

POLICY STATEMENT

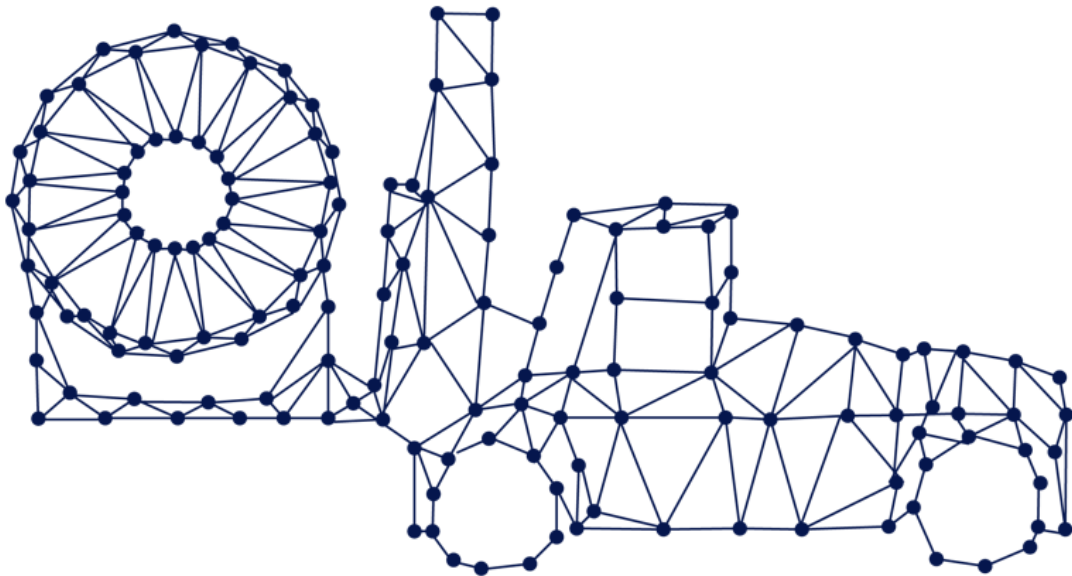


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Declaration of the Lufthansa Group for the respect of human rights

The Lufthansa Technik Logistik Services GmbH (LTLS) is part of the Lufthansa Group. The Lufthansa Group connects people, cultures, and economies every day. We are a company that stands for open-mindedness, tolerance, and diversity, and we believe we have a responsibility to uphold human rights and operate in a sustainable manner.

Unfortunately, the protection of human rights is not guaranteed in all countries in which we operate as a company. We cannot control the political development of these countries. However, we can contribute to respect for human rights in our business division and also in our supply chain by identifying risks relating to human rights and the environment and by preventing violations.

We therefore select our suppliers carefully and contractually oblige them to comply with human rights, labor and health standards and environmental protection. We check in 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 follow 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 labor standards of the International Labor 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
- International Holocaust Remembrance Alliance (IHRA)

- and environmental agreements such as the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Transboundary Movements of Hazardous Wastes and their Disposal.

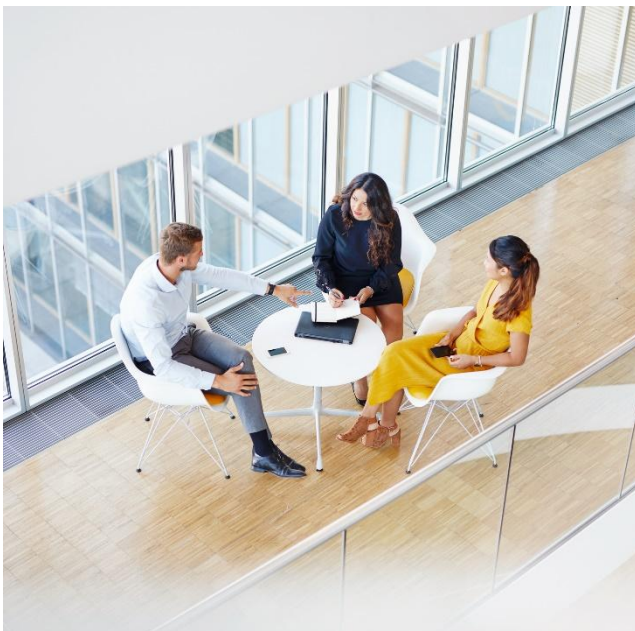
They form the framework for our actions in conjunction with the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz - LkSG).

The Lufthansa Group always complies with applicable national law. Where international human rights are restricted by local laws, we strive to comply with internationally recognized standards while not clashing with local laws. If local laws exceed international standards, then the Lufthansa Group will comply with local laws.

This Policy Statement defines the Lufthansa Group as Lufthansa Technik Logistik Services GmbH and all affiliated companies over which it exercises a controlling influence.

Lufthansa Group's expectations of employees and suppliers

The Lufthansa Group expects its employees and suppliers to respect human and environmental rights and to support the Lufthansa Group in preventing, minimizing, and/or ending risks and violations related to human and environmental rights.



The expectations placed on the employees and managers of the Lufthansa Group are specifically set out in the Lufthansa Group Code of Conduct.

Code of Conduct - Lufthansa Group Investor Relations

The expectations regarding the conduct of suppliers are summarized specifically in the Code of Conduct for Suppliers.

Code of Conduct - Lufthansa Group Investor Relations

The Lufthansa Group also expresses its expectations, particularly with regard to priority risks, in the form of further preventive and remedial measures (see below).

Procedures of the Lufthansa Technik Logistik Services GmbH to fulfill its due diligence obligations

1. Risk Management

The Lufthansa Technik Logistik Services GmbH has established a risk management system that aims to identify, prevent, and eliminate human rights and environmental risks and violations in its own business division and along the supply chain.

Modules of the Lufthansa Technik Logistik Services GmbH risk management:



The Lufthansa Technik Logistik Services GmbH has therefore established the following clear internal responsibilities, in particular:

At Lufthansa Technik Logistik Services GmbH, the Commercial Management, Business Development & Qualification central department is playing a key role in implementing the LkSG. Accordingly, the observance of human rights and environmental obligations within Lufthansa Technik Logistik Services GmbH

as well as the processes with regard to our suppliers and the supply chain will be centrally responsible. Contact persons from specialist departments such as occupational health and safety, human resources, compliance and purchasing, as well as key accounts in individual prioritized Lufthansa Group companies, provide support as required. This network can be continuously expanded based on the results of the risk analysis.

In order to monitor risk management, the Human Rights Key Account function is attached to the management of the central area of Management, Business Development & Qualification with a direct reporting line to the management.

The management is carried out by Özgür Yesilkaya.

The Human Rights Key Account of Lufthansa Technik Logistik Services, Esther Drobil, informs the Lufthansa Technik Logistik Management about risks and measures in its own business area and in the supply chain of Lufthansa Technik Logistik.

The Corporate Audit department is set up to support the Human Rights Key Account and to carry out checks on the implementation level.

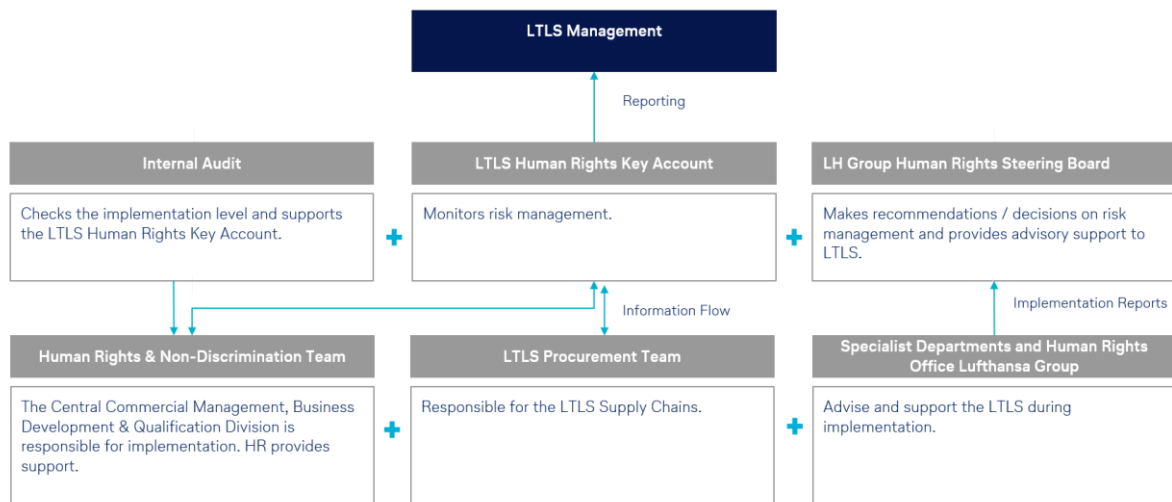


Özgür Yesilkaya, Managing Director, Lufthansa Technik Logistik Services GmbH



Esther Drobil, Head of Commercial Management, Business Development & Qualification

In addition, the LH Group Human Rights Steering Board has been created as a steering committee that can make recommendations on risk management. Chaired by the Human Rights Officer, it consists of the heads of the Sustainability, Compliance, Auditing, Purchasing and Occupational Safety departments. The LH Group Steering Committee makes recommendations on risk management and provides advisory support to the Human Rights & Non-Discrimination Team of the LTLS and to the LTLS Human Rights Key Account.



Organizational chart risk management Lufthansa Technik Logistik Services GmbH

Q 2. Risk Analyses and Priority Risks

The Lufthansa Technik Logistik Services GmbH carries out risk analyses relating to human rights and the environment every year and as warranted. 12 Lufthansa Technik Logistik Services operating sites and more than 450 suppliers were included in the annual risk analysis in 2025.

Software is used to assist in the appropriate identification, weighing, and prioritization of risks given the large number of companies and suppliers. The companies and suppliers are screened by country, sector, and media references. For companies in our own business division, the plausibility of identified risks is checked on the basis of 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 weighed and prioritized, while taking into account the appropriateness criteria of the LkSG, such as the Lufthansa Technik Logistik Services GmbH ability to influence a supplier.

With companies and suppliers that have a prioritized human rights or environmental risk, the Lufthansa Technik Logistik Services GmbH takes preventive measures to avoid violations. If violations are identified, the Lufthansa Technik Logistik Services GmbH stops the violation as quickly as possible or creates a remedial concept - depending on the type of violation and where it occurs.

The LTLS Human Rights Key Account informs the management of Lufthansa Technik Logistik Services GmbH annually about the results of the risk analysis. The results are also communicated to other relevant decision-makers such as the Works Council.

Lufthansa Technik Logistik Services GmbH continuously considering the prohibition of disregard for occupational health and safety and work-related health hazards in its own business area. Within the supply chain the risk related to environmental changes is being considered.

The Lufthansa Technik Logistik Services GmbH addresses these risks primarily through the preventive measures described below.



3. Preventive Measures

Lufthansa Technik Logistik Services 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. On the other hand, it wants to react to structural risks identified in the risk analysis with appropriate measures and prevent or at least minimize adverse effects on human rights and the environment.

Risks are to be prevented from arising in the company's own business area, primarily through a wide range of complaints mechanisms and internal and external quality audits.

Lufthansa Technik Logistik Services GmbH has also adapted its procurement processes so that, for example, sustainability criteria play a key role in the selection of suppliers and suppliers are always checked for compliance with human rights, labor and environmental standards and integrity before contracts are concluded.

Suppliers are also contractually obliged to protect human rights and the environment.

To ensure occupational health and safety and the avoidance of work-related health risks, far-reaching and comprehensive preventive measures have been implemented and are checked by regular internal and external audits. Furthermore, internally defined standards, cooperation with LH Group Security, the appointment of safety officers, internal occupational safety training and regular equipment checks are used to increase the minimum legal requirements that have already been implemented.



☰ 4. Remedial Measures

If the Lufthansa Technik Logistik Services GmbH becomes aware of an actual or imminent violation of human rights or environmental obligations, it will take appropriate remedial action without delay.

If a supplier is unable to immediately terminate, prevent, or minimize a violation, the Lufthansa Technik Logistik Services GmbH will 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 minimize the violation with the company causing the violation and

(ii) temporarily suspending the business relationship while efforts are made to minimize the risk. As a last resort, the Lufthansa Technik Logistik Services GmbH reserves the right to terminate business relationships.



📈 5. Effectiveness Monitoring and continuous Improvement

For the effective prevention of negative human rights or environmental impacts, the Lufthansa Group reviews the effectiveness of its preventive and remedial measures and makes any necessary adjustments. This includes evaluating information regarding occupational health and safety risks and conducting spot checks and audits.

6. Complaints Options

The Lufthansa Group relies on information to protect those affected and to recognize structural risks at an early stage.

Regardless of whether they are Lufthansa Group employees or external whistleblowers, such as employees of a supplier or affected parties, any person can report risks or violations relating to human rights and the environment that were caused by the Lufthansa Group or one of its suppliers to the Human Rights & Non-Discrimination Team. These can be reported directly by e-mail, via an electronic whistleblower system, or via an external ombudsperson. The channels for complaints are available in a variety of languages.

Every report is examined impartially and with due regard for confidentiality. Information can also be submitted anonymously via the electronic whistleblower system or the ombudsperson. The Lufthansa Group is expressly committed to protecting whistleblowers from reprisals and discrimination.

The Lufthansa Group reviews the effectiveness of the complaint procedure at least once a year and as warranted, e.g. regarding to the necessary communication of the complaint procedure.

All information regarding the complaint procedure, including the reporting channels, is summarized in the Rules of Procedure and published on the Lufthansa Group website.

Whistleblowing System - Lufthansa Group Investor Relations



7. Documentation and Reporting

The Lufthansa Technik Logistik Services GmbH continuously documents the fulfillment of its human rights and environmental due diligence obligations in accordance with the requirements of the LkSG.

In this Policy Statement, which is updated annually and as warranted, the Lufthansa Technik Logistik Services GmbH reports on the procedure by which it fulfills its due diligence obligations, on the priority risks, and on the expectations of employees and suppliers.

Each year, additionally Lufthansa Group publishes its annual report.

As a globally operating company, it also issues an annual UK Modern Slavery Act Statement.

All reports are published on the Internet.

Responsibility

Contact

For questions and comments on this Policy Statement or other human rights or environmental issues, please contact:

humanrights-governance@dlh.de

Further information is published on the Lufthansa Group website

[Human rights - Lufthansa Group](#)

