



# Modern Slavery and Human Trafficking Statement

Reporting year 2024



## 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. We are also a signatory to the UN Global Compact since 2013 and 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 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.
- Supplier Code of Conduct: Requires suppliers to uphold human rights, labour rights, and environmental standards. Breaches may result in contract termination.
- Finnair's Procurement Policy: Establishes internal frameworks for managing supplier relations and risks and ensuring compliance with legal, regulatory and internal standards.

We expect all suppliers to comply with our Supplier Code of Conduct and to cascade these expectations throughout their own supply chains.

As of 2024, Finnair had not published a policy commitment fully aligned with the UN Guiding Principles on Business and Human Rights. We published our Policy Commitment to Human Rights on our website in January 2025.

We follow standardized supplier management practices, including supplier assessments and audits, to ensure effective collaboration with contracted suppliers. In 2024, a sustainability audit framework was developed, covering modern slavery risks among other topics, and it will be implemented in 2025.

In 2024, we formulated and conducted our human rights due diligence process which will be fully implemented during 2025. Starting from 2025, Finnair's approach to human rights due diligence is embedded in our Internal Control Framework. We regularly conduct risk assessments across our operations and supply chain to identify, assess, and mitigate potential human rights infringements, including forced labour and human trafficking. These assessments are informed by internal expertise, external data sources, and stakeholder engagement. Our 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 provide a confidential and anonymous reporting channel, SpeakUp, which is available to both employees and external stakeholders for reporting suspected human rights violations.

## 5. Training, Awareness and Industry Engagement

All Finnair employees are required to complete training on our Code of Conduct as part of our ongoing commitment to ethical business practices. We also provide mandatory, role-specific training based on IATA and ICAO guidelines for cabin crew and ground agents on identifying and responding to suspected cases of human trafficking. During 2024, selected employees who participated actively in our due diligence process were provided with in-depth e-learning on human rights in business context. The topic of preventing human trafficking was included in an internal security blog publication, and presentations of the topic was held during Finnair's annual Safety & Security week by Finnair's Head of Security and the Finnish Border Guard.

We engage with our suppliers through direct dialogue to raise awareness and build capacity on responsible business conduct. 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. All destination management companies who provide tour operations services for Aurinkomatkat are required to complete Aurinkomatkat sustainability training including a module dedicated to human rights, forced labour, child labour and human trafficking.

We collaborate with governmental authorities and airport partners to ensure that any suspected cases of human trafficking identified during our operations are appropriately addressed and reported. We also actively participate in industry-led initiatives and events organized by for example Organization for Migration (IOM) and the International Air Transport Association (IATA) to combat human trafficking and promote human rights in aviation. 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.

## 6. Effectiveness and Future Actions

We monitor the effectiveness of our actions by measuring the number of severe human rights issues or incidents. In 2024, no such cases were reported.

We also monitor the 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 on 20 October 2025 and signed on its behalf by the Chief Executive Officer.



Turkka Kuusisto  
Chief Executive Officer, Finnair