

# Modern Slavery and Human Trafficking Statement pursuant to sec 54 (1) of the UK Modern Slavery Act 2015





## 1. Preliminary remarks

Condor Flugdienst GmbH (and its affiliated companies, together "Condor" or "we") is Germany's most popular vacation airline and has been taking its guests to the world's most beautiful vacation destinations since 1956. Every year, over nine million guests fly with Condor from the eight largest airports in Germany, from Zurich in Switzerland and Vienna in Austria to around 90 destinations in Europe, Africa and America. Condor operates a fleet of over 50 aircraft, which are maintained by the company's own maintenance organisation, Condor Technik GmbH, at its bases in Frankfurt and Düsseldorf in accordance with the highest safety standards.

Condor is fully aware of its responsibility in connection with the global exchange of products and services.

## 2. Commitment to human rights, including modern slavery and human trafficking

Condor is convinced that long-term business success must be in line with the needs of humans. This also requires a responsible approach to human rights which includes strong measures against modern slavery and human trafficking.

Accordingly, Condor aligns its business practices with the following international standards and guidelines:

- United Nations (UN) Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- International Labour Organization (ILO) conventions and recommendations on labour and social standards
- Principles of the United Nations Global Compact (UNGC)
- UN Convention on the Rights of the Child
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- International Covenant on Civil and Political Rights of 19 December 1966
- International Covenant on Economic, Social and Cultural Rights of 19 December 1966

Condor condemns breaches of these standards, including modern slavery and human trafficking, and we are committed to ensuring that they are complied with. We have implemented guidelines and processes to ensure compliance in our business operations. These include risk analysis, procurement processes, obligating our suppliers, information and training.

Condor acknowledges the IATA Resolution against Trafficking. Although it is local governments' responsibility to prosecute modern slavery and human trafficking, our commitment can contribute to identify and uncover such criminal offences. Therefore,



Condor has also integrated the topic of human trafficking into its operational processes which also includes training.

### 3. Position in the supply chain

Due to our business activity of offering flights to around 90 destinations in Europe, Africa and America, many of Condor's direct suppliers are located in the countries of the destination airports. These are e.g. airport operators whose airports are served, or groundhandlers, who are responsible in particular for handling passengers and baggage at the destination airports as well as handling aircraft.

In view of the strict regulatory requirements for air traffic, many of the suppliers are subject to special checks and conditions in order to be able to offer their services. In many cases contracts are concluded with groundhandlers using standard contracts from the International Air Transport Association (IATA).

Most of these services are provided by Condor's suppliers themselves, without Condor engaging other suppliers.

In some cases, subcontractors may also be engaged, which applies in particular to the following areas:

- Airport operators/groundhandling: subcontracting may occur here, for example in the areas of cabin cleaning, PRM ("Passengers of Reduced Mobility") handling or security
- Technical maintenance: aircraft weighting, non-destructive testing, cleaning
- Fuel: for example in the area of refuelling services
- Catering and equipment
- Crew hotels and logistics
- IT services

### 4. Description of procedures

The most important procedures by which Condor fulfils its human rights, including modern slavery and human trafficking, are described below.

#### 4.1. Risk management

Condor has a risk management system within the Internal Audit & Risk Management function, which also takes account of human rights risks. The role of Condor's **Human Rights Officer**, who is responsible for monitoring risk management and is in contact with the various functions in the company with which there may be interfaces with regard to human rights, including modern slavery and human trafficking, is also assigned to this function. This ensures that human rights are taken into account in all central business processes.



The Human Rights Officer reports directly to Condor's Chief Financial Officer (CFO), to whom he also reports human rights risks, any breaches of obligations and the status of risk management on an ongoing basis within the framework of the reporting line.

In addition, the Human Rights Officer provides the following information to Condor's general management at least once a year (and on *an ad hoc* basis):

- Report on human rights and the status of risk management
- Report on breaches of human rights obligations and notifications
- Report on annual and ad hoc risk analyses
- Results of controls and audits
- Report on the status of implementation of the German Supply Chain Due Diligence Act (LkSG), preventive measures and controls, including their further development
- Discussion of the annual report to the supervisory authority
- Presentation of the annual report on the work of the Human Rights Officer

Furthermore, the Human Rights Officer, as part of his or her responsibility for the Internal Audit and Risk Management department, is a member of Condor's Risk Committee, which also meets quarterly to discuss audit and risk management system issues and in which human rights issues, including modern slavery and human trafficking, are also raised.

In addition, the Human Rights Officer is a permanent member of the Audit Committee of Condor's Supervisory Board and reports to it on a quarterly basis in accordance with the agenda on risk management (including human rights) and on the status of measure implementation.

#### **4.2. Analysis of human rights risks**

Condor has analysed its position in the supply chain, its direct and indirect suppliers and the associated human rights risks. Furthermore, this is an ongoing process that is managed by the Human Rights Officer (Internal Audit & Risk Management).

The risk analysis uses an electronic system based on relevant indices to take into account both country-specific and industry-specific risks, as well as a database-based audit of suppliers.

In the event of specific indications of risks or concrete breaches of human rights obligations, ad hoc risk analyses are also carried out in order to identify possible weaknesses, take remedial action and improve the process. This process is also managed by the Human Rights Officer, who in turn ensures the reporting line to the management and the committees listed in 4.1.

Abstract human rights risks have arisen in the risk analysis in particular because Condor's flights also go to countries that do not prioritise human rights in the same way. This may be due to political, social and economic problems over which Condor has no influence. Condor has developed a risk prevention process to reduce risks as far as possible (see 4.3).

The risk analysis is carried out at least once a year and on an ad hoc basis.



### 4.3. Preventive measures

In addition to the risk analysis, Condor has various guidelines, processes and initiatives that also relate to human rights issues and are intended to preventively support compliance with them. They include, among others:

- Code of Conduct for Employees
- Code of Ethics & Conduct for Business Partners
- Procurement Strategies and Purchasing Practices Policy
- Approval processes
- System-supported processes for reviewing and evaluating new suppliers and for regularly reviewing existing suppliers, including database-based audits that enable a country-based, sector-specific and individual risk assessment with corresponding preventive measures
- Due Diligence Questionnaire and other risk-based questionnaires
- Contract templates

Condor's own employees are informed and trained in relation to human rights on the risks. This also includes information and training in relation to the expectations set out in this Statement, the Code of Conduct for Employees and the Code of Ethics & Conduct for Business Partners.

The aforementioned guidelines and processes are set up in such a way that they implement the human rights strategy set out in this Policy Statement in the interfacing departments. This includes the development of procurement strategies and purchasing practices. The overall process prioritises in particular the careful selection of suppliers as part of the procurement processes as well as the structuring and monitoring of the contractual relationship. This process includes the following elements in particular:

- Suppliers are considered as business partners only if they fulfil the applicable legal and regulatory requirements
- Suppliers undergo a database-based audit that also takes human rights issues into account in order to define targeted preventive measures
- Suppliers are obligated on the basis of risk-based written contracts (e.g. IATA standard contracts)
- Suppliers are provided with specific risk-based information in relation to our expectations regarding compliance with applicable laws and other legal requirements (compliance), the importance of human rights obligations, how to report compliance concerns (including human rights issues), training material, guidance on how to communicate their obligations to their suppliers (if applicable). When entering into a contract suppliers must acknowledge, based on the risks, the Condor Code of Ethics & Conduct for Business Partners, which details Condor's expectations regarding compliance, including the fulfilment of human rights obligations. This also includes encouraging our business partners and obliging them via the Code, based on the risks, to comply with our standards and to implement the same in their supply chain.
- Suppliers are subject to risk-based audits



In addition, Condor participates in industry initiatives and forums that also address human rights issues.

The aforementioned processes are continuously developed with the responsible Condor departments and their compliance is verified annually and on an ad hoc basis within the scope of the Internal Audit & Risk Management function.

#### **4.4. Remedial measures**

If a breach of a human rights obligation is identified in its own business area or at a direct supplier, Condor, under the direction of the Human Rights Officer and with the involvement of other relevant departments and functions as well as the bodies mentioned in 4.1, takes appropriate remedial action without undue delay to prevent, end or minimise the extent of the breach.

The decision-making process and the plan with the agreed measures are documented and their implementation is monitored by the Human Rights Officer.

#### **4.5. Complaints procedure**

Condor has set up various reporting channels for incoming complaints about human rights and has developed Rules of Procedure.

Reports can be submitted via the Condor SafeSpace electronic reporting system <https://safespace.condor.com/> or other listed contacts and channels (email, telephone, post). For further details see:

[https://www.condor.com/eu/fileadmin/dam/pdf/rules\\_of\\_procedure\\_lksg\\_englisch\\_20.09.2023.pdf](https://www.condor.com/eu/fileadmin/dam/pdf/rules_of_procedure_lksg_englisch_20.09.2023.pdf)

Condor encourages everyone to report observed risks or breaches of due diligence obligations in the company's supply chain in relation to human rights issues.

The Compliance department (headed by the Director of Legal & Compliance) and an external trusted lawyer are responsible for implementing and developing the complaints procedure.

The effectiveness of this procedure is monitored regularly and reviewed at least once a year by the Human Rights Officer.

#### **4.6. Indirect suppliers**

Where suppliers are authorised to subcontract in individual cases, direct suppliers receive risk-based information in relation to our expectations regarding the transfer of obligations to comply with applicable laws and other legal requirements (compliance), including the importance of human rights obligations, before entering into the contract. This includes communicating how to report compliance concerns (including human rights issues) to our Condor SafeSpace reporting centre or other listed contacts, as well as training materials.



#### 4.7. Our further steps to prevent modern slavery

Our support of efforts to prevent modern slavery and human trafficking is part of our ongoing commitment in the area of human rights. We are continuously working to further elaborate and implement our policies and processes in this regard.

#### Approval of this statement

On 13 March 2024, the statement was approved by the members of the Management of Condor Flugdienst GmbH with respect to the financial year 2023.

(Peter Gerber)

(Heiko Holm)

(Christian Schmitt)

(Björn Walther)

## Imprint

Condor Flugdienst GmbH  
An der Gehespitz 50  
63263 Neu-Isenburg