FINNAIR

Policy commitment to human rights

1. Introduction

Finnair Group ("Finnair") connects Europe, North America, and Asia, bringing people, cultures, and economies together daily. As one of the world's oldest continuously operating airlines, Finnair is committed to conducting sustainable business practices and respecting all internationally recognised human rights principles both in its own operations and throughout its value chain.

Finnair's commitment to respect human rights is reflected in Finnair's Code of Conduct, Supplier Code of Conduct, and in several internal policies established for managing risks, including risks on human rights of individuals.

Finnair strives to proactively prevent and mitigate potential adverse human rights impacts. We act with due diligence in accordance with the UN Guiding Principles on Business and Human Rights. Finnair's approach in conducting continuous human rights due diligence is described in section **3**. Grievance mechanisms and remedy are described in sections **4** and **5**.

The Policy Commitment has been approved by Finnair's Chief Executive Officer on 29 January 2025.

2. Finnair's commitment to respecting human rights

Finnair is committed to respecting all internationally recognised human rights as defined in the International Bill of Human Rights and the ILO[1] Declaration on Fundamental Principles and Rights at Work. We conduct our business in accordance with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. We are also committed to implementing the principles of the UN Global Compact.

We respect the freedom of association and employees' right to collective bargaining. Employees have the right to seek representation and join workers' unions and councils in accordance with local laws and international conventions.

We are committed to respecting and promoting the health and safety of our employees and complying with working hours legislation in accordance with the principles of the ILO. All employees have the right to fair and decent working conditions.

[1] The International Labour Organisation

We do not accept, use, or benefit from any forms of modern slavery, including but not limited to forced or bonded labour and human trafficking. We do not cooperate with suppliers who use such labour.

We do not accept child labour or cooperate with suppliers or subcontractors who use such labour.

We provide equal opportunities in employment to people regardless of origin, gender, nationality, religion, political opinion, age, sexual orientation, civil status, or disability. We treat everyone with dignity and respect, and do not accept any form of discrimination, harassment, violence, or safety or security violations.

We aim to provide an accessible end-to-end customer experience to all, including those needing special attention and adaptation to their particular needs.

We are committed to data privacy and ethical use of data. The purpose of data protection is to protect customers, employees, and other stakeholders against any violation of their privacy when processing personal data.

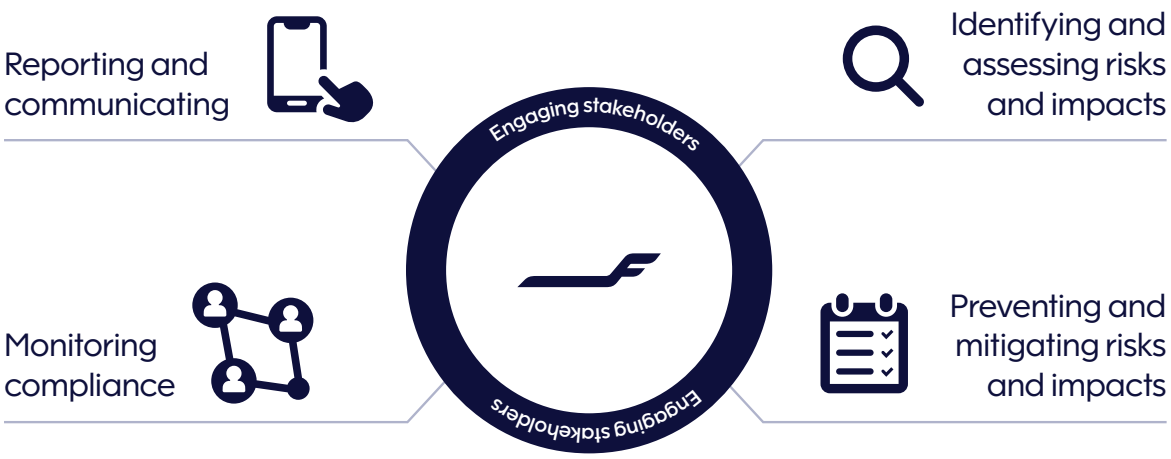
We aim to protect the environment and support local communities through socially and environmentally responsible practices in order to prevent harm to the living conditions and livelihood of communities.

We expect our suppliers and partners to respect these fundamental human rights.

3. Human rights due diligence

Finnair's human rights due diligence is integrated in Finnair's Internal Control Framework which is the defined set and structure of Finnair's internal policies, rules, procedures, and key controls. The company structures in the Internal Control Framework ensure that Finnair takes a systematic and proactive approach in respecting human rights.

This means that we regularly conduct risk assessments in all process areas including both our own operations and the value chain, we strive to identify any potential risks and impacts on human rights, we analyse and assess the risks and impacts identified, we perform control and risk management activities by defining and implementing procedures and key controls, as well as monitor compliance with the applicable requirements. Throughout due diligence, we strive to continuously improve the dialogue with the stakeholders affected by our operations. The phases of due diligence are described below.



3.1 Identifying and assessing risks and impacts

Risk assessments are regularly conducted in all Finnair process areas. This covers both our own operations and our value chain. Potential or actual adverse human rights impacts are identified and assessed across four stakeholder groups: own workforce, supply chain workers, customers, and affected communities.

Finnair's business and shared functions, i.e. the First Line of Defence, are responsible for continuously identifying potential risks, including adverse impacts on human rights, and integrating risk aspects in their decision-making procedures. In addition, systematic and comprehensive risk identification and assessment workshops are regularly facilitated by Risk & Compliance function, which is the Second Line of Defence compliance monitoring function.

The risks identified are documented in Finnair's risk register for the purpose of planning and implementing risk mitigation activities.

Insights from external human rights data sources are utilised in risk identification and assessment. Reports received through the grievance mechanisms are also a source of information in this work.

Salient human rights are those human rights that are at risk of the most severe negative impacts through a company's activities or value chain. Therefore, they vary from company to company, and over time. Finnair has identified that its salient human rights relate to customer health and safety, occupational safety, such as working conditions and discrimination, of its own employees and value chain workers, data protection of its customers and employees, forced labour and child labour in its supply chain, Finnair flights being utilised for human trafficking purposes, and impacts related to living conditions and livelihood of affected communities.

3.2 Preventing and mitigating risks and impacts

Based on the regular risk identification and assessment across Finnair's operations,including both own operations and value chain, control and risk management activities are planned and implemented. The activities and measures are developed in collaboration with relevant internal and external stakeholders and, if feasible, with affected stakeholders.

Accountability for all control and risk management activities is clearly assigned. Hence, preventing and mitigating adverse human rights risks and impacts is integrated in Finnair's management system.

Internal control and risk management activities are an integral part of the management's overall duty to ensure that Finnair's objectives, including the commitment to respecting human rights, are achieved. Through efficient systems of internal control and risk management, deviations from objectives can be prevented or detected as early as possible.

3.3 Monitoring compliance

The procedures and key controls already included in Finnair's Internal Control Framework are annually reviewed to ensure that they are designed, implemented and operating effectively. The Framework is refined as required. The Framework is systematically developed and maintained to ensure that Finnair takes a proactive and effective approach in respecting human rights across Finnair's own operations and our value chain.

Finnair's Internal Control Framework is maintained by the Risk & Compliance function which is also responsible for continuously monitoring compliance with the requirements set in the Framework.

The Internal Audit function, in the Third Line of Defence, provides independent and objective assurance on the efficiency and effectiveness of the internal control and risk management activities, including activities related to potential or actual adverse impacts on human rights.

Finnair's Board of Directors is responsible for monitoring and evaluating the efficiency of Finnair's internal control and risk management systems into which the requirement of respecting human rights is integrated. The primary governance principle is adherence to the Three Lines of Defence model, with clear division of roles and responsibilities with respect to internal control and risk management. This is described in the publicly available Finnair Corporate Governance Statement in more detail.

3.4 Reporting and communicating

Finnair's activities and measures related to respecting human rights are annually reported in the publicly available Finnair Sustainability Statement.

4. Grievance mechanisms

Since 2019, Finnair has had the SpeakUp reporting channel for raising concerns about violation of the law, suspected fraud or misconduct, or other unethical behaviour. This includes concerns on human rights issues. The link to the SpeakUp reporting system is easily available for Finnair employees through the Finnair intranet and on the Finnair website for all external stakeholders. People can report anonymously via SpeakUp system. All reports are investigated by the Risk & Compliance function and treated confidentially.

In addition to the SpeakUp reporting channel, human rights-related issues can also be reported through the following channels:

- Data protection breaches and issues on data privacy are reported to **privacy@finnair.com**.
- Occupational safety incidents are reported in the BeSafe system.

Finnair has a strict policy of non-retaliation against anyone raising a concern in good faith.

5. Remedy

Finnair is committed to taking appropriate action and effective measures to remedy any adverse impact on human rights that we have caused or contributed to. We expect that our suppliers uphold the same commitment.

If Finnair is made aware of a suspected human rights concern in Finnair's own operations or in our value chain, we will initiate investigation as per our standard operating procedure.

If the investigation substantiates the allegations, Finnair seeks to provide timely remedy, implement corrective actions, and review internal policies, procedures, and controls to enhance compliance and prevent similar incidents in the future.