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THE TRANSPARENCY ACT DUE DILIGENCE REPORT 2024

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1. INTRODUCTION

The Norwegian act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (the "Transparency Act" or the "Act") entered into force on 1 July 2022. Norwegian Air Shuttle ASA ("Norwegian") and certain of its subsidiaries are subject to the Transparency Act, pursuant to Section 2 and 3 of the Act.

Pursuant to Section 4 of the Transparency Act, Norwegian is obliged to conduct due diligence to identify actual and potential threats to fundamental human rights and decent working environment within its own organisation and supply chain. The findings from the due diligence shall be presented by way of an annual due diligence report, no later than 30 June each year, cf. Section 5 of the Act.

This due diligence report elaborates on the due diligence conducted by Norwegian in the period from 1 July 2023 to 30 June 2024. The purpose of this due diligence report is to give the general public access to the key findings from the due diligence, as well as Norwegian's implemented and ongoing efforts to address and combat any actual or potential risks.

2. GENERAL INFORMATION

2.1 Norwegian's business and corporate structure

Norwegian has a leading position in the Nordic market for air travel, operating short-haul point-to-point domestic and cross-border flights within the Nordics and flights from the Nordics to key destinations in Europe and closely adjacent countries. The corporate structure of the group is organised as follows:



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- A. Formal adoption of compliance within the organisation Board of Directors
 - B. Mapping out actual and potential risks Procurement and Human Resources (HR)
 - C. Action appropriate measures to combat negative effects Procurement and Human Resources (HR)
2. Due diligence report (Section 5 of the Act)
- A. Provide a general description of the company Legal
 - B. Inform about actual negative effects and potential risks Procurement and Human Resources (HR)
 - C. Inform about measures adopted by the company Procurement and Human Resources (HR)
3. Information to general public (Section 6 of the Act)
- A. Respond to requests regarding the company's due diligence Legal

Norwegian has implemented various tools for ensuring compliance with the Transparency Act, which are presented in chapter 3 and 4 of this report. No particular steps have been taken to produce this report, as the measures are already implemented as a part of Norwegian's general social responsibility conduct.

3. NORWEGIAN'S CONDUCTING OF DUE DILIGENCE

3.1 Overview of the value chain and suppliers

Norwegian consistently maintains an overview over its suppliers through SAP Ariba Supplier Lifecycle & Performance solution, where all new suppliers are registered and data for existing ones is maintained. Norwegian's supplier database in SAP Ariba consists of approximately 12,000 suppliers, which includes all historical suppliers and around 2150 currently active suppliers.

All the contracts with suppliers are registered in SAP Ariba Contracts, which enables thorough monitoring of the contract activity with controlled processes, automated tracking, and a full audit trail.

To prioritise environmental, social and governance (ESG) topics, Norwegian conducted a materiality assessment in December 2022 to January 2023. The assessment was conducted in accordance with the concept of double m meaning that it considered how the actions of the company impacts society but also how ESG topics may impact the value of the company. A third-party conducted the assessment through a process that involved an employee survey, a workshop with Executive Management and interviews with seven key stakeholders, including shareholders, union representatives, customers, suppliers, and NGOs. The result of the assessment has been calibrated by the Executive Management team. Topics identified as having high impact are direct greenhouse gas emissions, employee welfare, labour practices, health and safety, cyber security and data protection, supply chain sustainability, climate risk and labour and human rights. Due to the expansion of regulations within ESG, Norwegian conducted an ESRS gap analysis in 2023, building on insights from the previous materiality assessment. This analysis will aim to realign Norwegian's sustainability priorities with evolving regulatory standards, laying the groundwork for a more comprehensive evaluation of sustainability objectives. While not mandatory, the findings from this analysis are likely to impact the structure of Norwegian's 2023 ESG reporting by enhancing transparency and accountability. Norwegian also aims to inform all relevant stakeholders of upcoming expected changes to its ESG strategy, while at the same time seeking continuous alignment with relevant regulations.

Comprehensive approach to governance will continue to impact Norwegian's sustainability strategy, providing a more holistic perspective on objectives. Moreover, these assessments position Norwegian well for a forthcoming Double Materiality Assessment (DMA) that the company is aiming to complete in 2024. This will play a crucial role in shaping Norwegian's strategy and management approach, ensuring alignment with CSRD and ESRS guidelines. Committed to stakeholder engagement, Norwegian aims to refine its engagement processes, with the updated DMA likely identifying new stakeholders for inclusion. While we do not expect significant changes to the topics deemed material topics identified in the previous materiality assessment, we do expect an expansion in general of material topics. Furthermore, insights from an updated double materiality assessment will enrich and build upon the due diligence conducted via the Transparency Act report, bolstering Norwegian's risk management processes.



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3.2 How Norwegian's due diligence is conducted within its own organisation

At the heart of Norwegian are the people who make it all possible. At year-end 2023 Norwegian had 4,470 employees representing 60 nationalities, compared to 3,871 employees representing 58 nationalities at year-end 2022.

The People Engagement Survey conducted in 2023 measured employees' perception of respect, inclusion as well as job satisfaction. The survey will be conducted on an annual basis with the purpose to collect evidence-based input to help the company understand how to continuously improve the work environment, quality of work, employee's wellbeing, and organisational effectiveness.

Norwegian has a well-functioning Health, Safety and Environment (HSE) organisation, including HSE risk assessments (SRA), audits, handling of Grievance, Whistleblowing and occurrence reports. Trend analyses are presented and discussed in Work Environment Committees (WEC). HSE has been a key contributor to ensuring that Norwegian is compliant to relevant regulations and internal procedures. All aspects of its operations are subject to extensive safety controls and certification. Norwegian's operations meet the strictest standards and the highest level of regulations in the industry, set by the European Aviation Safety Agency (EASA).

Norwegian has skilled and active Health and Safety Representatives (HSR) throughout the entire organisation, actively participating in WEC's and various projects groups. WEC's are established within each legal entity and employees have access to oversight of all HSRs and WEC members, WEC minutes of meeting, HSE SRA reports and all relevant HSE information through the company's intranet. Collaboration meeting between Executive management and the Head of HSR (HHSR) and unions is maintained through bi-annual meetings.

At Norwegian, transparency and the involvement of employee representatives in various decisions is central. Meetings are conducted regularly with all unions and HSR, to ensure the high standards Norwegian is aiming for. Norwegian depends on continuous feedback and inputs from the employee representatives. In addition to regular meetings, Norwegian conducts an "All HHS" annual meeting to discuss common topics and solutions across all groups of employees. Furthermore, the company's employees are active through employee representation on the Board of Directors in Norwegian Air Shuttle ASA and several of the group's subsidiaries.

Norwegian listens to its employee's concerns and in Norwegian all employees have the right to report unacceptable circumstances. The company aims to have a culture of transparency with a low threshold for speaking out. If notifying a manager, HR advisory, HSE department or an employee representative of unacceptable circumstances does not lead anywhere, or if an employee is not comfortable raising the matter in any of these channels, it is possible to submit a notification in the Grievance or Whistleblowing channel. The channels are confidential and handled according to GDPR. Norwegian's employees have easy access to the company's reporting systems via the company's intranet.

The Grievance reporting system is used when an employee has personally been treated poorly. Poor treatment could involve a breach of individual employment rights, bullying or harassment, and the complainant is seeking redress or justice for themselves. The person making the complaint therefore has a vested interest in the outcome of the complaint and for this reason is expected to provide evidence to prove their case. Whistleblowing is used when raising a concern about danger or illegality that affects others, for example customers, members of the public, the environment or Norwegian. The person blowing the whistle is usually not directly or personally affected by the danger or illegality. Safety Net is the reporting system used for actual or potential HSE issues in the context of aviation safety, as well as other HSE hazards or concerns that can impact Norwegian's operations.

3.3 How Norwegian's due diligence is conducted with its suppliers



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Maintaining effective due diligence in supply chain is key, staying alert to changes is critical and requires ongoing attention from the organization.

Norwegian performs due diligence towards existing and new suppliers combining 3 platforms:

- **SAP Ariba Supplier Lifecycle & Performance** – a solution where business and procurement can monitor the performance of key suppliers. Supplier compliance is improved by using supplier qualifications, which allows to qualify a supplier for a specific region or commodity combination and segment with help of modular questionnaires, which are sent to suppliers to complete. To mitigate supply chain risks, including forced labor, slavery, human trafficking, and corruption, Norwegian imposes the legal requirements and internal rules and standards applicable to Norwegian on its suppliers. We require our suppliers to comply and follow with the requirements of the Corporate Code of Conduct, which defines Norwegian social, ethical, and environmental standards. How well they conform to these standards can be monitored in SAP Procurement tools.
- **SAP Ariba Supplier Risk** – a solution which performs risk due diligence in supply base, segmenting by country and industry, monitors risk and proactively alerts on ongoing compliance checks. It also provides assessment, monitoring and mitigation capabilities to manage an organization's supplier and third-party risk exposure. With SAP Ariba Supplier Risk, Norwegian can establish risk due diligence, ongoing monitoring and remediation processes to proactively address risks across the source-to-pay process and the full supplier base.
- **EcoVadis** - Norwegian is using EcoVadis collaborative platforms (EcoVadis IQ Plus and EcoVadis Ratings) to increase transparency, facilitate improvement and standardize reporting. As the world's leading and globally trusted sustainability rating company, EcoVadis evaluates sustainability performance across four themes – environment, labour and human rights, ethics and sustainable procurement and provides an overall rating that is weighted according to the specificities of a company's size, location and industry.

EcoVadis IQ Plus and EcoVadis Ratings solution provides the tools and support companies need to integrate sustainability into their corporate governance and conduct supply chain due diligence. Before Norwegian enters into sourcing process or contract with new suppliers, the supplier is assessed through the EcoVadis IQ Plus portal to get the instant risk screening results. If a supplier has gone through the full assessment process through ratings platform, it is requested to share the scorecard with Norwegian.

Norwegian also ensures that when new contracts are entered into with suppliers, appropriate contract clauses to mitigate the risk of threats to fundamental human rights and decent working environment are included. By including such contractual obligations, Norwegian has means to ensure that its suppliers at all times comply with its requirements regarding human rights and working environment within its supply chain.

4. DUE DILIGENCE FINDINGS AND IMPLEMENTATION OF APPROPRIATE MEASURES

4.1 Key findings – own organisation

A culture marked by Diversity, Equity and Inclusion is critical to the company's success. Norwegian works to ensure equal opportunities for all people and offer a safe and inclusive workplace, in addition to recognising individual differences. This is considered vital for every aspect of Norwegian's business practice. Diversity is found in any social identity, such as gender, age, culture, nationality, ethnicity, physical abilities, political and religious beliefs, sexual orientation, and other attributes.

The company's workforce as of year-end 2023 was made up of 46 percent women and 54percent men.



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Norwegian conducted the People Engagement Survey in 2023 identical to survey 2022. The participation rate was 76 percent .

The results from the People Engagement Survey for 2023 shows that 70 percent of the employees said that they believe that everyone can succeed in Norwegian, regardless of gender, age, cultural background, sexual orientation, religious affiliation, and disability.

- 78 percent of employees said they are treated with respect at work
- 76 percent of employees said that their perspective is valued by their colleagues, even if it is different from their view
- 76 percent of employees said that they are overall satisfied with Norwegian as a place to work
- 79 percent of employees said that they will be working at Norwegian in one year's time, while only 4-6 percent said that they are looking for new opportunities

Norwegian promotes equal pay for equal work and ensures that no employee is unlawfully discriminated against in terms of salary, benefits, incentives, or other forms of compensation or remuneration. The airline industry is a diverse industry with many job families and employees with different education and background. Norwegian differentiates between pay scale-based employees and individually salaried employees. A pay scale, also known as a salary structure, is a fixed system that determines what salary an employee is to receive, often adjusted in yearly increments. Pay scale salaries are independent of gender or age so there is no salary difference between genders. When comparing individual salaried employees regardless of roles or group, the average fixed salary among women amounts to 80 percent of the average fixed salary of men. Norwegian closely monitor and differences in salary and compare groups of employees/roles and constantly strives to ensure a fair pay practice for all.

A safe and healthy workplace is a fundamental right for all of us and a business imperative. One of Norwegian's top priorities is therefore to support the health and well-being, both mental and physical, and minimise absence due to ill-health or injury, through advice, awareness programs and proactive initiatives. Norwegian strives to avoid any kind of incidents and monitor any incidents closely. From 1 July 2023 to 30 June 2024 there were three serious injuries reported (fractures, two technical and one cabin crew) , a few minor crew and technical injuries (burns, musculoskeletal strain, cuts and bruises).

4.2 Key findings – supply chain

By year end 2023, we successfully onboarded 100% of our active suppliers to the EcoVadis IQ Plus tool for instant risk level screening and continuous monitoring. Currently out of 2634 suppliers, 12 suppliers have been identified with high overall risk, which is due to high country or industry risk. Overall Risk is summarized from four main themes risks (environment, labor and human rights, ethics and sustainable procurement), which also takes into consideration DocScan findings (technology to automatically search for IQ Network supplier's sustainability-related documents, certifications and commitments) and EcoVadis score from EcoVadis rating platform.

5 suppliers are identified with high Labor & Human Rights risk and this is mostly related to companies being located in high risk countries and which might have potential risk with dealing with health and safety issues encountered by employees at work during operations, working hours, remunerations and social benefits granted to employees. 5% of fully assessed suppliers in EcoVadis ratings platform have improvement action to provide supporting documents on working conditions (remuneration, working hours, benefits).

We are following EcoVadis recommendation on action priorities to determine which suppliers Norwegian should act on first. Every high-risk case is evaluated at Norwegian individually, depending on the criticality and usage of services or goods provided by supplier.

We have actively followed up with our suppliers to accept the Corporate Code of Conduct to ensure the ethical behavior and responsible practices. From July 2023 to June 2024, 97.5 % of our new suppliers have accepted the Code.

4.3 Implementation of appropriate measures – own organisation



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Diversity, equity and inclusion are core values at every level of Norwegian's business practices. By actively fostering a diverse workforce that values differences, Norwegian can better take advantage of different points of view and experiences and use these as a key factor to developing its business and driving innovation. Norwegian believes that by valuing its people, the company can create a valuable business.

Norwegian implements and actively updates actionable policies, practices, and evaluations that will support the company's ESG goals.

Based on amongst others the results from the People Engagement Survey 2023, the improvement areas lay within agility, work-life balance, development & performance. Management, HSRs and other relevant stakeholders are in a following up process discussing possible actions. Norwegian has set the following future targets for gender balance:

Norwegian's overall gender target is to have a sound gender balance with a 40/60 ratio either way throughout the company, as well as making a difference in the traditional split between female-dominated and male-dominated roles. The explicit targets to achieve this are as follows:

- In management positions at all levels 40/ 60 percent either way by 2025
- Cabin crew – increase share of male employees with 10 percent by 2025
- Pilots – double share of female pilots by 2030
- Technical – increase share of female employees with 5 percent by 2025

To achieve this, a strategy is created on how to include measurements.

Some focusing area:

- Encourage young females to study science, technology, engineering, and mathematics (STEM) education.
- Invite young students to our office, to inspire girls to consider aviation careers at an early age.
- Highlight successful female pilots as role models. Share their stories through media, social platforms, and events.
- Norwegian offer flexible schedules and part-time options for all pilots. To attract more female pilots to the profession.

Throughout 2023, Norwegian has proactively integrated DEI (Diversity, Equity, and Inclusion) principles into different stage in the recruitment process.

These collaborations have not only broadened our talent networks but also signal our commitment to creating a workplace where everyone feels valued and heard.

This approach ensures that Norwegian strive to have a workforce that mirrors the richness and diversity of the world around us.

We have continued to lead by example leveraging DEI initiatives to attract, retain and develop a workforce that represents the diverse society of talent available. By doing so, we are not only staying ahead in the competitive talent landscape but also embodying the principles that define us as an organization committed to excellence and inclusivity.

Decoupling from unconscious bias Norwegian has a goal to increase diversity and ensure that our recruitment procedures are fair and equal for all groups in society. Considering the updated version of Norway's equality and discrimination law, we also intend to be a frontrunner and make sure our recruitment processes



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are not only compliant but exceed the expectations from the relevant regulations. Norwegian deeply cares about societal equality and has long been a safe and inclusive workplace for minority groups.

After a thorough evaluation of current recruitment practices, we have uncovered that we need to reduce the exposure to unconscious biases and system noise which are some of the root causes of unconscious and random discrimination. This has been on our radar for some time as the current procedure includes manual evaluation of applicants before interviews.

Norwegian has considered several methods to reduce exposure to unconscious biases:

- Creation of job descriptions that promote inclusivity and fairness.
- Throughout 2023, Norwegian conducted a test project with impact startup Test Hub Technologies who offer blind screening process for applicants. This process has been designed specifically to reduce unconscious biases. The methods to reduce exposure to unconscious biases were supported by IMDI (The directorate of integration and diversity)
- Fostering partnerships with organizations that champion diversity and inclusivity.
- All members of Talent team have been trained in diversity and inclusiveness.
- Internal Promotion: In 2023, the blind screening solution was also used to screen internal applicants for several internal positions. This ensure that Norwegian strives to reflect global diversity, equity, and inclusion in all activities comprising employees and customers throughout the jurisdictions the company works in.

When it comes to Norwegian's work to ensure equal pay, Norwegian differentiates between pay scale-based employees and individually salaried employees, representing 81 and 19 percent of number of employees respectively.

A pay scale, also known as a salary structure, is a fixed system that determines what salary an employee is to receive, often adjusted yearly in increments. Pay scales and levels are defined in the Collective Bargaining Agreements (CBA) with the relevant unions. At Norwegian employees within Cabin Crew, Flight Deck, Technical, Warehouse and Operational Control Centre are under the agreement with specific Pay Scales for their employee group. When entering the position, employees are placed on a pay scale level based on education, years of experience and special skills. The employees are then adjusted one level in yearly increments.

Pay scale salaries are independent of gender or age. Criteria used to initially place employees on the correct level is agreed with the unions and seniority in the role would determine the level the specific employee is adjusted to each year. Pay scales are therefore a well-functioning tool to ensure equal pay for equal work.

Norwegian is committed to ensuring fair and equitable compensation practices for all employees, also individual salaried ones. To achieve this, Norwegian utilises the Korn Ferry Hay Grade methodology to evaluate and position all roles that are individually salaried, predominantly employees that work in administrative positions.

By doing so, compensation decisions are based on objective criteria such as job complexity, responsibility, accountability, and other relevant factors, rather than personal biases or subjective opinions. This approach allows Norwegian to establish clear and transparent guidelines for compensation, promoting a culture of fairness and equality within the organisation.

Norwegian aims to ensure that all employees have the same opportunities to advance. Achieving greater equity within job families require concrete actions both regarding internal advancement and hiring practices. Norwegian have implemented the following measures to achieve this:



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- Monitoring remuneration practices on an annual basis to identify areas of potential concern in terms of equal pay and put in place remedial measures when deemed appropriate and consistent with applicable law.
- Ensuring that leaves of absence related to pregnancy and parental leave, among other types of leaves, or other events linked to parenting/family care status/care tasks, do not result in a violation of Norwegian's equal employment opportunities commitment and equal pay commitment.

Norwegian has clear and firm expectations to record and follow up all incidents through the company's deviation systems, to identify and mitigate root causes. Norwegian believes in continuous learning, a constructive feedback culture and a diverse and inclusive organisation. There have been 12 Whistleblowing reports (6 of the reports on the same issue) and non-Grievance reports in in this period. All have been followed up in accordance with company policies.

One instance of reported discrimination or harassment is one too many. However, the company's concern also includes instances that might not be brought to the company's attention. Norwegian needs to ensure that guidelines and training offers are constantly communicated to crew and management. To measure the risk of lack of knowledge, the awareness of guidelines was a topic in the People Engagement Survey 2022 and 2023. During the last year Norwegian has simplified the guidelines and clarified the objective, commitment and desired behaviour. Information on where the relevant channels to report such instances, as well as the process of handling reports, has been communicated by top management in relevant town hall meetings. It is part of the HSE onboarding of crew through Computer Based Training (CBT) and for technical personnel through classroom training. The company is continuing the work of creating greater awareness of relevant guidelines throughout 2024 and 2025.

People are the company's greatest asset and Norwegian is committed to ensuring that employees have the opportunity to further develop their skills. All of the company's employees must have the same access to career development and Norwegian offers.

Norwegian has included a section on unconscious bias in training of Managers and will continue to include in all of its recruitment processes.

In Q4 of 2022, a comprehensive leadership framework encompassing 24 distinct leadership behaviours was established. This framework was meticulously crafted through a series of workshops that incorporated inputs from over 61 leaders, supplemented by one-on-one interviews with members of the Executive Management Team. Designed to underpin our company values and foster the behaviours needed to realize our strategic ambitions, this framework serves as the foundation for our leadership development initiatives.

Throughout 2023, the leadership framework and its associated behaviours have been integral to the development of leadership programs, executed in collaboration with an external partner. These programs aim to enhance leadership capabilities and align management practices with the organization's strategic goals. By February 2025, it is projected that all line managers overseeing three or more direct reports will have participated in the relevant leadership program, ensuring widespread adoption and consistent application of the established leadership behaviours across the organization.

Of the 107 participants in the leadership programs, 47% are female, and 53% are male, reflecting our commitment to diversity and inclusion within our leadership development efforts.

Additionally, a dedicated development program for our Specialists will be launched in the fall of 2024. This program will follow the same learning approach and structure as the leadership programs, ensuring that our Specialists receive consistent and high-quality development opportunities aligned with our organizational values and strategic goals.



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Norwegian remains at the forefront of innovation by being a first mover in the Nordics to introduce Evidence Based Training for all its pilots. This revolutionary training concept is based on strengthening a pilot's core competency framework to enhance Safety. By focusing on process instead of outcome, Norwegian expects increased effectiveness and efficiency in pilots' decision making going forward. Furthermore, all Norwegian employees that could have an impact on safety receives continuous training on the Safety Management Systems at a level in accordance with their role in the organisation. The training system is described in the Safety Management Manual and is audited by the Civil Aviation Authorities.

4.4 Implementation of appropriate measures – supply chain

The EcoVadis platform is helping Norwegian to manage and communicate its supply chain sustainability performance in a clear and actionable way. With the EcoVadis assessment, Norwegian can:

- monitor the performance of its supplier's sustainability performance and manage risks;
- promote transparency on sustainability practices with reliable ratings and global benchmarks;
- get practical insight into the key sustainability issues which are applicable to different industries. EcoVadis industry risk profiles provide an overview of the industries' major regulations, strengths and improvement areas; and
- identify high performers and encourage the continuous improvement of sustainability practices across the network.

EcoVadis Scorecard is helping Norwegian to understand its supplier's level of sustainability commitment and it is an actionable tool that helps to drive sustainability improvement throughout the company's supply chain. As the requesting company, Norwegian is enabled to:

- set a minimum score expected from its suppliers, aligned with Norwegian's sustainable procurement goals;
- identify strengths and weaknesses of its suppliers based on the sustainability evidence in the score card; and
- work on a customized corrective action plan for suppliers with low scores that do not meet Norwegian's requirements.

SAP Ariba Risk allows Norwegian to be aware of the wide range of supply chain risks it might face. Norwegian is monitoring supplier risk exposure and alerts on the Supplier Risk dashboard. These can be events affecting the supply chain continuity, including the political situation in the supplier country, natural disasters, corruption, fraud, compliance information about the supplier, including legal, regulatory, and environmental risks. SAP Ariba Supplier Risk gathers data, including articles, company information, news reports and other third-party content, from multiple public and private service providers.

By using SAP Ariba Supplier Lifecycle & Performance, Norwegian is requesting that its suppliers for certain categories provides certificates and all certificate types are visible on the Certificates tab in the supplier details. The validity statuses of the supplier's certificates are also displayed and suppliers can be automatically reminded of expiring or missing certificates. This helps Norwegian to identify, qualify, onboard and transact with the right suppliers for its business.

The above solutions which Norwegian are using helps safe decision making when selecting its suppliers and Norwegian can see that the future of supplier collaboration is intelligent, digitized, built on a secure foundation of transparency and trust, which enables more strategic relationships to help to reduce cost, mitigate risk and drive innovation.

5. HOW TO REQUEST INFORMATION FROM NORWEGIAN

Norwegian has set up a portal for its customers to make requests related to the Transparency Act. You can access this portal through <https://www.norwegian.no/om-oss/selskabet/innsyn> and file your request relating to suppliers and sub-suppliers, labour rights, reporting, services or others.



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(Chair)

Lars Rahbæk Boilesen
(Board Member)

Karina Kjær Deacon
(Board Member)

Katherine Jane Sherry
(Board Member)

Stephen Thomas Kavanagh
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