

***FINNAIR***

**Modern Slavery and  
Human Trafficking  
Statement**

Reporting year 2025



## 1. Introduction

This statement has been prepared and reviewed in compliance with the provisions of Section 54 of the UK Modern Slavery Act 2015, Part 2 of the Australian Modern Slavery Act 2018, and Section 11 of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. It outlines the steps Finnair Group ("Finnair") has taken to prevent modern slavery, including forced labour and child labour, and human trafficking in its operations and supply chain.

## 2. Our Commitment

Finnair is committed to respecting all internationally recognised human rights, including those set out in the International Bill of Human Rights and the International Labour Organization's 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. Finnair is a signatory to the UN Global Compact since 2013 and we uphold its ten principles, including those related to labour and human rights.

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

## 3. Our Business and Supply Chain

Finnair is one of the world's longest-operating airlines, connecting Europe, Asia, and North America through its Helsinki hub. Our own operations include passenger and cargo air transport, packaged tours, aircraft maintenance, catering, and various customer and support services.

Our diverse supply chain is built around our route network. Our supply chain includes outsourced cabin crew, service workers, and our suppliers' personnel involved in aircraft maintenance, cleaning, catering, ground handling, hotels, transportation services, and packaged tour destination services.

While the risk of modern slavery and human trafficking within our own operations is considered low due to the highly regulated nature of the aviation industry, we recognise that risks may exist in our global supply chains, especially in those that operate in higher-risk geographies or sectors.

## 4. Policies and Practices on Prevention of Modern Slavery and Human Trafficking

Our commitment to fulfilling our responsibility to respect human rights is set out in the following key policies:

- **Finnair Code of Conduct:** Sets expectations for ethical behaviour across all employees and operations.
- **Policy Commitment to Human Rights:** Outlines Finnair's human rights due diligence process, which is integrated into Finnair's Internal Control Framework.



- **Supplier Code of Conduct:** Requires suppliers to uphold human rights, labour rights, and environmental standards. Breaches may result in contract termination.
- **Procurement Policy:** Establishes internal frameworks for managing supplier relations and risks and ensuring compliance with legal, regulatory and internal standards.

We expect all our partners and suppliers to adhere to the same principles as set out in our Code of Conduct when working for Finnair by either signing Finnair's Supplier Code of Conduct or providing a written commitment to their own equivalent Code or public policy, given it meets similar standards.

We published our Policy Commitment to Human Rights on our website in January 2025. The Policy Commitment includes a human rights commitment and description of our human rights due diligence process, which is integrated into Finnair's Internal Control Framework. The due diligence process includes the assessment of potential and actual human rights risks in our own operations and extended value chain, including risks of modern slavery and human trafficking in the form of forced, bonded, or child labour. The due diligence process also encompasses prevention and mitigation of identified risks, appropriate remedy and grievance processes, stakeholder engagement, and monitoring and communication on progress, for example through our annual Sustainability Report.

The assessment of potential and actual human rights risks is informed by internal expertise, external data sources, and stakeholder engagement. Finnair's Risk & Compliance function oversees the implementation of due diligence processes, while our Internal Audit function provides independent assurance. The Board of Directors monitors the effectiveness of our internal control and risk management systems, including those related to human rights.

We follow standardized supplier management practices, including supplier assessments and audits, to ensure effective collaboration with contracted suppliers. In 2025, we implemented a systematic process to proactively identify and mitigate risks to people and the environment within our existing supply chain. Key and strategic suppliers, as well as suppliers with an elevated inherent risk profile based on country, industry, and commodity factors, undergo an AI-enabled ESG screening and receive a continuously updated risk score. This enables ongoing monitoring of our supplier base and timely action where needed.

We provide a confidential and anonymous reporting channel, SpeakUp, available to employees and external stakeholders for the reporting of any violations or non-compliance with applicable laws and regulations, violation of human rights, or violation of the Finnair Supplier Code of Conduct.

## 5. Training, Awareness and Industry Engagement

All Finnair employees are required to complete a Code of Conduct training as part of our ongoing commitment to ethical business practices.

During 2025 all procurement managers, relevant vendor managers and relevant Aurinkomatkat personnel received training for identifying social and environmental risks in the supply chain, performing risk analyses, and engaging with suppliers on these matters. In 2025, an on-site sustainability audit of a Tier-2 supplier manufacturing fabrics was carried out, with a focus on labour and human rights. There were no negative findings as a result of the audit.



Finnair provides mandatory, role-specific training based on IATA and ICAO guidelines for its cabin crew and ground agents on identifying and responding to suspected cases of human trafficking. Finnair mandates that all stations from which its flights are operated from have a human trafficking prevention plan in place, ensuring employees are aware of procedures and contact points for reporting suspected cases. We collaborate with relevant authorities and airport partners to ensure that any suspected cases of human trafficking are appropriately addressed and reported. We also actively participate in industry-led initiatives and events organised by, for example, Organisation for Migration (IOM) and the International Air Transport Association (IATA) to combat human trafficking and promote human rights in aviation.

All destination management companies who provide tour operations services for Aurinkomatkat are required to complete Aurinkomatkat sustainability training, which includes a module dedicated to human rights, forced labour, child labour, and human trafficking.

Finnair is a signatory to IATA's resolution against trafficking in persons, reaffirming airline industry's commitment to address human trafficking through training and exchange of best practices. We engage with our suppliers through direct dialogue to raise awareness and build capacity on responsible business conduct.

## 6. Effectiveness and Future Actions

We monitor the effectiveness of our actions by measuring the number of severe human rights issues or incidents. In 2025, no severe human rights issues or incidents were reported or otherwise brought to the attention of Finnair.

We monitor current trends in human trafficking and update internal training, instructions, and awareness building accordingly, with the aim to effectively recognise potential human trafficking situations.

As part of our ongoing commitment to preventing modern slavery and human trafficking, we acknowledge that both our operations and those of our suppliers are constantly evolving. We continue to review our processes and practices to ensure that they are up to date and continue to work with other companies and external stakeholders to share knowledge, learning, and best practices.

This statement has been approved by the Executive Board of Finnair and signed on its behalf by the Chief Executive Officer on 26.2.2026.

A handwritten signature in black ink, consisting of several overlapping loops and lines, representing the name Turkka Kuusisto.

Turkka Kuusisto  
Chief Executive Officer, Finnair