illegal or does not comply with the Code of Conduct is confirmed, disciplinary and legal action up to termination of employment without prejudice to Aviapartner's right to compensation, will be applied. Aviapartner does not allow any retaliation against anyone who acts in good faith in reporting any such violation and grants full immunity and anonymity.

See table 7 below

7.2 Information Security

Aviapartner maintains and communicates an Information Security Program consisting of topic-specific policies, standards, procedures, and guidelines that :

- Serve to protect the Confidentiality, Integrity, and Availability of the Information Resources maintained within the organization using administrative, physical, and technical controls.
- Provide value to the way we conduct business and support institutional objectives.
- Comply with all regulatory and legal requirements
- Comply with Information Security best practices, including ISO 27002 and NIST CSF. Our external IT provider is ISO27001 certified
- Meet Contractual agreements
- Comply with all other applicable laws or regulations

As part of Information Security best practices, Aviapartner has implemented tools and procedures to identify, detect, respond, prevent and recover data security breaches.

These include :

- Incident Response Procedure (IRP)
  - Security incident procedure with predefined scenarios
- IT security audits
  - External IT auditor conducts vulnerability scans for hosted infrastructure
  - Information security risk assessments
  - Microsoft 365 Assessment
  - Mc Afee EPO Assessment (yearly)
- Server protections
  - Norton Antivirus
  - SecureDNS (URL inspection)
  - Sweepattic (attack surface management)
  - Azure Advanced Threat Protection
  - Azure AD Identity Protection
- End-user level protections
  - McAfee Antivirus software
  - Microsoft Advanced Threat Protection (ATP) for Office365
  - Microsoft Defender for Endpoint

The results of the assessments, audits and scans are evaluated by Aviapartner and their service providers with a risk-based approach. Based on the results and alignments, improvements are proposed and implemented to systems, software and procedures.

In 2021, Aviapartner was specifically targeted in various cyberattacks, such as phishing, credential theft, brand impersonation, etc. Through the various security layers in place, the early detection, and fast response by our teams, these attacks were contained and no security breaches occurred.

To raise user awareness and participation a cyber security program was developed for 2022 including online training for relevant staff and penetration and phishing email tests by our information security provider.

To consult customers on personal and confidential data, Data Processing Agreements (DPA) are signed both with customers and suppliers.

No.	KPI	2019	2020	2021
1	Percentage of target group trained on business ethics issues	0%	10%	**92%**

Table 7 : Anti-corruption related KPI

When the General Data Protection Regulation, GDPR, came into effect in May 2018, we initially used an external training partner providing e-learning in English. Early 2020, we developed an e-learning program specifically oriented to our staff and business context, which has been translated into six languages. France, Spain and Belgium managed to kick this off in 2021 together training the first 560 staff . Cartoons and posters in our offices raise awareness for data security issues on a continuous basis.

In 2019, based on staff feedback, we extended our existing GDPR procedures with specific GDPR procedures tailored to the needs of our staff including how to handle personal data during audits and safety investigations, how to destroy flight files and confidential paper documents correctly etc. The latter also forms part of our regular quality audits and is reported on an annual basis.

Any GDPR data breaches can be reported via the QPulse Web Reporting platform or directly to our GDPR Data Protection Coordinator.

7.3 Anti-competitive practices

In the Anti-trust Competition Law Policy, Aviapartner has set out guidelines on how to prevent anti-competitive practices. Employees acknowledge this policy by signature.

Any incidents in relation to anti-trust can be reported electronically via the QPulse Web Reporting platform and are investigated immediately.

Like corruption topics, we raise awareness amongst staff through training for a specific group. As previously mentioned, the target group identified to take the training on Human Respect and Business Ethics including anti-competitive pricing, is extended from Senior management – 92% trained in 2021 - to managers and key staff who will take the training in 2022.

Sustainable Procurement

We strive to only use and buy sustainable products, and we also consider it equally important that Aviapartner's suppliers believe in our sustainability approach. Therefore, we ask our suppliers of goods and services to commit to Aviapartner's environmental principles set out in our Supplier Code of Conduct. This way the supplier contributes to incorporating the Aviapartner long-term strategic environmental objectives into their own company policy. This Code of Conduct does not only contain our environmental principles but also social and compliance aspects such as working conditions, harassment, human rights, anti-corruption, anti-trust and responsible information management.

In 2021, Aviapartner launched this new Code of Conduct to replace the previous Green Partner Charter which will no longer be used nor measured. The launch was delayed due to the Covid-19 pandemic. Only new suppliers and the critical suppliers in Spain have signed the Code of Conduct in 2021. This process continues in 2022.

Aviapartner may carry out audits and inspections to check the application of the Code of Conduct and may also request documentation to verify compliance, next to participation in supplier self-assessments and evaluations.

Another vital policy for working with our suppliers is the Aviapartner Ground Support Equipment (GSE) Policy. This Policy includes our environmental principles related to GSE procurement and lists our Health & Safety and Ergonomics Standards.

To put our environmental and social principles, outlined in our policies, into practice, several measures have been implemented over the last few years to include an environmental impact assessment which refers to all risks related to GSE purchasing and renting (our main procurement category) and to other critical suppliers (subcontractors). In 2021 this was extended to include a Social & Ethical Impact Analysis.

Contracts and Service Level Agreements with our critical suppliers refer to our environmental, social and ethical standards. For these critical suppliers we aim to organise a self-assessment minimum once every three years and whenever changes occur. This provides us with an overview of the management system, environmental performance, social responsibility and GDPR compliance status and allows us to set priorities when planning audits.

Regular meetings are organised with our subcontractors to discuss the performance which is followed up on a day-to-day basis by means of the monitoring of punctuality, incidents and complaints registered in the QPulse company tool used for reporting. Where agreed, yearly evaluations take place based on this data. In 2021 we organised to make the reporting tool available to our subcontractors with a contract. A pilot test at Brussels was arranged.

Critical supplier meetings and evaluations are complemented with a subcontracting audit by a qualified auditor using a specific checklist. It contains sections on environmental approach, working conditions, safety and GDPR aspects. The results of our audits are summarised in a Supplier Audit Report and corrective actions are identified. These are actively followed up with the supplier by the station to identify possible areas of support such as training etc.

Innovation Management

As "Creativity" is one of Aviapartner's company values, we actively promote new business ideas and practices. We encourage a pro-active and dynamic approach to ground handling solutions for our customers. New technologies form the backbone of our efficient and streamlined organisation. However, we are not inventing or installing new technologies on our own, but we are key stakeholders of the airports of the future and believe in a multi-stakeholder approach.

One example of a multi-stakeholder project was the IATA Safety Audit for Ground Operations (ISAGO). Aviapartner participates in ISAGO since the early start in 2009 and was the first network handler in Europe to appear on the ISAGO Registry with Amsterdam. Following this first station, Aviapartner was the first network handler registered in every country in Europe (except Spain which we only opened in 2015). Aviapartner was also a member of the ISAGO Oversight Committee (GOC).

A similar project was the IATA-CEIV Pharma certification for our first Pharmahub at Brussels Cargo in spring 2014. Following an audit according to EU guidelines on Good Distribution Practices for medicinal products for human use, we were about to be audited by the Belgian authorities when the IATA-CEIV Pharma certification came up. We worked closely with Brussels Airport and with IATA to achieve this IATA-CEIV certification which helps organizations and the entire air cargo supply chain to get on the right track to achieve pharmaceutical handling excellence. CEIV Pharma addresses industry's need for more safety, security, compliance and efficiency, by the creation of a globally consistent and recognized pharmaceutical product handling certification.

Some other multi-stakeholder projects include :

- A speed limitation option on Ground Support Equipment with Adveez, implemented in several airports.
- Self Service Kiosks at the Lost & Found Services, where passengers with lost bags can make a declaration.
- An artificial Intelligence project to introduce smart glasses for the airfreight industry together with Air Cargo Belgium and VLAIO, the Flemish Agency for Innovation & Entrepreneurship (not implemented).
- A test project at Rotterdam The Hague Airport for autonomous vehicles in the baggage sorting area, with Vanderlande and Schiphol Airport Group (not implemented).
- A first electric bus to test readiness of Spanish airports for a zero-carbon future at Seville in 2019.
- The first electric pushback in Spain at Tenerife South.
- Mobile application (MRS-Arion) to digitalise the processes performed around the turnaround of an aircraft. This key project was launched in 2021 together with a team of expert IT specialists and suppliers. It will be fully rolled out in the entire network in 2022.

In appreciation for our investment in digitalisation projects, Aviapartner was awarded with the Airport Safety Award 2019-2020 by ADR Aeroporti di Roma. Rome Fiumicino won the award based on Safety Management System compliance inspections and audits and for the introduction of a "We are Safety" QR code (linked to the QPulse Web Reporting software) for more accessible and immediate voluntary reporting.

Innovative thinking is key in a fast-paced and ever-changing work environment. Over 2020 and 2021 we focused on the transition from "paper-based" workflows to digital platforms that work with multiple stakeholders (airports, handlers, airlines etc.). At this moment we focus on the customer journey contributing to seamless passenger flows at airports, passenger experience, on-time performance and real-time baggage tracing. As the industry keeps moving, so will we. In the future, aprons will become zero-carbon using sustainable energy sources. Automated GSE such as pushbacks, passenger steps, belt loaders will be shared. There will also be automated equipment that reduces strain on people in baggage halls, autonomous vehicles for transporting passengers, crew, baggage and cargo, and automated driving technology (e.g. Mototok) will be standard at airport stands.

No.	KPI	2019	2020	2021
1	Percentage of operational sites working with an ISO27000 IT provider	100%	100%	**100%**
2	Number of audits on GDPR	0	17	**12**
3	Number of reports on GDPR	5	6	**4**

Table 8 : Information security related KPI

No.	KPI	2019	2020	2021
1	Percentage of targeted suppliers that have signed the Green Partner Charter (up for replacement by Supplier code of Conduct since 2021)	43%	30%	**22%**
2	Percentage of targeted suppliers that have gone through a CSR assessment	64%	71%	**12,5%** (target group extended)
3	Percentage of targeted suppliers that have gone through a CSR on-site audit	74%	80%	**34%**
4	Percentage of targeted (critical) suppliers with contracts that include clauses on environmental, labour, and human rights requirements		63%	Not measured in 2021

Table 9 : Sustainable Procurement related KPI

Customer Relationship and Quality

At Aviapartner, we aim to provide added value for all our stakeholders including airports, suppliers and airlines. It is our promise that all passengers and bags we handle in our airports receive the most reliable, safe and rapid service. In recent years, there has been an increased focus on safety for our staff and the aircraft of our customer airlines – as there is no quality without safety in our business. As our main framework, our Quality Assurance Manual (QAM) outlines our quality organisational structure, minimum service levels, quality monitoring, instruments and benchmarking.

To ensure the high level of service standards as described in our Quality Assurance Manual is upheld, we carry out regular audits and inspections. The main objective of the monitoring is the understanding of the trends of non-conformities to determine their root causes and take appropriate corrective actions, looking for risks and identifying opportunities. Aviapartner monitors on a continuous basis the key elements of the Aviapartner Minimum Service Level, defined as Key Quality Performance Indicators. Next to this performance monitoring, Aviapartner organises monitoring of the quality perception by means of perception assessments, complaint management and regular customer satisfaction surveys (postponed due COVID). The above monitoring is completed with follow-up of the customer's own monitoring where this is available, and temporary monitoring of focus points specified in the Service Level Agreements. The monitoring results in various types of reporting targeted at different users (groups). The Aviapartner Quality Control Monitoring Programme is rolled out in all stations of the Aviapartner network by means of the Quality Organisation. To ensure continuous improvement in the quality of our services, the Quality Assurance Manual was fully revised in May 2021.

Aviapartner uses several Key Quality Performance Indicators to measure its service level. Apart from safety, one of the most important standards of the Aviapartner Service Level and therefore also a Key Quality Performance Indicator, is the On-Time Performance at 15 minutes. The ultimate target is always to have no delays caused by Aviapartner, but safety always comes first. A threshold of 99% is used for evaluation (every 100 flights, maximum 1 flight delayed for more than 15 minutes). The graph shows the results per country from 2013-2021.

Certification programs are the main driver of our continuous improvement program. Therefore, we ensured all certifications were maintained, despite the Covid-19 pandemic :

- All our IS-BAH certifications were upgraded to Stage 2
- A full audit cycle ISO9001-14001 took place in autumn 2021
- All planned ISAGO audits had to be cancelled at the outbreak of the pandemic, but the program was resumed in December 2020 and 13 stations were audited in 2021, increasing the number of stations in the ISAGO Registry to 14 representing more than 60% of the flights handled.
- The IATA-CEIV pharma certification for Aviapartner Cargo N.V. in Brussels was renewed end February 2021.
- Our ethical and socially responsible management system was audited for the first time in January 2022 in Spain. This was the start of an ambitious certification program for 2022.

On Time Performance 15'
Results on country level 2013-2021

FR : France NL : Netherlands
ES : Spain BE : Belgium
IT : Italy GE : Germany
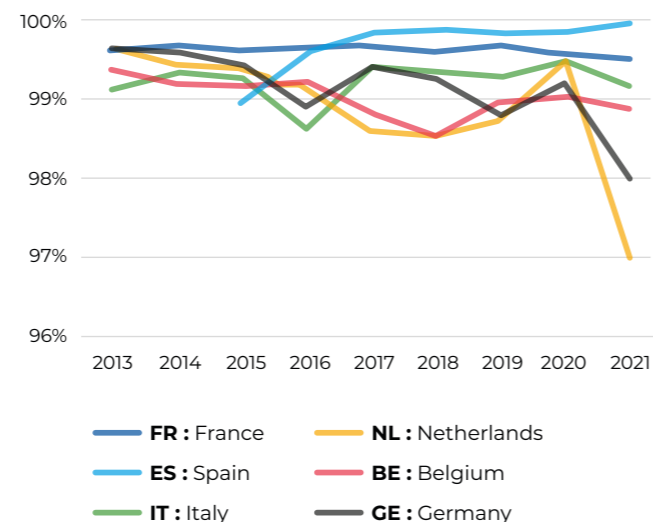
Outlook

We are proud to have been able to continue our sustainability journey including rolling out our digitalisation projects despite the challenges our industry is facing. We recognise that we still have a long road ahead of us and many more milestones to achieve. In the future, we aim to continuously improve our efforts with a growing emphasis on social sustainability. We plan to obtain additional certifications for our stations and to strengthen our cooperation with subcontractors and other critical suppliers. We are also a signatory of the International Air Transport Association's 25by2025 initiative to improve female representation in the aviation industry. To continue reducing our environmental impact, we will focus on several key initiatives in the coming years. We have set a goal to electrify 100% of our GSE by 2027, and to transition to carbon neutral operations by 2030, which is a high-impact goal in terms of reducing carbon emissions. We are also preparing to introduce our first electric ground power units (GPU) in Rotterdam airport. To reduce our impact from waste, we aim to increase our use of refurbished batteries for electric GSE and rule out all single-use plastic. With regards to business ethics, we launched a new cybersecurity program which will be fully deployed in 2022 to protect against data breaches. We will continue to offer training on corruption, bribery, anti-competition, and information security to complete the initiated training or extend further to more employees in the future.

We are confident about our ability to make continuous improvements, and we look forward to discussing Aviapartner's sustainability progress in future reports.

About this report

This is Aviapartner's second sustainability report. As part of our commitment to the UN Global Compact, we have committed to publishing a Communication of Progress (COP) report on an annual basis.

Starting this year, Aviapartner aims to make use of the Global Reporting Initiative (GRI) framework to align its reporting.

This report describes our sustainability approach from January 2021 to December 2021.

This report has been created in cooperation with the consulting company Nexio Projects Netherlands.

10180

AVIAPARTNER

GRI
SUSTAINABILITY REPORT 2021

GRI Disclosures	Description	Data Group 2021

GRI 2 General Disclosures		
2-1 Company information	a. Legal Name	The Aviapartner Group has two Belgian holding entities, Aviapartner Holding NV and Aviation Ground Handling Services NV.
	b. Nature of ownership and legal form	The Aviapartner Group is owned 99,99% by private individual Mr. Laurent Levaux and 0,01% by the Management Team. It's two holding companies are limited liability companies.
	c. Location of Headquarters	The HQ is located in Zaventem/Brussels (Belgium). Brussels National Airport - 1930 Zaventem
	d. Countries of operation.	The Aviapartner Group is actively operational in Belgium, the Netherlands, Germany, France, Italy and Spain.
2-2 Scope of the report	a. Entities included in its Sustainability Reporting	Aviapartner BV
		Aviapartner Belgium N.V.
		Aviiapartner Cargo N.V.
		Aviapartner Group Shared Services NV
		Aviation Services Ostend NV
		Aviapartner Liège S.A.
		Aviapartner Liège PAX SRL
		Aviapartner Dusseldorf GmbH & Co KG
		Aviapartner Hannover GmbH
		Aviapartner GmbH
		Aviapartner Holding Deutschland GmbH
		Aviapartner Merignac SAS
		Aviapartner Lille SAS
		Aviapartner La Rochelle SAS
		Aviapartner Lyon SAS
		Aviapartner Marseille SAS
		Aviapartner Montpellier SAS
		Aviapartner Nice SAS
		Aviapartner Nantes Atlantique SAS
		Aviapartner Toulouse SAS
		Aviapartner S.p.A
		Aviapartner Handling S.p.A
		Aviapartner Sicily S.R.M
		Aviapartner Palermo S.R.L
		Aviapartner Malaga FBO S.A
		Aviapartner Fuerteventura S.A
		Aviapartner Girona S.A
		Aviapartner Lanzarote S.A
		Aviapartner Menorca S.A
		Aviapartner Sevilla S.A
		Aviapartner Tenerife S.A
		Aviapartner Malaga Handling S.A
		Aviapartner Ibiza FBO S.A
		Aviapartner Menorca FBO S.A
		Lounges are currently not part of the Sustainability Reporting.
		The joint ventures with Strasbourg Handling SAS and Argos VIP Private Handling S.R.L, both concluded in mid 2021, have not yet been included in the Sustainability Reporting.
	b. Financial Reporting	In the Sustainability Reporting the operational entities are included.
	c. Approach used for consolidating the information	Significant companies over which Aviapartner has direct or indirect exclusive control have been fully consolidated. They include those of the company, its subsidiaries and its interests in companies accounted for using the equity method. All intra-group entries and the application of consolidation standards are considered to ensure the integrity of the information. No differences in the approach to the different items.
2-3 Current Reporting Period	a. Sustainability Reporting	Period : 2020-2021 Frequency : annual
	b. Financial Reporting	Period : 2020-2021 Frequency : annual
	c. Publication date	September 2022
	d. Contact point	Eva Vanallemeersch <Eva.Vanallemeersch@aviapartner.aero>

2-4 Previous Reporting Period	a. Report restatements	This report is the first GRI report produced by Aviapartner.
2.6 Activities and Workers	a. Sector	Aviapartner is a private independent Ground Handling company in the aviation sector operating in Europe.
	b. Value Chain Description	Upstream : manufacturers of Ground Support Equipment (GSE), suppliers of Ground Support Equipment & IT Technology, glycol for de-icing, uniforms etc. At the heart of our value chain we distinguish 4 primary activities situated in an airport environment : Ground Handling for Commercial flights : (and the passengers on commercial flights) Ground Handling for Executive flights : (and the Passengers on private flights) Cargo Warehousing Ground Handling for Full Freighter flights : (and the Cargo on Full Freighter flights) Services are delivered downstream to : Commercial airlines/passengers Private jet companies/passengers Passengers with private planes Cargo operators Ground Handling services, assisting airlines with handling aircrafts, passengers and freight on airport premises, are provided to both Commercial & Private Aviation in 48 airport in 6 countries in Europe (Netherlands, Belgium, France, Germany, Italy and Spain). Our Services Portfolio includes Premium Services such as General Aviation and Passenger Lounges. Ground Handling Services overview : Passenger Services : Ticketing Check-in Boarding Departure Closing System Special assistance / PRM (Passengers with Reduced Mobility) VIP Services Passenger Lounges Station Coordination Concierge service (*) Passenger security filter (*) Ramp Services : Aircraft marshalling Aircraft towing / pushback Stairs & bridge operations Power, airco & heating Water & Toilet Service Bussing & Crew transport Cabin cleaning Catering transfer Belly freight handling De-icing Aircraft fuelling (*) Operations : Flight documentation Flight planning Crew briefing Weight & balance Load plan & Load sheet Ground-crew communication Flight supervision Crew lounges (*) Airport/airway slot coordination (*) Traffic rights & landing permits (*) Aircraft reservation (*) Baggage Services : Loading / unloading Baggage transport Baggage sorting Baggage reconciliation Lost & Found Baggage Tracing (*) Services specific to General & Private Aviation activities Cargo Services : Cargo Terminal operations Warehousing and Inventory Control, Cargo Security ULD build-up and breakdown Dangerous Goods and Live Animal Handling Documentation for import and export, customs clearance Cargo transport to/from aircraft, tracing, airfreight trucking services Pharma hubs Perishable centres 2021 201668 Passenger Flights handled 7203 Cargo Flights handled 352995 Tons Cargo handled Supply chain consists of third-party contractors. Main categories are subcontractors of cabin cleaning, office cleaning, Ground Handling and interim staffing services , next to Ground Support Equipment & Maintenance, IT services and glycol for de-icing in the countries of operation. Also uniforms, office supplies and consulting services are purchased in Europe. Mostly long-term contractual services. Services are delivered downstream to : Commercial Airlines Private Jet companies Passengers with private planes Cargo operators Mainly with long-term contractual relationships, but also some event-based.
	c. Other relevant business relationships	Joint venture with Strasbourg Handling SAS Joint venture with Argos VIP Private Handling S.R.L
	d. Changes compared to the previous reporting period.	Not applicable
2-7 Employees	a. Total Number of employees - by gender and by region	See table on Page 54 (Disclosure 2-7 Employees)
	b. Permanent employees, Temporary employees, on-guaranteed hours employees, full-time employee, part-time employees	See table on Page 54 (Disclosure 2-7 Employees)
	c. Methodologies and assumptions used to compile the data	Headcount (HC), Full-Time Equivalent (FTE) : See table on Page 54 (Disclosure 2-7 Employees)
	d. report contextual information necessary to understand the data reported under 2-7-a and 2-7-b;	Each entity provided data in both FTE and HC. We highlighted in the table where data was calculated based on a year-average or at the end of the reporting period. We aim to align the calculations for next year.

	e. Significant fluctuations in the number of employees during and between reporting periods.	Not applicable as first year reporting in reference to GRI
2-8 Workers who are not employees	a.Total number of workers who are not employees	See table on Page 55 (Disclosure 2-8 Workers who are not employees) i. The most common type of workers who are not employees are Blue collars, White Collars, Consultants, Consultants directly engaged by Aviapartner, Workers indirectly through an employment agency. ii. Type of work performed : Aircraft handling, Baggage handling, Passenger Handling, Load Control and Operational work
	b. Methodologies and assumptions used to compile the data	See table on Page 55 (Disclosure 2-8 Workers who are not employees) Headcount (HC), Full-Time Equivalent (FTE). Please note that we did not include the staff from subcontractors in our calculation.
	c. Significant fluctuations in the number of workers who are not employees during and between reporting periods.	Not applicable as first year reporting in reference to GRI
2-9 Governance Structure	a. Governance structure, including committees of the highest governance body	Our Board of Directors are the highest organ, and consist of two Directors : Lys Conseil SRL represented by Board Member 1, and Board Member 2.
	b. Committees of the highest governance body that are responsible for decision	Our Board of Directors is responsible for decision-making and overseeing the management of the organization's impacts on the economy, environment, and people.
	c. Composition of the highest governance body and its committees	The highest Governance Body is the Board of Directors, with two male executive members. The Board is assisted by a CEO. There are no under-represented groups as the structure is very lean.
2-10 Highest governance body	a. Nomination and selection processes for the highest governance body and its committees	Our structure, comprised of 2 member, is very lean, and therefore limited. This does not apply.
	b. Criteria used for nominating and selecting highest governance body members	Not applicable
2-11 Senior executive in the organization	a. Whether the chair of the highest governance body is also a senior executive in the organization	Board Member 1 is non-Exectuve Director with several director mandates within the group. Board Member 2 is an Executive Director acting as General Counsel.
	b. Explain their function chair's function within the organization's management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated.	The structure generally operates without any conflicts of interest. In the event conflict is encountered, the appropriate procedure as outlined in art. 7:96 CCA (Code of Companies and Associations) is applied.
2-12 Role of the highest governance body	a. Role of the highest governance body and of senior executives in developing, approving, and updating the organization's purpose, value or mission statements, strategies, policies, and goals related to sustainable development	The ultimate responsibilty lies with the Board of Directors. Senior Members are involved where needed and/or appropriate. This is carried out during OPSCom meeting per country. (Managing Director (MD) and their Team, Finance, General Counserl, CEO and Chairman).
	b. Role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impacts on the economy, environment, and people, including :	Impact is identified and managed on different levels with a top-down approach throughout the organisation following the "Plan-Do-Check-Act" continuous improvement circle, whereby strategy is determined, measurable targets are agreed, and followed up by means of Monthly Board Reports and reviewed at regular intervals with the Stakeholders. Ultimately the Board of Directors is responsible. **On Corporate Level :** Annual Senior Management meeting to share group priorities, discuss innovations, sustainability, targets, profitability, industry challenges as input to country strategic meetings. For specific topics linked to the overall strategies, separate Business Reviews are organised to reach specific decisions and review them Quarterly Quality & Safety Review Boards Annual People Performance Appraisal Meeting (has not taken place during Covid) **On Country Level :** Annual country strategic review meeting with Country Team Bi-annual strategy update meeting to follow up and review what was agreed upon during the strategic meeting Monthly OPSCom meetings (MD with their Team, Finance, General Counsel, CEO, Chairman, etc.) ensure performance is evaluated versus the plan and corrective actions are taken where needed to reach the company goals. Annual Strategy Budget Setting Process in Q4

		On Station Level : Managing Directors (MD) translate this to the station level. Frequent meetings take place with customers, authorities, suppliers. Internally there are monthly OPSComs with Management, minimum 1x per year with European workers Council and Top Management. Meetings include views of main internal stakeholders in the different regions.
	c. Role of the highest governance body in reviewing the effectiveness of the organization's processes as described in 2-12-b, and report the frequency of this review.	See above in 2-12 b
2-13 Responsibilities of the highest governance body	a. describe how the highest governance body delegates responsibility for managing the organization's impacts on the economy, environment, and people, including :	Overall group ambitions on PPP are set at Group Level and delegated to Senior Managers and operational teams supported by Senior Executives in the group e.g. VP Safety and Occupational Health, VP Quality & Environment, General Counsel, Group IT Director. Managing Directors delegate responsibility for the management of impacts further to the Management Team in their respective country.
	b. Process and frequency for reporting to the highest governance body on the management of the organization's impacts on the economy, environment, and people.	We benefit from an open-culture whereby items can be put forward at any time and rather than a fixed timeframe.
2-14 Reviewing and approving reported information	a. Whether the highest governance body is responsible for reviewing and approving the reported information	At present, on Corporate Level, no Sustainability Reporting Committee exists. The first regional "CSR Committee" was formed in Spain, at end 2021, where a Social Responsibility Policy was signed. This is to serve as a steppingstone for further roll out to the rest of Group. This process was initiated with support and close follow-up of the Board of Directors.
	b. If the highest governance body is not responsible for reviewing and approving the reported information, explain the reason for this.	Not applicable
2-15 Conflicts of interest	a. Processes to ensure that conflicts of interest are prevented and mitigated	Should there be any conflicts of interest, this will be notified. Advice shall be given by the Legal Department. The structure generally operates without being confronted with conflicts of interest, but should this be the case the appropriate procedure of art. 7:96 CCA (Code of Companies and Associations) is applied.
	b. Whether conflicts of interest are disclosed to stakeholders	Nothing to report
2-16 Reporting critical concerns	a. Whether and how critical concerns are communicated to the highest governance body	A set of grievance mechanisms for internal and external stakeholders are in place as part of our policies and procedures (ranging from reporting forms in our QPulse software system, special mail addresses, surveys, etc.) A framework of meetings from the Station Level up to the Country Level allows any critical concerns to be communicated to the highest Governance body. In 2022 a Group Whistleblowing Policy is planned to enhance awareness and transparency.
	b. Total number and the nature of critical concerns during the reporting period.	Six (6) critical concerns were raised during the reporting period : (4 reports related to GDPR , 1 related to discrimination and 1 related to harrassment)
2-17 Advancing sustainable development	a. Measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development.	In 2021 a Senior Management Meeting took place in October. A Survey was organised prior to the meeting. Several workshops and presentations were dedicated to material topics as well as the progress and actions required to move forward on sustainable development. Sustainable development is also discussed in external meetings with our stakeholders customers, airport, and suppliers.
2-18 Evaluating performance on sustainable development	a. Processes for evaluating the performance of the highest governance body in overseeing the organization's impacts	On a yearly basis CSR KPI are reported by Station/Country in cooperation with the Human Resources, Euro Training Team, Euro Safety Team and Quality/Eco Pilots and Managers and consolidated on Corporate Level into a Yearly CSR KPI Report which is available internally in our intranet for all employees. It includes as a minimum the following topics : Certifications, Energy Audits, Social Indicators, Risk Management, Ethics, Training Management, Sustainable Procurement, Safety and Environment. It is also the basis for the reporting to external stakeholders in the Communication of Progress/Sustainability Report.
	b. Whether the evaluations are independent and the frequency of evaluations	Evaluations of the highest governance body are conducted internally on an annual basis.
	c. Actions taken in response to the evaluations	Investments, target-setting, creation of first CSR Committee. Certifications on Sustainability started up in one country as a steppingstone for the rest of the network. Please refer to our Sustainability Report to see all actions taken in 2021.
2-19 Remuneration policies	a. Describe remuneration policies for members of the highest governance body and senior executives	Remuneration conforms to market practices. Fixed payment and bonus payments according to results but this is not documented. Termination payments are in line with Belgian law.

	b. Describe how the remuneration relate to objectives and performance in relation to the management of the organization's impacts on the economy, environment, and people.	Not applicable
2-20 Remuneration policies	a. describe the process for designing its remuneration policies and for determining remuneration, including :	Ultimately the Board of Directors is responsible on all remuneration aspects
	b. report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable.	Not applicable
2-21 Compensation for the highest-paid individual	a. Ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees	Not available - Confidentiality constraints
	b. Ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees	Not available - Confidentiality constraints
	c. Contextual information necessary to understand the data and how the data has been compiled.	Not available - Confidentiality constraints
2-22 Sustainable development strategy	a. Statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development.	See Sustainability Report 2021, Page 3
2-23 Policy commitments	a. Policy commitments for responsible business conduct, including :	Aviapartner is commited to only conducting business responsibly and legally. The underlying principle of the commitment is the law. Our business is audited in accordance with the law.

Protecting the environment is part of the Aviapartner Environmental Policy which was last reviewed March 2nd, 2021. It is equally available on the Aviapartner website.
The Safety and Security of our staff, the customers' aircraft and their passengers and baggage, freight and mail is a top priority for Aviapartner. There is a continuing process of hazard identification and Safety Risk Management with the aim to reduce risk, as described in the Safety Policy, last reviewed on June 8th 2021.
Aviapartner considers it a social responsibility to contribute to the security of all stakeholders at airports creating a secure environment ensuring their protection to the maximum as well as the goods and data entrusted by its customers, company assets and information.
To this respect all necessary measures are taken into account in order to achieve this goal throughout its operations. This is included in the Aviapartner Security Policy, edition December 12th, 2019.
All policies are signed by the CEO

Aviapartner committed to the UN Global Compact in January 2021
Human Rights are reflected in Aviapartner's policies such as the HR Strategy and Procedures, the Safety, Security and Environmental policies, Human Respect Policy etc. |
| | b. Specific policy commitment to respect Human Rights | Aviapartner is commited to respect all Human Rights.

As specified in Aviapartner's HR Strategy and procedures Aviapartner supports and respects the protection of internationally proclaimed human rights in line with Principle 1 of the UNGC. The commitment also covers that it will not be complicit in human rights abuses, in line with Principle 2 of UNGC.

It is equally an objective of the HR Strategy to contribute to equal and fair treatment and working conditions, and inclusive recruitment.

Aviapartner has zero-tolerance on discrimination and strives for zero discrimination incidents with regards to nationality, sex, national or ethnic origin, colour, religion, language, or any other status.

Aviapartner expects that all its employees, as well as all individuals with whom they conduct business are treated with respect, fairness and dignity.

Policy of Human Respect, edition September 12th, 2019 covers the principles of non-discrimination, encourages equal opportunities and valorisation of diversity. |

		It refers specifically to Section 1 of the Human Rights Code which provides that every person has a right to equal treatment with respect to services, goods and facilities, without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital status, same-sex partnership status, family status, disability or the receipt of public assistance

The Supplier Code of Conduct equally addresses human rights principles with respect to human respect, equal opportunity, fair and ethical behaviour, child labour, forced labour, personal data.

The stakeholders included in the commitments cover consumers (passengers, including passengers with reduced mobility, unaccompanied minors and other vulnerable groups), customers; suppliers, (potential) employees, workers who are not employees and any individuals with whom we conduct business and/or could impact.

End 2021, Aviapartner Spain S.A. was the first to sign a Social Responsibility Policy for Spain with the aim of leading the way for the Aviapartner Group to become a source for good in supporting sustainable travel for generations to come. |
	c. Links to the policy commitments if publicly available.	All policies in place are available on request.
	d. The level at which the policy commitments was approved within the organization	Policy commitments are approved by the General Counsel Aviapartner group, at the most senior level and where applicable (Safety, Security, Quality and Environmental Policy) also signed by the CEO.
	e. The extent to which the policy commitments apply to the organization's activities and to its business relationships	Applicable to the entire organisation and any business partners Aviapartner conducts business with
	f. How the policy commitments are communicated to relevant parties	All policies and procedures are shared with employees via different internal communication channels such as the Aviapartner intranet.

During the Basic Safety for All Training, in which all employees and in some cases also non Aviapartner workers such as employees from business partners and subcontractor/supplier employees, participate, principles on human respect and the zero tolerance on discrimination are communicated.

A Training on Business Ethics targeting 270 key staff in the organisation equally addresses these principles as well as the mechanisms to report infringements of the policy.

The Quality, Safety, Security and Environmental poilicies are displayed in offices and departments, on billboards and digital displays throughout the organisation for stakeholders visiting the operations . Revisions are communicated internally via digital alerts and more and more also distributed via a recently launched online communication tool Sunrise.

Customers and airports are informed during meetings and via mail. Suppliers are invited to sign the Aviapartner Supplier Code of Conduct. |
| **2-24 Policy commitments** | a. How it embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships | To ensure that all employees act responsibly, with awareness of and respect for Human Rights, responsibility is given to everyone in the company by means of the employment contract. The Board keeps oversight top down, via country, Station Management up to the Supervisory level in charge of the day-to-day follow up on the workfloor.

Responsible business conduct is a fixed topic in Top Management Meetings where the General Counsel, equally Member of the Board, provides a yearly review to the participants

Upated commitments will get updated in strategies, operational policies and operational procedures.

A Data Processing Agreement is signed with suppliers who process personal data on behalf of Aviapartner.

Based on the existing Green Partner Charter, a Supplier Code of Conduct was introduced in 2021 and is gradually being rolled out. It consists of the following topics :
· Compliance with Laws, Rules and Regulations
· Hiring and Employment Practices
· Harassment
· Child Labour
· Forced Labour
· Health and Safety
· Testing of emergency procedures
· Environment
· Gifts
· Improper payments/bribery
· Anti-trust and Competition Laws |

		· Conflict of interest · Confidential information · Personal Data · Compliance and Continuous Improvement · Supply chain · Communication · Non-compliance reporting Service Level Agreements are also signed with subcontractors to ensure standards regarding Safety, Security, Environment, Social and Ethical factors are being fulfilled; In certain cases Training such as the Basic Safety for All and Environmental awareness is equally provided to subcontractors' staff. During the Basic Safety for All training, during which all employees and in some cases also non Aviapartner workers such as employees from business partners and supplier employees participate, principles on human respect and the zero tolerance on discrimination are communicated. Environmental Awareness Training for all staff is also mandatory for all new employees including sometimes supplier or subcontracting staff. A Training on Business Ethics targeting 270 key staff in the organisation equally addresses these principles as well as the mechanisms to report infringements of the policy. These trainings are mandatory and refreshed minium every 3 years. Top Management is trained on Business Ethics directly by the General Counsel and refreshed yearly. Employees dealing with personal data also receive a GDPR eLearning training, which has been designed by Aviapartner tailored to the specific situations staff are confronted with. This is a mandatory training, refreshed every 3 years. More specific training also exists in the countries, such as a training on Equal Opportunities for a specific target group in Spain, etc
2-25 Remediation of Negative Impacts	a. Commitments to cooperate in the remediation of negative impacts	We commit to remedy any negatively identified impacts. E.g. we have a GoGreen Program to address environmental impact .
	b. Approach to identify and address grievances	Aviapartner has several grievance mechanisms in place. Our most important operational-level grievance mechanism is embedded in our QPulse software system which allows for reporting and investigation of Safety, Environmental, Security, GDPR or other issues. This is complemented with regional mechanisms for discrimination and harassment which are both internal and external. In 2021 endevours were taken to extend the mechanisms also to our subcontractors and their staff. The reporting culture is monitored closely and reported, at minimum, yearly. There has been considerable improvement over the last years and was maintained despite COVID. One of the cornerstones of our Safety Management System (SMS), included in our Safety Policy is our "Just Culture" which is included in our Safety Policy. This is part of basic training for all staff and well known throughout the company. We have an open culture, whereby grievances can be easily submitted to Senior Management or directly to the Board.
	c. Processes the organization provides cooperates in the remediation of negative impacts	Investigations and remediations are handled by experts in the different fields. No formalised process is currently in place.
	d. How stakeholders are involved in the design, review, operation, and improvement of these mechanisms	All "forms" are designed with expert users and reviewed regularly. Amendments are made when/where necessary to improve reporting and make thresholds to reporting as low as reasonably possible. For this reason a Webreporting tool was implemented in 2016 and further extended with a QR code. We received the Airport Safety Award 2019-2020 for this in Rome. See Sustainability Report Innovation Management, page 25
	e. How the organization tracks the effectiveness of the grievance mechanisms and other remediation processes	The number of reports is continuously monitored. QPulse reporting and Just Culture is part of our Basic Safety Training for All staff. In the same training the regional tools for reporting on discrimination and harassment are included.
2-26 Mechanisms for individuals on responsible business conduct	a. Mechanisms for individuals to - seek advice on implementing the organization's policies and practices for responsible business conduct - raise concerns about the organization's business conduct.	To report on wrongdoings or breaches of the law in the organisation's operations or business relationships, regardless of wether individuals are harmed or not, the following internal mechanisms for internal and external stakeholders are included in the relevant policies : - Code of Business Conduct and Ethics, reviewed February 22nd 2021 : Directors, Managers and employees of Aviapartner and all of its subsidiaries and other business entities controlled by it can seek advice and/or raise concerns via a QPulse report. Call, detailed notes and/or emails are dealt with confidentially. Anonymous reporting is possible via the QPulse tool.
	b. Mechanisms for individuals raise concerns about the organization's business conduct.	Retaliation will not be tolerated. QPulse reports can easily be followed up and trends monitored. No reports were registered in 2021. - Antitrust and Competition Law Compliance Policy, reviewed September 30th, 2020 : it describes what Aviapartner expects from each of its employees in this respect including a list of do's and dont's. An entire chapter is dedicated to conduct in the event of an official investigation. All possible scenarios are described and readers of the policy are advised to inform the Legal Department, the General Counsel in the event of an investigation. Advice can be obtained via CEO or Aviapartner Legal Department. Misbehaviour or concerns are to be raised via the Aviapartner Legal Department. Managers are invited to cascade to all staff who are likely to conduct business with competitors. Specific training concerning the above policies is organised yearly for Senior Management during senior management meetings and since 2021, eLearning is also available for a target group. This is being extended to 270 staff into 2022. Managers are requested to Read & Sign the named procedures acknowledging understanding. In February 2021 89% of Managers addressed and signed for understanding. The new policies are available (in English) to all staff on the Aviapartner intranet. In 2021 they have also been translated into Italian and Spanish to improve accessibility. We have wistleblowning principles in our policies and are constantly fine-tuning the mechanisms to be as effective as possible for the different stakeholders. A separate whistleblowing policy with overview of the approach, the steps to be taken for investigation, feedback etc. is in preparation for launch in 2022. See Compliance and Business Ethics in the Sustainability Report page 23 Individuals can freely speak to senior managers or directly to the board as to grievances.
2-27 Instances of non-compliance with laws and regulations	a. Total number of significant instances of non-compliance with laws and regulations during the reporting period.	To the best of our knowledge there were no such instances.
	b. Total number and the monetary value of fines for instances of non- compliance with laws and regulations that were paid during the reporting period	To the best of our knowledge there were no such instances.
	c. Significant instances of non-compliance;	Not applicable
	d. Describe how significant instances of non-compliance has been determined	Not applicable
2-28 Associations & memberships	a. Industry associations, other membership associations, and national or international advocacy organizations	From 2015 until the end of 2021 the VP Quality and Environment was part of the IATA (International Air Transport Association) ISAGO Oversight Council Working Group (GOC) to support the Safety, Flight and Ground Operations Advisory Council (SFGOAC) as one of the representatives for the Ground Handling sector. Since April 9th, 2021 Aviapartner is a member of IATA's "25by2025" DE&I program as a signatory and participant to quarterly meetings. See page 14 in the report. In Belgium, Aviapartner Cargo is an active member of ACB, Air Cargo Belgium, an association which strives to make BRUcargo the most attractive, efficient, innovative, and successful logistical platform. Aviapartner participates in ACB (projects, steering groups) and holds two important roles : Our Station Director is Chairman of the Handling cluster ACB, representing all handling agents at BRUcargo. The HR Business Partner is the Chairman of the steering group HR & Training, engaging in cooperation and consultation between the HR partners in the BRUCargo zone. In the Netherlands, Aviapartner is a member of the WPBL, the association for Employers regarding Collective Labour Agreement (CLA). In Italy Aviapartner is a member of the National Board of Directors of Assohandler, Handling Employers Association representing handler's interests in CLA national negotiations, toward government and authorities. In France Aviapartner is a member of the CSAE, Chambre syndicale de l'assistance en escale, Trade union. The Managing Director France is one of the 3 Vice Presidents. Aviapartner is equally member of the A.M.A, Association des Métiers de l'Aéroportuaire in the role of Secrétaire Général Adjoint.

		Aviapartner also participates in the FDCAP, Fond de Dotation de la Communauté Aéroportuaire de Paris. The FDCAP's vocation is to support associations that act for populations in difficulty in the environment of airport platforms in Ile-de-France and thus act for greater social equality.
		In Spain Aviapartner is member of ASEATA, Asociacion de Empresas de Servicios de Assistencia en Tierra en Aeropuertos.
2-29 Stakeholder engagement	a. Categories of stakeholders	Refer to page 7 of the report
	b. Purpose	Refer to page 7 of the report
	c. Meaningful engagement	Refer to page 7 of the report
2-30 Collective bargaining agreements	a. Employees covered by collective bargaining agreements	Belgium - 97% Spain - 100% France - 100% Germany - 95% Italy - 100% Netherlands - 88%
	b. Working conditions of employees not covered by collective bargaining agreements	Most employees are covered by Collective Labour Agreements. For the remaining part, working conditions and terms of employment are applicable with the same entitlement as others. In the Netherlands the staff not covered by the CLA is temporary staff which has a specific CLA (ABU CAO).

GRI 205 Anti-corruption 2016

205-1 Corruption Risks	a. Number of operations assessed for corruption risks	Aviapartner globally assesses operations for corruption, relying on Aviapartner's legal representation in each country. We apply the anti-corruption guidelines on the entire organisation with a greater focus on Management, top down. Data is currently not available.
	b. Significant risks related to corruption identified through the risk assessment	Not available
205-2 Anti-Corruption Policies & Training	a. Number of governance body members that the organization's anticorruption policies and procedures have been communicated to by region.	Total Group : 45
	b. Total number and percentage of employees that the organization's anti-corruption policies and procedures have been communicated to, broken down by employee category and region.	The Antitrust and Competition Law Compliance Policy and the Code of Business Conduct and Ethics are available in English to all staff in the Aviapartner intranet as part of the Company Manual. These crucial documents have been communicated formally to all Station Managers with request to sign off for understanding and acceptance on February 1st 2021 and have been signed off by 89%. In 2021, Spain also included the policies in their staff manual to be signed by staff. 615 out of 914 employees in Spain have signed off (67%).
	c. Total number and percentage of business partners that the organization's anticorruption policies and procedures have been communicated to, broken down by type of business partner and region.	Not applicable
	d. Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.	Managing Directors and Senior Management are trained yearly by the General Counsel. In 2021 the training was organised in January, online, and was repeated during the Senior Management Conference in October 2021. In total 25 out of 27 managers in the target group were trained (92%). The target group for training has been extended to a total of 270 Managers and Key Staff for 2022. The Antitrust and Competition Law Compliance Policy, the Code of Business Conduct and Ethics and the Policy on Human Respect have also been communicated to all Station Managers as shown in a).
	e. Total number and percentage of employees that have received training on anticorruption, broken down by employee category and region.	Not applicable
205-3 Corruption Incidents	a. Corruption incidents	Zero (0)
	b. Employees dismissed or disciplined for corruption.	Zero (0)

	c. Contracts with business partners terminated or not renewed due to corruption.	Zero (0)
	d. Public legal cases regarding corruption brought against the organization or its employees	Zero (0)

GRI 206 Anti-competitive Behavior 2016

206-1 Anti-competition incidents	a. Number of legal actions pending or completed period regarding anti-competitive behavior	Zero (0)
	b. Main outcomes of completed legal actions	Non applicable

GRI 3 Material Topics 2021

3-1 Determining material topics	a. Process to determine material topics	See "Materiality", page 8 of the report
	b. Stakeholders and experts involved with determining its material topics	See "Materiality", page 8 of the report
3-2 Material topics	a. Material topics	> Energy consumption & GHG's > Local pollution and accidental pollution > Waste Management > Diversity, discrimination & harassment > Working conditions > Child labor, forced labor > Career Management > Employee Health and Safety > Social dialogue > Privacy and data security > Anti-competitive practices > Anti-corruption > Supplier environmental practices > Supplier social practices
	b. Changes to the list of material topics compared to the previous reporting period	See "Materiality", page 8 of the report

GRI 302 Energy 2016

302-1 Fuel & energy consumption	a. Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.	Please refer to page 58 (Disclosure 302-1 Fuel & Energy consumption)
	b. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used	Zero (0)
	c.i. electricity consumption (joules, watt-hours or multiples)	8254508,74 kWh
	e. Total energy consumption within the organization, in joules or multiples.	87151873 MJ fuel 8254508,74 kWh electricity
	f. Standards, methodologies, assumptions, and/or calculation tools used.	Fuel consumption : primary data was used. Electricity consumption : Estimation was based on the square meters for the locations where data was available. Then, intensity electricity consumption was used to estimate electricity consumption in locations where primary data was unavailable.
	g. Source of the conversion factors used.	1 kWh (kilowatt hour) = 3,6 MJ (megaJoule) www.convertlive.com

302-2 Energy consumption	a. Energy consumption outside of the organization, in joules or multiples.	Not applicable
	b. Standards, methodologies, assumptions, and/or calculation tools used.	Not applicable
	c. Source of the conversion factors used.	Not applicable
302-3 Energy Intensity Ratio	a. Energy intensity ratio for the organization.	580
	b. Organization-specific metric (the denominator) chosen to calculate the ratio.	Number of flights handled
	c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all.	Fuel : diesel, gasoline, kerosene, gas Electricity
	d. Whether the ratio uses energy consumption within the organization, outside of it, or both.	Energy consumption within the organisation is used
302-4 Energy Consumption Reductions	a. Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.	Information incomplete/unavailable
	b. Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all.	Information incomplete/unavailable
	c. Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.	Not applicable
	d. Standards, methodologies, assumptions, and/or calculation tools used.	Not applicable
302-5 Energy Consumption Reductions	a. Reductions in energy requirements of sold products and services achieved during the reporting period, in joules or multiples.	Information incomplete/unavailable
	b. Basis for calculating reductions in energy consumption	Not applicable
	c. Standards, methodologies, assumptions, and/or calculation tools used.	Not applicable

GRI 305 Emissions 2016		
305-1 Scope 1 Greenhouse Gas Emissions	a. Gross direct (Scope 1) GHG emissions in metric tons of CO2 equivalent.	Scope 1 emissions : 5925,27 ton CO2 Scope 2 emissions : 1543,5 ton CO2e
	b. Gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.	CO2 eq, including all GHG, was only used for Scope 2 emissions. for Scope 1 emissions only CO2 is included.
	c. Biogenic CO2 emissions in metric tons of CO2 equivalent.	Not applicable
	d. Base year for the calculation, if applicable, including :	Not applicable
	e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	Conversion factors for electricity : Effective 2021 the following emission factors have been used to calculate the emissions. They were last updated in 2021 with the dataset version of June 2019 based on 2018 data from Country specific Electricity Grid GHG factors www.carbonfootprint.com > France : 0,0470 kg CO2e/ kWh > Belgium : 0,1670 kg CO2e/kWh > Germany : 0,4690 kg C02e/kWh > Italy : 0,3270kg CO2e/kWh

		> The Netherlands : 0,4750 kg CO2e/kWh > Spain : 0,2880 kg CO2e/kWh Conversion factors for fuel : > Benzine/gasoline : 1liter = 2,4 ton CO2 > Diesel : 1liter = 2,65 ton CO2 > Natural gas = 2,023kg CO2/m³ > Kerosine = 2,523kg CO2/l
	f. Consolidation approach for emissions; whether equity share, financial control, or operational control.	Operational control
305-2 Scope 2 Greenhouse Gas Emissions	a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO2 equivalent.	1542 tonnes CO2eq
	b. Gross market-based energy indirect (Scope 2) GHG emissions in metric tonsof CO2 equivalent.	Not available
	c. If available, the gases included in the calculation; whether CO2 , CH4 , N2 O, HFCs, PFCs, SF6 , NF3 , or all.	All gases are included in the calculation
	d. Base year for the calculation, rationale, emissions for base year	Not applicable
	e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	We used CO2eq as a emission factor so GWP was already integrated for the different GHGs. Effective 2021 the following location-based emission factors have been used to calculate the emissions. They were last updated in 2021 with the dataset version of June 2019 which was based on 2018 data from location-based Electricity Grid GHG factors www.carbonfootprint.com >France : 0,0470 kg CO2e/ kWh >Belgium : 0,1670 kg CO2e/kWh >Germany : 0,4690 kg C02e/kWh >Italy : 0,3270kg CO2e/kWh >The Netherlands : 0,4750 kg CO2e/kWh >Spain : 0,2880 kg CO2e/kWh
	f. Consolidation approach for emissions; whether equity share, financial control, or operational control.	Operational control
	g. Standards, methodologies, assumptions, and/or calculation tools used.	Accurate data on electricity consumption was not available for all stations as electricity is often included in the rental charges. As a clear distinction between spaces, their sizes, and activities carried out in these spaces was missing, average kWh/m2 were used. For stations where accurate data on electricity consumption for battery charging was missing, in accordance we assumed that electricity consumption for battery chargers was linked to the number of flights, or tonnages, handled by the station. Available primary data was used to calculate an average electricity intensity factor used to estimate electricity consumption for stations where no primary data was available. Location based electricity emission factors (https://www.carbonfootprint.com) were used to calculate the emissions of Scope 2
305-3 Scope 3 Greenhouse Gas Emissions	a. Gross other indirect (Scope 3) GHG emissions in metric tons of CO2 equivalent.	This information is unavailable as the inventorization of Scope 3 emissions has not started yet. A preliminary assessment into employee mobility has been done in 2021 across all stations in preparation of further inventorization.
	b. If available, the gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.	Not available
	c. Biogenic CO2 emissions in metric tons of CO2 equivalent.	Not available
	d. Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.	Not available
	e. Base year for the calculation, rationale, emissions in the base year	Not available
	f. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.	Not available

	g. Standards, methodologies, assumptions, and/or calculation tools used.	Not available
305-4 Greenhouse Gas Emissions Intensity Ratio	a. GHG emissions intensity ratio for the organization.	For every flight we emit 0,037 ton CO2
	b. Organization-specific metric (the denominator) chosen to calculate the ratio.	Flights handled
	c. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).	Direct emissions in Scope 1 and indirect energy in Scope 2.
	d. Gases included in the calculation; whether CO2, CH4, N2O, HFCs, PFCs, SF6, NF3, or all.	CO2 eq, including all GHG, was only used for Scope 2 emissions. for Scope 1 emissions only CO2 is included.

GRI 306 Waste 2020		
GRI 306-1 Waste-Related Impacts	a.Significant actual and potential waste-related impacts.	Waste impacts depending on type of waste
GRI 306-2 Waste Generation Prevention	a. Actions taken to prevent waste generation in the organization's value chain, and to manage significant impacts from waste generated.	See "Waste Management", page 21 of the report
	b. If the waste generated by the organization in its own activities is managed by a third party, a description of the processes used to determine whether the third party manages the waste in line with contractual or legislative obligations.	Monitoring of waste-related environmental incidents for third parties Supplier/subcontractor audits and inspections Supplier self-assessments Supplier meetings and evaluations
	c. Processes used to collect and monitor waste-related data.	The process to collect and monitor waste-related data is limited to waste in own operation and differs per station. All data collected at the different stations is centralised via online data entry . This results in special waste reports per station consolidated per country, group which are closely monitored and help to guide decisions.
GRI 306-3 Total Weight of Waste Generated	a. Total weight of waste generated in metric tons	2360,3 metric ton
	b. Contextual information necessary to understand the data and how the data has been compiled.	Direct measurements with primary data from waste invoices is used where possible. In some cases estimations are used (e.g. for recovered toner kits)
GRI 306-4 Total Weight of Waste Diverted	a. Total weight of waste diverted from disposal	1943,7 metric ton
	b. Total weight of hazardous waste diverted from disposal	7 metric ton
	c. Total weight of non-hazardous waste diverted from disposal	1936,7 metric ton
	d. For each recovery operation listed in Disclosures 306-4-b and 306-4-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste diverted from disposal :	Please refer to page 58 (Disclosure 306 table Waste)
	e. Contextual information necessary to understand the data and how the data has been compiled.	Data are mainly based on invoices. Some of the data is extracted from our ISO14001 monitoring systtem. 1000 kilograms as the measure for a metric ton
GRI 306-5 Total Weight of Waste Directed to Disposal	a. Total weight of waste directed to disposal in metric tons	416,6 metric ton
	b. Total weight of hazardous waste directed to disposal in metric tons	Zero (0)
	c. Total weight of non-hazardous waste directed to disposal in metric tons	416,4 metric ton

	d. For each disposal operation listed in Disclosures 306-5-b and 306-5-c, a breakdown of the total weight in metric tons of hazardous waste and of non-hazardous waste directed to disposal onsite & offsite	Please refer to page 58 (Disclosure 306 table Waste)
	e. Contextual information necessary to understand the data and how the data has been compiled.	Data are mainly based on invoices. Some of the data is extracted from our ISO14001 monitoring systtem. 1000 kilograms as the measure for a metric ton

GRI 308 Supplier Environmental Assessment 2016		
308-1 Percentage of New Suppliers Screened Using Environmental Criteria	a. Percentage of new suppliers that were screened using environmental criteria	% not available
308-2 Supplier Environmental Impacts	a. Number of suppliers assessed for environmental impacts.	58
	b. Number of suppliers identified as having significant actual and potential negative environmental impacts.	17
	c. Significant actual and potential negative environmental impacts identified in the supply chain.	Waste Treatment / Management of Waste / Depending on treatment of Waste Possible soil and ground-water contamination depending on the product. Maintenance companies : processing waste, oil, tyres, etc. Cabin cleaning : waste handling waste, use of cleaning agents
	d. Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment.	% not available
	e. Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why.	Zero (0)

GRI 401 Employment 2016		
401-1 Employee Hires & Turnover	a. Total number and rate of new employee hires during the reporting period, by age group, gender and region.	Please refer to page 55 (Disclosure 401-1 Employee Hires & Turnover)
	b. Total number and rate of employee turnover during the reporting period, by age group, gender and region.	Please refer to page 55 (Disclosure 401-1 Employee Hires & Turnover)
401-2 Employee Benefits	a. Standard benefits for full-time employees	Please refer to page 56 (Disclosure 401-2 Employee Benefits)
	b. The definition used for "significant locations of operation".	"Significant locations of operation" includes all Aviapartner stations.
401-3 Parental Leave	a. Total number of employees that were entitled to parental leave, by gender.	Data not available in all countries due to different conditions applicable.
	b. Total number of employees that took parental leave, by gender.	Male - 289 (47%) Female - 323 (53%) Please refer to page 56 of this file Disclosure 401-3 Parental Leave
	c. Total number of employees that returned to work in the reporting period after parental leave ended, by gender.	Male 289 Female 323 Please refer to page 56 of this file Disclosure 401-3 Parental Leave

	d. Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender.	Male 256 Female 290 Please refer to page 56 of this file Disclosure 401-3 Parental Leave
	e. Return to work and retention rates of employees that took parental leave, by gender.	100% return rate for both male/female. 90% of women still employed 12 months after Parental leave ended, versus 89% for male. Please refer to page 56 of this file Disclosure 401-3 Parental Leave

GRI 402: Labor/ Management Relations 2016		
402-1 Notice Period of Significant Operational Changes	a. Minimum number of weeks' notice for significant operational changes	Minimum 1 week
	b. For organizations with collective bargaining agreements, report whether the notice period and provisions for consultation and negotiation are specified in collective agreements.	This depends on the country of operation. Aviapartner follows all relevant laws and legislation related to collective bargaining agreements. Where statutory, Aviapartner specifies the notice periods and provisions for consultation and negotiation.

GRI 403 Occupational Health and Safety 2018		
403-1 Health & Safety Management System	a. Statement of whether an occupational health and safety management system has been implemented	The Aviapartner Safety Management System (SMS) is based on industry specific best practice for the Management of Safety that meets all current stakeholder requirements including Occupational Health and Safety requirements of the countries where Aviapartner operates. The Aviapartner SMS formally exists since 2015 and is based on the following, extended with Occupational Health and Safety requirements : - IATA's Safety Audit for Ground Handling Operations (ISAGO) Standards Manual Edition 10. - International Business Aircraft Handling (IS-BAH) Standards and Recommended Practices. Where applicable, country specific requirements regarding Occupational Health and Safety, are an essential part of the system. Requirements included are followed up on country level by qualified Safety Managers in the countries, in some cases with the support of external parties.
	b. Description of the scope of workers, activities, and workplaces covered by the occupational health and safety management system	The following operations throughout the Aviapartner network are covered within the scope of the Safety Management System : For Commercial Ground Handling, this scope covers from Passenger Services personnel that asssist check-in, boarding and other customer facing processes through to all Ramp related activities. Ramp related activities cover the servicing of commercial aircraft in accordance with customer specific requirements that can include aircraft cleaning, provision of potable water and waste through to commercial baggage, cargo and other types of payload that is loaded and offloaded from aircraft. For General Aviation, the scope of activities is more limited to the customer facing processes of meeting and greeting arrival / departure customers, assisting in passenger hospitality. On exceptional occasions staff may be required to assist in load and uploading passenger payload onto and from aircraft, For Cargo services next to the cargo transport to/from aircraft and the ramp related activities as described above, the scope also includes Cargo terminal operations such as warehousing, ULD build-up and breakdown, dangerous goods and live animals, pharma and perishable handling next to documentation handling for import and export and customs clearance.
403-2 Work-Related Hazards	a. Processes used to identify work-related hazards and assess risks	Reporting accidents, incidents, threats and hazards, among others, is one of the main pillars of Aviapartner's SMS. Hazards are reported to involved partners through the usual means of communication : channels or communication systems established by the airport, by the airline, by the subcontractor, etc. Reporting such events follows a detailed classification to distinguish accidents, incidents, threats, hazards, risks, etc

		To ensure the quality of the processes all safety specific functions are held by qualified individuals in accordance with company standards which are designed to achieve both internal and nationional / regional requirements. Qualification validation is performed during regular audits and inspections. Safety Management is an integral part of the company management review which is performed at Group Level, Regional and location specific level. This annual process consists of the review of key safety performance indicators and the relevant occurences during the period to ensure corrective and preventive actions are taken consistently and the effectiveness of the system is assessed. Safety audits and inspections, by internal and external stakeholders, as well as an increasing number of ISAGO and ISBAH certifications are the drivers of continuous improvement of the system.
	b. Processes for workers to report work-related hazards and hazardous situations	Reporting is at the heart of the Aviapartner SMS. "We encourage and facilitate staff reporting all hazards whatever their severity, even if the occurrence may not represent a significant risk to personal or flight safety, by offering different ways of reporting incidents and risks, always integrating the systems with those provided by the airport." Several channels are available to the users : - Informal Reporting : Local Safety Advisors are available to receive any type of information on accidents, incidents and risks, in complete confidentiality. - Reporting via Aviapartner software tools linked to the Flight Information System : a simple, quick and user-friendly way to report accidents, incidents, potential hazards, defects, irregularities, etc. - Anonymous reporting via QPulse software for Quality and Safety Management : Aviapartner web reporting makes it easy to report anonymously via internet , outside the Aviapartner network. A QR code is used to enhance user-friendliness. This type of reporting is strongly encouraged. - Confidential Reporting : All anonymous reporting via web reporting is also confidential (report is only sent to the Safety Managers and Legal Department) depending on the country. - Occupational Accident Reports : reported by the victim, witnesses, a Supervisor to describe the event, circumstances, equipment involved, immediate consequences etc. - At any time, staff can also report safety incidents by mail to the mail address of the Euro Safety Team (Safety Manager Group). The Safety Team follows up on these reports. The reporter is kept confidential. These systems are used in conjunction with systems which have been put in place by stakeholders, such as the airports where we operate and/ or airlines we handle. - Shift reports Aviapartner promotes a "Just Culture", a fundamental pillar of its SMS. People are encouraged to report all accidents, incidents, risks, environmental and operational hazards or other deficiencies with the knowledge that this reporting will be used to continually improve by learning from such events and where no disciplinary action will be taken for such actions, omissions, or decisions by staff that are considered reasonable given their experience and training, but where deliberate neglect, willful violation, repetitive misconduct, unlawful conduct, destructive acts or deliberately not reporting an accident will not be tolerated. See Report Page 16 Occupational Health and Safety
	c. Policies and processes for workers to remove themselves from dangerous work situations	Several policies and processes for workers to remove themselves from dangerous work situations are in place. See Report page 16 Occupational Health & Safety. Reporting procedures for hazardous events as part of the Just Culture described in b. are aso essential. Workers have the right to remove themselves from work situations that they believe could cause them or another person injury or ill health.
	d. Processes used to investigate work-related incidents	Country specific incident investigation is performed in order to meet the relevant national and regional specific requirements. All work-related incidents and accidents are evaluated whether internally or by the sub-contracted Occupational Health Service provider and subsequently communicated to the relevant country/ regional governing bodies. The reporting, evaluation and communication of occupationl health accident / inicdents is covered within the Corporate and Country specific Audit Oversight Program.

403-3 Occupational Health Services	a. Occupational health services' functions that contribute to the identification and elimination of hazards and minimization of risks	Aviapartner has different measures in place across the company :

BELGIUM

The composition and operation of the internal service is described in the internal service identification document imposed by law. This document, and any changes to it, must be submitted to the Health and Safety Committee. The federal government also supervises the presence and content of this document. This document is available and can be requested.

SPAIN

Aviapartner Spain has a contract with the Aspy Occupational Risk Prevention Service, which deals with the following :
- Carrying out preventive activities in order to guarantee adequate protection of the safety and health of workers
- Advising and assisting the employer, workers and their representatives and specialized representative bodies
- The evaluation of risk factors that may affect the safety and health of workers
- The planning of preventive activity and the determination of priorities in the adoption of preventive measures and monitoring of their effectiveness
- The information and training of workers
- Provision of first aid and emergency aircraft
- Surveillance of the health of workers in relation to the risks arising from work

FRANCE

Independant state controlled Health services ("Médecine du travail") are present in each airport; fully qualified doctor and nurses are available H24 7/7 to airport workers. These services provide entry into functional medical check ups, recurrent (every 2 or 3 years depending on function) medical checks, on request (from employer or employee) medical checks, Medical checks are also organised based on age and end of career forecast. All medical checks are provided at the workplace and during working hours (checks are planned into the workers rosters). Doctors are also invited at each Health and Safety Committee meeting and are strongly involved in prevention, and hazard and risk identification; for instance they were systematically consulted during the Covid crisis to ensure preventive measures were efficient.

Airport Medical Services provide a yearly report with details of their activity and actions taken, this is used to evaluate their effectiveness. Emergency services are available at each airport H24 7/7 in case a severe Health and Safety accident requires an emergency response and/or transport to hospital.

GERMANY

Periodic preventive medical check-ups or protective vaccinations. These are provided by BAD, a provider of industrial health services and Occupational Safety and Health Management. The responsible persons are doctors with Occupational Medicine Specialist qualifications and/or physiotherapists or graduated sports scientists with appropriate further educations.

The dates for occupational health check-ups or vaccinations are arranged by the organisation and communicated to the employees. These appointments are usually during the employees' working hours and they are released from work for the duration of the appointment.

In general, the results of occupational health examinations are subject to medical confidentiality. Results are only shared with the organisation if the employee gives explicit consent and if the results are relevant to the working relationship. In this case, the employee's activities will be modified to adjust the workload according to the results of the medical examination until the situation can be resolved. For new recruits, an impairment identified during the pre-employment medical examination may lead to termination of employment if the examination shows that the new employee is not suitable for the expected physical demands of the job.

ITALY

In Italy there are diverse figures involved in the process, like the Medico Competente (dedicated doctor) and RSPP (Responsabile Servizio Protezione e Prevenzione) who act in continuous monitorings of workers' health (Sorveglianza sanitaria costante). A document that includes all risks related to all activities is prepared yearly (DVR : Documento di Valutazione dei Rischi)

NETHERLANDS

Health & Safety Coordinator.

403-4 Health & Safety Management System	a. Processes for worker participation and consultation in the occupational health and safety management system	The processes for worker participation in the development of the Health and Safety Management System varies across the group. Processes include : - Monthly Report of the Internal Service for Health & Safety - Workforce representation at Health & Safety Committee meetings - Workers' Committees - Constant reporting of all dangerous conditions or non-compliances - Basic Safety Training for all Staff
	b. Where formal joint management-worker health and safety committees exist, a description of their responsibilities, meeting frequency, decision-making authority, and whether and, if so, why any workers are not represented by these commZittees.	The following locations have a formal Management-Worker Health and Safety Committee in place :

BELGIUM

In Belgium, the function of the committee is defined by Law, the internal functioning is regulated by the internal regulations of the committee.

A meeting is organized monthly, with representation of the workers, employer and prevention service.

SPAIN

The Committee consists of the Prevention Delegates, on the one hand, and by the employer and/or their representatives in a number equal to that of the Prevention Delegates, on the other. In the meetings of the Health and Safety Committee, the Union Delegates and the Technical Managers of Prevention in the company who are not included in the composition referred to in the previous paragraph, participate vocally but without voting possibilities. Under the same conditions, company workers who have special qualifications or information regarding specific issues discussed in this body and prevention technicians from outside the company may participate, provided that one of the representations on the Committee so requests.

The Health and Safety Committee meets quarterly and whenever requested by any of the representatives. The Committee adopts its own rules of operation.

FRANCE

The Comité Social et Economique represents all workers without exception.

Its mission is to :

- Submit collective or individual employee claims to the employer

- Ensure that labour regulations are enforced in the company

- Promote the improvement of health, safety and working conditions in the company and carry out investigations into work-related accidents or occupational diseases

- Carry out investigations into work-related accidents or disease of an occupational nature or occupational diseases and has the right to alert the employer in case of infringement of people's rights and in case of damage to their physical and mental health.

The committee is informed and consulted on issues of interest to the organisation, management and overall business operation of the company. In the areas of health, safety and working conditions, the Committee is informed and consulted on :

- Conditions of employment, work, including working hours, and vocational training

- The introduction of new technologies, any major development that changes health and safety conditions or working conditions

- Measures taken to facilitate the employment, return to work or job retention of workers, war disabled persons, civil disabilities, people with progressive chronic diseases and workers with disabilities, including on the workstations layout.
In case of disputes, experts or the governement Health and Safety Inspector can be called in. Members of the Committe are protected by law against any reprisal and cannot be dismissed with the consent of the Health & Safety government Inspector.

Meetings are organised on a monthly basis.

GERMANY

The Occupational Health & Safety Committee meets every quarter and is also joined by representatives of the Works Council (the employee representative body). At these meetings, risk assessments are discussed and actions are agreed upon to improve Occupational Safety and Health Management as part of a preventive strategy of continuous improvement. Likewise, measures taken are continuously reviewed for their effectiveness.

		ITALY
		There is no formal structure of joint employer/employee safety committees as such, nevertheless there is a meeting with the employer and Health and Safety staff once a year or when there are major changes. Each station has an RLS (Rappresentante dei Lavoratori per la Sicurezza) as part of legal requirements, who represents all employees at each station along with the Employer and the RRSP (Responsabile di Prevenzione di Sicurezza/Responsible for Prevention and Safety.)
		Where present, as required by the law, more than one "RLS" work together but do not constitute committee.
		NETHERLANDS
		No committees are in place.
403-5 Health & Safety Training	a. Occupational health and safety training provided to workers	All locations provide at least a Basic Safety Training to employees. This mandatory training, is provided to all employees including very often contractors, in local language with a frequency, recently revised to minimum every 2 years (before it was every 3 years). It contains all basic elements including reporting, responsibilities, risks, Just Culture etc. Depending on the needs of the location, various other specific Health and Safety Trainings are also provided.
		Effectiveness of training is evaluated during daily Safety inspections on the workfloor which are closely followed up by the Safety Managers.
403-6 Non-Occupational Medical and Healthcare Services	a. How the organization facilitates workers' access to non-occupational medical and healthcare services	Locations have different measures in place depending on relevant regulations and resources available.
	b. Voluntary health promotion services and programs offered to workers to address major non-work-related health risks	In each country a program regarding alchohol & drug abuse is in place. This aspect is also included in the Basic Safety for All training for all staff and is subject to audits, both internally and externally.
403-7 Preventing or Mitigating Significant Health and Safety Impacts	a. Organization's approach to preventing or mitigating significant negative occupational health and safety impacts	Not available
403-8 Health & Safety Management System	a. If the organization has implemented an occupational health and safety management system based on legal requirements and/or recognized standards/guidelines.	Health and Safety Management is embedded in the Safety Management System which is fully integrated in the Aviapartner Management System. It is applicable to all workers and non-workers.
		Qualified Aviapartner Auditors perform internal safety audits and audits of the subcontractors considered as critical suppliers, minimum every 2 years, following a corporate checklist which is adapted to the specific national safety requirements.
		A minimum 3% of flights Ramp Safety Checks (inspections) are also carried out in all stations (5% in 2021).
		7 stations and the corporate headquarter representing in total half of the flights are ISAGO registered (IATA International Standard for Ground Operation) and audited minimum every 2 years by external auditors : Amsterdam, Rotterdam, Dusseldorf, Nice, Marseille, Malaga, Rome. In 2021 this list was extended with 2 additional stations (Milan and Toulouse) while 5 other (Tenerife, Lanzarote, Fuerteventura, Sevilla and Lyon) were audited in 2021 and ISAGO registered in 2022. The program will be further extended to other stations in the course of 2022.
	b. Workers excluded from disclosure	No workers excluded.
	c. Contextual information	Not available
403-9 Work-Related Injuries	a.i. For all employees - Number and rate of fatalities as a result of work-related injury;	Zero (0)
	a.ii. For all employees - Number and rate of high-consequence work-related injuries (excluding fatalities);	Data for this defintion currently not available
	a.iii. For all employees - Number and rate of recordable work-related injuries;	289 recordable work-related injuries based on input from our Safety Departments.
	a.iv. For all employees - Main types of work-related injury;	Over-use
		Trips & falls
		Pinching
		Bumping
		Contusion
		Distortion
		Joint injuries
	a.v. For all employees - Number of hours worked.	5441520

	c. Actions to determine and minimise hazards	> On-site checks
		> Evaluation of injury reports
		> Internal Risk Management System
		> Risk Assessments
		> Handling of luggage. Train-the-Trainer (TTT) program with basic trainers for handling, supporting other members
		> The measures aimed at eliminating or minimizing the dangers are training and information on Occupational Risk Prevention for the entire workforce
		> Training based on ergonomic study; rostering according to work load, flight typology
		Hazards evaluated in "Gefährdungsbeurteilungen" (EH&S risk assessments), actions agreed on following the "TOP Approach" (T = Technical Actions; O = Organizational actions; P = Personnelrelated actions.)
		> Safety checks on equipment
		> Toolbox talks
	d. Any actions taken or underway to eliminate other work-related hazards and minimize risks using the hierarchy of controls.	Emergency situations, fire and evacuation
		Regularizing work equipment
		Work uniforms - PPE
		Structure of accident investigations
		Ergonomics
	e. Whether the rates have been calculated based on 200,000 or 1,000,000 hours worked.	Not applicable
	f. Workers excluded from disclosure	Not applicable
	g. Contextual information	Not applicable
403-10 Work-Related Ill Health	a.i. The number of fatalities as a result of work-related ill health;	Zero (0)
	a.ii. The number of cases of recordable work-related ill health;	29
	a.iii. The main types of work-related ill health.	Hearing loss
		Gastrointestinal disorders due to irregular work hours
		Psychosomatic effects due to stress etc
		Skeletal injuries
	b.i. The number of fatalities as a result of work-related ill health;	Not available
	b.ii. The number of cases of recordable work-related ill health;	Not available
	b.iii. The main types of work-related ill health.	Not available
	c. The work-related hazards that pose a risk of ill health	How risks were determined :
		Differs per location. Measures include :
		- Risk assessments
		- Reporting on number of incidents
		- Hazard severity measurements
		Hazards that contributed to ill health :
		- Excessive noise
		- Fine dust
		- Loading / unloading
		Actions taken to minimise risks :
		> Study by airport on the presence of fine dust, and analysis of the results by the Occupational Physician
		> Sensitization and monitoring of the wearing of hearing protection. Ergonomics training
		> The measures aimed at eliminating or minimizing occupational diseases are training and information on Occupational Risk Prevention for the entire workforce and health surveillance
		> Training based on ergonomic study; rostering according to work load, flight typology
		> Health surveillance by the competent doctor and limitation of activities where useful

	d. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.	Not applicable

GRI 404 Training and Education 2016

404-1 Average Hours of Training	a. Average hours of trainining	Average* Male : 16,03 hours Female : 19,99 hours *These results reflect all countries but exclude the Netherlands as data is currently not available.
404-2 Employee Skills & Employability	a. Programs and assistance provided to upgrade employee skills.	Not available on a Group level
	b. Transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.	Not available on a Group level
404-3 Regular Performance Reviews	a. Percentage of employees who received a regular performance review.	Group result 8,7% Due to COVID restrictions priority was not given to performance evaluations

GRI 405 Diversity and Equal Opportunity 2016

405-1 Governance Body & Employee Diversity	a. Governance body diversity	Please refer to page 57 (Disclosure 405-1 Diversity)
	b. Employee diversity	Please refer to page 57 (Disclosure 405-1 Diversity)
405-2 Salary & Remuneration of Women to Men	a. Ratio of the basic salary and remuneration of women to men for each employee category, by significant locations of operation.	Data not available
	b. The definition used for "significant locations of operation".	Not applicable

GRI 406 Non-discrimination 2016

406-1 Discrimination Incidents	a. Total number of incidents of discrimination	One (1)
	b. Status of the incidents and actions taken with reference to the following :	Incident reviewed by the organization : 1 Incident no longer subject to action : 1

GRI 407 Freedom of Association and Collective Bargaining 2016

407-1 Freedom of Association & Collective Bargaining	a. Risks to freedom of association or collective bargaining from operations and suppliers	Not available
	b. Measures to support rights to exercise freedom of association and collective bargaining.	Not available

GRI 408 Child Labor 2016

408-1 Child Labour Risks	a. Operations and suppliers with significant risk of child labour	Zero (0)
	b. Operations and suppliers with significant risk of child labor either in terms of type of operations or geographic area	Zero (0)
	c. Measures taken by the organization in the reporting period intended to contribute to the effective abolition of child labor.	Zero (0)

GRI 409 Forced or Compulsory Labor 2016

409-1 Forced or Compulsory Labour Risks	b. Operations and suppliers with significant risk of forced or compulsory labor either in terms of type of operations or geographic area	Zero (0)
	b. Measures taken by the organization in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labor.	Zero (0)

GRI 414 Supplier Social Assessment 2016

414-1 New Suppliers Screened using Social Criteria	a. Percentage of new suppliers that were screened using social criteria.	% not available
414-2 Supplier Social Impacts	a. Number of suppliers assessed for social impacts.	51
	b. Number of suppliers with significant actual and potential negative social impacts.	10
	c. Significant actual and potential negative social impacts identified in the supply chain.	6
	d. Percentage of suppliers with significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment.	% not available
	e. Supplier contracts terminated due to social incidents	Zero (0)

GRI 418 Customer Privacy 2016

418-1 Data Breaches	a. Complaints received concerning breaches of customer privacy	Outside parties : 2 Regulatory bodies : 0
	b. Number of identified leaks, thefts, or losses of customer data.	2
	c. If the organization has not identified any substantiated complaints, a brief statement of this fact is sufficient.	Not applicable

Full-time Equivalent (FTE)							
	BELGIUM	**SPAIN**	**FRANCE**	**GERMANY**	**ITALY**	**NETHERLANDS**	**TOTAL**
Number of Employees (FTE)							
Male	816	389	969		799	220	
Female	337	187	660		538	258	
Total	1153	577	1629	373	1337	477	5546
Number of Permanent Employees (HC)							
Male	767	231	915		715		
Female	326	119	630		590		
Total	1094	350	1545	361	1305	419	5074
Number of Temporary Employees (FTE)							
Male	49	158	116		86		
Female	11	69	103		71		
Total	59	227	219	10	157	58	730
Number of Non-guaranteed Hours Employees (FTE)							
Male	0	0	0		0		
Female	0	0	0		0		
Total	0	0	0	6	0	1	7
Number of Full-time Employees (FTE)							
Male	600	166	685		418		
Female	103	81	361		201		
Total	703	247	1046	495	619	231	3341
Number of Part-time Employees (FTE)							
Male	216	223	284		381		
Female	234	107	299		317		
Total	450	330	583	21	698	246	2328
	Based on end of the reporting period	Based on year average	Based on year average	Based on year average	Based on year average		

Headcount (HC)							
	BELGIUM	**SPAIN**	**FRANCE**	**GERMANY**	**ITALY**	**NETHERLANDS**	**TOTAL**
Number of Employees (HC)							
Male	886	527	1031	636	1106	393	4579
Female	413	264	733	80	747	461	2698
Total	1299	791	1764	716	1853	854	7277
Number of Permanent Employees (HC)							
Male	831	260		619	856		
Female	393	146		77	590		
Total	1224	406	1446	696	1446	757	5975
Number of Temporary Employees (HC)							
Male	55	267		17	250		
Female	20	118		3	157		
Total	75	385	183	20	407	97	1167
Number of Non-guaranteed Hours Employees (HC)							
Male	0	0	0	8	0		
Female	0	0	0	4	0		
Total	0	0	0	12	0	239	251
Number of Full-time Employees (HC)							
Male	600	192	685	559	418		
Female	103	102	361	37	201		
Total	703	294	1046	596	619	231	3489
Number of Part-time Employees (HC)							
Male	286	335	345	77	688		
Female	310	162	372	43	546		
Total	596	497	717	120	1234	623	3787
	Based on end of the reporting period	Based on year average	Based on year average	Based on year average	Based on year average		

Edition 30/06/2022
Source : Aviapartner HR systems

BELGIUM	SPAIN	FRANCE	GERMANY	ITALY	NETHERLANDS
Number of workers who are not employees and whose work is controlled by the organization					
377	0	73	17	0	97
The most common types of worker and their contractual relationship with the organization					
Blue collar (BC) White collar (WC) Consultants Consultants directly engaged by Aviapartner BC/WC indirectly through an employment agency	Not applicable	Interim workers	Interim workers	Not applicable	Temporary workers
The type of work performed					
Same as fixed-contract employees	Not applicable	Handling	Aircraft Handling Baggage Handling Passenger Handling Load Control	Not applicable	Aircraft Handling Baggage Handling Passenger Handling
Headcount (HC) or Full-Time Equivalent (FTE)					
Headcount (HC)	Not applicable	FTE	FTE	Not applicable	HC
At the end of the reporting period, as an average across the reporting period					
Based on end of reporting period	Not applicable	Average	Average	Not applicable	

Edition 30/06/2022
Source : Aviapartner HR systems

Disclosure GRI 401-1 Employee Hires & Turnover 2021

New Hires (GRI 401-1 a)						
	BELGIUM	SPAIN	FRANCE	GERMANY	ITALY	NETHERLANDS	TOTAL
Total (HC)	161	378	381	11	392	123	1446
% on total	12%	48%	22%	2%	21%	14%	20%

Turnover (GRI 401-1 b)						
	BELGIUM	SPAIN	FRANCE	GERMANY	ITALY	NETHERLANDS	TOTAL
	189	403	327	72	373	184	1548
	15%	51%	19%	10%	20%	22%	21%

New hires by Gender/Region							
Male	141	267	208	8	244	62	930
Female	20	111	173	3	148	61	516
Total	161	378	381	11	392	123	1446
% Male	88%	71%	55%	73%	62%	50%	64%
% Female	12%	29%	45%	27%	38%	50%	36%

Turnover by Gender/Region							
Male	133	275	201	56	221	95	981
Female	56	128	126	16	152	89	567
Total	189	403	327	72	373	184	1548
% Male	70%	68%	61%	78%	59%	52%	63%
% Female	30%	32%	39%	22%	41%	48%	37%

New Hires by Age Range							
<30 years	56	205	220	8	238	95	822
Male	51	147	107	6	159	45	515
Female	5	58	113	2	79	50	307
30-50 years	82	156	138	2	122	19	519
Male	71	107	87	1	61	11	338
Female	11	49	51	1	61	8	181
>50 years	23	17	23	1	32	9	105
Male	19	13	14	1	24	6	77
Female	4	4	9	0	8	3	28
Total	161	378	381	11	392	123	1446
% < 30 years	35%	54%	58%	73%	61%	77%	57%
% 30-50 years	51%	41%	36%	18%	31%	15%	36%
% >50 years	14%	4%	6%	9%	8%	7%	7%

Turnover by Age Range							
<30 years	65	201	111	16	188	85	666
Male	41	137	64	0	118	38	398
Female	24	64	47	16	70	47	268
30-50 years	76	193	177	56	127	79	708
Male	58	132	107	56	65	40	458
Female	18	61	70	0	62	39	250
>50 years	48	9	39	0	58	20	174
Male	34	6	30	0	38	17	125
Female	14	3	9	0	20	3	49
Total	189	403	327	72	373	184	1548
% < 30 years	34%	50%	34%	22%	50%	46%	43%
% 30-50 years	40%	48%	54%	78%	34%	43%	46%
% >50 years	25%	2%	12%	0%	16%	11%	11%

Edition 30/06/2022
Source : Aviapartner HR systems

Disclosure GRI 401-2 a Benefits standard for FT employees by significant location of operation 2021

Benefits applicable to all workers						
	BELGIUM	**SPAIN**	**FRANCE**	**GERMANY**	**ITALY**	**NETHERLANDS**
i. Life Insurance	*	*				
ii. Health Care	*	*	*			
iii. Disability and Invalidity Coverage	*		*			*
iv. Parental Leave	*	*	*	*	*	*
v. Retirement Provision	*		*	*	*	*
vi. Stock Ownership						
vii. Others	*					

* Benefits applicable to all workers, including part-time employees.

Edition 30/06/2022
Source : Aviapartner HR systems

Disclosure GRI 401-3 Parental Leave 2021

Parental Leave								
	BELGIUM	**SPAIN**	**FRANCE**	**GERMANY**	**ITALY**	**NETHERLANDS**	**TOTAL**	**%**
Male employees entitled to Parental Leave	Data not available	Data not available	1021	Data not available	1106	Data not available	Data not available	Data not available
Female employees entitled to Parental Leave			733		747		Data not available	Data not available
Total number of employees entitled to Parental Leave			1754		1853		Data not available	Data not available

Number of employees that took Parental Leave/by Gender								
Male	72	14	162	10	30	1	289	47%
Female	52	4	164	6	90	7	323	53%
Total number of employees that took Parental Leave	124	18	326	16	120	8	612	

Number of Employees returning after Parental Leave/by Gender & return to work rate								
Male	72	14	162	10	30	1	289	47%
Female	52	4	164	6	90	7	323	53%
Total number of employees returning after Parental Leave	124	18	326	16	120	8	612	
Return to work rate Male	100%	100%	100%	100%	100%	100%	100%	
Return to work rate Female	100%	100%	100%	100%	100%	100%	100%	

Number of Employees still employed 12 months after Parental Leave ended/by Gender & Retention rate								
Male	42	14	159	10	30	1	256	47%
Female	29	4	154	6	90	7	290	53%
Total number of employees still employed 12 months after	71	18	313	16	120	8	546	
Retention rate Male	58%	100%	98%	100%	100%	100%	89%	
Retention rate Female	56%	100%	94%	100%	100%	100%	90%	

Edition 30/06/2022
Source : Aviapartner HR systems

Disclosure GRI 405-1 Diversity 2021

Diversity							
	BELGIUM	**SPAIN**	**FRANCE**	**GERMANY**	**ITALY**	**NETHERLANDS**	**TOTAL**
Diversity by Gender (Headcount)							
Male	886	527	1031	636	1106	393	4579
Female	413	264	733	80	747	461	2698
Total	1299	791	1764	716	1853	854	7277
% Male	68%	67%	58%	89%	60%	46%	63%
% Female	32%	33%	42%	11%	40%	54%	37%
Diversity by Age							
<30 years	239	246	257	90	214	464	1510
30-50 years	668	438	1109	472	1230	307	4224
>50 years	392	107	397	157	409	83	1545
Total	1299	791	1763	719	1853	854	7279
% < 30 years	18%	31%	15%	13%	12%	54%	21%
% 30-50 years	51%	55%	63%	66%	66%	36%	58%
% >50 years	30%	14%	23%	22%	22%	10%	21%
Diversity Governance bodies by Gender (405-1 a)							
Male	21	5	36	15	18	8	103
Female	9	3	27	1	14	1	55
Total	30	8	63	16	32	9	158
% Male	70%	63%	57%	94%	56%	89%	65%
% Female	30%	38%	43%	6%	44%	11%	35%
Diversity Governance bodies by Age (405-1 a)							
<30 years	Data not available	0	1	0	0	1	2
30-50 years	Data not available	8	23	12	18	4	65
>50 years	Data not available	0	39	4	14	4	61
Total	Data not available	8	63	16	32	9	128
% < 30 years	0%	0%	2%	0%	0%	11%	1,6%
% 30-50 years	0%	100%	37%	75%	56%	44%	50,8%
% >50 years	0%	0%	62%	25%	44%	44%	47,7%

Edition 30/06/2022
Source : Aviapartner HR systems

Reduced sample excluding Belgium

Disclosure 302-1 Fuel & Energy consumption 2021

Fuel use in Megajoules (MJ)							
	BELGIUM	**SPAIN**	**FRANCE**	**GERMANY**	**ITALY**	**NETHERLANDS**	**TOTAL (MJ)**
Fuel (diesel in liters)	25865260,08	5382591,99	15296717,3	7106484,97	9456169,02	6895655,35	70002878,75
Diesel for heating	0	0	0	4754799,91	0	0	4754799,91
Gasoline	0	3628,28	533558,99	636824,86	890408,63	0	2064420,76
Jetfuel	0	0	0	0	5925,12	0	5925,12
Gas (m³)	10323848,52	0	0	0	0	0	10323848,52

Disclosure GRI 306 Waste 2021

Total weight of waste in metric tons (306-4/306-5)		Waste category	Prepared for re-use	Recycling	Other recovery operations	Directed to landfill	On-site	Off-site	CARGO	HANDLING	TOTAL
Non-hazardous waste	Diverted from disposal	Paper & cardboard		x			x		29,0	1605,2	1634,2
	Diverted from disposal	Plastic		x	x		x		2,1	1,7	3,8
	Diverted from disposal	Plastic foil		x	x		x		87,9	0,0	87,9
	Diverted from disposal	Wood		x			x		173,1	17,0	190,0
	Diverted from disposal	WEEE	x	x	x		x		0,8	0,2	1,0
	Diverted from disposal	Metal		x			x		3,4	3,4	6,7
	Diverted from disposal	Tyres	x	x			x			0,1	0,1
	Diverted from disposal	Old GSE& vehicles	x	x			x			5,2	5,2
	Diverted from disposal	Other recycled waste		x			x		7,2	0,5	7,7
Hazardous waste	Diverted from disposal	Waste oil		x			x			2,8	2,8
	Diverted from disposal	Hazardous waste		x		x	x		4,0	0,2	4,2
	Diverted from disposal	Toner kits	x	x			x			0,1	0,1

Non-hazardous waste	Directed to disposal	Residual waste				x		x	133,1	283,3	416,4
Hazardous waste	Directed to disposal									0	0

Edition 30/06/2022
Source : Aviapartner Finix

Sustainability
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*September
2022*

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