

AVIALLIANCE

Modern Slavery Act - Section 54 Statement

AviAlliance GmbH



AVIALLIANCE

Content

- 1. Introduction.....3
- 2. Organizational structure, business, supply chain.....4
- 3. Organizational Policies.....5
- 4. Assessing and managing risk - Due diligence and approach to remediation6
- 5. Training – building awareness7
- 6. Monitoring and Evaluation8

AVIALLIANCE

1. Introduction

This statement is published by AviAlliance GmbH (**AviAlliance**) under Section 54 of the United Kingdom Modern Slavery Act 2015 (**MSA**), for the fiscal year starting 1 January 2025 and ending 31 December 2025.

As of the date of this statement, AviAlliance has chosen to publish this statement on a voluntary basis, taking into account the UK Government's practical guidance on modern slavery and providing relevant information where applicable and to the extent available.

AVIALLIANCE

2. Organizational structure, business, supply chain

Organizational structure

AviAlliance is a limited liability company established under the laws of Germany registered with the local court (*Amtsgericht*) of Düsseldorf, and with its registered offices in Düsseldorf.

As at 31 December 2025, AviAlliance employed 54 employees in its sole office in Düsseldorf (excluding seconded employees and dormant employment relationships).

AviAlliance is managed by its Managing Director.

Business

AviAlliance is one of the world's leading private industrial airport managers and investors. It participates in airport privatizations and secondary-market processes worldwide and acquires shares in airports and concessions.

AviAlliance has built up a portfolio with current holdings in the airports in Athens, Düsseldorf Hamburg and as asset manager of Aberdeen, Glasgow, San Juan (Puerto Rico) and Southampton. For more information on AviAlliance business and its airport portfolio please see our latest [corporate presentation](#).

The airports and related entities, in which AviAlliance invests, operate under autonomous management and distinct governance framework, and therefore their policies, risk assessment and choices may differ from those of AviAlliance. To that end, those entities are not included in this Report and, to the extent they have a filing obligation under the UK Modern Slavery Act, we would expect them to report separately.

Supply Chain

AviAlliance procures a range of goods from external providers within its ordinary operations, such as the purchase of office equipment, laptops, cell phones and other equipment, hardware and software, or other supplies for its employees as well as branded items for its employees and third parties. AviAlliance also provides strategic and consulting services to some of its airport participations.

Furthermore, AviAlliance procures a range of services from external providers within its ordinary operations, such as advisory, accounting, tax, legal, IT-services, travel services, cleaning and catering services. AviAlliance also leases office space as well as company cars.

In the fiscal year ended 31 December 2025, AviAlliance procured goods and services from 56 Tier 1 suppliers from 8 countries (Australia, Greece, Luxemburg, Spain, Puerto Rico, Switzerland, UK, Germany). By country 93,6 percent of our related expenditure was with suppliers based in Germany.

AVIALLIANCE

3. Organizational Policies

The key policies that apply to the AviAlliance and its wholly owned entities (“**AviAlliance Group**”) as regards our workplace and supply chains are outlined below:

- The Compliance Manual is built around our Code of Conduct, which defines AviAlliance’s commitment to integrity, transparency, fairness, and legal compliance in our business activities, and regulates corporate ethics and behavioral expectations. It prohibits unethical conduct such as bribery, corruption, and any improper influence, while also requiring equal treatment, non-discrimination, and respect for human dignity in the workplace. It also establishes AviAlliance’s whistleblowing system, encouraging reporting of misconduct through multiple channels, ensures confidentiality, allows anonymous re-ported, and explicitly prohibits retaliation against whistleblowers. It also sets out procedures for investigating reports, documenting findings, and implementing corrective actions, aiming to ensure that breaches are addressed consistently and transparently.
- The Business Partner Compliance Policy governs establishing and managing business relationships with our business partners¹. It requires that all business partners, prior to engagement, undergo a vetting process, which may include, depending on the nature of the business relationship, a check on their integrity-critical aspects or other findings that could endanger AviAlliance or its reputation, economic performance and financial reliability, as well as an assessment of any compliance critical findings (as regards any applicable laws, including anti-corruption regulations). The check can be conducted through various means, such as self-assessment questionnaires, internet and press research, interviews, comparison with other internal *and* external databases, and, if necessary, through commissioning background research from external service providers. A partner that has not been engaged for more than three years needs to be reassessed. Depending on the findings and in particular if these, to the opinion of the Compliance Officer, are critical to the integrity of the AviAlliance Group or otherwise pose a risk to the company, the Compliance Officer may not approve the establishment or the continuation of the relationship with the business partner.
- AviAlliance also has a Diversity Charter which sets out the company’s commitment to fostering a workplace culture based on diversity, equity, and inclusion. It applies to all employees and serves as a guiding principle for how AviAlliance exercises its rights in its shareholdings.

¹ AviAlliance defines ‘business partners’ as all natural or legal persons, with whom companies of the AviAlliance Group enter into a contractual or quasi-contractual relationship within the scope of their business operations (such as consortium partners, consultants, intermediaries and members of corporate bodies in other entities nominated by AviAlliance).

4. Assessing and managing risk- Due diligence and approach to remediation

The nature of our workforce, which is highly skilled and predominantly permanent, means we consider ourselves at lower risk for modern slavery in the workplace.

German law is intended to provide a strong safeguard against the risks of forced labor, child labor, and other forms of modern slavery (“Modern Slavery”). All employees receive appropriate wages in line with German labor laws. The German Constitution (*Grundgesetz, 1949*) protects human dignity. The General Act on Equal Treatment (*Allgemeines Gleichbehandlungsgesetz, 2006*) prevents discrimination based on race, gender, religion, disability, age, or sexual identity. The Occupational Health and Safety Act (*Arbeitsschutzgesetz, 1996*) requires employers to assess risks and ensure safe working conditions. The Minimum Wage Act (*Mindestlohngesetz, 2014*) establishes a binding wage floor and protects workers from exploitation.

Together, these measures promote fair, safe, and respectful working conditions.

In addition, AviAlliance has a whistleblowing system (see information above on our Compliance Manual) which actively encourages our employees and external parties to report any suspected wrongdoing, such as violations of laws, internal policies, fraud, or serious mismanagement. Reports can be made confidentially or even anonymously, and AviAlliance has a non-retaliation policy which states that individuals who report concerns in good faith will not face dismissal, demotion, harassment, or any other form of disadvantage as a result of speaking up. Reports can be submitted through several channels, including direct supervisors, management, the Compliance Officer, or an external ombudsman. Regardless of the chosen channel, all reports are treated seriously, forwarded to the Compliance Officer, and handled with strict confidentiality. Once a report is received, the Compliance Officer assesses whether it qualifies as wrongdoing under the policy and decides whether to investigate personally or appoint an external qualified investigator. The whistleblower is kept informed throughout the process, and a summary of actions and results is generally provided within a defined timeframe.

For the fiscal year ended on 31 December 2025 AviAlliance has not received any complaints or discovered situations with respect to AviAlliance’s workplace.

5. Training – building awareness

Employees at AviAlliance are required to acknowledge the Compliance Manual formally at the start of their employment and to confirm on a recurring basis—specifically annually or whenever the Code is significantly updated—that they have read, understood, and will comply with its contents. This ensures continuous awareness of compliance obligations and reinforces accountability across the organization. In addition, managers are expected to actively communicate the content of the Code, explain its policies, and support their teams in understanding and applying it in practice. AviAlliance also provides an ongoing training dimension by requiring employees to seek guidance from the Compliance Officer whenever uncertainties arise, and by encouraging continuous engagement with compliance topics in real situations. Thus, compliance understanding is reinforced through practical application and consultation.

In addition, all employees receive periodically online training on various aspects of legal compliance, including anti-bribery and anti-discrimination, as well as on specific legal frameworks such as the General Act on Equal Treatment (*Allgemeines Gleichbehandlungsgesetz, 2006*), occupational health and safety regulations, data protection laws, and competition and antitrust laws.

Lastly, compliance awareness is extended beyond its employees to partners and third parties. AviAlliance expects that such partners and third parties will comply with the same ethical standards as AviAlliance employees and are committed to respecting anti-bribery and corruption laws (see information above on our Compliance Manual). Third parties, agents and advisors who perform services on behalf of AviAlliance, are subject to appropriate due diligence (including a background check) before they are engaged as well as to subsequent screenings (see information above on our Business Partner Compliance Policy).

AVIALLIANCE

6. Monitoring and Evaluation

Through periodically internal audits and ad-hoc reviews via sampling by the Compliance Officer, we periodically assess whether our activities adhere to organizational policies in order to identify risks and prevent any deviations. We also regularly carry out reviews of our policies and procedures.

Düsseldorf, 30 June 2026

AviAlliance GmbH

Approved and signed by: Gerhard Schroeder, Managing Director