

Policy Statement of EW Discover GmbH

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1 Commitment of EW Discover GmbH to respect Human Rights

EW Discover GmbH is part of Lufthansa Group. Lufthansa Group connects people, cultures and economies every day. As a company that stands for cosmopolitanism, tolerance and diversity, we see it as our responsibility to respect human rights and act as sustainably as possible.

The protection of human rights is not a matter of course in all countries in which we operate as a company. We cannot control the political development of these countries. However, we

can contribute to respecting human rights by recognising human rights and environmental risks in our business operations and also in our supply chain and by preventing violations.

We therefore select our suppliers carefully and contractually oblige them to comply with human rights, labour and health standards and environmental protection. We check any cases of doubt.

Embedding human rights and sustainability in our business processes and our global supply chain is an ongoing task. In doing so, we are guided by

- key international conventions and declarations such as the Universal Declaration of Human Rights,
- the International Covenant on Civil and Political Rights,
- the International Covenant on Economic, Social and Cultural Rights,
- the core labour standards of the International Labour Organization (ILO),
- the UN Guiding Principles on Business and Human Rights,
- the 10 principles of the UN Global Compact,
- the OECD Guidelines for Multinational Enterprises,
- the IATA resolution on combating human trafficking
- and environment-related agreements such as the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Transboundary Movement of Hazardous Wastes.

In conjunction with the requirements of the German Supply Chain Due Diligence Act (LkSG), they form the framework for our corresponding actions.

The Lufthansa Group always complies with applicable national law. In cases where international human rights are restricted by local laws, we endeavour to comply with internationally recognised standards without coming into conflict with local laws. Where local laws go beyond international standards, the Lufthansa Group will comply with local laws.

2 EW Discover GmbHs' Expectations of Employees and Suppliers

EW Discover GmbH expects its employees and suppliers to respect human and environmental rights and to support EW Discover GmbH in preventing human rights and environmental risks and in preventing, ending or minimising violations.

The expectations of EW Discover GmbHs' own employees and managers are set out in particular in the Code of Conduct for Lufthansa Group (<https://investor-relations.lufthansa-group.com/en/corporate-governance/compliance/code-of-conduct.html>). The expectations regarding the behaviour of suppliers are summarised in particular in the Code of Conduct for Suppliers (<https://investor-relations.lufthansa-group.com/en/corporate-governance/compliance/code-of-conduct.html>).

EW Discover GmbH also sets its expectations, particularly with regard to priority risks, through further preventive and remedial measures (see below).

3 EW Discover GmbH's Procedures to fulfil their Due Diligence Obligations

3.1 Risk Management

EW Discover GmbH has set up a risk management system with the aim of recognising and preventing or ending human rights and environmental risks and violations of legal interests along the supply chain.



To this end, EW Discover GmbH has established the following clear internal responsibilities in particular:

At EW Discover GmbH, two employees are mainly responsible for implementing the LkSG. The Human Rights Key Account, which is part of the LH Human Rights Project Group, is primarily responsible for the topic of human rights and non-discrimination and advises on relevant internal company issues. The EW Discover GmbH Human Rights Key Account is supported and accompanied across the Group by the Lufthansa Group Human Rights & Non-Discrimination Team, which coordinates the observance of human rights and environmental obligations within the Lufthansa Group.

Risk management with regard to our suppliers and the supply chain is managed by the Head of Finance, Controlling & Procurement, who is responsible for purchasing and is closely supported and assisted in his work by the Lufthansa Group Procurement Team.

The Human Rights Key Account and the division manager responsible for Procurement are supported by contact persons from specialist departments such as Occupational Health and Safety, Human Resources, Compliance and Procurement. This network can be continuously expanded based on the results of the risk analysis.

3.2 Risk Analyses and Priority Risks

EW Discover GmbH conducts human rights and environmental risk analyses on an annual and ad hoc basis. Eight operating sites and more than 740 suppliers were included in the annual risk analysis in 2024. Software is used to assist in the appropriate identification, weighting and prioritisation of risks given the large number of operating sites and suppliers. The companies and suppliers are subjected to a country, sector and media information screening. In the case of companies in our own division, the plausibility of the risks identified is checked using surveys and company statistics. In addition to external data sources, internal findings such as information received via Group reporting channels, including the anonymous whistleblower system, are also taken into account.

The identified risks are then weighted and prioritised, taking into account the appropriateness criteria of the LkSG, such as the EW Discover GmbHs' ability to influence a supplier.

For companies and suppliers that have a prioritised human rights or environmental risk, EW Discover GmbH takes preventive measures to prevent violations. If violations are identified, EW Discover GmbH stops the violation as quickly as possible or creates a remedial concept - depending on where and which violation occurs.

The Human Rights Key Account and the Head of Finance, Controlling & Procurement inform the management of the EW Discover GmbH annually about the results of the risk analysis. The results are also communicated to other key decision-makers such as the Ground Works Council and the Works Council Board or the future General Works Council. The risk analysis did not identify any high or medium risks, only low risks.

EW Discover GmbH considers the prohibition of disregarding labour protection in its own business area and the prohibition of disregarding freedom of association and the prohibition of disregarding labour protection in the supply chain to be particularly relevant.

3.3 Preventive Measures

EW Discover GmbH pursues a two-pronged strategy to protect human and environmental rights: on the one hand, it aims to prevent risks from arising in the first place. Secondly, it aims to respond to structural risks identified as part of the risk analysis with appropriate measures and prevent or at least minimise adverse human rights and environmental impacts.

The aim is to prevent risks from arising in the company's own business area, primarily through regular global awareness-raising campaigns, a wide range of grievance mechanisms and a broad range of advisory services provided by the Human Rights & Non-Discrimination Team. EW Discover GmbH has also adapted its procurement processes so that, for example, sustainability criteria already play a key role in the selection of suppliers and suppliers are generally checked for compliance with human rights, labour and environmental standards and integrity before contracts are concluded. Suppliers are also contractually obliged to protect human rights and the environment.

A portfolio of measures has been developed to prevent, stop or minimise the risks posed by EW Discover GmbH, which includes the following measures in particular:

Codes of Conduct and Contractual Measures

Lufthansa Group has summarised its expectations with regard to respecting human rights and protecting the environment in two codes of conduct: in a code addressed to managers and employees of Lufthansa Group and in a code addressed to suppliers ([Code of Conduct - Lufthansa Group Investor Relations](#)). Both codes have been revised in order to fully fulfil the requirements of the LkSG. EW Discover GmbH is based on the behavioural requirements of both codes.

In addition, EW Discover GmbH has adopted its own "Social Agreement", which contains a clear commitment to mutual respect, appreciation and inclusion and describes the key principles and behaviours that the management of EW Discover GmbH wishes to promote and uphold together with its employees. The "Social Agreement" includes clear guidelines against discrimination and the promotion of equal rights and respect for all employees, regardless of their origin, religion, sexual identity, gender or age.

A detailed corporate social responsibility clause is negotiated in supplier contracts, which combines the expectations of EW Discover GmbH as a Lufthansa Group company with rights and obligations and in which suppliers are also requested, among other things, to pass on the expectations placed on them to their own suppliers.

3.4 Remedial Measures

If EW Discover GmbH identifies an actual or imminent violation of human rights or environmental obligations, it will take appropriate remedial action without delay. If it is not possible to immediately end, prevent or minimise a violation at a supplier, EW Discover GmbH shall draw up and implement an appropriate remedial and/or preventive concept.

When creating and implementing the concept, particular consideration is given to (i) the joint development and implementation of a plan to end or minimise the breach with the company causing the breach, (ii) joining forces with other companies as part of industry initiatives and industry standards in order to increase the possibility of influencing the perpetrator and (iii) temporarily suspending the business relationship while efforts are made to minimise the risk. As a last resort, EW Discover GmbH reserves the right to terminate business relationships.

3.5 Effectiveness Monitoring and Continuous Improvement

In order to effectively prevent negative human rights or environmental impacts, EW Discover GmbH reviews the effectiveness of its preventive and remedial measures and makes any necessary adjustments. To this end, information from those affected is analysed, among other things. In addition, dialogue is actively sought with employee representatives.

3.6 Complaints Options

In order to protect those affected and recognise structural risks at an early stage, Lufthansa Group relies on information. Anyone - whether Lufthansa Group employees or external whistleblowers such as employees of a supplier or affected persons - can report human rights and environmental risks or violations caused by Lufthansa Group or one of its suppliers to the Human Rights & Non-Discrimination Team. This is possible, for example, directly by e-mail, via an electronic whistleblowing system or via an external ombudsperson. The complaints channels are available in a variety of languages.

Every report is examined impartially and in a confidential manner. Reports can also be submitted anonymously via the electronic whistleblower system or the ombudsperson. Lufthansa Group is expressly committed to protecting whistleblowers from reprisals and discrimination.

Lufthansa Group reviews the effectiveness of the complaints procedure at least once a year and on an ad hoc basis, e.g. with regard to the necessary communication of the complaints procedure.

All information on the complaints procedure, including the reporting channels, is summarised in the rules of procedure and published on the website (<https://investor-relationships.lufthansagroup.com/en/corporate-governance/compliance/hinweisgebersystem.html>) of the Lufthansa Group on the Internet

3.7 Documentation and Reporting

EW Discover GmbH continuously documents the fulfilment of its human rights and environmental due diligence obligations in accordance with the requirements of the LkSG. EW Discover GmbH reports on the process by which it fulfils its due diligence obligations, on the priority risks and on the expectations of employees and suppliers in this Policy Statement,

which is updated annually and as required. It also reports to the Federal Office of Economics and Export Control (BAFA). All reports are published on the Internet

Contact us

For questions and comments on this policy statement or other human rights or environmental issues, please contact humanrights4y@lufthansa-group.com.

Further information is published on Lufthansa Group website (<https://www.lufthansa-group.com/en/responsibility/corporate-responsibility/ethics-and-integrity/menschen-rechte.html>).