AviusULD
A CCE GROUP COMPANY



AVIUSULD
SUSTAINABILITY REPORT

2025

Your Partner in ULD Excellence
Prepared in accordance with the GRI Standards

NAME OF THE ORGANISATION

AviusULD

REPORTING ENTITIES

AviusULD Ltd. Thailand, AviusULD B.V. Netherlands and AviusULD Inc. USA

LOCATION OF HEADQUARTERS

999/146-153 Moo 15, Bangsaothong, Samutprakan 10570, Thailand

REPORTING STANDARD

Prepared in accordance with the GRI Standards

REPORTING PERIOD

1 January to 31 December 2025

CONTACT POINT

Sustainability Team, AviusULD Ltd., 999/146-153 Moo 15, Bangsaothong, Samutprakan 10570, Thailand

AviusULD

A CCE GROUP COMPANY

SUSTAINABILITY REPORT
2025

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Supply chain 378

AVIUSULD SUSTAINABILITY REPORT 2025

Prepared in accordance with the GRI Standards for the year ended 31 December 2025.

EXECUTIVE_ SUMMARY

Purpose, approach and performance at a glance

OUR VISION

To revolutionize the global ULD industry in customer experience, innovation, and continuous improvement.

OUR MISSION

To be the leading provider of tailored aircraft cargo equipment solutions by prioritizing customer centricity, business partner relationships, total cost of ownership, sustainability, and aftermarket services.

OUR VALUES

EXCELLENCE

We do it right the first time.

CUSTOMER FOCUS

We listen. We anticipate. We deliver.

INTEGRITY

We are honest. We are ethical. We are passionate.

INNOVATION

We are best in class. We set new standards.

TEAMWORK

We win together. We learn together.

OUR SUSTAINABILITY APPROACH

Fifteen material topics, each with its management approach, 2025 performance and GRI disclosures. Environmental topics cover the Bangkok manufacturing operation; people, ethics and supply-chain topics cover all three legal entities.

HOW WE REPORT

Prepared in accordance with the GRI Standards for 1 January to 31 December 2025. AviusULD Ltd. (Thailand), AviusULD B.V. (Netherlands) and AviusULD Inc. (USA); 239 employees at 31 December 2025. The 2025 GHG inventory was not independently verified.

PERFORMANCE AT A GLANCE

OUR ENVIRONMENTAL IMPACT

15,033.34 tCO_2e total emissions, down 19.2%. 5,513.80 GJ energy. 4,063.8 t materials used: 3,841.8 t non-renewable, 222.0 t renewable. 54.7% of waste diverted from disposal. 5.79 ML water withdrawn, down 11.0%.

OUR PEOPLE IMPACT

239 employees, 41.4% women. Turnover 10.5% against a 12% target. 45.4 training hours per employee. Zero discrimination or harassment cases and zero grievances recorded.

OUR HEALTH AND SAFETY IMPACT

Zero recordable injuries and no occupational disease case. 230 workers covered by the certified safety system: 228 employees and 2 workers under operational control. 100% of 63 contractor companies inducted. Twelve Safety Committee meetings.

OUR GOVERNANCE AND SUPPLY CHAIN IMPACT

Zero confirmed corruption cases and THB 0 in fines. 238 of 239 employees completed anti-corruption training. Zero substantiated privacy complaints. 67 of 100 suppliers signed the Supplier Code. One ESG corrective action, closed. EcoVadis Gold, top 5%, December 2025.

OUR MATERIAL TOPICS

Environment: climate and emissions, materials and waste, water, pollution prevention. People: employment, labour relations, health and safety, learning, diversity, human rights. Product responsibility, customer safety and trust. Ethics and information security: business ethics and anti-corruption, information security and data privacy. Supply chain: responsible supplier selection, ethical procurement and supply chain human rights.

SDGS LINKED TO OUR MATERIAL TOPICS





Figures in this summary are drawn from the topic sections; each is located in the GRI content index with its reason for omission where a disclosure is not reported.

STATEMENT_ FROM THE CEO

GRI 2-22

Sustainability is increasingly important to AviusULD's ability to remain a supplier our customers can rely on. Our ULDs are designed to remain in service for years, which means the materials we choose, how we operate our facilities and how we treat our people all matter to our long-term competitiveness as aviation decarbonises.

2025 is the first year AviusULD has prepared its sustainability report using the GRI Standards. Our objective was to establish a credible baseline rather than to suggest that the work is complete. Our materiality assessment identified 15 reporting topics, mapped to 23 GRI Topic Standards.

The results show progress as well as areas where we need to improve. Total greenhouse gas emissions fell 19.2% to 15,033.34 tCO_2e, with location-based Scope 2 emissions reducing by 15.2%. Total waste fell 8.2% to 384.5 tonnes, with 54.7% diverted from disposal. No product safety incidents, recalls or significant product failures were recorded. At the same time, Scope 1 emissions increased by 10.9%, the rooftop solar project was postponed and our renewable-energy target was not achieved, while Scope 3 remains 95.0% of our total footprint.

Our contribution to sustainable development focuses on three areas we can directly influence: reducing energy use and greenhouse gas emissions at our Samut Prakan plant; designing lightweight and repairable ULDs that use materials efficiently and support greater aircraft fuel efficiency; and strengthening labour, human-rights and ethical standards across our own operations and supply chain.

Progress is tracked through the KPIs, targets and actions set out in this report and reviewed through our management processes. I approve this report on behalf of AviusULD and accept management responsibility for the completeness of the information presented.



CHARLES DRUMMOND
Chief Executive Officer | AviusULD

15

reporting topics from the 2025 materiality assessment

3

strategic priorities carried into 2026

STATEMENT ON SUSTAINABLE DEVELOPMENT STRATEGY

#	STRATEGIC PRIORITY	HOW PROGRESS IS MEASURED
1	**Reduce energy use and GHG emissions**	Scope 1 and 2 emissions and energy intensity against the 2025 baseline, reported in the climate and energy chapter.
2	**Lower impact per ULD across its life**	Lightweight and repairable designs, higher recycled content where supplier certification allows, repair before replacement.
3	**Hold suppliers to our commitments**	Labour, human rights and ethics targets in the topic chapters, reviewed by management quarterly.

Source: 2025 GRI 3 materiality assessment.

Our History
Our Products
Our Locations
Our Organization
Lower Deck Containers
Main Deck Containers
Pallets & Extenders
Special and Fire Resistant Containers
SmartULD
Certifications, Approvals and Affiliations
EcoVadis Gold Medal
ULD CARE Climate Impact Labels

WHO WE ARE

Fifty years of ULD design and manufacturing, the products we make, and the external recognition AviusULD received in 2025.



01 COMPANY PROFILE

OUR HISTORY

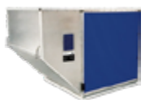
For AviusULD, our journey started in the 1970s under the name Alusingen. Although we have had several names during our history, our spirit, mindset and customer focus remain integral to our business. We have the accumulated experience and prestige of all our iterations, including Alusuisse, Alcan, Driessen Air Cargo Equipment, Zodiac Air Cargo Equipment and Safran Cabin Cargo – all well-known names in the ULD industry.

With this wealth of experience, customers can expect to receive the same excellent support, superior products and trailblazing innovation as seen during the past decades.

OVER THE PAST 50+ YEARS

we have set new design standards and significant industry milestones, like:

1987



The 1st non-welded container

1988



The 1st ULD with a single-type fastener

1993



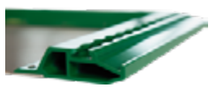
The 1st pallet extender with one-hand operation design

2001



The 1st certified Collapsible AKE container

2014



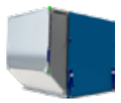
Introduction of the S-Series containers and pallets

2016



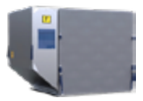
Launch of the modular design for AviusULD main deck containers

2017



Launch of the new ergonomic SEN door design

2018



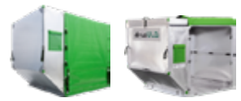
Introduction of the Fire Resistant Container (FRC)

2021



Relocation of our factories to a purpose-built Manufacturing facility in Bangkok

2022



Record output of ULDs manufactured and sold. Collapsible Redesigned Container

2023



Change of ownership and launch of AviusULD, leading to faster decision making, enhanced agility, and increased innovation for customers. SmartULD brings digital Solutions to the market

2025



Combined Strength with Trip & Co. Fire, Occupancy & Pallet Tag

2026

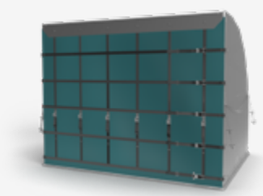


FRC Gen 2

OUR PRODUCTS



LOWER DECK
Containers



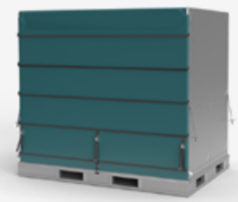
MAIN DECK
Containers



FIRE RESISTANT
Containers (FRC)



PALLETS
& Extenders



SPECIAL
Containers

OUR LOCATIONS

AviusULD caters to leading Airlines, ULD management companies and MROs around the world, with state-of-the-art facilities in Bangkok (Thailand) and Alkmaar (the Netherlands). Our locations are equipped with the latest machinery and technology, and are run and supported by our highly skilled teams.

AviusULD's network of offices deliver excellence, innovation and superior ULDs to customers in APAC, EMEA, the Americas.



OUR ORGANIZATION

Our EASA-certified manufacturing facility in Bangkok (Thailand) is equipped with the latest machinery and technology in order to consistently provide the highest quality, and to respond to any customer request and handle demands in quantity and lead time.

Bangkok is also the home of our Engineering team and our Sales, Sales Support and Technical Support team for the APAC region.

In addition to requests from customers all around the globe, all spare parts for the APAC region are also served from this state-of-the-art facility.

The offices in Alkmaar (The Netherlands) are the home of our Sales, Sales Support and Technical Support teams for EMEA and the Americas, and are also the base for our Product Development team.

The Alkmaar location also includes a showroom, offering an ideal environment for customer workshops, seminars and training courses. It also serves as the spare parts distribution center for the EMEA region. Our distribution center in Auburn (USA) supports customers in the Americas.

AviusULD is part of CCE Group, an aerospace platform that brings together leading companies in the cabin and cargo equipment ecosystem. CCE Group also includes Driessen Catering Equipment, the market leader in onboard catering solutions, and Trip&Co, a specialist in advanced cargo protection and custom-engineered products.



LOWER DECK
CONTAINERS

AviusULD S-series Lower Deck Cargo Containers are designed to meet every airline's need for superior durability, minimized weight, and adaptability to the industry's unique challenges.

By combining durable and high-quality materials in a modular design with interchangeable parts, we guarantee the lowest TCO (Total Cost of Ownership), easy maintenance and optimized ULD handling.

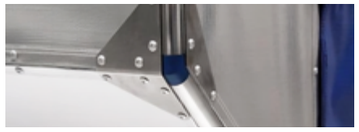
Modular Design | **Lowest TCO** | **User Friendly** | **Easy Maintenance** | **Superior Durability**

Design Features



Container Surface

Seamless fitting and smoothness due to contour-adapted extrusions.



Structural Integrity

Maximum robustness due to strong gussets and extrusions.



Enhanced Door Closure

Easy and ergonomic handling due to door locking mechanism.



Unique Corner Design

Repair cost-reduction due to individually replaceable forged corners.



Robust Reinforcement

Extrusion inserts create resistance to high impact forces and bending.



Container Interior

Protection of cargo and bags with smooth interior surfaces.

Design Features

PANEL MATERIALS



ENDUMAX

Taking weight-savings and durability to new levels.

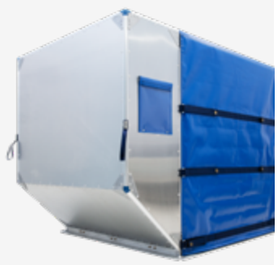
- Industry-wide lowest weight AKE container at 51 kg
- High-impact resistant composite material
- Minimizes weight while maximizing durability and fuel-efficiency



HERCULIGHT

The perfect balance between strength, weight, and cost.

- Weighs 55 kg (10 kg less than aluminum configuration)
- Performs 18% better than industry-standard AKE container
- Excellent Total Cost of Ownership (TCO)



ALUMINUM

High-grade alloys with the best quality at a competitive price.

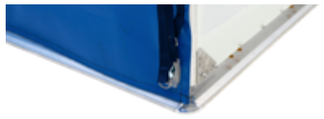
- 65 kg for a standard AKE container
- A tried and tested design with the ultimate balance between weight and cost

Design Features

SEN DOOR

Our Award-Winning SEN door

- Easy, quick and tight closure with new mushroom-locking mechanism
- Reduces opening and closing time an average of 30 seconds
- 30% stronger door with reinforcement
- Lowers handling time and cost by 15%



Ergonomic Pulling



Mushroom-Lock Mechanism

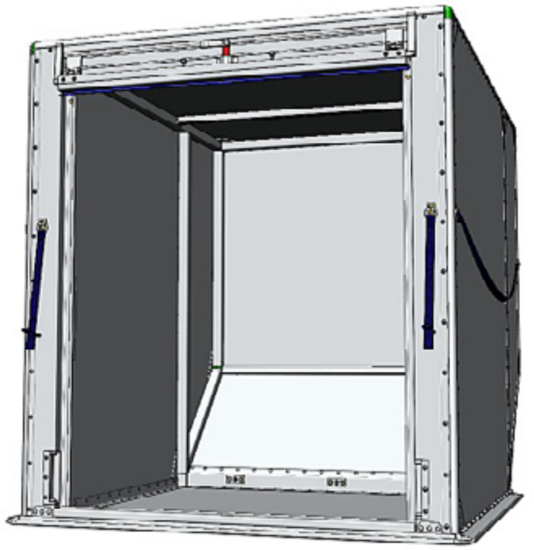


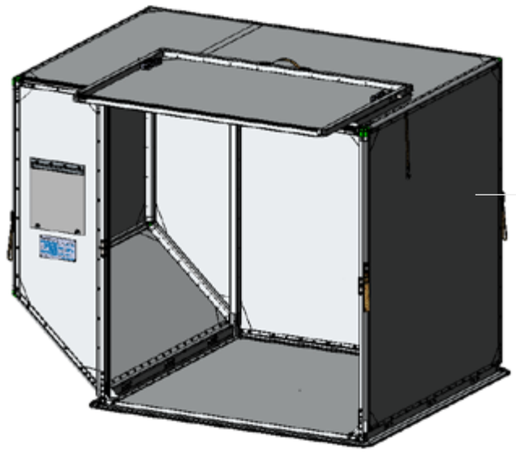
Tight Locking mechanism

Design Features

SELF-ROLL-UP DOOR

Durable and easy to operate thanks to our new SRU system, with a sliding lock clasp and locking mechanism integrated in the bottom door bar.





Design Features

SOLID DOOR

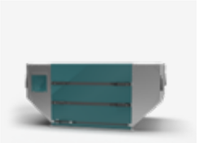
Safe and easy operation due to our ergonomic toggle lock system, which includes a visible status indicator. Suitable for all custom seal designs.

Common

ULD TYPES



AKE



AKH



AMF



AMP



DPE



MAIN DECK
CONTAINERS

AviusULD Main Deck Container range is constructed with impact-resistant flangeless extrusions, which provide a 100% smooth interior.

Designed with standardized parts and made of high-quality materials, our modules meet airlines' need for durability, reduced weight and adaptability to their unique challenges as well as an easy and fast repair.

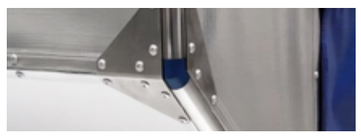
Modular Design | **Lowest TCO** | **User Friendly** | **Easy Maintenance** | **Superior Durability**

Design Features



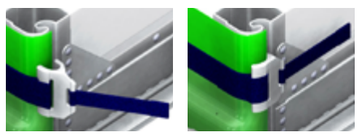
Container Surface

Seamless fitting and smoothness due to contour-adapted extrusions.



Structural Integrity

Maximum robustness due to strong gussets and extrusions.



Enhanced Door Closure

Easy and ergonomic handling due to door locking mechanism.



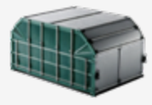
Unique Corner Design

Repair cost-reduction due to individually replaceable forged corners.

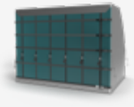
Roller Door

Sturdiness and easy operating thanks to our new integrated roller system.

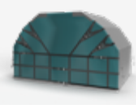
Common
ULD TYPES



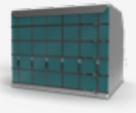
AAK



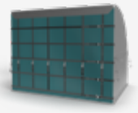
AAX



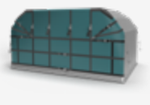
AAY



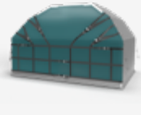
AMJ



AMV



LAK



LAY



PALLETS
& EXTENDERS

AviusULD Pallets are manufactured using the strongest extrusion and sheet alloys to ensure high impact resistance and reinforced stiffness. Additionally, each pallet is equipped with solid reinforcements inserted in every corner, enhancing its ability to withstand day-to-day handling in the aviation logistics chain.

Modular Design | **Lowest TCO** | **User Friendly** | **Easy Maintenance** | **Superior Durability**

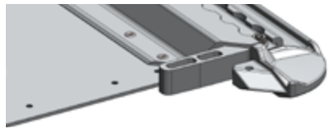
Design Features



Maximum Loading
The pallet's cross-section design maximizes loading area.



Unique Corner Design
Repair cost-reduction due to individually replaceable forged corners.



Corner Reinforcement
Increased pallet stiffness due to inserted solid corner reinforcements.

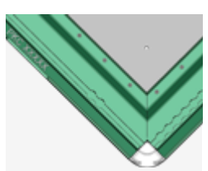


Customizable Pallets
Pallet edge rail coloring, airline code, and/or logo can be custom-built per customer's preference.

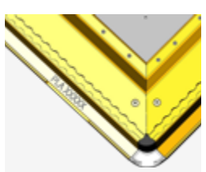


Distinct ID Codes
High-quality engraving for optimized legibility. Front cut-out for stacked condition.

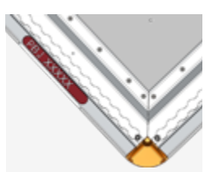
Common
ULD TYPES



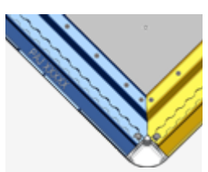
PKC



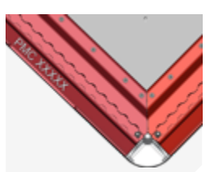
PLA



PBJ



PAJ

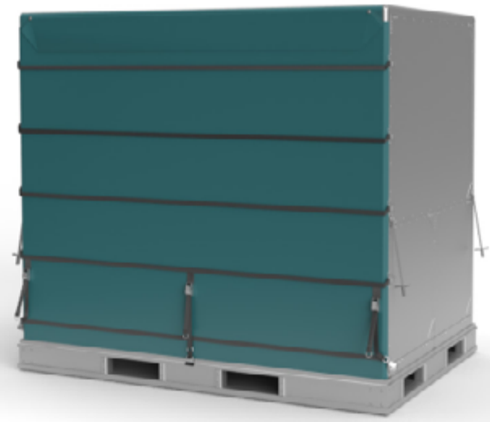


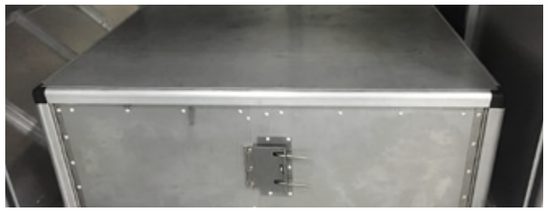
PMC

SPECIAL
CONTAINERS

Ground Containers

For ground-handling purposes, non-certified containers can be designed according to your specifications and operational requirements. Many options are available, including different base and door types as well as several panel materials.







FIRE RESISTANT
CONTAINERS

AviusULD has developed Fire Resistant Containers (FRCs) that provide an additional layer of protection against fires in the container contents. Our FRCs have a proven capability to withstand and contain fires, including those involving lithium batteries, for up to 6 hours.

We have specifically designed our FRCs to endure the harsh operating environments of cargo containers. Our selection of materials and construction design prioritize damage resistance and ease of maintenance, resulting in the lowest Total Cost of Ownership (TCO) possible.

Currently, there is a lack of fully defined requirements for FRCs, particularly regarding fires involving batteries. For comprehensive details on our existing products and upcoming developments, we encourage you to contact us directly.

Modular Design | **Lowest TCO** | **User Friendly** | **Easy Maintenance** | **Superior Durability**

SMARTULD_ SOLUTIONS





SMARTULD TAG

The SmartULD Tag uses patented Kinetic Charging technology that converts vibration and movement into power, so the tag operates continuously without battery replacement. It enables uninterrupted real-time cargo monitoring and avoids the cost and effort of manual battery management.

PALLET TAG

The Pallet Tag has an easy-fit design that requires no modification, streamlining installation and reducing setup costs using LTE-M (+/- 68 countries). An alternative design requiring minor modification using LTE-Cat 1 Bis (+/- 190 countries) is also available. LTE data transmission ensures reliable data transfer without infrastructure, supporting continuous cargo monitoring across the network.

CERTIFICATIONS_ AND APPROVALS

Management-system certifications, aviation approvals and business partnerships

AviusULD holds management-system certifications and aviation regulatory approvals for its operations, and works with industry bodies as a partner. The EcoVadis rating and the ULD CARE Climate Impact Labels are described on pages 24 and 25; membership associations under GRI 2-28 are on page 73.

CERTIFICATION, RATING OR AFFILIATION	TYPE	ISSUED BY	SCOPE OR STATUS	VALID TO
ISO 45001:2018	Certification	LRQA	Occupational health and safety management; certificate 10674655	19 May 2028
ISO 14001:2015	Certification	LRQA	Environmental management; certificate 10584635	21 March 2027
ISO 9001:2015 and EN 9100:2018 (AS9100D equivalent)	Certification	Bureau Veritas Certification	Quality management; manufacture of ULD cargo containers and pallets; certificate TH023648	8 December 2027
EASA Part-21G Production Organisation Approval (NL.21G.2401)	Regulatory approval	Civil Aviation Authority of the Netherlands (CAA-NL)	Unit load devices and spare parts; Alkmaar and Bangsaothong; valid until surrendered or revoked	Unlimited
Green Industry Level 3	Government certification	Department of Industrial Works, Thailand (DIW)	Bangkok manufacturing site	3 February 2028
IATA	Business partnership	International Air Transport Association	Strategic Partner	Ongoing
AMCHAM Thailand	Chamber of commerce	American Chamber of Commerce in Thailand	Membership from 2026, after the reporting period	From 2026



ECOVADIS_ GOLD MEDAL

DECEMBER 2025

AviusULD received an EcoVadis Gold Medal in December 2025, which places the company in the top 5% of organisations assessed by EcoVadis. The medal is valid until December 2026.

EcoVadis rates companies on four themes: Environment, Labor & Human Rights, Ethics and Sustainable Procurement. AviusULD has been assessed by EcoVadis since 2024.

The rating is an external view of the management system. The 2025 performance figures in this report come from AviusULD's own records, not from the EcoVadis assessment.



ULD CARE_ LABELS

CLIMATE IMPACT LABELS NOVEMBER 2025

AviusULD received its first ULD CARE Climate Impact Labels in November 2025, at the ULD CARE conference in Copenhagen. Seven AviusULD products were labelled: two rated A+, two rated A and three rated C.

WHAT THE LABEL MEASURES

The label rates a ULD mainly on its weight, with information on spare-part availability, recyclability and second-life potential. A lighter ULD reduces aircraft fuel burn and CO_2 emissions in use, and a durable, repairable and recyclable design extends its working life.



How AviusULD builds this report

GRI reporting principles

Process to determine material topics

Prioritization of impacts and scoring outcome

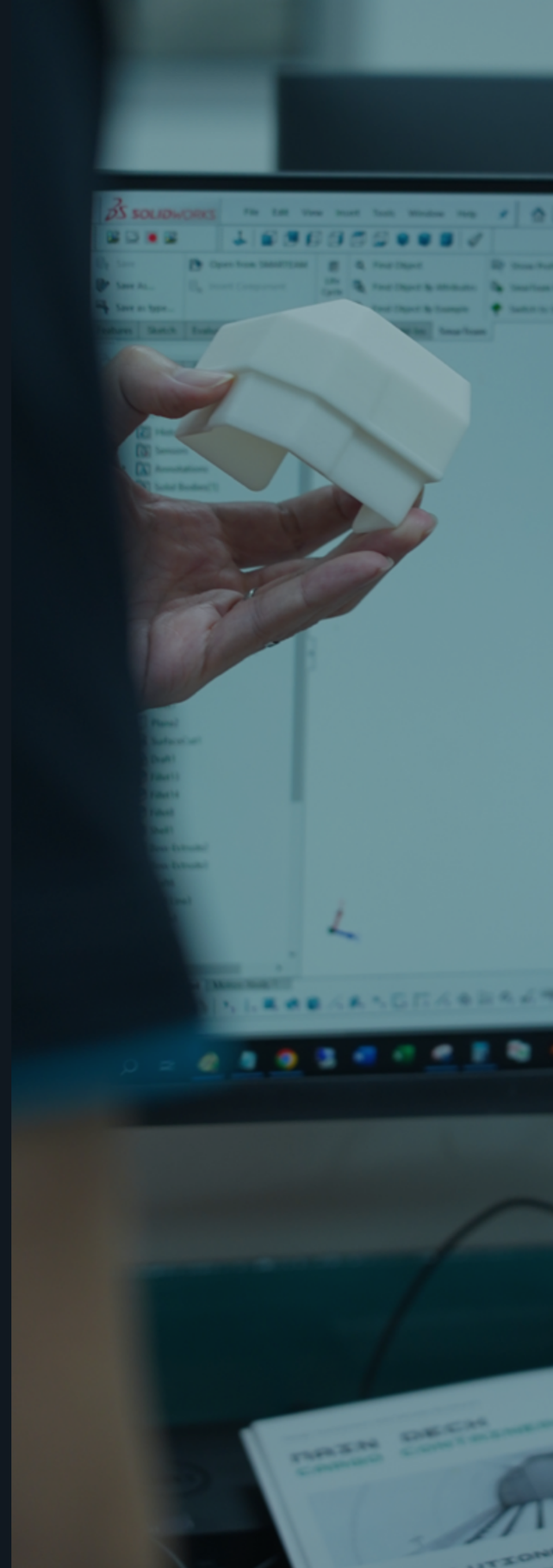
Material topics: environmental and governance

Material topics: social

HOW THIS REPORT WAS PREPARED

The reporting cycle, the GRI reporting principles, how stakeholders are engaged, and how the fifteen material topics were determined and scored.

02 — REPORTING PROCESS



HOW AVIUSULD BUILDS THIS REPORT

GRI 3-1 **The annual reporting cycle, from stakeholder engagement to Board approval**

AviusULD runs an annual cycle aligned to the GRI Universal Standards and the GRI Topic Standards. Each step feeds the next, so the material topics and the data behind them are re-tested every year rather than carried forward unchanged.

01

Engage stakeholders

Employees, the Welfare Committee, customers, suppliers, regulators, CCE and HIG, and the certification bodies. Engagement is reported under GRI 2-29.

02

Identify impacts

Environmental, social and human-rights impacts that AviusULD causes, contributes to or is linked to, drawn from the risk assessments run by HSE, HR, Sourcing and Compliance.

03

Score and prioritise

Impacts are scored on severity and likelihood. The scoring outcome is on the next slide.

04

Approve material topics

The topic list is reviewed by the Leadership Team and approved by the Chief Executive Officer.

05

Set management approach and targets

Each topic gets a documented approach, an owner, and targets carried in the governing policy.

06

Implement and monitor

Owners run the controls through the year; performance is reviewed in the management review.

07

Collect and report data

Data is collected on a common year-end basis, cross-checked between topics, and reported with its basis of preparation.

08

Review and approve the report

The draft is reviewed by the Leadership Team and approved by the Chief Executive Officer before publication.

WHERE EACH STEP IS EVIDENCED IN THIS REPORT

Steps 1 and 2 are reported under GRI 2-29 stakeholder engagement and in each topic's materiality slide, which names the impacts and whether AviusULD causes, contributes to or is linked to them.

Steps 3 and 4 are reported on the next three slides: the process to determine material topics, the prioritisation and scoring outcome, and the resulting list of fifteen topics.

Steps 5 to 8 are reported inside each topic section: the management approach, the targets table, the basis of preparation, and the GRI index that locates every disclosure.

Aligned with the GRI Universal Standards and the GRI Topic Standards. The process is reviewed annually by the Leadership Team.

GRI REPORTING_ PRINCIPLES

GRI 1: FOUNDATION 2021 **The eight principles applied to this report**

AviusULD applies the eight principles for sound sustainability reporting defined by GRI 1: Foundation 2021. Each one is stated below with how it is met in this report.

ACCURACY

Figures are reported on a stated basis with the denominator printed, so a reader can reproduce every percentage. Where two sources disagree, the difference is disclosed rather than smoothed.

COMPLETENESS

All fifteen material topics are reported. Where a requirement cannot be met, it appears in the GRI index with a reason for omission under Requirement 6 of GRI 1, not silently dropped.

CLARITY

One message per slide, figures labelled with their units, and a basis of preparation slide in every topic section setting out scope, definitions and limitations.

COMPARABILITY

2024 comparatives are given wherever HR, HSE and Sourcing hold them, on the same denominator as 2025. Restatements are disclosed under GRI 2-4.

BALANCE

Missed targets are reported alongside met ones. Each topic carries a what we did not achieve panel, and reasoned omissions are stated rather than left blank.

SUSTAINABILITY CONTEXT

Performance is set against the quantitative targets in AviusULD's own policies and against the legal requirements of Thailand, the Netherlands and the USA.

TIMELINESS

The reporting period is 1 January to 31 December 2025, reported annually on the same cycle as the financial year.

VERIFIABILITY

Every figure traces to a named source document, procedure or register, listed in the source line on each slide, and the underlying records are retained.

Source: GRI 1: Foundation 2021, Requirement 4 and the principles for sound reporting. Reasons for omission follow Requirement 6.

PROCESS TO_ DETERMINE MATERIAL TOPICS

GRI 3-1 **Impact identification, prioritisation and the views that informed the process**

DISCLOSURE NARRATIVE

AviusULD determined its material topics in a facilitated internal workshop held during the 2025 reporting cycle. The participants were the functions that own the impacts: HSE, Production, Engineering, Purchasing and supplier quality, HR, Facilities, Finance, IT, Sales and senior management. No GRI Sector Standard covers unit load device manufacturing, so the assessment applied the GRI Universal Standards and considered the impacts commonly associated with the sector, the product and the locations in which AviusULD operates. It covers the reporting period 1 January to 31 December 2025 and the same reporting boundary as this report.

Impacts were identified issue by issue across AviusULD's own activities and its business relationships, covering purchased materials and components, contracted transport and waste handling, and customer use of the product. For each issue the assessment recorded the actual or potential impact, whether it is negative or positive, and the stakeholder groups affected: employees, contractors, customers, suppliers, the surrounding community, regulators, investors and wider society.

Human-rights impacts were assessed inside the same process and cover freedom of association and collective bargaining, child labour, forced labour, security practices and labour conditions in the supply chain.

External stakeholders were not surveyed specifically for this assessment. Their views reached the process through the functions that hold those relationships and through existing channels: the independent customer experience survey carried out by Blauw Research, the employee committee and grievance channels, supplier assessment and qualification records, correspondence with regulators and the industrial estate, and customer and certification audits.

The refined list of 15 reporting topics was reviewed by the topic owners and approved by the Chief Executive Officer.

15
reporting topics on the final list

3
pillars: environmental, social and governance (E, S, G)

23
distinct GRI Topic Standards mapped to those topics

01

IDENTIFY IMPACTS

Issues listed for own operations and business relationships, each with the impact described and the affected stakeholders named.

02

ASSESS SIGNIFICANCE

Each issue rated 1 to 5 for impact on stakeholders and 1 to 5 for impact on the organisation.

03

CONSOLIDATE AND APPROVE

Related issues grouped into 15 reporting topics under the E, S and G pillars, highest score carried forward, list approved by the CEO.

PRIORITIZATION OF_ IMPACTS AND SCORING OUTCOME

GRI 3-1 **How significance was determined and where the 15 topics landed**

PRIORITISATION BASIS

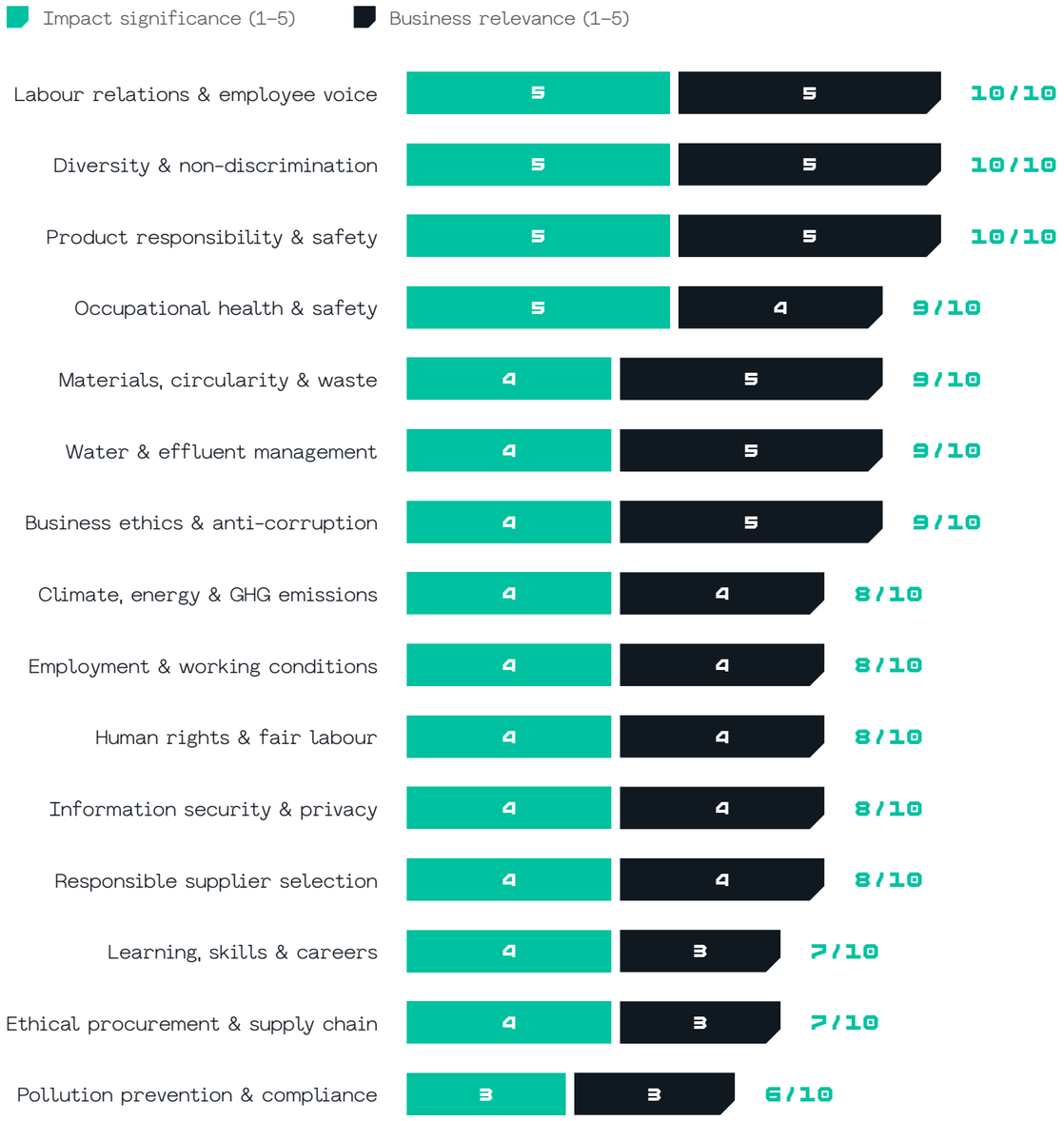
Each issue was scored on two scales of 1 to 5. The first is the significance of the impact on people and the environment. For a negative impact this is its severity, judged on the scale of the harm, its scope or how widespread it is, and how far it can be put right; for a potential impact, the likelihood of it occurring is judged alongside severity, and for human-rights impacts severity takes precedence over likelihood. For a positive impact, scale and scope are judged, with likelihood added where the impact is potential. Under GRI 3 this scale alone determines whether a topic is material: a score of 4 or 5 makes a topic material and it is reported in full with performance data and targets, and a score of 3 makes it important and it is reported as a supporting topic. The second scale records business relevance, being the effect on AviusULD's own operations, costs, compliance exposure and customer relationships. It sets management priority within the material topics and does not affect the materiality decision. Where several issues were grouped into one reporting topic, the highest score in the group was carried forward, so consolidation cannot lower a topic's significance. Fourteen of the 15 topics are material on impact significance and one, pollution prevention and environmental compliance, is important. Four reached the maximum of 5: labour relations and employee voice; occupational health and safety including contractors; diversity, equal pay and non-discrimination; and product responsibility and customer safety. The impact scale used in 2025 takes only three values across the 15 topics, so it supports the list of material topics but not a ranking within it; finer-grained scoring is planned for 2026. The chart shows both scores for each topic; their sum, out of 10, indicates management priority and is not used to decide materiality.

14
material topics, impact significance 4 or 5

1
important topic, impact significance 3

5
highest impact significance recorded

IMPACT SIGNIFICANCE AND BUSINESS RELEVANCE BY REPORTING TOPIC, 2025 ASSESSMENT



MATERIAL TOPICS: ENVIRONMENTAL AND GOVERNANCE

GRI 3-2 **Eight of the 15 reporting topics: 4 environmental (E) and 4 governance (G), with score, classification and GRI Standards mapped**

E AND G PILLARS

Impact level: effect on people and the environment; high or very high = material. Priority score: impact + business relevance, out of 10.

MATERIAL TOPIC	IMPACT LEVEL	PRIORITY SCORE	CLASSIFICATION	PRIORITY	GRI STANDARDS MAPPED	SDGS
E Climate Change, Energy & GHG Emissions	High (4)	8 / 10	Material	Core	GRI 302; GRI 305	
E Materials, Circular Resource Use & Waste Management	High (4)	9 / 10	Material	Core	GRI 301; GRI 306	
E Water & Effluent Management	High (4)	9 / 10	Material	Core	GRI 303	
E Pollution Prevention & Environmental Compliance	Moderate (3)	6 / 10	Important	Supporting	GRI 305-7; GRI 2-27	
G Business Ethics, Anti-corruption & Whistleblowing	High (4)	9 / 10	Material	Core	GRI 205; GRI 2-23; GRI 2-26	
G Information Security, Cybersecurity & Data Privacy	High (4)	8 / 10	Material	Core	GRI 418	
G Responsible Supplier Selection & ESG Due Diligence	High (4)	8 / 10	Material	Core	GRI 204; GRI; GRI 414	
G Ethical Procurement & Supply Chain Human Rights	High (4)	7 / 10	Material	Supporting	GRI 204; GRI 205; GRI 407-409; GRI 414	

MATERIAL TOPICS: SOCIAL

GRI 3-2 **The remaining seven reporting topics, all social (S), and changes against the previous period**

S PILLAR

Impact level: effect on people and the environment; high or very high = material. Priority score: impact + business relevance, out of 10.

MATERIAL TOPIC	IMPACT LEVEL	PRIORITY SCORE	CLASSIFICATION	PRIORITY	GRI STANDARDS MAPPED	SDGS
S Employment, Benefits & Working Conditions	High (4)	8 / 10	Material	Core	GRI 401	
S Labour Relations, Employee Voice & Grievance	Very high (5)	10 / 10	Material	Core	GRI 402; GRI 2-26; GRI 2-30	
S Occupational Health, Safety & Contractor Safety	Very high (5)	9 / 10	Material	Core	GRI 403	
S Learning, Skills & Career Development	High (4)	7 / 10	Material	Supporting	GRI 404	
S Diversity, Equal Pay & Non-discrimination	Very high (5)	10 / 10	Material	Core	GRI 405; GRI 406	
S Human Rights & Fair Labour Practices	High (4)	8 / 10	Material	Core	GRI 407; GRI 408; GRI 409; GRI 410; GRI 412	
S Product Responsibility, Customer Safety & Trust	Very high (5)	10 / 10	Material	Core	GRI 416; GRI 417	

CHANGES TO THE LIST

The 2025 report is AviusULD's first prepared in accordance with the GRI Standards, so there is no previously published list of material topics to compare. The refined list consolidates an earlier internal working list, in which related impacts were held as separate line items, into the 15 reporting topics above; that working list was never published. The list will be reviewed for the 2026 cycle and any change, addition or removal will be disclosed here with the reason.

Organizational details

Entities included in sustainability reporting

Reporting period, frequency and contact point

Restatements of information

External assurance

Activities, value chain and other business relationships

Employees

Workers who are not employees

Governance structure and composition

Delegation of responsibility for managing impacts

Role of the highest governance body in sustainability reporting

Conflicts of interest

Communication of critical concerns

Policy commitments

Embedding policy commitments

Processes to remediate negative impacts

Mechanisms for seeking advice and raising concerns

Compliance with laws and regulations

Membership associations

Approach to stakeholder engagement

Collective bargaining agreements

THE ORGANISATION AND HOW IT IS RUN

GRI 2-1 to 2-30: entities and activities, workforce, governance, strategy and policies, and stakeholder engagement.

2 — GENERAL DISCLOSURES



ORGANIZATIONAL_ DETAILS

GRI 2-1 **Legal identity and operating footprint**

AviusULD Ltd. is a privately held limited company incorporated under the laws of Thailand and forms part of CCE Group, an aerospace platform in cabin and cargo equipment. The Bangkok facility serves as AviusULD's EASA-certified manufacturing site for aviation Unit Load Devices. AviusULD B.V. is headquartered in Alkmaar, the Netherlands, and supports EMEA commercial, technical support and product development activities. AviusULD Inc. supports commercial and distribution activities in the Americas. AviusULD operates through major facilities and offices in Thailand, the Netherlands and the United States.

LEGAL NAME

AviusULD Ltd.

LEGAL FORM / OWNERSHIP

Privately held limited company; part of CCE Group

BANGKOK SITE ADDRESS

999/146-153 Moo 15, Bangsaothong, Samut-prakan 10570, Thailand

HEADQUARTERS

AviusULD B.V., Saffierstraat 10, 1812 RM Alkmaar, The Netherlands

UNITED STATES OFFICE ADDRESS

AviusULD Inc., 1808 B Street NW, Bldg B, Suite 170, Auburn, Washington 98001, USA

OPERATING COUNTRIES DISCLOSED

THAILAND

Manufacturing and APAC support

THE NETHERLANDS

EMEA commercial, technical support and product development

UNITED STATES

Americas commercial and distribution support

CORE DISCLOSURE STATEMENT

AviusULD operates globally, with major facilities and offices in Thailand, the Netherlands and the United States.

ENTITIES INCLUDED_ IN SUSTAINABILITY REPORTING

GRI 2-2 **Reporting boundary for AviusULD Sustainability Report 2025**

DISCLOSURE NARRATIVE

AviusULD Ltd. prepares stand-alone financial statements. AviusULD B.V. and AviusULD Inc. are separate legal entities with their own financial reporting and are not consolidated into AviusULD Ltd. AviusULD Ltd. therefore forms the primary reporting boundary for this report. Where a disclosure includes information on AviusULD B.V. or AviusULD Inc., this is identified in that disclosure. CCE Group is outside the boundary.

3

entities in scope / referenced

1

principal manufacturing site

REPORTING ENTITIES

AVIUSULD LTD. | THAILAND

Manufacturing site in Samut Prakan, Thailand. Covers all operational functions and activities at the Bangkok manufacturing facility.

AVIUSULD B.V. | NETHERLANDS

Headquarters / EMEA commercial, technical support and product development activities. Included where relevant to organization-level information.

AVIUSULD INC. | USA

Americas commercial and distribution support; included where relevant.

FINANCIAL REPORTING AND CONSOLIDATION

AviusULD Ltd.'s financial statements for the year ended 31 December 2025 are audited and cover AviusULD Ltd. on a stand-alone basis; no consolidated financial statements are prepared. The financial boundary is AviusULD Ltd. alone, while this report covers AviusULD Ltd. as the main reporting operation and includes AviusULD B.V. and AviusULD Inc. for people, ethics, policy and customer disclosures where data exist. The data-coverage matrix opposite sets out the difference.

No adjustments for minority interests are made, and there were no mergers, acquisitions or disposals of entities during the reporting period. Any differences in reporting boundaries or data coverage for individual disclosures and material topics are identified in the data-coverage matrix.

GRI 2-2

Boundary transparency for quantitative and qualitative disclosures

DATA-COVERAGE MATRIX

DATA CATEGORY	BANGKOK	NETHER-LANDS	USA	DISCLOSURE TREATMENT
Employees	Full	Full	Full	People data cover all three AviusULD entities.
Outsourced workers	Full	Excluded	Excluded	Bangkok only, where outsourced workers are under operational influence.
Energy & emissions	Full	Excluded	Excluded	Operational environmental metrics are Bangkok-only unless separately stated.
Water & waste	Full	Excluded	Excluded	Bangkok manufacturing operation only.
Health & safety	Full	Excluded	Excluded	Bangkok operational health and safety data.
Procurement & suppliers	Full	Excluded	Excluded	Direct materials for all entities are bought by AviusULD Ltd. Thailand; NL and USA buy only office supplies locally.
Ethics & training	Full	Full	Full	Ethics and training data cover all three AviusULD entities.
Policies	Full	Full	Full	Group/company policies are disclosed where applicable across entities.
Product/customer impacts	Full	Full	Full	Product safety and customer data cover all products sold by all three entities.

Remark: Full = all data for the entity is included in the disclosure. Partial = some data for the entity is included; the gap is explained in the disclosure treatment column. Excluded = the entity is outside the reporting boundary for this data category.

REPORTING PERIOD, FREQUENCY AND CONTACT POINT

GRI 2-3

Reporting practice for Sustainability Report 2025

DISCLOSURE NARRATIVE

AviusULD prepares its Sustainability Report on an annual basis. The 2025 report covers 1 January to 31 December 2025, the same period as AviusULD's financial reporting, so the two reporting periods are fully aligned. The report is published in November 2026, this being AviusULD's first reporting cycle under the GRI Standards. Future reports will be published annually, covering each calendar year.

CONTACT POINT

Questions regarding this report can be directed to Chiwarat Saowiboon, Business Excellence, at chiwarat.saowiboon@aviusuld.com.

REPORTING TIMELINE

JAN - DEC 2025
Reporting period

2026
Data consolidation

NOV 2026
Final publication date

ANNUALLY
Reporting frequency

REPORTING PROCESS

01
DATA COLLECTION
Functions consolidate 2025 ESG data and supporting records.

02
TOPIC REVIEW
Topic owners review boundaries, assumptions and exceptions.

03
MANAGEMENT VALIDATION
Management / consultant review the final report content.

RESTATEMENTS OF_ INFORMATION

GRI 2-4 **Reporting practice and comparability**

DISCLOSURE NARRATIVE

AviusULD's 2024-25 Sustainability Report, which was not prepared using the GRI Standards, published 2024 figures. Eleven figures from it are restated in this report, across seven indicators: greenhouse gas emissions (total and Scopes 1, 2 and 3), materials used, total waste, hours worked, training hours per employee, CEO–employee representative meetings (2023 and 2024) and women in the Leadership Team. The restated values are the 2024 comparatives used throughout this report. Other 2024 figures in that report, including water consumption and the share of women employed, are unchanged.

11

figures restated from the 2024-25 report, across 7 indicators

2024

comparative baseline where 2024 data are available

INDICATOR (2024)	2024-25 REPORT (JUL 2023-JUN 2024 FOR GHG)	2024 IN THIS REPORT	REASON FOR RESTATEMENT	PAGES
Total GHG emissions	68,617.5 tCO_2e	18,608.40 tCO_2e	Period changed to calendar 2024; recalculated under ISO 14064-1 and the GHG Protocol; transport formulas corrected; refrigerant GWPs updated to TGO Apr 2022 (CFO V1.2)	4, 51, 55, 59
Scope 1	53.9 tCO_2e	53.78 tCO_2e	Period change as above; refrigerant GWPs updated to TGO Apr 2022	55
Scope 2	1,016.6 tCO_2e (market-based)	811.84 tCO_2e (location-based)	Period change as above; also now location-based (earlier figure market-based)	55
Scope 3	67,547.0 tCO_2e	17,742.78 tCO_2e	Period change; transport formulas corrected; earlier figure included 61,763 tCO_2e use of sold products	55
Materials used	4,073 t (raw materials only)	4,861.6 t	Calendar 2024 production materials from CFO calculation records (4,575.0 t) plus packaging (286.6 t, 270.6 t renewable)	64, 69
Total waste	318.1 t	418.6 t	Source changed from ESG KPI dashboard to CFO waste calculation records (all streams)	67, 69
Hours worked	405,212	716,222	STC workers' on-site hours now included alongside employee hours (payroll records)	114, 116
Training hours per employee	71 hours	78.2 hours	Recalculated on the 2024 average headcount of 234.5, including on-the-job training	127–129, 137
CEO–employee rep. meetings	6 (2024); 2 (2023)	4 (2024); 4 (2023)	Data-entry error in the ESG KPI dashboard; corrected to town hall meeting records	101, 110, 246
Women in the Leadership Team	33% (2024)	22% (2024), 2 of 9	Dashboard counted top executives (4 of 12); now the Leadership Team, same basis as 2025	246

EXTERNAL_ ASSURANCE

GRI 2-5 Assurance approach for Sustainability Report 2025

DISCLOSURE NARRATIVE

AviusULD has appointed BSI to provide independent limited assurance over selected disclosures in its 2025 Sustainability Report. External assurance is sought to increase confidence in the environmental, social and governance information reported.

Senior management prepared the assurance scope, criteria and level of assurance, agreed them with BSI and had them approved by the Chief Executive Officer before the engagement began. BSI is independent of AviusULD and has declared no conflict of interest in this engagement. BSI did not take part in preparing the report or the information within its scope. Apart from this assurance engagement, BSI provided no other services to AviusULD in 2025.

ASSURANCE PROFILE

ASSURANCE PROVIDER

BSI

Engaged for the 2025 report

ASSURANCE STANDARD
ISAE 3000 (Revised)

ASSURANCE LEVEL
Limited

ESG DISCLOSURE STANDARD
GRI (in accordance)

DISCLOSURES IN ASSURANCE SCOPE

Selected environmental and social information for 1 January to 31 December 2025, covering these GRI Topic Standards:

- GRI 205: Anti-corruption 2016
- GRI 301: Materials 2016
- GRI 302: Energy 2016
- GRI 305: Emissions 2016
- GRI 306: Waste 2020
- GRI 308: Supplier Environmental Assessment 2016
- GRI 401: Employment 2016
- GRI 402: Labor/Management Relations 2016
- GRI 403: Occupational Health and Safety 2018
- GRI 414: Supplier Social Assessment 2016

LIMITATIONS

Limited assurance.

The procedures are narrower in extent than for reasonable assurance, so the level of confidence obtained is lower.

Scope.

The disclosures under the ten GRI Topic Standards listed are assured. The GRI 2 and GRI 3 disclosures were reviewed with BSI during the engagement.

Estimates.

Scope 3 emissions are calculated from activity data with TGO and other secondary emission factors; some inputs, such as transport distances, supplier data and packaging weights, are estimates and carry inherent uncertainty.

Boundary.

Boundaries differ by topic, as set out on page 40. Energy, emissions, water, waste and health and safety data cover the Bangkok manufacturing operation; employment, labour relations and anti-corruption data cover all three AviusULD entities; supplier assessment covers procurement managed from Thailand.

ACTIVITIES, VALUE CHAIN AND BUSINESS RELATIONSHIPS

GRI 2-6 **Activities, products, markets served and value-chain context**

DISCLOSURE NARRATIVE

AviusULD operates in the aviation Unit Load Device (ULD) sector. Its activities cover product design and certification support, sourcing, manufacturing, inspection, testing, packing, export and customer support. The company serves global aviation and air-cargo markets through major operating locations in Thailand, the Netherlands and the United States. Its products are used by airlines, cargo operators, leasing companies, ground handlers, MROs, distributors and other aviation-industry customers across APAC, EMEA and the Americas.

PRODUCTS & CUSTOMER MARKETS

PRODUCT FAMILIES

Lower deck containers, main deck containers, special containers, pallets, extenders and fire-resistant containers.

MARKETS SERVED

APAC, EMEA and Americas, supported through Thailand, Netherlands and United States operations.

CUSTOMER TYPES

Airlines, cargo operators, leasing companies, ground handlers, MROs, distributors and aviation-industry customers.

3
regions served
APAC / EMEA / Americas

100
active suppliers at 31 Dec 2025

71
direct-material suppliers

GRI 2-6 **Value-chain flow and business relationships**

VALUE-CHAIN FLOW

The flow below summarizes how AviusULD creates and delivers aviation ULD products, from supplier inputs through Bangkok manufacturing to global customer use and repair/ spare-parts support.

Supplier Inputs
Aluminium, plastics, textiles, composites, components, restraint materials and packaging.

Bangkok Operations
Sourcing, incoming inspection, fabrication, sub-assembly, final assembly and packing.

Inspection & Release
Product conformity checks, testing, EASA/ quality controls and shipping preparation.

Distribution
Export and logistics to customers, cargo operators, MROs and assembly stations.

Customer Use
Products used in aviation ground operations; spare parts supplied for customer/MRO repair.

Sector: aviation Unit Load Device manufacturing. ISIC Rev. 4: 2920, manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers (EcoVadis classification).

UPSTREAM RELATIONSHIPS

Main supplier categories include raw materials, components, restraint materials, packaging, logistics and operational services. Main sourcing countries by spend are China, Thailand, Australia and the Netherlands.

Supplier notes: 100 active suppliers 71 direct-material suppliers 75% Thai supplier share. Supplier selection and approval process is governed through the purchasing procedure.

DOWNSTREAM RELATIONSHIPS

Products are shipped directly to customers including airlines, cargo operators, MROs, leasing companies and assembly stations. The products do not require installation on aircraft they are used by customer ground-handling teams.

AviusULD provides spare parts where required. Product life depends on customer use and repair decisions main aluminium structures can be recycled at end of use, but AviusULD does not currently collect products at end of life.

SIGNIFICANT CHANGES

There were no significant changes to AviusULD's activities, products, markets, value chain or business relationships during 2025. In April 2025 the Technology function was merged into the IT/IS department, reporting to the CFO. The change affected internal reporting lines and management structure only there was no change to AviusULD's activities, products, markets, value chain or business relationships.

EMPLOYEES_

GRI 2-7 **Workforce profile and geographic coverage at 31 December 2025**

TOTAL EMPLOYEES
239
Headcount, 31 Dec 2025

THAILAND
228
95.4% of total

FEMALE
99
41.4% of total

MALE
140
58.6% of total

DISCLOSURE NARRATIVE

AviusULD reports employee figures as headcount as of 31 December 2025. The total employee population was 239 employees across Thailand, the Netherlands and the USA. Thailand is the principal employment location, representing approximately 95.4% of the total employee headcount. The 239 includes 2 temporary employees in Thailand contracted directly by AviusULD; outsourced STC and agency workers are excluded and reported under GRI 2-8.

GENDER COMPOSITION

Male 58.6% | 140 HC

Female 41.4% | 99 HC

Gender information is reported based on HRM, payroll and personnel records. "Other" or "not disclosed" would be reported if employees self-identified or did not provide gender information none is reported in the current dataset.

EMPLOYEES BY COUNTRY AND GENDER

COUNTRY	FEMALE	MALE	TOTAL
Thailand	97	131	228
Netherlands	1	8	9
USA	1	1	2
TOTAL	**99**	**140**	**239**

COVERAGE NOTE

Employees are included where they hold an active employment contract with AviusULD entities. Agency, STC and outsourced workers are excluded from GRI 2-7 and reported separately under GRI 2-8, so the two disclosures do not double-count the same people.

Headcount is stated on the frozen HR basis of 239 employees at 31 December 2025. Country and gender totals are as confirmed by HR; the country-by-gender cells are residuals of those totals.

GRI 2-7 **Employment type, calculation basis and annual movement**

EMPLOYMENT-TYPE SUMMARY

COUNTRY	PERMANENT	FIXED-TERM	FULL-TIME	PART-TIME	TEMPORARY
Thailand	222	4	228	0	2
Netherlands	9	0	9	0	0
USA	2	0	2	0	0
TOTAL	**233**	**4**	**239**	**0**	**2**

USA employees are reported as 2 headcount, equivalent to 1.5 FTE. All employees are full-time; AviusULD has no part-time employees and no employees on non-guaranteed hours. Interns are not recorded as part-time employees and are reported under GRI 2-8.

CALCULATION METHOD

Reported as headcount at 31 December 2025.

Data sources: HRM, payroll and personnel records.

Employees on maternity leave, long-term sick leave or unpaid leave are included when their contract remains active.

Fixed-term contracts are counted as employees. Workers engaged through outsourcing, including STC and agency personnel, are excluded from employee calculations and reported under GRI 2-8 the 2 temporary employees contracted directly by AviusULD are included in the 239.

Trainees, interns, agency workers and outsourced personnel are excluded from GRI 2-7.

Headcount figures reported for training and development are calculated as a monthly average and therefore differ from the 31 December point-in-time figure used here.

Permanent headcount is 233 the 239 total also includes 4 fixed-term contracts and 2 temporary employees. The movement figures use the same basis: 241 employees at 31 December 2024, 23 hires and 25 leavers.

2025 MOVEMENT AND FLUCTUATION ASSESSMENT

241 (31 Dec 2024) +23 (New hires) -25 (Departures) 239 (31 Dec 2025)

Total headcount decreased from 241 to 239 employees (-0.8%), with 23 new hires and 25 departures during 2025. Of the departures, 22 were voluntary and 3 involuntary, giving a turnover rate of 10.5% against a 12% target, and a retention rate of 89.6%. No major increase or decrease occurred by country. A fluctuation is considered significant where total headcount changes by 10% or more year-on-year, or where a change materially affects a country, function or workforce category. An internal reorganization in April 2025 merged the Technology function into IT/IS it changed reporting lines rather than headcount levels and did not cause a significant fluctuation in employee numbers.

PERMANENT
233
All employees

FIXED-TERM
4
Fixed-term, Thailand

TEMPORARY
2
Thailand

WORKERS WHO ARE_ NOT EMPLOYEES

GRI 2-8 **Non-employee workers under AviusULD operational control at 31 December 2025**

DISCLOSURE NARRATIVE

AviusULD reviews on-site workers against GRI 2-8 based on the level of control or supervision over their work. Workers are included when AviusULD determines working schedules, assigns daily work, controls work location, or jointly supervises methods and safety. STC workers are not AviusULD employees and are excluded from the 2-7 headcount, so no worker is counted twice. The year-end headcount is 20 the 2025 monthly average of 50 reflects production-driven fluctuation.

20

Total non-employee workers
Headcount at 31 Dec 2025

50

Average 2025 coverage
Average headcount across 2025

INCLUDED CATEGORY	PROVIDER / BASIS	WORK PERFORMED	HC 31 DEC	AVG 2025
STC production workers	Shinchoni (Thailand) Co., Ltd.	Production / assembly	2	38
Security guards	Guardforce Security (Thailand) Co., Ltd.	Security	4	4
Cleaning staff	CLN Cleaning Service Co., Ltd.	Cleaning	4	4
Gardener	Individual contractor	Planting, watering, mowing lawn	1	1
Interns	Various universities	Internship / on-the-job training	9	3
TOTAL			**20**	**50**

INCLUDED SCOPE

Bangkok on-site non-employee workers under AviusULD operational direction or joint supervision. The Netherlands and USA entities are not included in this disclosure.

GRI 2-8 **Methodology, control basis and 2025 fluctuations**

INCLUSION DECISION LOGIC

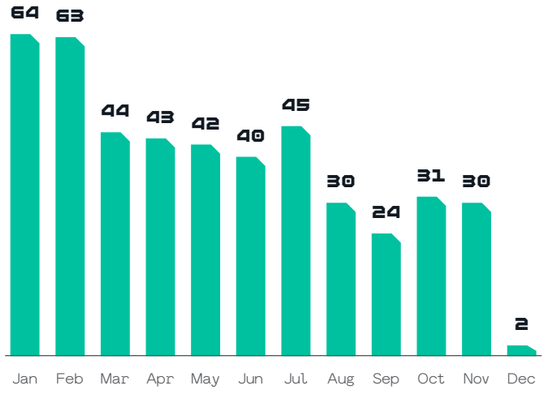
REGULARLY ON-SITE
Worker performs recurring activities at AviusULD site

WORK DIRECTED
AviusULD sets location, daily work or schedule

SUPERVISED /CONTROLLED
AviusULD or joint control over methods, safety or quality

REPORTED UNDER 2-8
Included separately from employees under GRI 2-7

STC TEMPORARY PRODUCTION WORKER TREND



2025 FLUCTUATION EXPLANATION

Temporary workers fluctuated with production demand and workforce planning. STC workers decreased from 63 in Feb to 44 in Mar, from 45 in Jul to 30 in Aug, and from 30 in Nov to 2 in Dec. A change of 10% or more year-on-year is treated as significant. 2025 is AviusULD's first GRI reporting period, so no comparison with a previous period is available.

DATA BASIS

Figures are reported as headcount, stated at 31 December 2025 and as a 12-month average across 2025. Source: HR manpower report, contractor information and operational records.

Exclusions Excluded: short-term supplier technicians, recruiters, Rhenus Logistics, external auditors and consultants, approved assembly stations and workers on supplier premises, as their work is not under AviusULD's operational control.

GOVERNANCE_ STRUCTURE AND COMPOSITION

GRI 2-9 **AviusULD governance structure and management team**

DISCLOSURE NARRATIVE

This disclosure covers AviusULD's own governance structure. AviusULD is part of CCE Group, whose CCE Supervisory Board is the highest governance body its composition and committees are held at Group level and are omitted, as explained in the GRI content index. Within AviusULD, the CEO leads an Executive Committee of the CEO and CFO, supported by an Executive Leadership Team of function heads. The structure below took effect on 24 April 2025, when Technology moved into the IT/IS department under the CFO. Economic, environmental and people impacts are managed by the Executive Committee and function heads through the monthly management business review (GRI 2-13).

SCOPE OF THIS DISCLOSURE

AVIUSULD ONLY

CCE Group Board composition omitted

EXECUTIVE COMMITTEE

2 members in 2025: CEO and CFO

AVIUSULD ORGANIZATION, FROM 24 APRIL 2025

Executive Committee



Chief Executive Officer
Charles Drummond



Chief Financial Officer
Elodie Saykham

Executive Leadership Team

Sales & BD VP Taco van den Bergh	**Engineering & PD** Director Daniel Koecher	**Purchasing** Director Francesco Colombo	**Business Excellence** Director	**Financial** Controller Kriengkrai Modsuwan	**HR** Director
Plant Management Director Witthaya Inluamsai	**Digital Solutions** Director Floris Kleijn	**Order Fulfillment** Senior Manager Krittika Ittipakornkul	**Strategic Projects** Senior Manager Nisara Towon		

Reporting treatment The 2025 disclosure covers AviusULD's Executive Committee and Executive Leadership Team. Requirement 2-9-c on the composition of the highest governance body is omitted: the information is held by CCE Group and has been requested for the 2026 reporting cycle.

DELEGATION OF_ RESPONSIBILITY FOR MANAGING IMPACTS

GRI 2-13 **Delegation from Board oversight to executive and functional management**

DISCLOSURE NARRATIVE

The CCE Supervisory Board is the highest governance body overseeing AviusULD. Responsibility for managing economic, environmental and people-related impacts is delegated through the Group governance structure to AviusULD's CEO, senior management and functional owners. During 2025, day-to-day management of impacts was embedded in functions including HSE, Operations, Quality/SMS, HR, Finance, Purchasing, IT/IS and Business Excellence. Information security and IT have been managed by the IT/IS department, reporting to the CFO, since April 2025. Functional owners report to senior management through the monthly management business review. Management reports monthly to CCE Group through the Companies MBR review and the monthly Group investor review. The CCE Supervisory Board acts on significant matters through the Reserved Matters and LOA frameworks, with exception reporting where thresholds apply. Significant matters are escalated through management review and, where defined thresholds apply, to the CCE Supervisory Board under the Reserved Matters and LOA frameworks. The ESG Committee formalised by the ESG Governance and Committee Policy issued in August 2026 is a cross-functional management committee, sponsored by the CEO and chaired by the Director of Business Excellence, meeting at least quarterly. It is treated as a subsequent governance enhancement and was not part of the 2025 governance structure.

HIGHEST GOVERNANCE BODY

CCE SUPERVISORY BOARD

Confirmed for AviusULD

DELEGATED MANAGEMENT

CEO + FUNCTIONS

Day-to-day impact management

DELEGATION AND REPORTING FLOW

Board Oversight

CCE Supervisory Board provides highest-level oversight and approves matters within Reserved Matters.

Executive Responsibility

AviusULD CEO and senior management translate Group direction into business priorities, controls and resources.

Functional Ownership

HSE, Operations, Quality/SMS, HR, Finance, Purchasing, IT/IS and BE manage specific impacts and data.

Reporting Back

Performance, incidents, risks and significant decisions are reported through management review and escalated as needed.

MANAGEMENT AREAS AND ROUTES

IMPACT AREA	DELEGATED OWNER(S)	REPORTING / ESCALATION ROUTE
Strategic, financial and legal	CEO, Finance, senior management	Annual budget, strategic plan, business plan, material litigation and executive matters through Reserved Matters / LOA
Environmental, OHS and operations	HSE, Operations, Facility, BE	ISO systems, KPI review, incident/CAPA and management review; significant matters escalated to management or Board
People, ethics and human rights	HR, line managers, Finance / BE	HR processes, training, grievance and whistleblowing channels, policy implementation and escalation
Product, customer and information	Quality/SMS, Engineering, Sales/CS, IT/IS	NCR/CAPA, SMS, customer complaints, cyber/ privacy controls and risk review; significant issues escalated

Reporting treatment No separate 2025 Board-level ESG Committee reporting cadence has been evidenced. Disclosure is therefore based on Board reserved matters, executive management review and functional responsibility.

ROLE OF THE HIGHEST GOVERNANCE BODY_ IN SUSTAINABILITY REPORTING

GRI 2-14 **Review and approval of reported information and material topics**

DISCLOSURE NARRATIVE

AviusULD's 2025 Sustainability Report is prepared by Business Excellence / ESG with support from functional data owners and external consultant review. The CCE Supervisory Board is the highest governance body for AviusULD. For the 2025 reporting cycle, detailed drafting, data validation and publication approval are managed through AviusULD senior management, with Chief Executive Officer approval before publication and assurance. Matters with strategic, financial, legal or reputational significance can be escalated under the Reserved Matters / LOA framework. The Board is therefore not responsible for reviewing or approving the report or the material topics; approval sits with the CEO because the report covers AviusULD own operations. No separate Board-level ESG reporting committee was evidenced for 2025. The ESG Governance and Committee Policy issued in August 2026 confirms that final approval of the Sustainability Report remains with the Chief Executive Officer, and that the ESG Committee confirms reporting boundaries, data ownership, disclosure completeness and reasons for omission; that committee is a subsequent governance enhancement, not 2025 reporting-year evidence.

HIGHEST GOVERNANCE BODY

CCE SUPERVISORY BOARD

Confirmed for AviusULD

REPORT APPROVAL ROUTE

CEO / MD

Senior-management review before publication

REVIEW AND APPROVAL WORKFLOW

Topic Owners
Collect data, boundaries, assumptions and supporting evidence.

BE / ESG
Consolidate GRI disclosures, data checks and draft report content.

Management Review
Review material topics, evidence quality and exceptions.

CEO / MD Approval
Approve final report content before publication and assurance.

Assurance & Publish
BSI assurance statement or reference included once issued.

GOVERNANCE ROLES IN SUSTAINABILITY REPORTING

REVIEW LAYER	ROLE IN SUSTAINABILITY REPORTING	DISCLOSURE TREATMENT
Topic owners	Collect, validate and retain 2025 ESG data and evidence by function.	Operational ownership and evidence retention.
Business Excellence / ESG	Coordinate GRI report structure, data-coverage matrix and content consolidation.	Primary preparation and consistency review.
Senior management / CEO	Review material topics, assumptions, exceptions and final report before publication.	Management-level approval route for 2025.
CCE Supervisory Board	Highest-level oversight through Reserved Matters / LOA for strategic, legal, financial or reputational matters.	No separate 2025 Board-level ESG reporting committee evidenced.

Reporting treatment The ESG Committee formalised in August 2026 is disclosed as a subsequent governance enhancement, not as 2025 governance evidence.

CONFLICTS OF_ INTEREST

GRI 2-15 **Processes for preventing and mitigating conflicts of interest**

DISCLOSURE NARRATIVE

Conflicts of interest are identified, disclosed, reviewed and managed through AviusULD's Conflicts of Interest Charter, Code of Ethics, Employee Code of Conduct and related procedures. Employees covered by the Charter are required to disclose actual or potential conflicts of interest through the applicable Disclosure Statement. HR and Purchasing maintain the relevant declarations and coordinate follow-up with the employee and relevant manager to determine the appropriate response. Where a conflict exists, the individual must refrain from acting, influencing the decision or using confidential information in relation to the matter. Where the conflict arises in a Board or steering committee setting, the individual must disclose the conflict and withdraw from the discussion and decision. Suspected breaches may be investigated and may result in disciplinary, corrective and/or legal action.

PRIMARY CONTROL OWNER

HR / Purchasing / relevant management

OVERSIGHT AND REPORTING

Annual reporting to CEAC

DISCLOSURE STATEMENT

Covered employees disclose actual or potential conflicts through the applicable Disclosure Statement

MITIGATION CONTROLS

Abstention / recusal / confidentiality / corrective action

CONFLICT-OF-INTEREST MANAGEMENT PROCESS

Identify
Employee identifies an actual or potential conflict.

Declare
Conflict is disclosed through the applicable Disclosure Statement / reporting channel.

Review
HR / Purchasing and relevant manager assess the situation and appropriate response.

Mitigate / Recuse
Abstain, recuse, protect confidential information and implement appropriate controls.

Investigate / Correct
Investigate suspected breaches and take corrective, disciplinary and/or legal action where required.

Record and Report
Declarations maintained by HR / Purchasing annual reporting to CEAC.

CONFLICT-OF-INTEREST CONTROL RESPONSIBILITIES

CONTROL AREA	RESPONSIBLE PARTY	REQUIREMENT
Disclosure	Covered employees	Declare actual or potential conflicts.
Recordkeeping	HR	Maintain declarations for relevant employees.
Purchasing declarations	Purchasing	Maintain declarations for Purchasing employees.
Review and mitigation	HR / Purchasing / relevant manager	Determine appropriate response and controls.
Recusal	Conflicted individual	Abstain from acting or influencing the matter.
Investigation / corrective action	Manager / CEAC as applicable	Investigate suspected breaches and take action.
Oversight	HR Director / Purchasing Director	Annual reporting to CEAC.

Reporting treatment The disclosure reflects AviusULD's documented conflict-of-interest identification, disclosure, review, mitigation and reporting processes. Detailed disclosures of individual conflicts or Board-member declarations are not separately reported.

COMMUNICATION OF_ CRITICAL CONCERNS

GRI 2-16 **How critical concerns are communicated and escalated**

DISCLOSURE NARRATIVE

Critical concerns can be raised through line management, HR, compliance, whistleblowing channels, audits and functional escalation. The Whistleblowing Policy requires concerns to be received, assessed and investigated confidentially, with outcomes reported to senior management and corrective actions recommended where required. Matters with significant legal, financial, safety, ESG or reputational exposure are escalated through AviusULD management and, where they exceed delegated authority or require Group oversight, through the applicable LOA / CCE Group governance framework to the highest governance body. For the 2025 reporting period the criteria for escalation were those set out in the Whistleblowing Policy and the Reserved Matters / LOA framework. From August 2026 the ESG Governance and Committee Policy defines the ESG matters requiring immediate escalation to the CEO, including serious injury or fatality, significant environmental incident, product or aviation safety risk, major regulatory non-compliance, human-rights violation, corruption or fraud, significant data breach, material supplier ESG issue, serious stakeholder complaint and significant misstatement in sustainability information.

PRIMARY ROUTE

Management / HR / Whistleblowing

BOARD ESCALATION

LOA / CCE Group governance for critical matters

2025 STATUS

No Board-level critical concern confirmed in available records

REPORTING PRINCIPLE

Escalate by severity, authority threshold and impact

COMMUNICATION AND ESCALATION FLOW

Raise
Employee, supplier or stakeholder raises a concern

Receive
Line management, HR or whistleblowing channel

Assess
Screen severity, confidentiality and responsible owner

Investigate
Fact finding and confidential case handling

Escalate
Senior management or LOA / Group route where required

Close
Corrective action, tracking and reporting

WHISTLEBLOWING TARGETS AND CRITICAL CONCERN EXAMPLES

CONTROL ELEMENT	2025 DISCLOSURE APPROACH	EXAMPLES OF CRITICAL CONCERNS
Reporting channel	Whistleblowing, HR, line management, audits and compliance escalation.	Fraud, corruption, major breach of law or policy, retaliation, data privacy/security issue.
Response expectation	Reports acknowledged within 5 working days; investigations targeted within 30 working days unless complex.	Major safety/regulatory matter, material customer/product issue, significant environmental event.
Escalation to governance	Issues beyond delegated authority or with material exposure are escalated using the LOA / Group governance framework.	Material litigation, major financial exposure, Board approval matter, severe reputational risk.

Reporting treatment Critical concerns are escalated based on severity, delegated authority and the Group governance framework. 2025 Board-level critical-concern tracking is disclosed based on available records.

POLICY_ COMMITMENTS

GRI 2-23 **Responsible-business commitments and scope of policies**

DISCLOSURE NARRATIVE

AviusULD maintains a suite of policy commitments covering environmental responsibility, aviation and product safety, labour and human rights, ethical conduct, information security, responsible procurement and employee welfare. The 2025 policy framework is approved by the Chief Executive Officer, assigned to functional owners, communicated to all employees, reinforced through training, and supported by objectives, targets, responsibilities and review intervals. Commitments apply across AviusULD operations unless a policy defines a more specific employee group or operational scope. For business relationships, supplier-facing commitments are embedded through the Supplier Code of Conduct and Sustainable Procurement Policy, while employees and managers are guided through the Code of Conduct, Anti-Corruption, Whistleblowing, Conflict of Interest and related procedures.

POLICY OWNERSHIP

CEO approval · Functional document owners · Leadership Team oversight

SCOPE AND STAKEHOLDERS

Employees and managers · Temporary / contracted staff · Suppliers and partners

HUMAN-RIGHTS COMMITMENT

Embedded through Ethical Labor & Diversity, Code of Conduct, Whistleblowing and Supplier Code of Conduct

BUSINESS CONDUCT

Anti-corruption, conflicts of interest, gifts & hospitality, reporting and non-retaliation controls

POLICY GOVERNANCE MODEL

Commit
Policy states purpose, scope, principles, objectives and targets.

Assign
Document owner and functional responsibility are defined.

Implement
Training, procedures, operational controls and reporting channels support application.

Review
Policies are reviewed annually or at defined intervals and updated where needed.

KEY POLICY COMMITMENTS

Environment
Reduce waste, conserve water, minimize emissions, use energy/materials efficiently.

Safety
Maintain aviation safety, SMS risk controls, safety reporting and zero product flight-safety incidents target.

People
Respect human rights, non-discrimination, employee voice, welfare, fair treatment and development.

Ethics
Prevent corruption, bribery, fraud, conflicts of interest and improper gifting.

Data
Protect information security, privacy, access control and business continuity.

Reporting treatment This disclosure summarizes policy commitments available for the 2025 reporting period. The August 2026 ESG Governance and Committee Policy is treated separately as a post-reporting-period enhancement.

GRI 2-23

Policy commitment matrix

AviusULD's policy commitments are organized across six management themes. Together, they define expectations for employees, managers, suppliers and partners, and provide the basis for operational controls, training, reporting channels and annual review.

THEME	POLICIES / COMMITMENTS	COMMITMENT FOCUS	HOW IT IS APPLIED
Environment & circularity	Environmental Policy Sustainable Products Policy	Waste, water, emissions, energy, materials efficiency and lower-impact product design.	ISO-based controls, environmental objectives, product development review and management review.
Aviation / product safety	Aviation Safety Policy Aviation Safety Objective 2025 Just and Fair Culture Policy	Safety as highest priority; hazard identification, risk assessment, Certified Aviation Safety Management System (SMS) training and zero product flight-safety incident target.	SMS, risk assessment, safety reporting, audits, mitigation plan and Just/Fair Culture reporting channel.
People & labour rights	Ethical Labor and Diversity Paternity Leave Flextime Rewards & Recognition Career Development	Respect human rights, non-discrimination, employee voice, fair opportunities, well-being and work-life balance.	HR policies, welfare mechanisms, training, recognition programs, leave benefits and performance/ development process.
Ethics & governance	Anti-Corruption Policy Employee Code of Conduct Code of Ethic Conflict of Interest Charter Gifts, Hospitality & Expenses	Integrity, legal compliance, anti-bribery, conflict-of-interest prevention, confidentiality and responsible conduct.	Declarations, approval thresholds, reporting channels, disciplinary process and LOA / governance escalation where required.
Information & privacy	Information Security Policy Privacy Notice & Consent Record retention / access controls	Cybersecurity, data protection, confidentiality, access management, backup and recovery.	IT/IS controls, access review, incident response, DRP, training and privacy consent process.
Responsible supply chain	Sustainable Procurement Policy Supplier Code of Conduct	Supplier environmental and social practices, human rights, anti-corruption, conflict minerals, counterfeit prevention and reporting.	Supplier screening/ assessment, supplier code sign-off, audits, grievance mechanism and buyer training.

KEY DISCLOSURE NOTES

- Policy commitments are approved by the CEO and assigned to functional owners.
- Human-rights commitments are embedded across labour, ethics, whistleblowing and supplier policies rather than one standalone Human Rights Policy.
- Supplier-facing commitments are communicated through the Supplier Code of Conduct and procurement controls.

Reporting note The matrix presents policy commitments at disclosure level. Detailed implementation and effectiveness are covered under GRI 2-24 and the relevant material-topic disclosures.

EMBEDDING POLICY_ COMMITMENTS

GRI 2-24 **How policy commitments are embedded in activities and business relationships**

DISCLOSURE NARRATIVE

AviusULD embeds policy commitments through a CEO-approved policy framework, functional ownership, operating procedures, training, reporting channels and regular review. Commitments are translated into day-to-day controls through ISO-based management systems, SMS/QMS/HSE/IT procedures, HR and ethics processes, supplier requirements and management review. Policies are communicated to employees and relevant workers, while supplier-facing commitments are embedded through the Supplier Code of Conduct, Sustainable Procurement Policy and sourcing processes. Deviations, concerns and potential adverse impacts are managed through reporting channels, non-conformity/CAPA, risk assessment, whistleblowing, aviation safety reporting and escalation through management or the applicable Limit of Authority where needed.

WHERE COMMITMENTS ARE EMBEDDED

People & Culture
Code of Conduct, Ethical Labor & Diversity, Career Development, Flextime, Paternity Leave, Rewards & Recognition.

Ethics & Compliance
Anti-Corruption, Conflict of Interest, Gifts & Hospitality and Whistleblowing controls.

Operations & Safety
Aviation Safety Policy, Just & Fair Culture, SMS objectives, HSE/Environmental controls and QMS/CAPA.

Value Chain & Data
Supplier Code of Conduct, Sustainable Procurement, Information Security, privacy and access-control processes.

EMBEDDING MODEL

Commit
Policies define purpose, scope, objectives and targets.

Assign
Document owners and functions are accountable.

Operate
Procedures, work instructions and controls apply policies.

Monitor
KPIs, audits, reviews and reporting channels track performance.

Improve
CAPA, lessons learned and annual reviews close gaps.

IMPLEMENTATION MECHANISMS

Communication & Training
Policy updates, e-learning/training, SMS awareness, employee acknowledgement and internal communication.

Controls & Due Diligence
Risk assessment, supplier requirements, procurement controls, access review, legal compliance and operational procedures.

Reporting & Escalation
Whistleblowing, grievance/concern channels, safety reporting, NCR/CAPA and management/LOA escalation.

Review & Accountability
Annual review by document owners, Leadership Team oversight, KPI monitoring and corrective-action follow-up.

Reporting note This disclosure describes how 2025 policy commitments are embedded in operations and business relationships. The 2026 ESG Governance Policy is treated separately as a post-reporting-period enhancement.

PROCESSES TO_ REMEDIATE NEGATIVE IMPACTS

GRI 2-25

Mechanisms for remediation, grievance handling and effectiveness review

DISCLOSURE NARRATIVE

AviusULD provides multiple channels to identify and remediate actual or potential negative impacts affecting employees, contractors, suppliers, customers and other stakeholders. Concerns can be raised through management, HR, whistleblowing, aviation safety reporting, quality non-conformity reporting and corrective and preventive action (NCR/CAPA), and supplier channels, including the reporting addresses Whistleblower@aviusuld.com and myconcern@aviusuld.com. The responsible function assesses the case, protects affected persons, investigates root causes, defines proportionate corrective or remedial actions and verifies effectiveness before closure. Grievance mechanisms are reviewed with the Welfare Committee, employee representatives and, for supplier channels, with Purchasing. For human-rights related cases, OP-HRM-004 establishes a formal victim-centered remediation process covering immediate protection, confidential investigation, compensation or reinstatement where appropriate, disciplinary measures, supplier corrective action plans and follow-up review.

FORMAL HUMAN RIGHTS REMEDIATION

SCOPE

Employees, contractors, suppliers and parties under AviusULD influence worldwide

RESPONSE TIME

HR and Whistleblowing Committee conduct fact-finding within 5 working days

SUPPLIER CASES

Corrective Action Plan required within 30 days, followed by verification audit

EFFECTIVENESS

HR follow-up within 30 days root-cause and preventive actions implemented

REMEDIATION PROCESS

Raise / Identify

Whistleblowing, HR, manager, SMS, NCR/CAPA, supplier or stakeholder channel

Protect & Assess

Immediate safety, confidentiality, anti-retaliation and case triage

Investigate

Evidence review, fact-finding, root-cause analysis and escalation if required

Remediate

Correction, compensation/ reinstatement, counseling, disciplinary action, supplier CAP

Verify & Learn

Follow-up, effectiveness check, closure, trend review and preventive action

KEY REMEDIATION MECHANISMS

Whistleblowing & Ethics

Confidential reporting, non-retaliation, investigation and disciplinary action.

Safety & Product Quality

SMS reporting, Just & Fair Culture, NCR/8D/ CAPA, containment and verified closure.

Human Rights & Labor

Victim protection, counseling/ rehabilitation, compensation or reinstatement, authority referral where required.

Supply Chain

Supplier Code of Conduct, corrective action plans, follow-up audits and commercial escalation.

Reporting note The remediation framework is multi-channel rather than a single centralized grievance mechanism. Specific procedures apply depending on the nature of the impact. Effectiveness is tracked through case closure rates, verification of actions before closure and feedback from affected persons, reviewed at management review.

MECHANISMS FOR_ SEEKING ADVICE AND RAISING CONCERNS

GRI 2-26 **Mechanisms for seeking advice and raising concerns**

DISCLOSURE NARRATIVE

AviusULD provides several channels for employees, suppliers and stakeholders to seek advice and raise concerns about ethics, legal compliance, human rights, labor practices, discrimination, harassment, product safety and aviation safety. Concerns may be raised through managers, HR, the Leadership Team, the Whistleblowing System / QR code, the dedicated reporting addresses Whistleblower@aviusuld.com and myconcern@aviusuld.com, Purchasing for supplier-related matters, and aviation safety reporting routes. The Company's policies require confidential handling, impartial assessment and protection from retaliation. For labor and human-rights related concerns, the remediation procedure defines initial response, fact-finding, remedial actions, communication, monitoring and follow-up to protect affected individuals and prevent recurrence.

ADVICE AND REPORTING CHANNELS

Line Manager / Head of Function
First point for guidance, workplace concerns and operational escalation.

Human Resources
Employee relations, labor, welfare, discrimination and harassment matters.

Whistleblowing channels
Confidential reporting by e-mail / QR code anonymous reporting where available.

Aviation Safety / SMS
Safety reports, hazards, product safety risks and Just & Fair Culture reporting.

Purchasing / Supplier Route
Supplier concerns and supply-chain remediation linked to supplier code and procurement policy.

HOW CONCERNS ARE HANDLED

Seek Advice
Employee or stakeholder asks a manager, HR or responsible function.

Raise Concern
Issue is reported via HR, whistleblowing, SMS, QR code or supplier route.

Assess & Investigate
Responsible team reviews facts, severity, confidentiality and affected parties.

Protect & Remediate
Interim protection, correction, CAPA, counseling, compensation or supplier CAP.

Close & Learn
Follow-up, effectiveness check, trend review and preventive actions.

KEY SAFEGUARDS AND TIMING

Confidentiality
Information and identities are protected throughout assessment and follow-up.

No Retaliation
Good-faith reporters and affected persons are protected from retaliation.

Fact-finding within 5 working days
HR and the Whistleblowing Committee start fact-finding for defined remediation cases.

30-day follow-up
HR follows up to confirm case closure, protection and effectiveness.

Reporting note Mechanisms apply through multiple policy routes reporting channels are available for employees, suppliers and stakeholders depending on the issue type.

COMPLIANCE WITH_ LAWS AND REGULATIONS

GRI 2-27 **Legal compliance status and definition of significant non-compliance**

2025 COMPLIANCE DASHBOARD

SIGNIFICANT NON-COMPLIANCE	CASES WITH FINES	NON-MONETARY SANCTIONS	FINES PAID
0	0	0	0
Total instances identified	2025 fine cases	Regulatory restrictions/ orders	Paid during 2025

2025 DISCLOSURE POSITION

AviusULD monitors legal and regulatory compliance through designated functional owners, supported by Group Legal Counsel and, where required, external legal or specialist advisers. Potential compliance matters are subject to management review and escalation, with corrective actions implemented where necessary.

For 2025, there were no significant instances of non-compliance, no instances resulting in fines or non-monetary sanctions, and no fines paid in relation to either current- or prior-period instances.

Compliance monitoring covers areas including tax, customs, labour, environmental, aviation, product, data privacy and corporate matters.

For reporting purposes, an instance of non-compliance is considered significant where it results in a fine, non-monetary sanction, formal regulatory notice, suspension of a permit, or escalation under the Group's Reserved Matters framework.

DEFINITION OF SIGNIFICANT NON-COMPLIANCE

Significance is assessed based on the nature, severity and consequence of the event, including formal enforcement, permit or licence restriction, material fine or sanction, significant harm, or a material impact on AviusULD's operations or reputation.

COMPLIANCE REVIEW FLOW

Identify	Assess	Escalate	Correct
Law, audit or report	Severity and impact	Owner / management	CAPA and closure

No reportable legal cases

No fines paid in 2025

MEMBERSHIP_ ASSOCIATIONS

GRI 2-28 **Membership associations and external initiatives**

2025 DISCLOSURE POSITION

AviusULD Ltd. has been a participant in the United Nations Global Compact since 10 December 2024 and is a member of two associations: ULD CARE, the international ULD industry association, and NTCC, the Netherlands-Thai Chamber of Commerce. As a ULD CARE member, AviusULD signed the 2024 memorandum of understanding establishing the ULD Climate Impact Label, and its AKE container (part number 3S-VA12E1R7AD) received an A+ weight rating on 10 October 2025. Certifications, regulatory approvals, ratings and business partnerships are not membership associations and are reported on pages 23–25.

2	UNGC	10	A+
membership associations: ULD CARE and NTCC	participant since December 2024	principles in 4 areas: human rights, labour, environment, anti-corruption	ULD CARE Climate Impact Label, AKE container

ORGANIZATION /ASSOCIATION	TYPE	2025 ROLE /STATUS	SIGNIFICANCE TO AVIUSULD	DISCLOSURE TREATMENT
United Nations Global Compact (UNGC)	International sustainability initiative	Participant since 10 December 2024 (AviusULD Ltd.); status Active	Supports policy commitments and reporting across human rights, labor, environment and anti-corruption.	Include in GRI 2-28 as confirmed significant external sustainability initiative.
ULD CARE; NTCC	Industry association (ULD CARE); chamber of commerce (NTCC)	Member of ULD CARE and NTCC	ULD CARE: ULD industry practice and sustainability, including the Climate Impact Label. NTCC: Dutch-Thai business network and advocacy.	List as membership associations under GRI 2-28.

Reporting note GRI 2-28 lists formal associations and initiatives with significant AviusULD participation. Certifications, approvals, ratings and business partnerships are reported on pages 23–25.

APPROACH TO **STAKEHOLDER ENGAGEMENT_**

GRI 2-29 **Stakeholder engagement approach**

DISCLOSURE NARRATIVE

AviusULD engages stakeholders through recurring operational routines, management reviews, customer and supplier processes, employee dialogue, regulatory audits and grievance channels. Each group is engaged at the frequency it requires, and outcomes are recorded in management review and carried into action plans.

6
Key stakeholder groups

233
employees took part in the 2025 engagement survey

MONTHLY
MBR reporting to CCE

224
face-to-face customer visits in 2025

STAKEHOLDER GROUP	ENGAGEMENT CHANNELS	FREQUENCY/ TRIGGER	HOW INPUT IS USED
Employees	Engagement survey, Welfare Committee (also the counterparty to the collective agreements, see GRI 2-30), shopfloor meetings, town halls, HR/manager channels, whistleblowing	Ongoing; survey / action plans; monthly progress review	Employee engagement action plans, policy updates, HR programs, working-condition improvements
Customers	Account plans, visits, customer meetings, complaints/8D, satisfaction/ NPS and technical discussions	Ongoing; monthly customer-visit targets tracked in MBR	Customer experience actions, product/service improvements, project prioritization and corrective actions

STAKEHOLDER GROUP	ENGAGEMENT CHANNELS	FREQUENCY/ TRIGGER	HOW INPUT IS USED
Suppliers / contractors	Supplier questionnaires, Code of Conduct, ESG assessments/ audits, purchasing discussions, CAPA when needed	Onboarding, periodic review, audit or issue-based	Supplier selection, risk mitigation, corrective actions and sustainability expectations
Regulators / certification bodies	Audits, inspections, permits, legal-compliance evaluation and certification reviews	Periodic, annual or regulatory-triggered	Compliance actions, management review, process controls and closure of audit findings
BFTZ / local community	BFTZ service email for issue reporting and communication; environmental controls and monitoring	Issue-based; no formal monthly/ quarterly/annual meeting	Respond to operational/ environmental concerns and coordinate corrective actions if needed
CCE / shareholders	Monthly Business Review to CCE; CCE reporting to upper level; budget/strategy/ approval routines	Monthly and as required by approval thresholds	Strategic priorities, resource allocation, governance escalation and performance management

Reporting note The six stakeholder groups are employees customers suppliers and contractors, including outsourced workers regulators and certification bodies BFTZ and the local community and CCE and shareholders. Industry associations and business partners are engaged through the memberships reported under GRI 2-28. Stakeholder input is centralized through materiality assessment, MBR routines, action-plan tracking, management review, customer and supplier processes and issue-escalation channels.

COLLECTIVE BARGAINING AGREEMENTS_

GRI 2-30 **AviusULD Collective bargaining agreements**

AGREEMENTS

3

issued in Jun 2025

EMPLOYEE COVERAGE

~95%

228/239 employees

CAO COVERAGE

0

NL/USA

DISCLOSURE NARRATIVE

AviusULD maintains collective agreements negotiated with elected Welfare Committee representatives, covering working time, leave, health and safety, career development, training and diversity, valid from June 2025.

DISCLOSURE POSITION

Thailand employees are covered through collective agreements negotiated with elected Welfare Committee representatives.

Coverage basis: 228 Thailand employees out of 239 total employees disclosed for 2025 Netherlands and USA employees are not covered by a Dutch CAO / collective agreement.

For employees not covered by collective agreements, employment terms are based on local law, individual employment agreements and company policies.

The Employee Committee under the Labour Relations Act, together with the Welfare and Health & Safety Committees, provides ongoing representation, consultation and quarterly review channels.

2025 COLLECTIVE AGREEMENTS

AGREEMENT	MAIN COVERAGE	PARTICIPATION/VALIDITY
Working hours, Overtime, Leaves	Working days, shifts, overtime consent and pay, public holidays, leave entitlements incl. paternity leave.	Signed by CEO, HR Director and Chair of the Employee Committee under the Labour Relations Act; valid from Jun 2025.
Employee Health, Safety & Working Conditions	Safe workplace, facilities, PPE, H&S training, health monitoring, incident review and employee feedback.	Employee Committee, H&S Committee and Welfare Committee include employee representatives; quarterly review minimum.
Career Management, Training and Diversity	Social dialogue, ethics training, gender pay gap, female representation, disability inclusion, discrimination, training hours and performance reviews.	Employee representatives advocate employee needs; KPIs include social dialogue, engagement, training, turnover and whistleblower reports.

AviusULD disclosed collective agreements established in 2025 with employee representatives covering working time, leave, health and safety, working conditions, training, career development and diversity. These agreements apply to the Thailand operation employees outside this scope follow applicable local law, individual employment agreements and company policies.

Climate Change, Energy & Greenhouse Gas Emissions

Materials, Circular Resource Use & Waste Management

Water & Effluent Management

Pollution Prevention & Environmental Compliance

Employment, Benefits & Working Conditions

Labor Relations, Employee Voice & Grievance

Occupational Health, Safety & Contractor Safety

Learning, Skills & Career Development

Diversity, Equal Pay & Non-discrimination

Human Rights & Fair Labor Practices

Product Responsibility, Customer Safety & Trust

Business Ethics, Anti-corruption & Whistleblowing

Information Security, Cybersecurity & Data Privacy

Responsible Supplier Selection & ESG Due Diligence

Ethical Procurement & Supply Chain Human Rights

THE FIFTEEN MATERIAL TOPICS

Each topic sets out its management approach, its 2025 performance against the relevant GRI Standards, and the reasons for any omission.

04

MATERIAL TOPIC DISCLOSURES





CLIMATE CHANGE, ENERGY & GHG EMISSIONS

GRI 3-3 · 302 · 305

CLIMATE CHANGE, ENERGY & GREENHOUSE GAS EMISSIONS

Reporting period 1 January – 31 December 2025 · Boundary: Bangkok manufacturing, Thailand

AviusULD manages climate impacts by reducing energy use, monitoring greenhouse gas emissions, improving product and packaging efficiency, and strengthening Scope 3 data quality.

Climate change is a material topic for AviusULD because energy consumption, greenhouse gas emissions and upstream materials represent significant environmental impacts across the value chain. During 2025, the Company continued to strengthen its environmental management practices through energy efficiency, GHG monitoring and continuous improvement initiatives. This chapter describes the management approach and performance in accordance with GRI 3-3, GRI 302 and GRI 305.

KEY 2025 FIGURES

TOTAL GHG

15,033.34

tCO_2e | -19.2% vs 2024

ENERGY

5,513.80

GJ total organizational energy

SCOPE 3 SHARE

95.0%

dominant source of emissions

OUTPUT

45,055

finished ULD units

REPORTING BOUNDARY

- 2025 reporting period
- Thailand GHG inventory
- Relevant Scope 3 categories
- Operational-control consolidation
- Base year: 2024 (first GHG inventory year)

WHY THIS TOPIC_ IS MATERIAL

GRI 3-3

Climate-related impacts, stakeholders and value-chain relationship

Climate change is material because AviusULD has direct operational energy use and significant value-chain emissions, especially purchased materials and logistics.

Climate-related impacts arise from manufacturing operations, purchased materials and logistics activities. Aluminium, electricity consumption and transportation contribute the majority of the environmental footprint. Understanding these impacts enables AviusULD to prioritise improvement projects, monitor performance and engage relevant parties such as management, employees, investors, regulators, assurance providers and selected value-chain partners. The material topic therefore covers both impacts caused by AviusULD directly and impacts linked to the Company through suppliers, logistics providers and sold products.

KEY IMPACTS

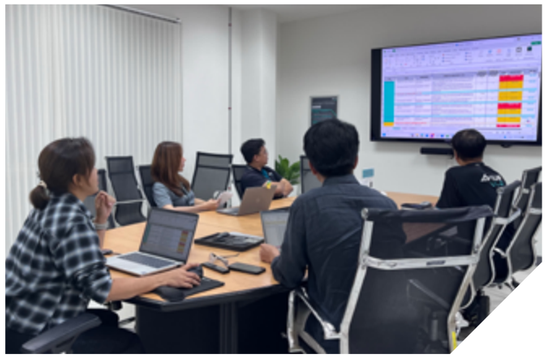
01	**Purchased Aluminium and Materials**	Largest upstream GHG impact localization project in progress.
02	**Electricity Consumption**	Manufacturing energy demand and Scope 2 emissions.
03	**Direct Emissions**	Fuel use and refrigerant leakage under operational control.
04	**Transport and Logistics**	Inbound and outbound freight emissions packaging optimization.
05	**Climate Risks**	Heat, flooding, energy price, regulation and customer expectations.

STAKEHOLDER EXPECTATIONS AND RESPONSE

STAKEHOLDER	MAIN EXPECTATION	AVIUSULD RESPONSE
Investor / CCE-HIG	EcoVadis score, Scope 1&2 reduction, training KPI	Work with CCE Group on target setting: EcoVadis, -2% Scope 1&2/year, training hours
Management	Operational efficiency, risk control and accurate reporting	KPI review, environmental targets, ISO 14001/14064-1 approach
Employees	Responsible operations and practical engagement	Kaizen and Energy Saving Suggestion Programme
Regulators / assurance providers	Legal compliance and traceable data	Legal monitoring, ISO 14001 controls, evidence files and methodology review
Customers / suppliers	Progress on EcoVadis rating and the ESG programme; carbon data on request	Share EcoVadis scorecard progress and ESG programme updates each year; maintain product carbon footprint evidence and supplier-data readiness

VALUE-CHAIN RELATIONSHIP

- Own electricity/fuel: caused by AviusULD
- Purchased aluminium: linked through suppliers
- Freight: linked through logistics providers
- Business travel/commuting: contributed or linked
- End-of-life: linked through sold products



Source: **AviusULD** materiality assessment and stakeholder engagement, 2025.

MANAGEMENT APPROACH: GOVERNANCE, POLICY AND NEGATIVE-IMPACT MANAGEMENT_

GRI 3-3 **Policies, responsibilities, due diligence, targets and review process**

Environmental performance is managed through clear policy commitments, cross-functional data ownership, ISO-based controls and routine management review.

The Company's climate management approach is based on continual improvement. Environmental objectives are established through the Environmental Policy and supported by ISO 14001, ISO 14064-1 and GHG Protocol principles. AviusULD identifies and manages negative environmental impacts through its ISO 14001 environmental aspect assessment, legal-compliance monitoring, operational controls and management-review processes. Deviations, environmental incidents and significant performance gaps are escalated to the responsible manager and addressed through corrective actions. Value-chain impacts are managed through supplier engagement, logistics optimisation and requests for environmental and carbon data where relevant.

POLICIES AND COMMITMENTS

- Environmental Policy introduced and revised during 2025
- ISO 14001 environmental management system
- ISO 14064-1 and ISO 14067 verification history
- GHG Protocol Corporate Standard considered
- UN Global Compact and customer expectations considered

2025 POLICY TARGETS

RENEWABLE ENERGY INTENSITY	SCOPE 1	SCOPE 2	SCOPE 3	TOTAL GHG
10%	-5%	-4%	-10%	-1%	-1%

ROLES AND RESPONSIBILITIES

OWNER	RESPONSIBILITY
Facility & Maintenance	electricity, fuel, refrigerant data
Purchasing	material and supplier data
Order Fulfilment / Logistics	downstream logistics data
HR / Finance	travel and commuting data
ESG Coordinator / ESG Chair	GHG consolidation and review
CEO / Management	target and report approval

REVIEW AND ESCALATION PROCESS

- Weekly Performance Review tracks KPI performance, deviation management, trends, forecast and escalation
- Environmental incidents and significant performance gaps are escalated to responsible managers
- Corrective actions are handled through ISO 14001 nonconformity/CAPA and management-review processes

Source: **AviusULD** Environmental Policy and ISO 14001 management system records.

METHODOLOGY, BOUNDARY AND DATA QUALITY_

GRI 302 · GRI 305 **Methodology, boundary and data quality**

AviusULD prepared the 2025 GHG inventory with reference to ISO 14064-1:2018 and the GHG Protocol Corporate Standard. The consolidation approach is operational control. The organizational and operational boundary for the 2025 climate and energy data is the Bangkok manufacturing operation in Thailand. The Netherlands HQ, USA entity, warehouses, assembly stations and outsourced operations are not included in the 2025 GHG inventory boundary. This climate inventory boundary is narrower than the group employee boundary of 239 employees across the three legal entities reported under GRI 2-7, so per-employee climate figures should not be derived by combining the two. 2024 is used as the official GHG base year because it was the first year the Company calculated its GHG inventory. Prior-year data will be restated where significant boundary changes, methodology changes, emission-factor changes, errors or data improvements materially affect comparability.

FACTORS, CONVERSIONS AND DATA QUALITY

ITEM	DISCLOSURE BASIS
Energy Conversion	1 kWh = 0.0036 GJ. Fuels are reported as non-renewable; the 7% biodiesel in B7 and 10% ethanol in E10 are not separated in energy terms, but their CO_2 is reported as biogenic. Renewable electricity was zero in 2025.
Factor Source	Emission factors are referenced from TGO. 2025 uses the TGO emission factor list of February 2026, including the grid electricity factor 0.475 $kgCO_2e$/kWh (Thai National LCI Database, AR5, grid mix 2022–2024). The 2024 base year keeps 0.4999 $kgCO_2e$/kWh (TGO, April 2022, grid mix 2016–2018).
Scope 2 Treatment	Location-based Scope 2 is reported. Market-based Scope 2 was not calculated because no green tariff, PPA, RECs, contractual instruments or residual-mix factor were available.

ITEM	DISCLOSURE BASIS
Gases Included	CO_2, CH_4 and N2O from fuel and electricity; HFCs from refrigerants. Biogenic CO_2 from the bio-blend share of B7 diesel and E10 gasohol is 0.457 tCO_2 in 2025, reported separately from the scopes (GRI -c). The same gas set applies to Scope 1, Scope 2 and Scope 3.
GWP Version	Refrigerant GWPs follow the TGO emission factor lists: February 2026 for 2025 and April 2022 for the 2024 base year (R-32 677, R-134a 1,300; AR5). R-410A uses 1,923.5 (IPCC 2006 default) in both years, as the TGO list carries no R-410A factor.
Data Quality	Scope 1 and 2 use invoices, fuel and maintenance records. Scope 3 combines actual records, surveys, estimates and secondary factors; Scope 3 uncertainty is higher.

Source: **AviusULD** 2025 GHG inventory, prepared with reference to ISO 14064-1:2018 and the GHG Protocol Corporate Standard.

2025 GHG EMISSIONS_ DASHBOARD

GRI 305-1 · GRI 305-2 · GRI 305-4

Scope 1, Scope 2 and Scope 3 emissions and intensity

Overall greenhouse gas emissions decreased by approximately 19.2% in 2025, mainly from lower value-chain transport emissions and lower electricity consumption.

Overall greenhouse gas emissions decreased during 2025, although Scope 1 emissions rose 10.9% from a small base. Reduced electricity consumption and lower Scope 3 emissions contributed to an overall reduction compared with 2024. Scope 3 remains the most significant source of emissions and therefore continues to be the Company's primary improvement focus. Scope 2 emissions are reported on a location-based basis. Market-based Scope 2 was not calculated because AviusULD did not purchase renewable-energy certificates or other contractual electricity instruments during 2025, and supplier-specific contractual emission factors were not available.

TOTAL GHG

15,033.34

tCO_2e | -19.2% vs 2024

SCOPE 1

59.64

tCO_2e | 0.4%

SCOPE 2

688.75

tCO_2e | 4.6%

SCOPE 3

14,284.94

tCO_2e | 95.0%

OUTPUT

45,055

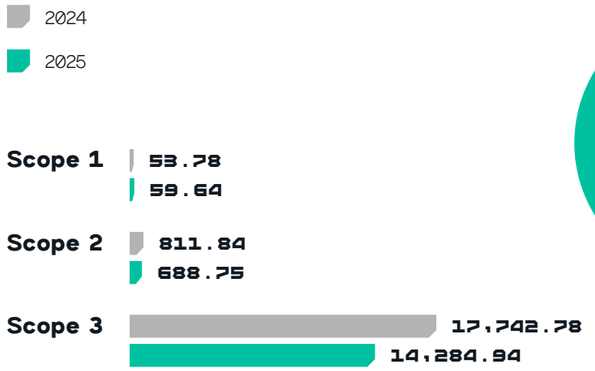
finished ULD units

GHG INTENSITY

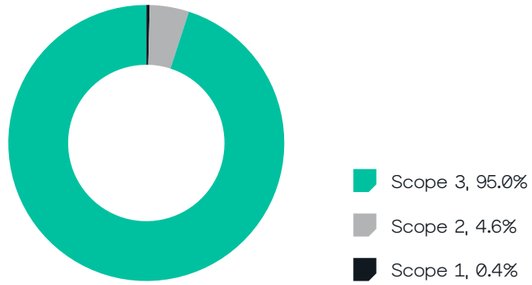
16.6

$kgCO_2e$/ULD | Scope 1+2

2024 VS 2025 BY SCOPE (tCO_2E)



2025 EMISSIONS SHARE



READING OF PERFORMANCE

- Scope 3 is the dominant emissions source
- Scope 2 reduced by 15.2%: lower electricity use and the updated TGO grid factor
- Scope 1 increased, mainly from direct sources including fugitive emissions
- Market-based Scope 2 unavailable no RECs or offsets used

GHG EMISSIONS INTENSITY (GRI 305-4)

- Scopes 1 and 2: 16.6 $kgCO_2e$ per finished ULD
- Scope 3: 317.1 $kgCO_2e$ per finished ULD (reported separately)
- Denominator 45,055 units. Biogenic CO_2: 0.457 tCO_2, reported separately (GRI 305-1-c).

Source: AviusULD 2025 GHG inventory (CFO calculation V1.3). 2024 base year: total 18,608.40 tCO_2e (Scope 1 53.78, Scope 2 811.84, Scope 3 17,742.78). Grid factor: 2025 at 0.475 $kgCO_2e$/kWh (TGO, Feb 2026); 2024 at 0.4999 $kgCO_2e$/kWh (TGO, Apr 2022). At 0.475 for both years, 2024 Scope 2 would be 771.4 tCO_2e and the Scope 2 reduction 10.7%.

SCOPE 3 EMISSIONS_ VALUE-CHAIN HOTSPOTS

GRI 3-3 **Included categories, calculation methods and data quality**

Scope 3 represents 95.0% of total emissions. The largest impact is purchased goods and services, mainly materials, followed by transport and distribution.

Scope 3 emissions account for the majority of AviusULD's carbon footprint. Purchased goods and services contribute the highest emissions, followed by downstream and upstream transportation. Because these emissions occur outside direct operational control, effective collaboration with suppliers and logistics partners is essential. Transport emissions were recalculated in 2025 after formula, distance and tonne-kilometre corrections. The 2025 calculation uses a combination of spend-based methods, actual activity data, freight records, distance-based calculations, surveys and product-weight assumptions. As a result, Scope 3 results have a higher level of estimation uncertainty than Scope 1 and Scope 2, and data quality will continue to be improved over time.

CATEGORY	METHOD
Purchased goods & services	Spend-based
Fuel & energy related	Actual data + factor source
Upstream transport	Weight-distance / actual freight record
Waste generated	Actual waste weight + treatment method
Business travel	Distance + transport mode
Employee commuting	Survey / estimated distance / fuel type
Downstream transport	Shipment weight-distance
End-of-life treatment	Product weight + assumed recycling/disposal

PURCHASED GOODS & SERVICES

12,129.5

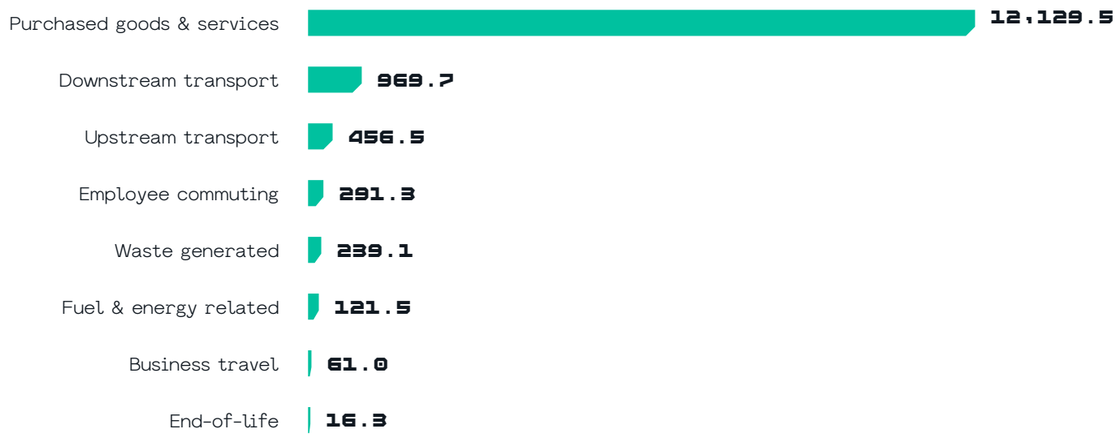
tCO_2e | largest Scope 3 source

TRANSPORTATION

1,426.2

tCO_2e | upstream + downstream

SCOPE 3 CATEGORY BREAKDOWN (tCO_2e)



Commuting and business travel cover the Thailand site only; the survey covered AviusULD employees plus STC workers on site at mid-2025, so it does not reconcile to the 239 employees under GRI 2-7.

REPORTING TREATMENT

- Included categories: 1, 3, 4, 5, 6, 7, 9 and 12
- Excluded/not applicable categories: 2, 8, 10, 11, 13, 14 and 15
- Use of sold products is excluded because ULDs do not directly consume energy in normal use
- End-of-life treatment is included as a downstream Scope 3 category

MANAGEMENT FOCUS

- Strengthen supplier-specific data where available
- Improve logistics data quality and shipment weight-distance evidence
- Continue packaging optimisation and material localisation where feasible
- Document assumptions, estimates and data limitations for each Scope 3 category

Source: **AviusULD** 2025 Scope 3 inventory (CFO calculation V1.3). Category 3: gasoline and diesel litres converted to kg at 0.75 and 0.84 kg/L (typical densities at 15 C, within the EN 228 and EN 590 specification ranges) before applying TGO per-kg emission factors.

ENERGY PERFORMANCE_ UNDER GRI 302

GRI 302-1 · GRI 302-3 **Energy consumption, conversion factors and intensity**

Energy management focuses on reducing consumption through operational excellence and Kaizen activities. Electricity remains the primary energy source for manufacturing operations.

Electricity accounted for almost 95% of AviusULD's total energy consumption during 2025, making energy efficiency a key management priority. Purchased electricity is converted using 1 kWh = 0.0036 GJ. Fuel energy is calculated from activity quantities using DEDE (Thailand) net heating values: diesel 36.42 MJ/litre, gasoline 31.48 MJ/litre and LPG 26.62 MJ/litre, converted at 0.54 kg/litre (49.30 MJ/kg). All fuel sources are classified as non-renewable. Purchased heating, cooling and steam are not applicable, energy sold is zero and renewable electricity was zero in 2025 because the rooftop solar project was postponed. Energy performance is monitored using absolute consumption and intensity indicators.

PURCHASED ELECTRICITY

1,450,000

kWh | 5,220.00 GJ

FUEL ENERGY

293.80

GJ | non-renewable fuels

TOTAL ENERGY

5,513.80

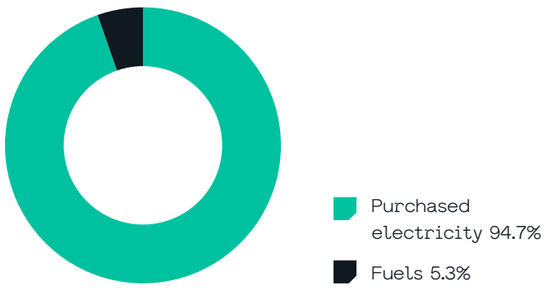
GJ | Thailand operations

ENERGY INTENSITY

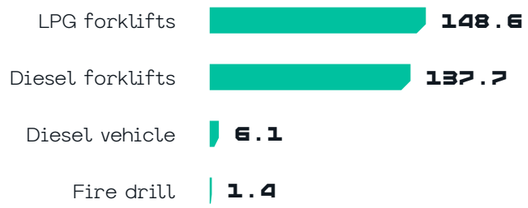
0.1224

GJ per finished ULD

ENERGY MIX



FUEL BREAKDOWN (GJ)



DISCLOSURE NOTES

- Energy boundary: Thailand only the intensity ratio covers purchased electricity and fuels consumed within the organization
- Purchased heating, purchased cooling and purchased steam are not applicable
- Energy sold is zero
- Renewable electricity was zero in 2025 because the rooftop solar project was postponed

ENERGY INTENSITY

- Ratio: 0.1224 GJ per finished ULD
- Numerator: 5,513.80 GJ total energy consumed within the organization (purchased electricity 5,220.00 GJ + fuels 293.80 GJ)
- Denominator: 45,055 finished ULD units, 2025

Energy outside the organization is not included in the ratio.

Source: AviusULD 2025 energy records and GHG inventory.

ENERGY-SAVING ACTIONS AND IMPROVEMENT PROJECTS_

GRI 302-4 · GRI 305-5 **Project-level reductions**

Energy-saving initiatives provide project-level evidence of reduction actions. These savings are disclosed separately from year-on-year inventory changes.

The Energy Saving Suggestion Program, launched in August 2025, collected 55 employee suggestions; 11 implemented projects have a calculated saving, all in purchased electricity. Savings are engineering estimates against each project's pre-implementation operation (kW hours avoided, or leak volume 0.129 kWh/m^3 for compressed air), converted at 0.0036 GJ/kWh and 0.475 kgCO_2e/kWh (TGO grid factor, Feb 2026). The 2025 figure counts only the weeks from each project's closure to 31 December 2025; the annualised figure assumes 50 operating weeks. Three air-tube projects (Nos. 51, 52, 55) use an assumed leak rate of 2.25 m^3/hr.

INITIATIVE RECORDS

- Project name and status
- Baseline and calculation method
- Estimated kWh/GJ saving
- Estimated tCO2e reduction
- Supporting evidence / reviewer

Not deducted: the 2025 reduction is already reflected in the measured 2025 electricity use (1,450,000 kWh) and in total energy and Scope 2. It is reported separately under GRI 302-4 and 305-5 and is not subtracted again.

KEY MESSAGE

Continuous improvement projects support both operational efficiency and long-term climate objectives by turning employee ideas into measurable environmental benefits.

Data quality improvement: From 2026, project-saving calculations and evidence review will follow a standard format covering baseline, formula, owner and reviewer.

CLIMATE CHANGE, ENERGY & GHG EMISSIONS

IMPLEMENTED PROJECTS WITH CALCULATED SAVINGS, 2025

NO.	PROJECT	WEEKS IN 2025	2025 KWH	ANNUALISED KWH/YR	TCO_2E/YR
5	Air fitting leak, ROU-M-002	16	93	290	0.14
6	Lighting double layer, maintenance shop	16	1,183	3,696	1.76
46	Lighting double layer, compressor roof	12	887	3,696	1.76
40	Outside factory lighting, daylight switch	12	200	832	0.40
42	Canteen AC temperature control	12	665	2,771	1.32
48	Vacuum machine runtime, ENG-M-008	12	86	360	0.17
49	Air leak in machine, IMW-M-006	12	209	869	0.41
50	Air tube leak, packing	8	185	1,159	0.55
51, 52, 55	Air tube leaks (3), assumed 2.25 m^3/hr	8 each	834	5,213	2.48
TOTAL, 11 PROJECTS			**4,341 (15.6 GJ)**	**18,883 (68.0 GJ)**	**8.97**



IDEA > BASELINE > ESTIMATE SAVING > IMPLEMENT > REVIEW EVIDENCE

01 SUGGESTION

02 CALCULATION

03 APPROVAL

04 IMPLEMENTATION

05 REVIEW

Source: **AviusULD** Energy Saving Suggestion Programme, 2025.

PERFORMANCE EVALUATION AND OUTLOOK_

GRI 3-3 **Balanced disclosure, remaining challenges and future direction**

The 2025 assessment shows positive progress together with areas requiring further attention.

Performance against the Company's environmental objectives demonstrates encouraging progress while highlighting opportunities for further improvement. Targets for Scope 2, Scope 3 and total greenhouse gas emissions were achieved through operational improvements and lower electricity consumption. Scope 1 emissions increased and the renewable-energy target was not achieved due to the postponement of the rooftop solar project. AviusULD presents both achievements and performance gaps to support balanced reporting. Looking ahead, priorities include strengthening refrigerant management, improving Scope 3 data quality, reviewing renewable electricity options and standardising project-saving validation.

2025 TARGET EVALUATION

Scope 1 Emissions 2025 RESULT +10.9% vs 2024	Not Achieved	**Scope 2 Emissions** 2025 RESULT -15.2% vs 2024	Achieved
Scope 3 Emissions 2025 RESULT -19.5% vs 2024	Achieved	**Total GHG Emissions** 2025 RESULT -19.2% vs 2024	Achieved
Energy Intensity 2025 RESULT approx. -4.9%	Nearly Achieved	**Renewable Energy** 2025 RESULT 0% in 2025	Not Achieved

ACHIEVEMENTS

Scope 2, Scope 3 and total GHG emissions reduced Energy improvement projects implemented and tracked Scope 3 categories and exclusions are more transparent Base year, boundary and methodology clarified

REMAINING CHALLENGES

Scope 1 increased from direct sources, including fugitive emissions Renewable-energy target was not achieved because solar rooftop was postponed 2025 calendar-year inventory was not independently verified, although earlier ISO 14064-1 and ISO 14067 verifications were obtained

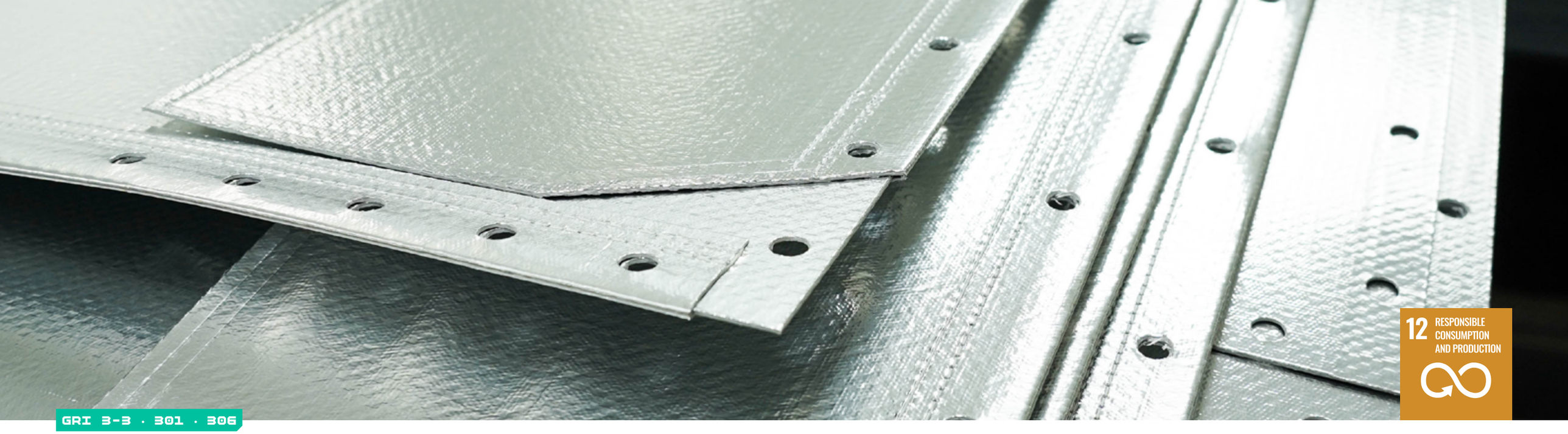
OUTLOOK PRIORITIES

Strengthen refrigerant leak inspection and preventive maintenance Review fuel use and efficiency options Reassess rooftop solar and renewable-electricity options Request supplier-specific carbon data where relevant Standardize project-saving calculation and review form

GRI CONTENT SUMMARY

- Included: GRI 3-3, GRI 302 and GRI 305
- Climate-related financial implications are not yet quantified and are planned for a later reporting cycle
- Emission factor sources and calculations are retained in the Company's GHG inventory records
- Lesson learned in 2025: project-saving claims varied in baseline and evidence quality, so a standard calculation and review format is being introduced for 2026, and refrigerant handling is being tightened after fugitive emissions drove the Scope 1 increase.

Source: **AviusULD** 2025 target evaluation and GHG inventory.



GRI 3-3 · 301 · 306

MATERIALS, CIRCULAR RESOURCE USE & WASTE MANAGEMENT_

Reporting period 1 January – 31 December 2025 · Boundary: Bangkok manufacturing, Thailand

AviusULD manages material consumption, chemical controls and waste streams through a structured management system, circular-resource initiatives and licensed waste-treatment routes.

MATERIAL & WASTE FLOWS, 2025



Source: materials from the AviusULD 2025 CFO calculation records; waste from the CFO calculation records and HSE waste records; diverted tonnage is 384.5 t x 54.7%.

2025 KEY NUMBERS

T MATERIALS USED

4,063.8

3,841.8 t non-renewable, 222.0 t renewable

T/MUSD SALES

61.82

materials intensity, 2025

KG AL SHEET RECOVERED

633

returned to production

T TOTAL WASTE

384.5

2025 total

RECYCLED (DIVERTED FROM DISPOSAL)

54.7%

of total waste all non-hazardous

DISCLOSURE SCOPE

- Bangkok manufacturing operation 2025 reporting period
- Materials: raw materials, packaging, chemicals and recovered materials
- Waste: hazardous and non-hazardous streams, recycling/recovery and disposal routes
- Boundary and methodology consistent with the climate and energy topic

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

WHY THIS TOPIC_ IS MATERIAL

GRI 3-3 · GRI 306-1 **Material impacts, stakeholder expectations and business relevance**

Material use, chemicals and waste are key environmental impacts in ULD manufacturing. Aluminium and engineered materials drive product performance, but also create resource-depletion, scrap, packaging and end-of-life impacts. Waste and hazardous-waste management also carry potential environmental, health and legal consequences if not controlled.

SIGNIFICANT WASTE-RELATED IMPACTS (GRI 306-1)

INPUTS

- 3,825.7 t production materials, mainly aluminium (3,452.0 t); composites, plastics, textiles
- 19,984 kg chemicals
- 238.1 t packaging: 222.0 t wood, paper and carton; 16.1 t plastic and metal. Production materials are all non-renewable

ACTIVITIES

- Cutting, extrusion, fabrication, assembly, printing and packing, Bangkok site
- Machine maintenance

OUTPUTS

- 384.5 t waste: aluminium scrap and offcuts, packaging, general waste
- 4.15 t hazardous: used and contaminated oil, coolant, chemical containers
- Finished ULDs

STAKEHOLDER	EXPECTATION	BUSINESS RELEVANCE
Customers	Responsible materials and reliable product performance	Supports ULD safety and trust
Employees	Legal waste and chemical compliance	Protects licence to operate
Regulators	Safe chemical handling and clean workplace	Reduces exposure risks
Suppliers	Packaging and material-efficiency cooperation	Extends impact upstream

OUR APPROACH

AviusULD's approach combines design and process optimization, supplier engagement, chemical control, recycling and licensed waste treatment. The focus is to reduce unnecessary consumption, recover usable materials and keep hazardous streams under legal control. AviusULD causes some of these impacts directly, contributes to others, and is directly linked to further impacts through suppliers, contractors and customers. Downstream, AviusULD operated no product or packaging take-back in 2025, so end-of-life handling of a delivered ULD sits with the customer or operator. The packaging redesigns completed in 2025 cut the material AviusULD ships with each unit, which removes that same weight from the waste the customer has to handle on receipt.

WHERE THE IMPACTS ARISE

OWN OPERATIONS

production scrap and offcuts, general waste and hazardous waste from maintenance and chemical use.

UPSTREAM

materials and packaging bought in from suppliers become waste on site.

DOWNSTREAM

end-of-life handling of delivered ULDs sits with the customer or operator, as AviusULD ran no take-back in 2025 customers also receive the ULD packaging.

MANAGEMENT APPROACH: GOVERNANCE, POLICY AND CONTROLS_

GRI 3-3 · GRI 306-2-A, B

Policies, procedures, responsibilities and controls

The management approach is governed by the Environmental Policy, OP-HSE-019 Waste Management, OP-HSE-022 Management of Chemicals and Materials, OP-HSE-032 Chemical Risk Assessment and SI-HSE-046 hazardous waste storage, with role ownership and control points across material selection, chemical authorization, storage, waste segregation and offsite treatment. HSE is the central owner of environmental controls, while Production, Facility, Warehouse, Procurement and HR have defined operational responsibilities.

CORE CONTROLS

- **Chemical authorization before use**
- **SDS/MSDS control**
- **Chemical risk assessment**
- **Segregated waste areas**
- **Weekly hazardous-waste inspection**
- **Monthly waste-stream records**
- **Licensed waste vendors**
- **Supplier packaging engagement**

FUNCTION	MAIN RESPONSIBILITY
HSE	Chemical authorization, SDS/MSDS control, risk assessment, legal waste control
Production	Aluminium scrap and non-hazardous production-waste areas
Facility	Used oil, contaminated oil, coolant and related storage
Procurement	Supplier SDS requests, substitutions, licensed waste contractors
Warehouse	Chemical/material receiving, label checks and storage transfer
HR	Training support and garbage-waste handling

ACTIONS TO PREVENT WASTE AND MANAGE IMPACTS (GRI 306-2-A)

- **Prevention and design:** repairable ULD design with spare-parts supply extends product life; the 2025 packaging redesign cut packing material per unit shipped.
- **Circular inputs:** 633 kg of aluminium sheet recovered back into production.
- **Own operations:** segregation at source, designated storage, chemical authorisation and substitution, weekly hazardous-waste inspection.
- **End of life:** all 210.5 t diverted from disposal was recycled by licensed contractors; hazardous waste goes only to fuel blending or secure landfill.
- **Value chain:** supplier packaging engagement; 2026 targets planned for waste recycling and hazardous waste.

MANAGEMENT FOCUS

Strengthen measurement and trend review by connecting material consumption, recycled-input, chemical inventory and waste-treatment data into one topic-level performance dashboard. Waste contractors hold government licences and are verified by the Department of Industrial Works before engagement, with quantity and contractor logged in the DIW system on every removal. No spills or environmental noncompliance were recorded in 2025.

WASTE DATA: COLLECTION, MONITORING AND THIRD-PARTY MANAGEMENT_

GRI 3-3 · GRI 306-2-b, c

Waste data sources, contractor oversight, boundary and calculation basis

Waste data for 2025 are compiled in the CFO calculation records (Activity tab) from HSE monthly waste records, contractor weighbridge tickets and DIW waste manifests, on the same boundary and reporting period as the climate and energy topic. The streams below show how waste data are collected and monitored (GRI 306-2-c) and how treatment by third parties is checked (GRI 306-2-b). Materials and chemical data are described with the materials dashboard on page 106.

DATA STREAM	PRIMARY SOURCE	TREATMENT
Waste generated by stream	CFO calculation records (Activity tab); HSE monthly waste records	Monthly weights by stream; 384.5 t total in 2025
Hazardous waste	CFO calculation records; DIW waste manifests	4.15 t; fuel blending and secure landfill only
Recycled (diverted from disposal)	CFO calculation records; contractor weighbridge tickets	210.5 t, all non-hazardous, offsite recycling
Directed to disposal	CFO calculation records; contractor manifests and receipts	174.0 t: landfill, incineration, fuel blending
Waste contractors	Licensed-vendor list (Procurement); DIW licences	Licence checked before award; removals logged in DIW system

BOUNDARY

- Reporting period: 1 Jan–31 Dec 2025
- Boundary: Bangkok manufacturing operation under operational control, the same environmental boundary as the climate and energy topic
- Excludes external warehouses, assembly stations, Netherlands, USA and outsourced manufacturing, where waste is not captured in operational data
- 2024 included for trend comparison on the same CFO calculation basis. Prior-year data are restated annually, or sooner if a significant issue arises

DATA-QUALITY NOTES

- **Waste data collection and monitoring (306-2-c):** each removal is weighed and recorded by stream and treatment route in the monthly waste records, logged in the DIW system, and entered in the CFO calculation records, where treatment routes are reconciled to total waste every month.
- **Weights and estimates:** contractor and internal weights are both used. Paper and plastic scrap travel in one vehicle, so the manifest carries an estimated combined weight split equally between the two streams; the disposal site reweighs on arrival and the variance is small.
- **Third-party waste management (306-2-b):** all treatment is offsite by licensed contractors. AviusULD checks each contractor's government licence before award, with verification by the Department of Industrial Works, reconciles weighbridge tickets and manifests to the monthly records, and keeps the licensed-vendor list under Procurement control.
- **Exclusions:** wastewater is treated at the BFTZ central plant and reported as effluent under GRI 303, not as waste under GRI 306.

INTENSITY BASIS

- Waste intensity is stated per USD million of sales, not per unit produced. The climate and energy topic uses 45,055 finished ULD units as its intensity denominator, so the two series sit on different bases and are not comparable.
- Packaging figures on page 114 are kilograms per unit on the redesigned AKH and pallet lines only they are not a group per-unit figure.

MATERIALS PERFORMANCE_ DASHBOARD

GRI 301-1 **Materials used by weight and chemical consumption**

GRI 301-1: Materials used in 2025 totalled 4,063.8 t: 3,841.8 t non-renewable and 222.0 t renewable. Production materials from the 2025 CFO calculation records were 3,825.7 t, all non-renewable, including aluminium of 3,452.0 t; subcontractor-supplied material of 81.9 t is tracked separately and sits outside this total. Packaging issued to production added 238.1 t: 222.0 t of renewable wood, paper and carton, and 16.1 t of plastic and metal. 2024 production materials of 4,575.0 t come from the 2024 CFO calculation records, the same basis as 2025.

T TOTAL MATERIALS USED

4,063.8

2025, incl. 238.1 t packaging

T NON-RENEWABLE MATERIALS

3,841.8

3,825.7 t production + 16.1 t packaging

T RENEWABLE MATERIALS

222.0

wood, paper and carton packaging

T/MUSD SALES

61.82

2025, CFO records

2024 VS 2025 TREND

Materials Used



Materials Intensity



Chemical Consumption



INTERPRETATION

- Materials used in 2025 were 4,063.8 t: 3,825.7 t production materials, all non-renewable, and 238.1 t packaging, of which 222.0 t renewable.
- Packaging weights come from the packaging material history: production-order issues estimated weight per unit, net of returns. 2024 includes 286.6 t of packaging.
- Materials intensity was 61.82 t/mUSD sales.
- Chemical consumption decreased slightly from 20,418 kg to 19,984 kg.
- Materials used fell 16.4% from 4,861.6 t in 2024.



CIRCULAR RESOURCE USE: RECOVERED MATERIALS

GRI 301-2 · GRI 301-3 **Recycled input materials and reclaimed products**

GRI 301-2 / 301-3: Recycled input is not reported for 2025 (information unavailable): aluminium suppliers declared recycled content, but no certification was provided. AviusULD will request certified data from 2026. Project evidence shows recovery of usable nonconforming materials. There was no formal product or customer-packaging take-back programme in 2025, so reclaimed products are treated as not applicable.

KG AL SHEET RECOVERED

633

defect recovery project

REPORTING NOTE

Recycled input (GRI 301-2) is omitted for 2025 because supplier declarations are not certified. Waste diverted to recycling is reported separately under GRI 306.

RECOVERED-MATERIAL EXAMPLES

PROJECT	CIRCULAR-RESOURCE OUTCOME	REPORTED BENEFIT
AL sheet 0.7 mm recovery (2024)	Recovered 633 kg for production	THB 107,276.8 avoided scrap/new material
Extrusion low tensile recovery (2024–25)	Re-processed heat treatment and reused extrusion	Scrap cost reduced from USD 55k to USD 0.9k
Coil left-over management (2024)	Reduced coil-width trimming scrap per AKE container	1.078 kg to 0.253 kg, -77%



ULD CARE

ULD CLIMATE IMPACT LABEL CERTIFICATION

Issued by: ULD CARE - Unit Load Device Management & Environmental Sustainability Initiative

Certificate of Environmental Performance

This certifies that the following Unit Load Device (ULD) model has been evaluated and classified according to.

ULD Model: AKE
Manufacturer: AviusULD
Product Part Number: 3S-VA12E1R7AD
Date of Certification: 10/10/25
Label version: 1.0

Weight rating: A+
Weight: 52 kg / 115 lbs
Spare Parts Availability: Yes
Second Life Potential:

	Weight (in kg)	Percentage of ULD
Aluminium	40,85	78,0%
Steel	1,11	2,1%
Plastic	2,84	5,4%
Composites (Aramid fibre)	7,34	14,0%
Other	0,24	0,5%

Recycling or end-of-life program: Yes

Authorized by:
Nandip Mann, 10/10/2025

ULD CARE CLIMATE IMPACT LABEL

A+ **weight rating, AKE container part number 3S-VA12E1R7AD**

Weight 52 kg: aluminium 78.0%, aramid-fibre composite 14.0%, plastic 5.4%, steel 2.1%, other 0.5%. Spare parts available. Certified by ULD CARE on 10 October 2025, label version 1.0.

The label is an industry assessment of weight and materials, not a regulatory certification. Source: ULD CARE certificate, 10 October 2025.

CHEMICAL AND HAZARDOUS-SUBSTANCE MANAGEMENT

GRI 3-3

Chemical authorization, SDS control, substitution and hazardous-substance handling

Chemical management is controlled through authorization before use, SDS/MSDS control, chemical risk assessment, designated storage, training and spill-response readiness. Hazardous substances are prioritized for substitution using REACH, CLP, local legal and environmental criteria. Nineteen air conditioners using obsolete R22 refrigerant were replaced with R32 inverters in 2024. A trial of acetone as a hexane substitute did not meet cleaning-performance requirements.

CHEMICALS CONTROLLED	HAZARDOUS CHEMICALS	VALID SDS	KG CHEMICAL USE
80	32	100%	19,984 (2025)

SUBSTITUTION CRITERIA

- REACH Annex XIV / Candidate List
- REACH Annex XVII and local restrictions
- CMR 1A/1B and category 2 substances
- GHS09 aquatic-environment hazard and RoHS where relevant

CONTROL PROCESS

EVIDENCE-BASED CONTROL

01 REQUEST
New chemical/material authorization form before purchase/use

02 HSE VALIDATION
Regulatory obsolescence, restricted substances, use/storage/disposal precautions

03 DECISION
Authorized, authorized with restrictions, or refused

04 RISK ASSESSMENT
Hazard class, workstation exposure, raw risk and residual risk

05 TRAINING & STORAGE
SDS, labels, segregation, inspections and emergency response





WASTE PERFORMANCE AND TREATMENT ROUTES

GRI 306-3 · GRI 306-4 · GRI 306-5

Waste generated, diverted from and directed to disposal

GRI 306-3 / 306-4 / 306-5: Total waste fell 8.2% in 2025, while waste intensity per product sales improved. Most waste is non-hazardous, and 54.7% of total waste was recycled and so diverted from disposal, down from 57.4% in 2024. All treatment is carried out offsite by licensed contractors.

T TOTAL WASTE

384.5

2025

T NON-HAZARDOUS

380.3

98.9%

T HAZARDOUS

4.15

1.1%

T TOTAL WASTE

210.5

diverted from disposal non-hazardous

T/MUSD SALES

5.85

waste intensity

2024 VS 2025 WASTE TREND

Total Waste



Recycled (diverted from disposal)



Directed to Disposal



2025 WASTE ROUTE MIX



54.7% Recycled (diverted from disposal)

45.3% Directed to disposal

26.5% of which landfilled

Waste flows are supported by segregation, designated storage, monthly records, manifests and licensed vendor controls. Treatment routes reconcile to total waste; general waste is collected by Chainant-Bangplee Parkland for sanitary landfill at the Praeksa Mai community waste centre, Samut Prakan. Disposal comprises landfilling 101.7 t, incineration without energy recovery 70.1 t and fuel blending with energy recovery 2.2 t, all offsite. By hazard class, the 210.5 t diverted was non-hazardous material sent offsite for recycling, and the 174.0 t directed to disposal comprised 169.8 t non-hazardous and 4.15 t hazardous. The split is confirmed from the 2025 carbon-footprint calculation: all 210.5 t diverted is non-hazardous recycling, and all 4.15 t of hazardous waste was directed to disposal, 2.20 t by fuel blending and 1.95 t to secure landfill.

MATERIAL-EFFICIENCY, PACKAGING AND WASTE-REDUCTION INITIATIVES_

GRI 3-3 · GRI 306-2 **Actions to manage material use and waste**

Improvement activities show how circular-resource use is managed in practice: reduce material consumption, recover usable materials, redesign packaging and work with suppliers to reduce unnecessary packaging and improve recyclability.

INITIATIVE

SUSTAINABLE PACKAGING AKH

2025 / VERIFIED RESULT
Packaging 86 to 61.5 kg per unit (–28.5%) saving USD 12,486

STATUS
Completed 2025

INITIATIVE

SUSTAINABLE PACKAGING PALLET

2025 / VERIFIED RESULT
Packaging 56 to 50 kg per unit (–10.7%) saving USD 5,404

STATUS
Completed 2025

INITIATIVE

ENDUMAX COST SAVING, AKH JETSTAR AND KLM

2025 / VERIFIED RESULT
Endumax use cut 0.59–0.74 m per unit saving USD 52,100

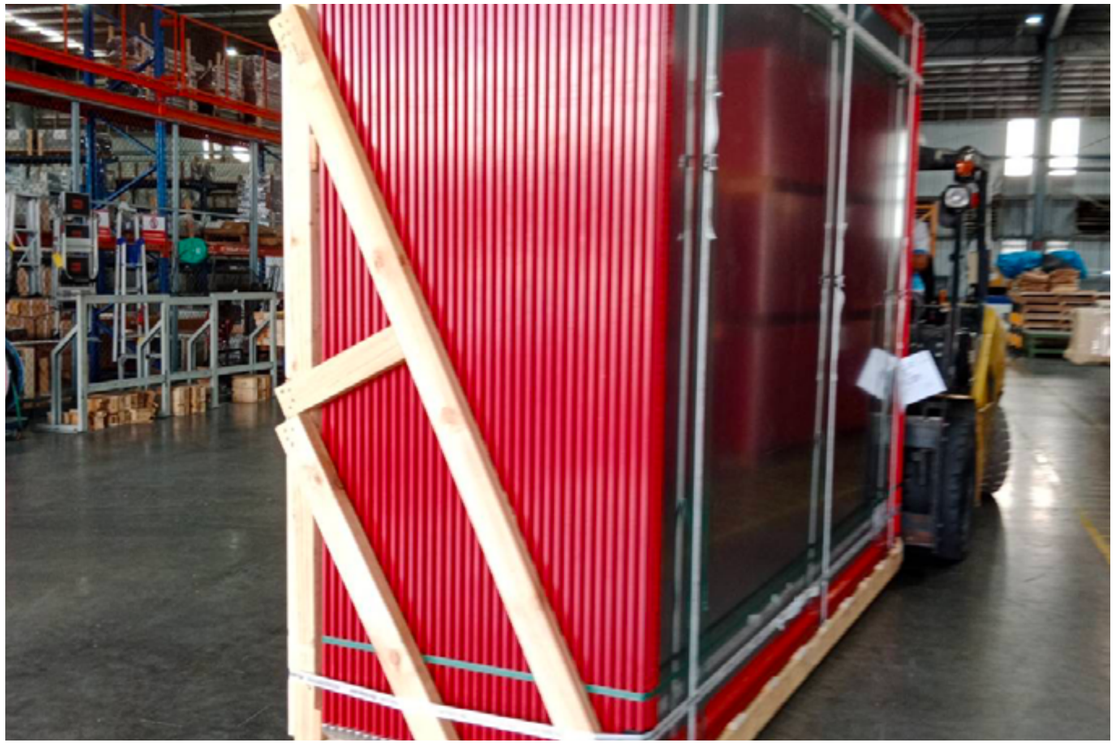
STATUS
Completed 2025

INITIATIVE

CUT SIZE EXTRUSION, P0000886

2025 / VERIFIED RESULT
Extrusion length 3,075 to 2,346 mm saving USD 2,192 per year

STATUS
Completed 2025



FORWARD-LOOKING FOCUS

Projects completed in 2025 delivered USD 72,183 in verified savings. Two remain in progress: the FR STRAP 45 mm substitution and Spare Part Packing. Coil Left Over Management, which cut aluminium coil trimming scrap 77%, closed in December 2024; its review records the lessons carried forward, that the savings were identified by people closest to the shopfloor and that waste fell once employees owned the search for it. The 2025 dashboard provides the baseline for formal 2026 targets covering raw-material intensity, recovered inputs, waste diversion and hazardous waste. Packaging weights are tracked per unit on the redesigned lines, which is how the AKH and pallet reductions are measured; total packaging tonnage across all products is not yet aggregated, which is why packaging is omitted from the GRI 301-1 total. Lower shipped packaging also reduces the material customers handle as waste on receipt.

PERFORMANCE EVALUATION AND OUTLOOK_

GRI 3-3 **Effectiveness of actions, target evaluation and next cycle**

2025 performance is quantified across materials, chemicals and waste. The main areas for improvement are formal target-setting, monthly reconciliation of waste-treatment routes, and obtaining supplier certification for recycled content. No quantitative targets were set for 2025 these results form the baseline for targets from 2026. Of the 4,063.8 t of materials used in 2025, 3,841.8 t were non-renewable and 222.0 t renewable 2024 production materials are taken from the 2024 CFO calculation records.

Materials Used
2024
4,861.6 t
2025
4,063.8 t
Restated Basis

Materials Intensity
2024
78.46 t/mUSD
2025
61.82 t/mUSD
Restated Basis

Chemical Consumption
2024
20,418 kg
2025
19,984 kg
Improved

Recycled Input Materials
2024
n/a
2025
Not Reported
No certification

Total Waste Generated
2024
418.6 t
2025
384.5 t
Decreased

Waste Intensity
2024
6.76 t/mUSD
2025
5.85 t/mUSD
Improved

Hazardous Waste
2024
3.76 t
2025
4.15 t
Increased

Waste Recycled
(diverted from disposal)
2024
240.1 t
2025
210.5 t
57.4% to 54.7%

SUPPORTING EVIDENCE

- **ESG KPI dashboard with 2024–2025 actuals**
- **Waste Management Procedure and waste-flow mapping**
- **Chemical/material authorization and risk assessment procedures**
- **SDS coverage and hazardous-chemical inventory**
- **Project evidence for material recovery, packaging and waste-reduction initiatives**

NEXT ACTIONS

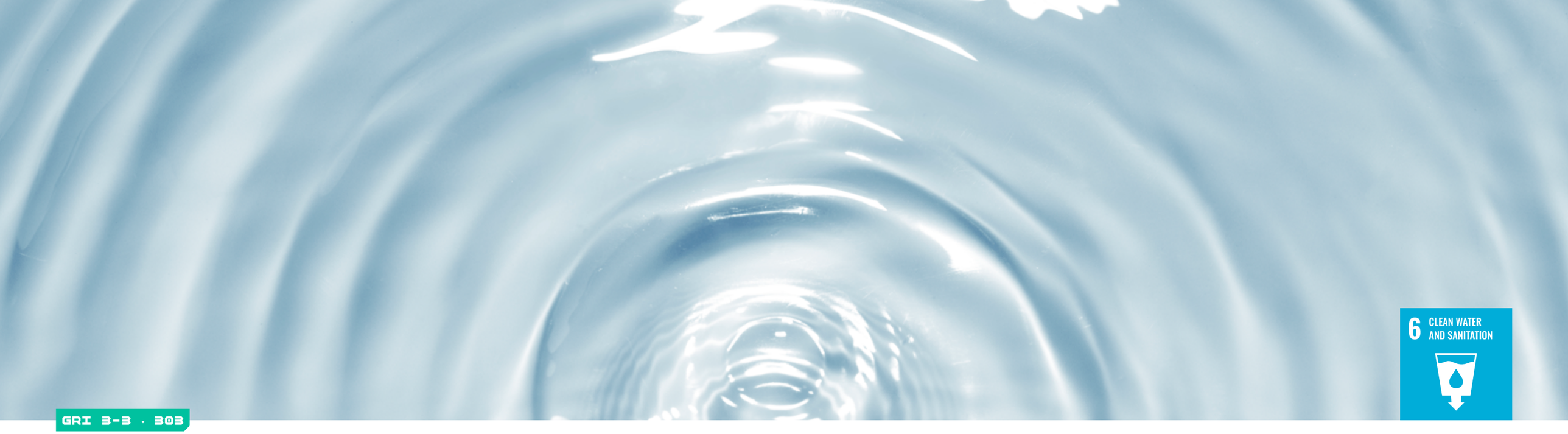
01 Set 2026 targets for material intensity, waste recycling (diversion from disposal) and hazardous waste.

02 Reconcile waste-treatment route totals to the total waste line every month.

03 Request certified recycled-content data from aluminium suppliers, so recycled input can be reported from 2026.

04 Record project evidence in a consistent format.

05 Explain the rise in hazardous waste from 3.76 t to 4.15 t; all 2025 hazardous waste went to disposal (fuel blending 2.20 t, secure landfill 1.95 t).



GRI 3-3 · 303

WATER & EFFLUENT MANAGEMENT

Reporting period 1 January – 31 December 2025 · Boundary: Bangkok manufacturing, Thailand

Managing water responsibly through metered withdrawal, wastewater controls and practical water-efficiency projects.

Water is drawn from the metered municipal supply at the Bangkok manufacturing operation. Withdrawal fell 11.0% in 2025 to 5.79 ML, and water intensity of 88 m^3 per USD million of sales was below the 2025 target of 102. Wastewater is sent to BFTZ central wastewater management and remained within the reported compliance limits. Water consumption is calculated as withdrawal minus discharge, so it cannot be reported for 2025 because discharge to the BFTZ plant is not metered; this limitation is disclosed under GRI 303.

KEY 2025 FIGURES

WATER WITHDRAWAL

5.79

ML | −11.0% vs 2024

WATER INTENSITY

88

m^3/mUSD sales

2025 TARGET

102

m^3/mUSD target

WASTEWATER COMPLIANCE

100%

within reported limits

REPORTING

- 2025 reporting period
- Bangkok manufacturing operation
- GRI 3-3 and GRI 303 disclosures

WHY THIS TOPIC_ IS MATERIAL

GRI 3-3 **Water-related impacts, stakeholders and management approach**

Water efficiency and wastewater compliance matter because AviusULD uses water for employee welfare, sanitary facilities, cleaning and evaporative cooling; wastewater quality is managed to protect regulatory compliance and the wider industrial-estate system.

WATER USE

Water is supplied by BFTZ/municipal utility and measured monthly. Major uses are sanitary facilities and evaporative cooling production/ process water use is low.

WASTEWATER DISCHARGE

Wastewater from restrooms, handwashing, dishwashing and cleaning is collected through the internal drainage/septic infrastructure and then managed through the BFTZ central wastewater management system.

REPORTING FOCUS

Water withdrawal, water intensity, wastewater compliance and the actions taken to reduce water use are reported for 2025.



OMISSIONS FOR THIS TOPIC - GRI 303-3-D, 303-4-A, 303-4-B, 303-4-C, 303-5-A AND 303-5-D - ARE LISTED WITH REASONS ON PAGE 444. A SITE-LEVEL WATER-STRESS ASSESSMENT HAS NOT BEEN COMPLETED; WRI AQUEDUCT AREA DATA FOR SAMUT PRAKAN INDICATES MEDIUM-HIGH TO EXTREMELY HIGH STRESS, AND AN ASSESSMENT WILL BE COMPLETED FOR 2026.

MANAGEMENT APPROACH: GOVERNANCE, POLICY AND REVIEW

GRI 3-3 · GRI 303-1 **Policies, responsibilities, water interactions and review**

AviusULD manages water and wastewater through the ISO 14001-aligned HSE management system, environmental-aspect review, wastewater procedures, BFTZ coordination and routine compliance monitoring.

POLICIES AND CONTROLS

- Environmental Policy (, October 2025) commits to decreasing water consumption and managing discharge responsibly.
- EHS Manual OP-HSE-36 establishes the ISO 14001 and 45001 framework, PDCA review and management responsibility.
- Environmental Aspects procedure OP-HSE-017 and the 2025 water audit identify water and wastewater impacts wastewater is governed by OP-HSE-033. Water-related impacts are identified through the OP-HSE-017 aspect assessment across the whole site on an annual cycle, supported by the 2025 water audit at building level and by published WRI Aqueduct data for the surrounding area.

OPERATIONAL OWNERSHIP

- HSE reviews water/wastewater data and leads compliance actions.
- Maintenance supports wastewater infrastructure and system functionality.
- BFTZ coordinates certified wastewater analysis and manages central treatment compliance. No suppliers or customers with significant water-related impacts have been identified.

REVIEW AND ESCALATION

- Water withdrawal is tracked monthly through utility/meter records.
- Wastewater quality is sampled every two months through BFTZ and an external laboratory.
- Abnormal values trigger analysis and corrective action under OP-HSE-010 annual figures are approved by the HSE Manager, with escalation to the CEO.



- Reporting boundary: Bangkok manufacturing operation under operational control. Netherlands HQ, USA entity, external warehouses and assembly stations are excluded from Water & Effluent Management data.
- Water intensity denominator: total sales revenue in USD million for the 1 January – 31 December 2025 reporting period, the same revenue base used for materials and waste intensity in Materials, Circular Resource Use & Waste Management.

HOW WATER TARGETS ARE SET

Water targets are set by HSE with Management at the annual environmental review, built from the prior year's measured performance and the reduction potential found in the water audit. The 2025 intensity target of 102 m3 per USD million of sales was set on that basis. Thai law sets no withdrawal limit for the site, so the target answers local context: WRI Aqueduct places Samut Prakan in a medium-high to extremely high water-stress range.

2025 WATER PERFORMANCE_ DASHBOARD

GRI 303-3 **Water withdrawal by source and water intensity, 2025**

Water withdrawal decreased and water intensity was better than the 2025 target. All withdrawal is third-party municipal water supplied by the BFTZ industrial estate; groundwater, surface water and rainwater are zero.

WATER WITHDRAWAL

5.79 ML

2025 actual | -11.0% vs 2024

WATER INTENSITY

88

m^3/mUSD sales

2025 TARGET

102

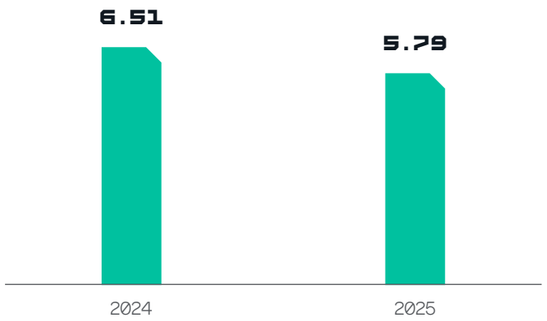
m^3/mUSD target

WASTEWATER COMPLIANCE

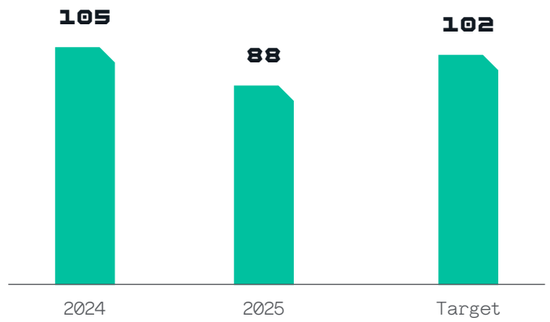
100%

within reported limits

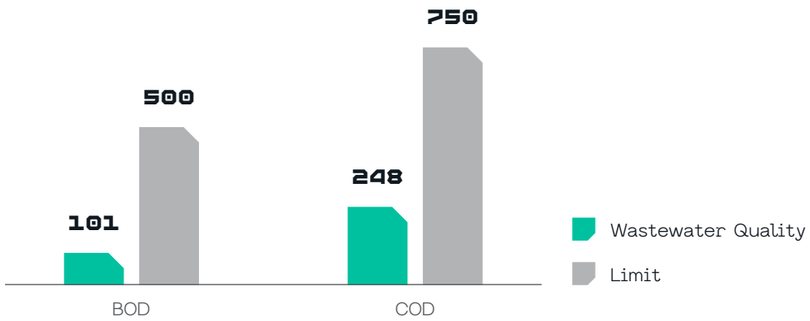
Water Withdrawal (ML)



Water Intensity (m^3/mUSD sales)



Wastewater Quality vs Limit



GRI 303-3: withdrawal is measured from utility meters and billing records, all third-party freshwater. Omissions for this topic — GRI 303-3-b, 303-4-a, 303-4-b, 303-4-c, 303-5-a and 303-5-b — are listed with reasons on page 444 discharge is not metered and the site-level water-stress assessment is outstanding. All withdrawal is classified as freshwater because it is potable municipal supply delivered through the BFTZ estate total dissolved solids are not measured at the site, so the classification rests on the supply type rather than on a TDS test.

WATER-USE HOTSPOTS AND REDUCTION ACTIONS_

GRI 3-3 · GRI 303-1 **Water-use areas and efficiency actions**

The 2025 water audit identified evaporative cooling and sanitary facilities as the main water-use areas. The evaporative-cooling project reduced daily water use after timer installation.



EVAPORATIVE-COOLING SYSTEM

Reduced water consumption in the evaporative cooling system by installing a digital timer to automatically control water pump operating hours





BUILDING 8 DAILY USE

-55.5%

5.77 to 2.57 m³/day

BUILDING 9 DAILY USE

-55.8%

12.83 to 5.67 m³/day

WATER SAVING

1,118 ML/YR

Evaporative cooling project

PM SUPPORT

QUARTERLY

Evaporative cooling system

Key action: a digital time switch controls the evaporative cooling water pump, operating 07:30–16:30 and reducing unnecessary water use outside working hours.

WASTEWATER MANAGEMENT AND QUALITY

GRI 303-2 · GRI 303-4

Discharge management, effluent quality and standards

Wastewater is primarily sanitary/general wastewater and is not discharged directly to natural water bodies. It is collected internally and routed to BFTZ central wastewater management.

Office wastewater includes restrooms, handwashing, dishwashing and cleaning water.

Internal drainage/septic infrastructure collects wastewater before transfer to BFTZ central wastewater management system.

BFTZ manages central treatment and legal compliance with Thai requirements. Discharge limits are set by BFTZ under industrial-estate requirements; no internally developed or sector-specific standards are applied and no receiving waterbody is involved.

BFTZ coordinates certified wastewater sampling every two months; reports are reviewed by AviusULD.

Abnormal results require HSE coordination with BFTZ and relevant personnel to analyze and prepare corrective actions.

WATER & EFFLUENT MANAGEMENT

BOD RESULT

101

Limit 500 | Passed

COD RESULT

248

Limit 750 | Passed

COMPLIANCE

100%

within reported limits

INCIDENTS/FINES

0

No exceedance reported

GRI 303-4-d: BOD and COD are the substances of concern for this site, determined by the industrial-estate discharge requirements BFTZ applies to tenants rather than by an internal or sector standard, and they are the monitored parameters, sampled two-monthly by BFTZ with an external laboratory. No heavy metals are used pH, TSS and TDS are not monitored. Zero incidents of non-compliance in 2025.

WATER INITIATIVES AND FUTURE_ OPPORTUNITIES

GRI 3-3 **Efficiency actions completed and reuse and rainwater feasibility**

AviusULD's water programme combines completed efficiency actions with feasibility studies for future water reuse and rainwater harvesting opportunities.

COMPLETED ACTION

Digital timer control was installed for the evaporative cooling system to reduce unnecessary pump operation outside working hours. The project generated a quantified reduction of 4.3 m3/day and supports the 2025 water-intensity target.

Status: implemented and tracking

FEASIBILITY STUDY

A rainwater-harvesting system was studied for potential reuse in the evaporation system and general facility applications. The project requires gutter/ pipeline improvement and additional equipment, estimated at approximately THB 300,000 per building.

Status: feasibility / budget review

FUTURE IMPROVEMENT

Future actions will focus on improving discharge estimation, adding sub-metering where practical, and maintaining evidence for BFTZ wastewater compliance reports and project savings.

Status: planned

2025 TARGET_ EVALUATION

GRI 3-3 **Targets, results and evidence of effectiveness**

The 2025 disclosure prioritizes measured water withdrawal, water-intensity improvement and wastewater-compliance evidence. Limitations are clearly explained where direct measurement is unavailable.

KPI	2024	2025 TARGET	2025 ACTUAL	STATUS	DISCLOSURE NOTE
Water withdrawal	6.51 ML	n/a	5.79 ML	No target set	Absolute withdrawal reduced by ~11.0%.
Water intensity	105	102	88	Achieved	m^3 per mUSD sales.
Wastewater compliance	100%	100%	100%	Achieved	BFTZ manages central wastewater compliance.
Water discharge	Not metered	n/a	Not reported – not metered	No target set	All discharge goes to BFTZ central wastewater system; no direct discharge to natural water bodies.
Water consumption	Not calculated	n/a	Not reported – discharge not metered	No target set	Discharge is not metered, so consumption cannot be derived. No water is incorporated into products and there is no significant storage.

GRI 303-5 WATER CONSUMPTION

Omissions for this topic – GRI 303-3-b, 303-4-a, 303-4-b, 303-4-c, 303-5-a and 303-5-b – are listed with reasons on page 444. Wastewater discharge is not metered. An estimation method based on site population including contractors and agency workers, not the GRI 2-7 employee figure, and average daily use per person has been defined and will be applied for 2026, enabling consumption to be derived as withdrawal minus discharge. Under GRI 303-5-c there was no significant change in water storage during 2025, and storage is not a material factor at the site.

SCOPE NOTE

A site-level water-stress assessment has not been completed, so GRI 303-3-b, 303-4-c and 303-5-b are omitted the full omission list is on page 444. WRI Aqueduct area data for Samut Prakan indicates medium-high to extremely high stress. An assessment will be completed for 2026.

DISCLOSURE_ SUMMARY

GRI 3-3 · GRI 303 **Reported disclosures, limitations and omissions**

Water withdrawal, intensity and wastewater compliance are reported for 2025. Discharge is managed through BFTZ central wastewater management, and water consumption is calculated as withdrawal minus discharge and therefore cannot be reported, because discharge is not metered.

WASTEWATER DISCHARGE

All wastewater generated within AviusULD's reporting boundary is discharged through the internal drainage/septic infrastructure and routed to the Bangkok Free Trade Zone central wastewater management system. BFTZ manages the central system to comply with applicable Thai wastewater regulations.

SUPPORTING EVIDENCE

Monthly meter records and dashboard data

Wastewater management procedure

Water reduction project evidence

BFTZ two-monthly wastewater sampling process

No exceedances, notices, complaints, fines or significant leaks reported

Next improvement: establish a documented discharge and consumption estimation method or obtain annual discharge data from BFTZ.













GRI 3-3 · 305-7 · 2-27

POLLUTION PREVENTION & ENVIRONMENTAL COMPLIANCE

Reporting period 1 January – 31 December 2025 · Boundary: Bangkok manufacturing, Thailand

AviusULD prevents pollution through engineering controls, legal compliance monitoring, external stack measurement and emergency preparedness.

Air emissions are measured at source by an external laboratory against Thai regulatory limits. All monitored stack parameters were within limits in 2025, with no notices of violation, no significant spills, and THB 0 paid in environmental fines or non-monetary sanctions. Non-GHG air pollutants are reported as measured, with annual mass derived from stack results unmeasured pollutants are not estimated.

KEY 2025 FIGURES

STACK PARAMETERS

100%

within regulatory limits

NOTICES OF VIOLATION

0

THB 0 in fines or penalties

SIGNIFICANT SPILLS

0

no reportable releases

MEASUREMENT BASIS

DIRECT

external stack measurement

REPORTING

- 2025 reporting period
- Bangkok manufacturing operation
- GRI 3-3, GRI 305-7 and GRI 2-27

Source: AviusULD 2025 environmental monitoring records and external laboratory reports.

WHY THIS TOPIC_ IS MATERIAL

GRI 3-3 **Pollution impacts, involvement, stakeholders and management approach**

Pollution prevention protects employees, surrounding communities, legal compliance and the company's license to operate.

SCOPE

REPORTING SCOPE

2025 data covers AviusULD Bangkok manufacturing operation. Primary owners are HSE, Production and Facility & Maintenance. Monitoring includes external laboratory testing, environmental inspections, equipment records and legal-compliance reviews.

IMPACTS

POTENTIAL IMPACTS

Relevant pollution sources include welding, laser cutting, grinding, hand painting, solvent/ cleaning chemical use, forklifts and vehicles, and dust/fume extraction systems. Key risks are VOCs, particulate/dust, CO, chemical vapour, noise, spills and non-compliance.

RESPONSE

CONTROL APPROACH

The approach combines source identification, engineering controls, preventive maintenance, direct monitoring, legal evaluation, employee training, and corrective action when abnormal values or non-conformities are identified.

POLLUTION PREVENTION & COMPLIANCE

IDENTIFY SOURCES › MONITOR PERFORMANCE › CONTROL & MAINTAIN › REVIEW LEGAL COMPLIANCE › IMPROVE /CORRECT

- **Topic boundary is deliberately non-GHG:** climate and GHG emissions are reported under Climate Change, Energy & GHG Emissions.
- GRI 305-7 is addressed using the non-GHG air pollutants AviusULD actually monitors in 2025.
- Environmental legal compliance is presented under GRI 2-27 with zero significant non-compliance reported in 2025.
- **Involvement:** AviusULD causes the stack, dust, solvent and noise emissions of its own processes directly, and is linked to traffic-related emissions through contracted transport and visiting vehicles.
- **Stakeholder expectations:** employees expect clean workplace air, regulators and the BFTZ estate expect measured compliance evidence, neighbouring tenants expect no nuisance, and customers expect a valid environmental licence. These expectations set the monitoring scope and the control priorities below.

GOVERNANCE, LEGAL COMPLIANCE AND MONITORING CYCLE_

GRI 3-3 · GRI 2-27

Legal obligations, monitoring cycle and compliance record

AviusULD uses documented procedures to identify obligations, monitor pollution controls and act on abnormal results.

LEGAL COMPLIANCE PROCEDURE

- HSE identifies and accesses applicable legal and other requirements.
- Legal register is updated and communicated to relevant departments.
- Compliance is evaluated through FO-HSE-004 corrective action is issued where required.
- Annual review is performed in Q1 of the fiscal year.

MANAGEMENT ACCOUNTABILITY

- HSE leads technical compliance and reporting.
- Department managers ensure departmental processes comply with requirements.

AIR POLLUTION CONTROL PROCEDURE

Defines measures to control and reduce air pollution from operations and machinery maintenance, prevent environmental spread and maintain legal compliance.

MONITORING & ASSESSMENT

Air-pollution control systems are monitored and assessed regularly. Air samples from exhaust stacks are collected at least two times per year.

MAINTENANCE & ABNORMAL VALUES

Control systems are maintained regularly, at least annually. If abnormal values are detected, HSE convenes relevant parties to agree actions.

ENVIRONMENTAL LEGAL NON-COMPLIANCE

Significant cases in 2025

ENVIRONMENTAL FINES/ SANCTIONS

THB 0 in fines and non-monetary sanctions

POLLUTION INCIDENTS/ COMPLAINTS

Significant spills and environmental complaints

Significance is assessed by nature, severity and consequence, including formal enforcement, permit restriction, material fine/sanction, significant environmental harm, or material impact on operations or reputation.

DEFINITION OF SIGNIFICANT NON-COMPLIANCE

The significance threshold is the same one used in the GRI 2 General Disclosures deck, so the two reports do not diverge. Under GRI 2-27-b, no fines were incurred for instances occurring in 2025 and none for instances that occurred in earlier periods the monetary value of fines paid in 2025 is THB 0.

2025 ENVIRONMENTAL MONITORING_ DASHBOARD

GRI 305-7

Measured stack and workplace results against legal limits, 2025

External measurement evidence supports the 2025 disclosure. Results are based on direct measurement, not estimated emission factors.

STACK SOURCES TESTED

3

Printing stack + 2 cutting strap stacks

STACK COMPLIANCE

100%

Monitored parameters within applicable limits

MEASUREMENT BASIS

DIRECT

Stack testing by external laboratory

SIGNIFICANT VIOLATIONS

0

2025 environmental legal cases

SPILLS/COMPLAINTS

0

Significant pollution incidents reported

RESULT VS. LEGAL LIMIT FOR MEASURED POLLUTANTS WITH LIMITS

CO Shelfield — <1.1/997 MG/M³

TSP Manual — <1/400 MG/M³

CO Manual — <1.1/997 MG/M³

MEASURED AIR-EMISSION SOURCES AND PARAMETERS

SOURCE	PARAMETER	RESULT	LIMIT	STATUS	NM³/H	KG/YR*
Printing stack	Particulate (carbon black)	<1.0 mg/m³	–	Monitored	1,684	<10.1
Printing stack	Methanol	<0.76 ppm/<1.0 mg/m³	–	Monitored	1,684	<10.1
Cutting Strap - Shelfield	CO	<1.0 ppm/<1.1 mg/m³	870 ppm/997 mg/m³	Pass	895	<5.9
Cutting Strap – Manual	TSP/CO	<1.0 mg/m³/<1.0 ppm	400 mg/m³/870 ppm	Pass	1,047	<6.3/<6.9

2025 air emissions (GRI 305-7): particulate <16.4 kg, CO <12.8 kg, methanol <10.1 kg.

* Annual mass = measured concentration stack flow (Environment Research & Technology Co., Ltd., reports 2025-RAAK534/415/416, sampled 7 May 2025) 6,000 operating hours per year (assumed: 120 h/week 50 weeks). All results were below the detection limit, so values are upper bounds.

Note: Total VOC emissions were not calculated in 2025 only methanol, measured at the printing stack, is reported as annual mass. TVOC was measured in the working area and is not reported as stack emission. Methanol carries no stack limit under Thai regulation, so it is reported as monitored rather than pass or fail. Stack sampling met the procedure requirement of at least two rounds per year, carried out by an accredited external laboratory whose reports are held as evidence.

GRI 305-7: WHAT_AVIUSULD REPORTS

GRI 305-7 **Parameters measured and annual mass reported, 2025**

The disclosure follows measured non-GHG air pollutants from the 2025 environmental monitoring report.

REPORTED FOR 2025

Annual mass from direct stack measurement (page 140): particulate <16.4 kg, CO <12.8 kg, methanol (VOC) <10.1 kg. Upper bounds, 6,000 h/yr basis.

MEASURED IN 2025

Particulate (carbon black), CO, TSP and methanol at the printing stack and two cutting strap stacks, sampled by an accredited external laboratory on 7 May 2025.

METHODOLOGY NOTE

Results are based on direct stack measurements at operating conditions, reported at 25 C, 1 atm and dry basis. Because the values are measured directly, no emission factors were used, which is what GRI 305-7-b and 305-7-c ask to be stated. Sampling and analysis were performed by an accredited external laboratory under the methods named in its reports.

DISCLOSURE NARRATIVE

AviusULD manages non-GHG air emissions through source identification, engineering controls, preventive maintenance and periodic external monitoring. In 2025, stack-emission monitoring covered the printing stack and two cutting strap stacks. The measured parameters were particulate matter (carbon black at the printing stack, total suspended particulate at the manual cutting stack), methanol and carbon monoxide. All parameters with applicable limits were within the required standards, and annual mass is derived from these results on page 140. AviusULD also monitors chemical concentrations in selected work areas to verify employee exposure controls these results are used for occupational and environmental management but are not presented as stack-emission quantities.

This avoids overstating performance and keeps the disclosure aligned with verifiable, measured data.

ASSURANCE-READY POSITION: ANNUAL MASS IS DERIVED ONLY FROM MEASURED STACK RESULTS.

POLLUTION-CONTROL HIERARCHY: FROM SOURCE TO MAINTENANCE

GRI 3-3 **Engineering controls, operation and preventive maintenance**

Engineering controls are used where emissions or exposure risks are identified, supported by preventive maintenance.

SOURCE CONTROL

Laser cutting of aluminium can generate fine chips and dust. The dust collector captures aluminium dust through cartridge filters and includes condition monitoring through a gauge.

EXPOSURE CONTROL

Sticker printing uses ink and cleaning solutions containing VOC-based substances. Local exhaust ventilation was installed to manage VOC exposure and improve workplace air quality.

RELIABILITY CONTROL

Preventive maintenance is performed and recorded to ensure pollution-control equipment remains effective and available when operations are running.



Laser cutting dust collector:
cartridge filters and filter-condition gauge



Sticker-room exhaust system:
local ventilation/extraction control

BROADER POLLUTION-PREVENTION ACTIONS

GRI 3-3

Noise, light, traffic-related emissions and nuisance prevention

The material topic also covers noise, light, traffic-related emissions and nuisance prevention beyond stack emissions.

NOISE MITIGATION

91.5 TO 78.7

dB(A) Leq after laser-cut project

CYCLE TIME REDUCTION

-64%

151 sec to 54 sec with new machine

LIGHT AUDIT COVERAGE

154

Factory measurement points

TRAFFIC GUIDELINE

ISSUED

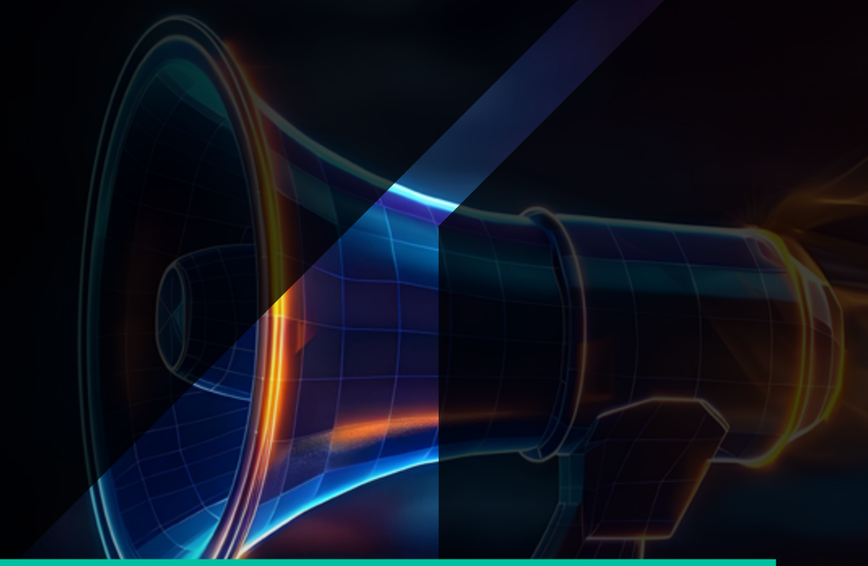
No-idling/route/speed controls

COMPLAINTS

0

2025 pollution complaints

POLLUTION PREVENTION & COMPLIANCE



IMPORTANT NOTE

AMBIENT-NOISE MONITORING WAS WITHIN THE 24-HOUR STANDARD, WHILE ANNOYANCE-NOISE MONITORING IDENTIFIED NUISANCE POINTS AT THE SIDES OF BUILDINGS 1 AND 8. THESE ARE TREATED AS IMPROVEMENT SIGNALS RATHER THAN REGULATORY NON-COMPLIANCE CLAIMS. NO EXTERNAL NOISE COMPLAINT WAS RECEIVED IN 2025; THE NUISANCE POINTS WERE FOUND BY AVIUSULD'S OWN MONITORING. HSE OWNS THE FOLLOW-UP: THE TWO LOCATIONS ARE BEING RE-MEASURED AND SCREENING OR EQUIPMENT-SITING OPTIONS ASSESSED, WITH ACTIONS TO BE AGREED IN THE 2026 ENVIRONMENTAL PLAN.

PREPAREDNESS, TRAINING AND OPERATIONAL CONTROLS

GRI 3-3 **Training, spill response and emergency preparedness**

Employees are trained on chemical/hazardous-substance management, spill response and hazardous-waste storage.









Training:
Chemical and Hazardous Substance Management and Chemical Spill (Nov 2024)

CONTROL MEASURES REINFORCED THROUGH TRAINING

- Hazardous waste must be segregated by type, sealed and labelled before storage.
- Mandatory PPE includes chemical gloves, chemical mask, safety glasses and safety shoes.
- Spill-response equipment is provided, including absorbent materials and emergency controls.
- Fire/smoking controls apply in hazardous-waste storage areas.
- Practical training included spill-response demonstration and employee participation.

EMERGENCY RESPONSE

Environmental emergency response and spill preparedness support prevention of chemical releases and rapid containment.

WASTE INTERFACE

Hazardous-waste controls link Pollution Prevention & Environmental Compliance to Materials, Circular Resource Use & Waste Management waste management and chemical-material controls.

AUDIT EVIDENCE

Training attendance records and photographs provide verifiable implementation evidence. The chemical and spill-response course was delivered in November 2024 and remained the current qualification through 2025 no refresher was required in 2025 and the next cycle falls in 2026.

2025 KEY HIGHLIGHTS_ AND IMPROVEMENT FOCUS

GRI 3-3 **2025 results, effectiveness and 2026 improvement focus**

The 2025 disclosure is built on measured data, legal compliance evidence and practical pollution-control projects.

KEY HIGHLIGHTS

01 100% of monitored stack parameters with applicable limits were within legal standards in 2025.

02 No significant environmental non-compliance, environmental fines or non-monetary sanctions were reported.

03 Dust collector and sticker-room exhaust controls strengthen prevention at source and exposure control.

04 Noise reduction project reduced exposure from 91.5 to 78.7 dB(A) while improving process performance.

05 Hazardous-substance and spill-response training supports operational readiness and incident prevention.

PUBLIC-DISCLOSURE POSITION

Disclose measured pollutants, compliance status, methodology and control actions. No quantitative pollution-prevention targets were set for 2025 the 2025 results form the baseline for targets from 2026 covering stack monitoring coverage, noise nuisance points and pollution-control equipment availability.

SUGGESTED 2026 FOCUS

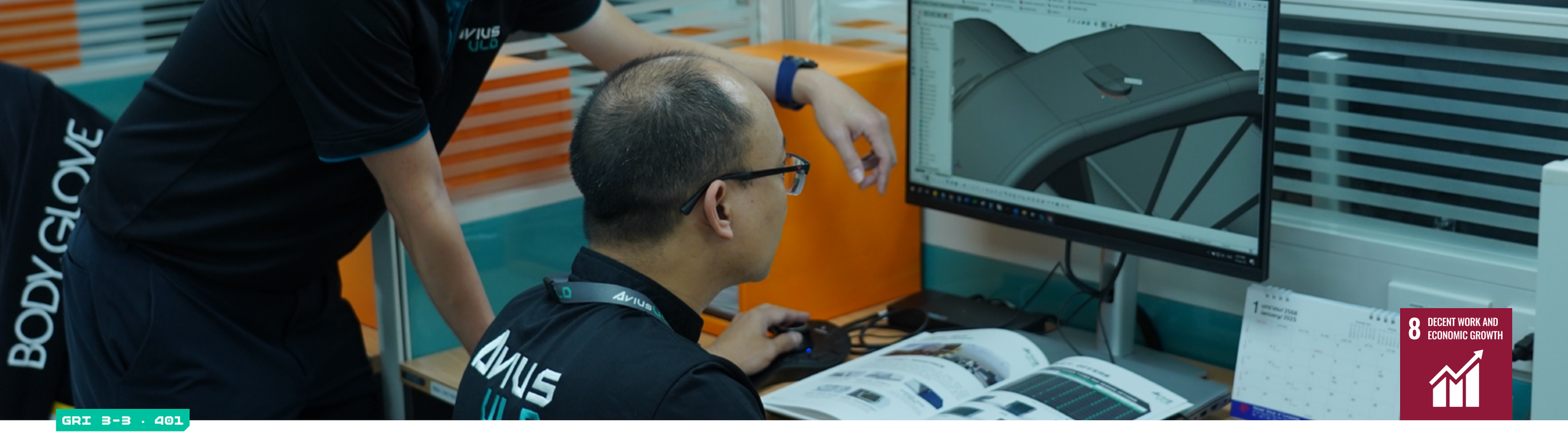
01 MEASURE
Continue direct stack monitoring and add NOx/SOx where the 2026 monitoring plan requires it.

02 INVENTORY
Consider building a VOC-containing chemical inventory if management wants a stronger future GRI 305-7 disclosure.

03 PREVENT
Continue PM of dust collectors, exhaust systems and other pollution-control equipment.

04 RESPOND
Maintain spill response drills, training and emergency readiness.

COMPLIANCE	FINES	INCIDENTS
100%	0	0
Air monitoring	Environmental	Significant



GRI 3-3 · 401

EMPLOYMENT, BENEFITS & WORKING CONDITIONS

Reporting period 1 January – 31 December 2025 · Boundary: AviusULD Thailand, Netherlands and USA

AviusULD manages employment impacts through stable contracts, competitive pay and benefits, controlled overtime and structured employee dialogue.

Employment, benefits and working conditions are a material topic for AviusULD because pay, contract stability, benefits and workload directly affect 239 employees and their households, and because turnover and retention determine whether the plant keeps the skills it needs. During 2025 the Company raised minimum wages and applied a salary merit increase, adjusted the meal allowance and welfare loan terms, introduced a paternity leave policy and a flextime policy for managers, and implemented overtime monitoring and reduction actions. This chapter describes the management approach and performance in accordance with GRI 3-3 and GRI 401.

KEY 2025 FIGURES

TURNOVER

10.5%

against a 12% target

RETENTION

89.6%

up from 86.4% in 2024

NEW HIRES

23

Thailand 21, Netherlands 2

ENGAGEMENT SCORE

68%

down from 71% in 2024

REPORTING BOUNDARY

- 2025 reporting period
- Thailand operations as the principal employment location
- Headcount at 31 December 2025 turnover on the year-end headcount
- STC and outsourced workers excluded and reported under GRI 2-8
- GRI 3-3, GRI 401-1, 401-2 and 401-3
- 2024 comparatives from HR and payroll records

Source: AviusULD 2025 HR, payroll and personnel records.

WHY THIS TOPIC_ IS MATERIAL

GRI 3-3 **Employment impacts, stakeholders and management approach**

Employment is material because pay, contract stability, benefits and workload determine income security for 239 employees and whether AviusULD keeps the skills it needs.

Impacts arise directly from AviusULD's own employment practices: wage levels and increases, contract type, benefits, overtime and workload, recruitment and promotion, and the channels through which employees raise concerns. Positive impacts in 2025 included a minimum wage increase from 1 January, a salary merit increase, a special perfect attendance bonus, a fixed bonus and cash premium, a higher meal allowance, amended welfare loan terms and a new newborn gift benefit. The principal negative impacts are turnover among direct and indirect labour, difficulty retaining skilled workers, and overtime above target. HR identifies turnover and skill retention as the most significant workforce risk for 2025. The topic covers AviusULD's own employees outsourced and agency workers are addressed under GRI 2-8.

KEY IMPACTS

01	**Pay and Income Security**	Minimum wage increase, merit increase, bonuses and allowances applied in 2025.
02	**Employee Turnover**	10.5% turnover 25 leavers, of which 22 voluntary and 3 involuntary.
03	**Skill Retention**	Exit-interview analysis and a retention programme using promotion and role change.
04	**Overtime and Workload**	13.1% average monthly overtime against a 12% target monitoring and reduction actions.
05	**Benefits and Welfare**	Insurance, provident fund, welfare loan, meal allowance and family benefits.

STAKEHOLDER EXPECTATIONS AND RESPONSE

STAKEHOLDER	MAIN EXPECTATION	AVIUSULD RESPONSE
Employees	Stable employment, fair conditions and benefits	Wage and benefit adjustments, employee committee, engagement-survey actions
Management	Retention and workforce stability	Retention programme, exit-interview analysis, monthly KPI review
Job Applicants	Fair recruitment and employment terms	OP-HRM-001 recruitment procedure, recruitment partner, university job fairs
Regulators	Labour-law compliance	Employee Handbook, working-condition policy, Labour Relations Act committee
Customers /CCE-HIG	Stable, capable workforce and responsible practices	ESG and EcoVadis assessments, monthly business review

IMPACT BOUNDARY

- Caused by AviusULD: pay, contracts, benefits, overtime, recruitment
- Contributed: workload arising from production planning and demand
- Linked through relationships: outsourced and agency labour via STC
- Employees in Thailand, Netherlands and USA where HR data are available

Source: AviusULD 2025 materiality assessment, HR records and employee engagement survey.

MANAGEMENT APPROACH: POLICIES, RESPONSIBILITIES AND REVIEW_

GRI 3-3 **Policies, procedures, responsibilities and review process**

Employment is managed through documented HR policies, defined functional ownership, employee representation and monthly KPI review.

Employment terms, pay and benefits are set out in the Employee Handbook 2025 and in the Health, Safety and Working Condition Policy, and are applied through the recruitment, employment and promotion procedure. Wage and benefit changes in 2025 were issued as HR announcements approved by the CEO and communicated to all employees. Employee views reach management through the employee committee under the Labour Relations Act, the Welfare Committee, the annual engagement survey, town halls and monthly production meetings. Negative impacts are addressed through exit-interview analysis, a retention programme based on promotion and role change, overtime monitoring with reduction actions, and department-level action plans following the engagement survey. Concerns can be raised confidentially under the Whistleblowing Policy, and identified harm is remediated under the remediation procedure OP-HRM-004.

POLICIES AND PROCEDURES

- Employee Handbook 2025
- Health, Safety and Working Condition Policy, Oct 2025
- OP-HRM-001 Recruitment, Employment and Promotion
- Paternity Leave Policy Jun 2025 and Flextime Policy
- Rewards and Recognition Policy Group Life and Health Insurance Policy
- Whistleblowing Policy Oct 2025 OP-HRM-004 Remediation Procedure

Source: **AviusULD** HR policies, announcements and 2025 HR KPI records.

2025 KPI RESULTS

TURNOVER	RETENTION	OVERTIME
10.5%	89.6%	13.1%

ABSENTEEISM	ENGAGEMENT	NEW HIRES
1.9%	68%	23

ROLES AND RESPONSIBILITIES

OWNER	RESPONSIBILITY
HR	employment terms, payroll, benefits, recruitment and leave
HR Business Partner	employee relations, engagement survey and follow-up
Department managers	workload and overtime planning, performance reviews
HSE	working conditions, health checks and work environment
CEO / Management	policy approval, wage decisions and target approval
Finance	payroll funding, provident fund and benefit cost control

REVIEW AND ESCALATION PROCESS

- Monthly review of turnover, overtime, absenteeism and headcount in the management business review
- Employee committee and Welfare Committee meet management engagement-survey actions tracked by department
- Concerns raised under the Whistleblowing Policy identified harm remediated under OP-HRM-004
- Wage, benefit and policy changes approved by the CEO and issued as HR announcements

METHODOLOGY, BOUNDARY AND DATA QUALITY_

GRI 401 **Employment data basis, definitions and calculation methods**

AviusULD reports employment data for the 2025 calendar year. Headcount is reported at 31 December 2025 and covers employees holding an active contract with AviusULD Ltd. in Thailand, AviusULD B.V. in the Netherlands and AviusULD Inc. in the United States: 239 in total, of which Thailand 228, the Netherlands 9 and the United States 2, and by gender 140 male and 99 female. Hire and turnover rates use that same year-end headcount as the denominator HR confirmed the year-end basis and did not adopt a monthly average. Regions are grouped by country. Total turnover is all leavers, 25 in 2025, giving 10.5% against a 12% internal target. Overtime, absenteeism and engagement remain internal management indicators.



Headcount movement – 2025 reconciles: 241 employees at 31 December 2024, plus 23 hires less 25 leavers, gives the 239 reported at 31 December 2025. Basis: HR employee register and movement register.

DEFINITIONS AND CALCULATION BASIS

ITEM	DISCLOSURE BASIS
Headcount Basis	Employees with an active contract at 31 December 2025: 239 in total, Thailand 228, Netherlands 9 and United States 2; permanent and fixed-term contracts are both included.
New Hires	All employees joining during 2025, counted by country, age band and gender; 23 hires in 2025. The hire rate uses the same year-end headcount of 239 as the turnover rate.
Turnover Rate	Leavers during 2025 divided by the year-end headcount of 239 at 31 December 2025, the basis HR confirmed. Total turnover 10.5% (25 leavers) against a 12% internal target; HR records 22 of the 25 as voluntary.
Retention Rate	Opening headcount less leavers, divided by opening headcount; 89.6% for 2025 (241 less 25 of 241) and 86.4% for 2024 (228 at 1 January 2024 less 31 leavers). Separately, retention actions in 2025 covered 8 employees, 3.3%: 5 promotions and 3 with increased responsibility and a salary adjustment.
Overtime and Absenteeism	Overtime hours as a share of standard working hours, averaged monthly (13.1% for 2025 against a 12% target); absence days as a share of scheduled working days (1.9% against a 2.0% target).
Exclusions	STC and outsourced workers, agency workers and interns are excluded from GRI 401 and reported under GRI 2-8.

Source: AviusULD HRM system, payroll and personnel records 2025 HR KPI data.

2025 HIRES AND_ TURNOVER DASHBOARD

GRI 401-1 **New employee hires and employee turnover**

AviusULD hired 23 employees and recorded 25 departures in 2025, a turnover rate of 10.5% against a 12% target; voluntary turnover was 9.2%.

Recruitment filled 23 of 25 vacancies during the year, a hire rate of 9.6% (23 of 239 employees at year end). Of these hires, 21 were local hires in Thailand and 2 were in the Netherlands there were no hires in the United States. Indirect labour was recruited through an external recruitment partner and direct labour mainly through STC. Of the 25 departures, 22 were voluntary and 3 involuntary. Turnover fell from 12.9% in 2024 to 10.5% in 2025, below the 12% target, and retention rose from 86.4% to 89.6%. Exit interviews are analysed and fed into the retention programme, which uses promotion and role change to hold skilled employees. Leavers by age group were five under 30 (4 men, 1 woman), nineteen aged 30 to 50 (10 men, 9 women) and one over 50 (1 woman) by region, 24 in Thailand and 1 in the Netherlands.

EMPLOYEES

239

at 31 Dec 2025

NEW HIRES

23

TH 21 | NL 2 | US 0

DEPARTURES

25

22 voluntary, 9.2% | 3 involuntary

TURNOVER

10.5%

target 12% | 2024: 12.9%

RETENTION

89.6%

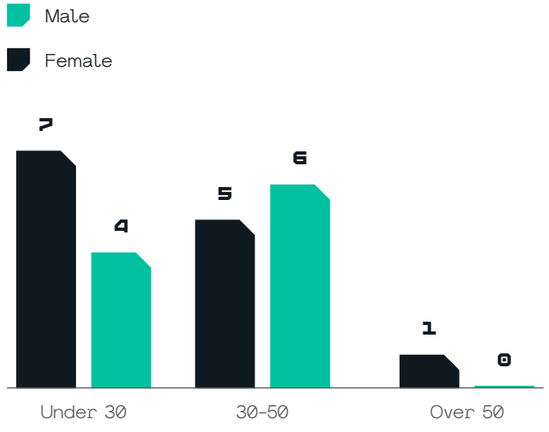
2024: 86.4%

HIRE RATE

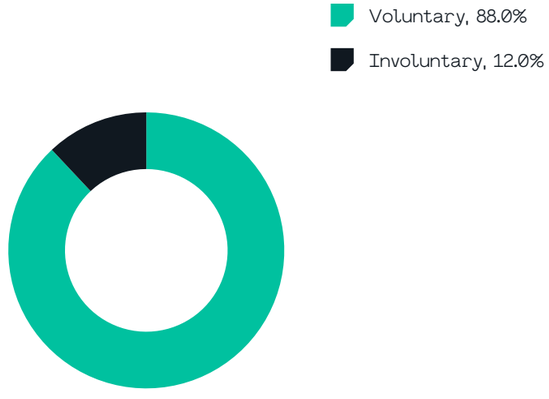
9.6%

23 of 239 at year end

New hires by age band and gender, 2025 (headcount)



2025 departures by type



READING OF PERFORMANCE

- 23 hires, 9.6% of 239, filled 25 vacancies 21 local Thai hires
- Total turnover 10.5%, 25 leavers on a year-end headcount of 239
- Turnover 10.5%, below the 12% internal target
- Retention improved from 86.4% to 89.6%
- Leavers: Thailand 24, Netherlands 1, United States 0

Source: **AviusULD** 2025 HR records, recruitment and turnover data.

BENEFITS, WELFARE AND PARENTAL LEAVE

GRI 401-2 · GRI 401-3 **Benefits provided | Parental leave**

Permanent employees receive insurance, provident fund and welfare benefits beyond statutory minimums; temporary workers receive statutory social security coverage.

Benefits are set out in the Employee Handbook and the Group Life and Health Insurance policy. Permanent employees receive group life and health insurance, in-patient and out-patient medical cover, a provident fund, dental cover, a welfare loan facility, a meal allowance and family benefits including a newborn gift. Interns receive life insurance but not health, dental or provident fund cover. STC workers hold their own coverage through their employer and receive statutory social security benefits. AviusULD reports benefits for its Thailand operations, which is the only location with a manufacturing workforce Netherlands and USA employees receive benefits set locally under national practice.

PERMANENT EMPLOYEES

100%

covered by insurance and provident fund

PARENTAL LEAVE TAKEN

0

Thailand employees, 2025

2025 PAY AND BENEFIT MEASURES

1 JAN	Minimum wage increase
JAN 2025	Salary merit increase
2025	Perfect attendance bonus
CY2025	Fixed bonus and cash premium
2025	Meal allowance increase
2025	Welfare loan terms amended
2025	Newborn gift benefit amended
JUN 2025	Paternity leave policy issued

BENEFIT	PROVIDED TO
Group Life Insurance	All employees and interns; STC workers hold their own cover
Health Insurance (IPD)	Permanent employees
Medical Benefits (OPD)	Permanent employees
Dental Cover	Permanent employees
Provident Fund	Permanent employees
Welfare Loan Facility	Permanent employees, terms amended in 2025
Meal Allowance	All employees, increased in 2025
Family and Newborn Benefits	All employees; newborn gift amended in 2025

PARENTAL LEAVE (GRI 401-3)

Parental leave is reported for employees in Thailand only. They are entitled to parental leave under Thai law, and AviusULD issued a Paternity Leave Policy in June 2025. Entitlement at 31 December 2025 was 131 male and 97 female employees, the 228 Thailand employees. No employee took parental leave during 2025, so none returned from leave and none was retained twelve months after return the return-to-work and retention rates are therefore not calculable for the year. Employees in the Netherlands and the United States are entitled to parental leave under the law of their own country.

REPORTING NOTE

Benefits are reported for Thailand, the only significant location of operation with a manufacturing workforce. Statutory social security applies to temporary workers. Interns are reported under GRI 2-8.

Source: AviusULD Employee Handbook 2025, insurance policy and 2025 HR announcements.

WORKING_ CONDITIONS, OVERTIME AND ENGAGEMENT

GRI 3-3 **Workload, absence, employee voice and improvement actions**

Overtime remains above target at 13.1% and the engagement score fell to 68%, while absenteeism stayed within its 2.0% limit.

Overtime is monitored monthly against a 12% target and is managed through the overtime monitoring and reduction actions implemented during 2025. Absenteeism was 1.9%, within the 2.0% target. The annual engagement survey score fell from 71% in 2024 to 68% in 2025 each department has identified improvement actions for 2026 in response to the lower-rated dimensions. Working conditions are governed by the Health, Safety and Working Condition Policy, with a flextime policy for managers and a rewards and recognition programme delivered through monthly production meetings and quarterly town halls.

OVERTIME RATE

13.1%

target 12% | 2024: 15.7%

ABSENTEEISM

1.9%

target 2.0% | 2024: 1.6%

ENGAGEMENT SCORE

68%

2024: 71%

TURNOVER TARGET MET

YES

10.5% against 12%

Source: **AviusULD** 2025 HR KPI data, overtime monitoring records and employee engagement survey.

OVERTIME AGAINST TARGET



Overtime, 2024 vs 2025 (%)



Turnover, 2024 vs 2025 (%)



IMPROVEMENT ACTIONS IN 2025

Overtime monitoring with monthly review and reduction actions by department

Flextime policy for managers to support work-life balance

Rewards and recognition at monthly production meetings and quarterly town halls

Engagement survey action plans owned by each department for 2026

Annual health check-up and wellbeing activities during the year

DISCLOSURE NOTE

Overtime, absenteeism and engagement are internal management indicators rather than GRI 401 metrics they are disclosed to support the GRI 3-3 management approach. Engagement is measured through the annual survey covering the Thailand workforce.

EMPLOYMENT INITIATIVES AND EMPLOYEE VOICE

GRI 3-3 **Actions taken in 2025 and how employees are heard**

Pay, benefits and working-condition changes in 2025 were issued as approved HR announcements and communicated through employee representation channels.

Employment initiatives in 2025 fell into three groups: pay and income measures, benefit and family support, and working-condition and recognition measures. Each was approved by the CEO and issued as an HR announcement. Employee views were gathered through the employee committee under the Labour Relations Act, the Welfare Committee, the annual engagement survey, quarterly town halls and monthly production meetings, and the meal allowance adjustment was consulted through the social dialogue channel before issue.

2025 INITIATIVES

MINIMUM WAGE
Statutory increase applied from 1 January 2025

SALARY MERIT INCREASE
Annual merit review effective January 2025

BONUS AND PREMIUM
Perfect attendance bonus fixed bonus and cash premium

MEAL ALLOWANCE
Rate increased consulted via social dialogue

WELFARE LOAN
Regulations amended improved access for employees

FAMILY SUPPORT
Paternity leave policy newborn gift benefit amended

EMPLOYEE VOICE CHANNELS

Employee committee under the Labour Relations Act and the Welfare Committee meet management and review welfare matters. The annual engagement survey, quarterly town halls and monthly production meetings provide direct feedback routes, and the Communication Policy sets out how changes are announced.

The meal allowance adjustment was consulted through the social dialogue channel before the announcement was issued.

HOW FEEDBACK CHANGED DECISIONS

Engagement survey results are broken down by department, and each department owns an improvement action plan for 2026. Exit-interview findings feed the retention programme, which uses promotion and role change to hold skilled employees.

EMPLOYEE VOICE TO ACTION: FIVE STEPS

01 RAISE
survey, committee, town hall or manager

02 RECORD
HR logs the issue and owner

03 REVIEW
management business review monthly

04 ACT
policy, pay, benefit or workload change

05 COMMUNICATE
HR announcement and town hall

Data quality improvement: from 2026 HR will record hire and turnover rates by age band, gender and region, and parental-leave entitlement counts by gender, to complete GRI 401-1 and 401-3.

Source: AviusULD 2025 HR announcements, employee representatives report and engagement survey.

TARGETS, EVALUATION AND 2026 OUTLOOK_

GRI 3-3 **Effectiveness of actions, target evaluation and next cycle**

Turnover and absenteeism targets were met in 2025; overtime remained above target and engagement fell, and both carry actions into 2026.

AviusULD evaluates the effectiveness of its employment management approach through the monthly HR KPI review and the annual engagement survey. Turnover fell well below its 12% target and retention improved, indicating that the retention programme and 2025 pay measures had effect. Overtime fell from 15.7% to 13.1% but remains above the 12% target, and the engagement score fell three points, so neither can be treated as resolved. Absenteeism stayed within target. No parental leave was taken, so the return and retention rates are not applicable for the year.

2025 TARGET EVALUATION

	2025 TARGET | ACTUAL	
Turnover	12% | 10.5% total	Achieved
Absenteeism	2.0% | 1.9%	Achieved
Overtime rate	12% | 13.1%	Not Achieved
Engagement score	No target | 68%	No Target Set
Parental Leave Return	100% | 0 employees (Thailand)	Not Applicable

Management reviews employment KPIs monthly in the management business review the CEO approves wage, benefit and policy changes. Employment targets for 2026 will be confirmed with the ESG Committee.

WHAT WORKED

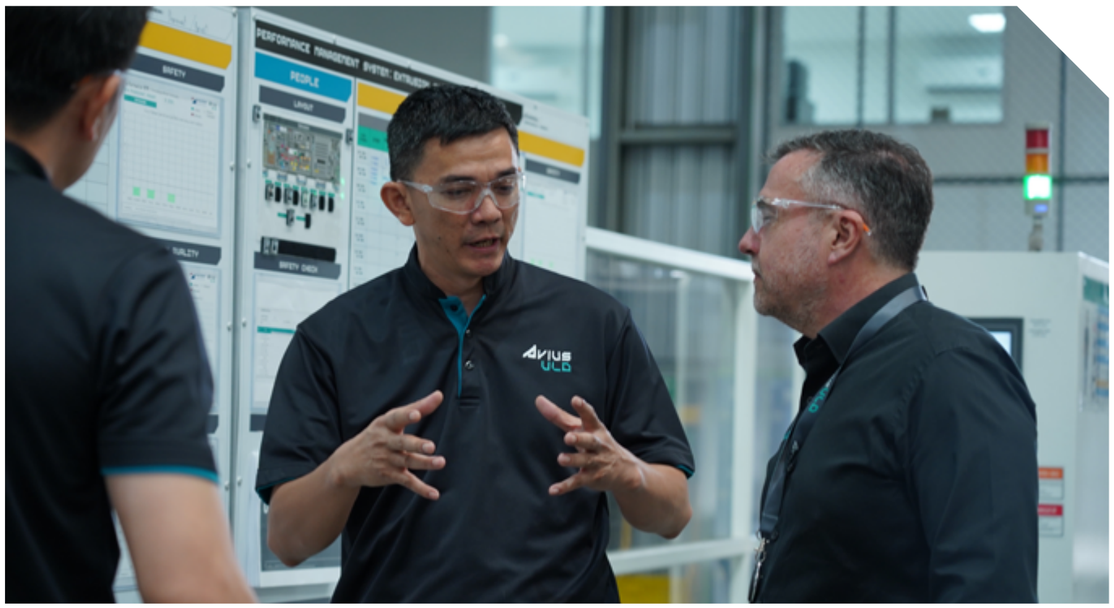
Turnover fell from 12.9% to 10.5%, retention rose from 86.4% to 89.6%, and 23 of 25 vacancies were filled. Pay and benefit measures were issued and communicated on schedule.

WHAT DID NOT

Overtime remained above the 12% target at 13.1%, indicating workload pressure that monitoring alone has not resolved. The engagement score fell from 71% to 68%, with department-level dimensions rated lower than in 2024. Parental leave (401-3) is reported for the 228 Thailand employees no employee took leave in 2025.

2026 OUTLOOK

Priorities for 2026 are to bring overtime within the 12% target, deliver the department engagement action plans, set an engagement target, and keep 401-1 and 401-3 data current for 2026 reporting.



Source: AviusULD 2025 HR KPI data, engagement survey and target records.



GRI 3-3 · 402-1 · GRI 2-26 · 2-30

LABOR RELATIONS, EMPLOYEE VOICE & GRIEVANCE_

Reporting period 1 January – 31 December 2025

Employees elect their own representatives, and every channel for raising a concern carries a published response clock.

AviusULD has no trade union. Employees elect five representatives to the Welfare Committee, which met management four times in 2025, and the Safety Committee met twelve times. Three company-level collective agreements, signed in June 2025, cover the whole workforce. Concerns can be raised through nine channels, from the morning meeting to an anonymous whistleblowing line. No grievance, labour dispute, legal violation or retaliation case was recorded in 2025.

Source: Employee Handbook 2025 Whistleblowing Policy, Oct 2025 three AviusULD collective agreements, Jun 2025 Employee Engagement Survey 2025.

KEY 2025 FIGURES

GRIEVANCES RECEIVED

0

2024: 0 | resolution rate 100%

WELFARE COMMITTEE

4

meetings with management

SAFETY COMMITTEE

12

meetings in 2025

SURVEY PARTICIPATION

100%

233 of 233 at the survey date 239 at 31 December

REPORTING

- 1 January to 31 December 2025
- All AviusULD entities owner Human Resources
- Data consolidated and verified by Human Resources
- GRI 3-3, 402-1, 2-26 and 2-30
- All employees, including fixed-term whistleblowing and remediation also cover STC, agency, intern and supplier workers
- No trade union is present at any AviusULD site

EVERY NEGATIVE IMPACT SCREENED FOR STAYED AT ZERO_ IN 2025

GRI 3-3 **Actual and potential impacts, whether AviusULD causes them, and how they are tracked**

POTENTIAL NEGATIVE IMPACTS, SCREENED BY HR

NONE OF THESE OCCURRED DURING 2025.

- ⚠ Employees unable or afraid to raise a concern
- ⚠ Grievances left unresolved
- ⚠ Retaliation against anyone who raises a concern
- ⚠ Poor labour-management communication
- ⚠ Inadequate consultation before an operational change
- ⚠ No worker representation
- ⚠ Disputes over employment conditions
- ⚠ Strikes, lockouts or work stoppages

POSITIVE IMPACTS CONFIRMED FOR 2025

EACH OF THESE WAS CONFIRMED BY HUMAN RESOURCES.

- ✓ Open communication across nine channels
- ✓ Early identification of employee concerns
- ✓ Timely grievance resolution, 100% resolution rate
- ✓ Employee participation through elected representatives
- ✓ Improved employee trust
- ✓ Constructive labour-management relationships
- ✓ Transparent organisational change

WHERE THE IMPACTS ARISE, AND WHAT TO WATCH

All impacts are caused by AviusULD's own employment and management practices, not through business relationships. The Thailand manufacturing site carries most of the workforce the Netherlands and USA offices follow the same policies, supported locally by the Personeelsvertegenwoordiging.

Two survey answers act as early warning even though no impact materialised: compensation fairness scored 45% and fair workload distribution 49%.

Source: HR materiality confirmation for Labor Relations, Employee Voice & Grievance, 2025 Employee Engagement Survey 2025 versus 2024.

FOUR INSTRUMENTS_ MANAGE THE TOPIC, EACH WITH AN OWNER AND A FIXED CLOCK

GRI 3-3 **Policies and commitments, actions taken, and how their effectiveness is tracked**

GRIEVANCE PROCEDURE

Employee Handbook 2025, section 2.6.5. A signed grievance goes to the supervisor within 30 days reply in 7 days, appeal in 7, executive decision in 14.

Human Resources

WHISTLEBLOWING POLICY

, October 2025. Two channels plus a QR code, anonymous reporting allowed, covering Thailand, the Netherlands and the USA including agency staff.

Whistleblowing Committee

ELECTED REPRESENTATION

Five employee representatives on the Welfare Committee, four on the Safety Committee, and the PVT in the Netherlands. No trade union is present.

HR and HSE

ANNUAL ENGAGEMENT SURVEY

Culture Amp survey run each year, 19 November to 18 December in 2025, with three Focus Agent priorities carried into action plans.

Human Resources

HOW EFFECTIVENESS IS TRACKED

Case volumes, committee minutes and survey scores are reviewed annually by HR and reported to the CEO. The whistleblowing policy is reviewed each year and next revises in Q4 2026 awareness is communicated at least twice a year.

TRAINING AND AWARENESS, AND ONE GAP

Policy training sits in the Learn and Work app for employees with an email address, and HR runs classroom sessions for shop-floor operators. The grievance procedure was communicated by internal note to email users only and has not yet been trained to the shop floor Human Resources will deliver shop-floor training during 2026.

COMMITMENTS CARRIED IN THE COLLECTIVE AGREEMENTS, 2025 TO 2050

At least four meetings a year between the CEO and employee representatives 100% of the workforce completing ethics training each year all whistleblower reports investigated and resolved zero confirmed discrimination incidents and annual turnover held below 12%.

Source: Employee Handbook 2025 Whistleblowing Policy, Oct 2025 OP-HRM-004 AviusULD Collective Agreement on Career Management, Training and Diversity, Jun 2025.

BASIS OF_ PREPARATION

Scope, definitions and counting rules applied to every figure in this topic

DEFINITIONS USED IN THIS TOPIC

Grievance – a written, signed complaint that the employee has not been treated fairly on employment status, working conditions, benefits or disciplinary action. Requests to appoint, transfer or dismiss another person are out of scope, as are personal matters that do not affect work.

Whistleblowing report – a report of misconduct, unethical conduct or a legal violation made through an official channel. May be submitted anonymously.

Employee representative – an employee elected to the Welfare Committee or serving as an employee member of the Safety Committee. No trade union is present.

Significant operational change – restructuring, relocation, a change of machinery or technology, or suspension of operations that alters employment terms or headcount.

Notice period – the minimum advance notice given to affected employees and, where the law requires it, to the labour inspector, before such a change takes effect.

ENTITY, PERIOD AND COVERAGE

- AviusULD Ltd., with the Netherlands and USA offices
- 1 January to 31 December 2025
- All employees, including fixed-term whistleblowing and remediation also cover STC, agency, intern and supplier workers
- Consolidated and verified by Human Resources

DATA SOURCES

- Employee Handbook 2025
- Whistleblowing Policy, Oct 2025
- OP-HRM-004 Remediation Procedure, Nov 2025
- Welfare and Safety Committee minutes, 2025
- Three collective agreements, Jun 2025
- Employee Engagement Survey 2025
- Working Conditions Improvement Report, Sep 2025

COUNTING RULES

A grievance or report is counted in the year it is filed, and cases still open at 31 December are reported as open. Human Resources removes duplicates where one case reaches more than one channel, so each case is counted once. Notice periods are stated in calendar days unless the disclosure says working days. Survey results cover 19 November to 18 December 2025, compared with 9 October to 9 November 2024.

Source: HR reporting confirmation for Labor Relations, Employee Voice & Grievance, 2025.

EMPLOYEES ELECT THEIR REPRESENTATIVES_ AND MET MANAGEMENT 19 TIMES IN 2025

GRI 2-29

Approach to stakeholder engagement; committee meetings held during the reporting period

WELFARE COMMITTEE

4

quarterly, with the CEO

SAFETY COMMITTEE

12

monthly

TOWN HALL MEETINGS

3

against a target of 4

IMPROVEMENT SUGGESTIONS

203

all 203 implemented

LABOR RELATIONS, VOICE & GRIEVANCE

THAILAND

WELFARE COMMITTEE

Five employee representatives, elected by ballot on 28 February 2024 for a two-year term running 1 March 2024 to 28 February 2026 — the five candidates with the most votes from thirteen standing.

Members and responsibilities announced company-wide.

Met management four times, satisfying the collective agreement commitment of at least four CEO meetings a year.

THAILAND

SAFETY COMMITTEE

Four employee representatives sit with employer representatives under an employer chair.

HSE provides the secretariat and attends as observer.

Met twelve times in 2025, covering the safety plan, workplace monitoring, drills and training.

NETHERLANDS

WORKS REPRESENTATION

Representation is provided by the Personeelsvertegenwoordiging under Dutch law.

The same company policies apply to the Netherlands and USA offices.

No trade union is present at any AviusULD site.

HOW AN ISSUE REACHES A DECISION

An employee raises a concern with a representative, at the morning meeting or through a suggestion card. The representative puts it on the agenda of the next scheduled meeting, where the item, the response and the owner are recorded in signed minutes. Actions are tracked to closure and the status is reported at the following meeting. Shop-floor teams also meet production management monthly.

Source: Employee Representatives Report, Jun 2025 Welfare Committee minutes Q3 2025 Safety Committee minutes, 15 Dec 2025 Working Conditions Improvement Report, Sep 2025.

NINE CHANNELS CARRY EMPLOYEE_ VOICE, AND ONE OF THEM IS ANONYMOUS

GRI 2-26

Channels available to employees in 2025, with confidentiality and escalation route

CHANNEL	CONFIDENTIAL	ANONYMOUS	RESPONSIBLE	ESCALATION ROUTE
Morning meeting	No	No	Direct supervisor or manager	Next level of management
Internal note	No	No	Human Resources	Reply by email
Executive committee	Yes	No	ExCom and leadership team	Bi-weekly leadership meeting
Welfare Committee	No	No	ExCom and Welfare Committee	Quarterly meeting
Safety Committee	No	No	ExCom and Safety Committee	Monthly meeting
Pink Card suggestion scheme	No	No	All employees and the BE team	Reviewed each month
Engagement survey	Yes	No	All employees and HR	Annual survey cycle
Town hall	No	No	ExCom, leadership and all employees	During the town hall
Whistleblowing channel	Yes	Yes	HR and ExCom	Whistleblowing Committee

LABOR RELATIONS, VOICE & GRIEVANCE

Employees without a company email address are reached through their manager and the morning meeting, and HR runs classroom sessions on the shop floor. The whistleblowing channel is the only route that accepts anonymous reports, and it is also the only one that bypasses line management entirely.

EMPLOYEES WITHOUT A COMPANY EMAIL ADDRESS ARE REACHED THROUGH THEIR MANAGER AND THE MORNING MEETING. AND HR RUNS CLASSROOM SESSIONS ON THE SHOP FLOOR.

Source: AviusULD Communication Policy, Jan 2025 Whistleblowing Policy, Oct 2025 HR channel inventory 2025.

THREE ROUTES_ FOR RAISING A CONCERN, EACH WITH A PUBLISHED CLOCK

GRI 2-26

Mechanisms for seeking advice and raising concerns, and the 2025 case record

EMPLOYEE HANDBOOK 2025, S.2.6.5

GRIEVANCE PROCEDURE

Who Any employee. The grievance must be signed anonymous letters are not considered.

Scope Unfair treatment on employment status, working conditions, benefits or discipline.

Clock File within 30 days. Supervisor replies in 7 days, appeal within 7, executive decides in 14 and that decision is final.

POLICY, OCTOBER 2025

WHISTLEBLOWING

Who Employees, agency and contract staff, suppliers and other stakeholders. Anonymous reports accepted.

Scope Misconduct, unethical conduct and legal violations, including bribery, fraud and conflicts of interest.

Route Whistleblowing System / QR code, or Whistleblower@aviusuld.com and myconcern@aviusuld.com.

Clock Acknowledged in 5 working days, investigation closed in 30, confirmed retaliation acted on in 15.

OP-HRM-004, EFFECTIVE NOV 2025

REMEDIATION FOR VICTIMS

Who Anyone affected by forced or child labour, trafficking, discrimination or harassment, in operations or supply chain.

Scope Immediate protection, investigation and referral of criminal cases to the labour authorities.

Clock Fact-finding in 5 working days, supplier corrective action plan in 30, HR follow-up in 30.

LABOR RELATIONS, VOICE & GRIEVANCE

GRIEVANCES RECEIVED

2024: 0

SUBSTANTIATED

2024: 0

ANONYMOUS REPORTS

2024: 0

ESCALATED TO MANAGEMENT

2024: 0

RETALIATION ALLEGATIONS

2024: 0

WHAT THE ZERO MEANS

Human Resources confirms no grievance, whistleblowing report, labour dispute, strike, lockout, work stoppage, mediation, court case, labour-authority finding, fine or retaliation allegation in 2024 or 2025, and no case outstanding at either year end. The 100% resolution target was therefore met. Employees may bypass their direct manager, seek advice before reporting formally, and report anonymously through the whistleblowing channel.

Source: Employee Handbook 2025 Whistleblowing Policy, Oct 2025 OP-HRM-004 HR case register 2025.

THREE COLLECTIVE AGREEMENTS_ COVER THE WHOLE WORKFORCE, WITH NO TRADE UNION PRESENT

GRI 2-30 **Collective bargaining agreements, and how terms are set for everyone else**

EMPLOYEES COVERED	COLLECTIVE AGREEMENTS	TRADE UNIONS	NEXT REVISION
100%	3	0	Q2 2026
all employees in scope	signed June 2025	no union at any site	reviewed annually

WORKING HOURS, OVERTIME AND LEAVES

- Monday to Friday, 07:30 to 16:30, with three defined shifts and fixed rest periods.
- Overtime must be authorised in advance and the employee must consent each time.
- Leave entitlements set for annual, sick, personal, maternity, paternity and eight further categories.

HEALTH, SAFETY AND WORKING CONDITIONS

- Ventilation, lighting and temperature standards, ergonomic workspaces and hazardous-material storage.
- Mandatory health and safety training with annual refreshers on emergency procedures and PPE.
- The Health and Safety Committee reviews incidents and conditions quarterly as a minimum.

CAREER MANAGEMENT, TRAINING AND DIVERSITY

- At least four CEO meetings a year with employee representatives, held every year to 2050.
- 100% of the workforce completing ethics training annually adjusted gender pay gap held at 0%.
- 35 training hours per employee a year, turnover below 12% and zero confirmed discrimination incidents.

LABOR RELATIONS, VOICE & GRIEVANCE

HOW TERMS ARE DETERMINED

The three agreements are company-level, negotiated with the elected employee representatives of the Welfare Committee and approved by the CEO, and they cover all employees in scope. No trade union is present at any AviusULD site. Terms the agreements do not cover are set by the Labour Protection Act B.E. 2541, individual employment contracts, the Employee Handbook, company policies and market benchmarking.



Source: AviusULD collective agreements, Jun 2025 Employee Handbook 2025

NO OPERATIONAL CHANGE MET THE 60-DAY NOTICE THRESHOLD IN 2025

GRI 402-1

Minimum notice periods regarding operational changes, reported in days and weeks

OPERATIONAL CHANGE	MINIMUM NOTICE	WHO MUST BE NOTIFIED	HANDBOOK REF.
Restructuring from a change of machinery or technology that reduces headcount	60 days (8.6 weeks) Otherwise 60 days' wages in lieu, plus special severance for 6+ years' service (15 days per extra year, up to 360 days)	Affected employees and the labour inspector	s.2.2.3 (4)
Relocation that significantly affects employees or their families	30 days (4.3 weeks) Otherwise 30 days' wages in lieu; employees may decline the move and receive special severance	Affected employees	s.2.2.3 (5)
Retirement at age 55	30 days (4.3 weeks) In writing; employment may continue yearly by agreement, with a medical certificate	The employee, in writing	s.2.2.3 (6)
Temporary suspension of operations under Section 75	3 working days (under 1 week) At least 75% of wages paid during the suspension	Employees and the labour inspector	s.2.2.3 (7)

OPERATIONAL CHANGE	MINIMUM NOTICE	WHO MUST BE NOTIFIED	HANDBOOK REF.
Change to working days, working hours or rest periods	In advance; no fixed period Employee consent required where the change is less favourable	Affected employees	s.2.3.2
Annual traditional-holiday calendar	By December of the preceding year At least 13 traditional holidays a year	All employees	s.2.3.3 (3)
Company change to annual leave already arranged	No fixed period The employee re-applies at least 3 working days in advance	The employee	s.2.4 (1.6)
Resignation by an employee	30 days (4.3 weeks) Written notice from the employee; the Company may claim losses if not given	The Company, by the employee	s.2.2.3 (2)

WHERE THE NOTICE PERIODS ARE SET

Notice periods come from the Labour Protection Act B.E. 2541, the Employee Handbook and employment contracts AviusULD applies the statutory minimum. A less favourable change needs the employee's consent. The June 2025 collective agreements set no notice period but require at least four CEO meetings a year with employee representatives.

OPERATIONAL CHANGE SCREENING, 2025

No significant operational change occurred in 2025. The Technology function was absorbed into IT/IS under the CFO from 24 April 2025 when the Director of Technology left the role closed without redundancy and other employees' terms were unchanged, so no notice obligation arose. There was no relocation, closure, outsourcing transfer, merger, sale or Section 75 suspension.

Source: Employee Handbook 2025, s.2.2.3, 2.3.2, 2.3.3 and 2.4 Labour Protection Act B.E. 2541 three AviusULD collective agreements, Jun 2025 Announcement - Company Reorganization, 24 April 2025.

NOTICE_ PRACTICE RAN AHEAD OF EVERY LEGAL DEADLINE IN 2024

GRI 402-1

Evidence of notice practice, from the 2024 Welfare Committee election cycle

NOTICE EVENT, 2024 WELFARE COMMITTEE CYCLE	LEGAL REQUIREMENT	AVIUSULD PRACTICE	MARGIN
Election announced to all employees by email and canteen notice board	None set	14 Feb 2024, 14 days before the outgoing term ended	14 days' notice
Candidate list of thirteen posted	3 days before the vote	21 Feb 2024, 7 days before the vote	4 days early
Election completed	Within 30 days	Completed in 14 days	16 days early
Result notified to the labour inspector	Within 7 days	29 Feb 2024, 1 day after the result	6 days early

LABOR RELATIONS, VOICE & GRIEVANCE

THE OUTGOING COMMITTEE'S TERM ENDED ON 29 FEBRUARY 2024 AND THE FULL ELECTION RAN INSIDE 14 DAYS AGAINST THE 30 DAYS THE LAW ALLOWS.

HOW NOTICE REACHES EMPLOYEES

Notice is given directly to employees by email and on the canteen notice board, and through the elected Welfare Committee representatives. The outgoing committee's term ended on 29 February 2024 and the full election ran inside 14 days against the 30 days the law allows.

NOTICE PERIODS, CONSULTATION AND CONSENT

Thai law prescribes no general minimum notice period for operational changes, and no change during 2025 required statutory notice. Notice practice is therefore evidenced by the 2024 Welfare Committee election cycle, in which each step was notified earlier than the law requires. Where a proposed change would be unfavourable to employment conditions, the Company obtains the consent of the employees concerned before the change takes effect, and consultation with the elected representatives is held at least four times a year with the CEO.

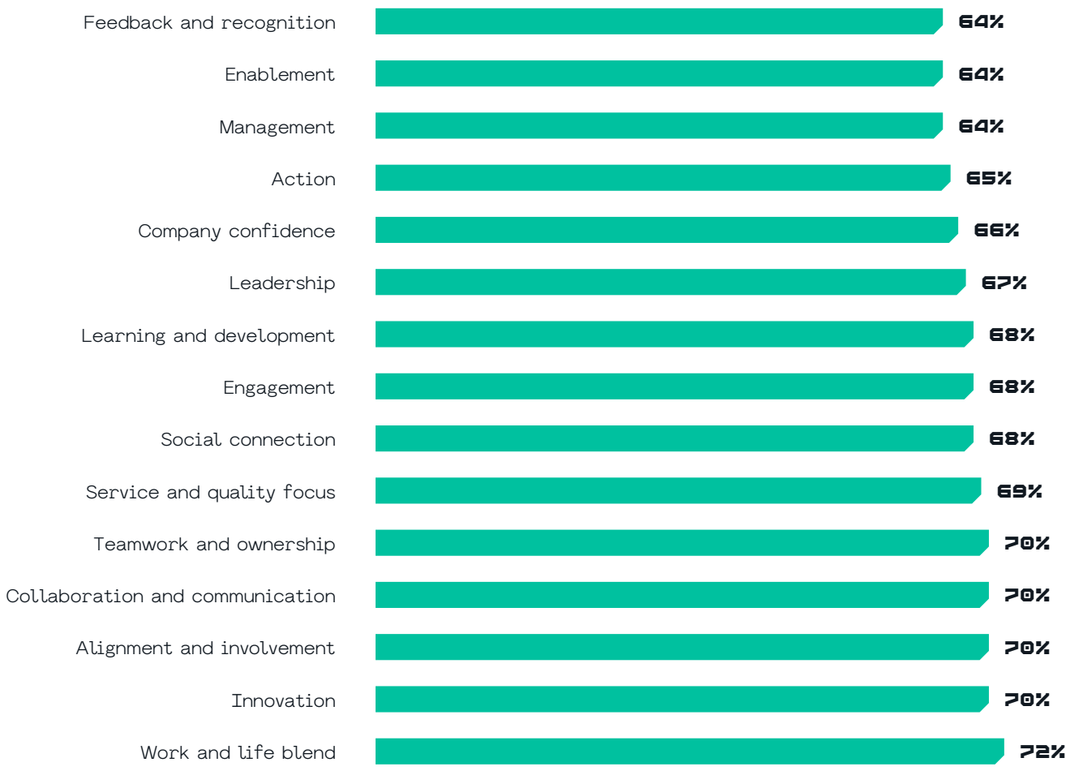
Source: Welfare Committee election records, Feb 2024 Labour Protection Act B.E. 2541 Employee Handbook 2025, s.2.2.3.

COMMUNICATION SCORED 70%, UP SEVEN POINTS, WHILE ENGAGEMENT SLIPPED TO 68%

GRI 3-3

Results of the 2025 employee engagement survey, run 19 November to 18 December 2025

SURVEY FACTOR SCORES, ALL EMPLOYEES, 2025



MOVEMENT AGAINST 2024

BIGGEST GAINS

+10 Social connection

+7 Collaboration and communication

+6 Service and quality focus

+5 Feedback and recognition

BIGGEST FALLS

-3 Engagement

-3 Teamwork and ownership

-1 Work and life blend

AGAINST TARGET

68% engagement score against a 73% target, down from 71% in 2024. Participation reached 100%, 233 of 233 employees on the payroll when the survey ran from 19 November to 18 December 2025, against 97% in 2024. The GRI 2-8 headcount is 239 employees at 31 December 2025 the difference is the movement between the survey date and year end, not a change of scope.

Source: **AviusULD** Employee Engagement Survey 2025 versus 2024, Culture Amp.

PAY FAIRNESS AT 45% IS THE LOWEST-SCORING QUESTION_ IN THE SURVEY

GRI 3-3

Signals the survey raises before they become impacts, and the action selected for 2026

LOWEST-SCORING QUESTIONS, ALL EMPLOYEES, 2025

45% I believe my total compensation is fair, relative to similar roles at other companies

49% Workloads are divided fairly among people where I work

51% Most of the systems and processes here support us getting our work done effectively

WHERE ACTION WILL HAVE MOST IMPACT

FOCUS AGENT PRIORITIES

LEADERSHIP

59% +2

Leaders have communicated a vision that motivates me

ENABLEMENT

51% +1

Systems and processes support effective work

LEARNING AND DEVELOPMENT

62% -2

There are good career opportunities for me here

WHAT HAPPENS NEXT

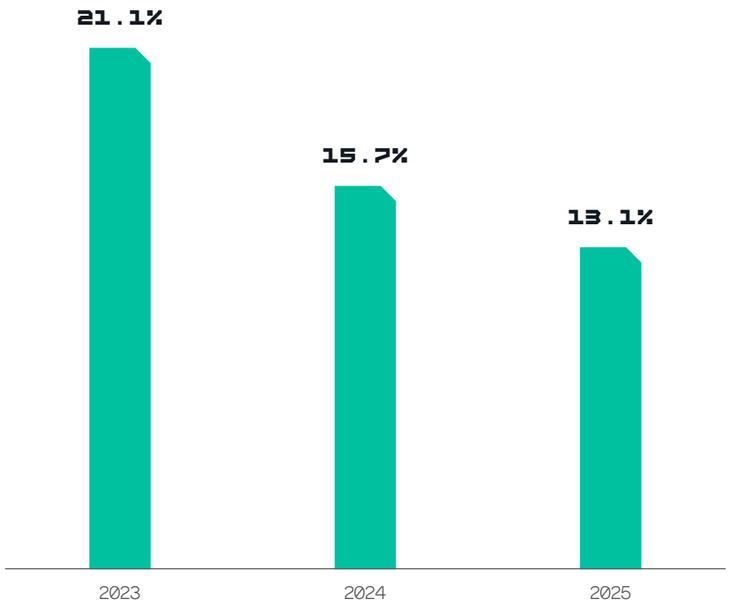
Culture Amp's Focus Agent ranks these three as the highest-impact changes. AviusULD selects one as the single focus for 2026, assigns an owner and an action plan, and measures the result in the next survey. Compensation fairness is reviewed separately against market benchmarks, and the collective agreement holds the adjusted gender pay gap at 0%.

Source: **AviusULD** Employee Engagement Survey 2025 versus 2024, Culture Amp Collective Agreement on Career Management, Training and Diversity, Jun 2025.

OVERTIME HAS FALLEN EIGHT POINTS IN TWO YEARS SINCE EMPLOYEES RAISED FATIGUE

GRI 3-3 **Actions taken in response to employee voice, and the results they produced**

OVERTIME AS A SHARE OF TOTAL HOURS WORKED, ANNUAL AVERAGE



-8.0 PTS

WHAT EMPLOYEE VOICE CHANGED IN 2025

OVERTIME REDUCTION PROGRAMME

Monthly overtime is reported to management and reviewed with the committees. The 2025 average of 13.1% sits just above the 12% target.

PINK CARD SUGGESTION SCHEME

Employees submitted 203 improvement ideas on paper or by QR code during 2025, and all 203 were implemented.

SOFT GOODS LINE REDESIGN

Rebuilt with the operators who run it: scan time fell 25% on the Sen Door and 11.6% on the Velcro Door.

WOMEN'S MENTORSHIP PROGRAMME

Group mentoring launched in June 2025 for 10 to 15 women with three to four mentors.

EMPLOYEES SUBMITTED 203 IMPROVEMENT IDEAS ON PAPER OR BY QR CODE DURING 2025, AND ALL 203 WERE IMPLEMENTED.

Source: Working Conditions Improvement Report, Sep 2025 HR suggestion register 2025 Internal Communication - Women's Mentorship Program, 27 Jun 2025.

EVERY CASE-HANDLING TARGET WAS MET; **THE ENGAGEMENT SCORE AND THE FOURTH TOWN HALL WERE NOT**

GRI 3-3 **Targets set for 2025 and the result achieved, against the 2024 baseline**

INDICATOR	2024	2025 TARGET	2025 RESULT
Grievances received	0	0	0
Grievances resolved	0	100%	100%
Cases outstanding at year end	0	0	0
Retaliation allegations	0	0	0
Labour disputes and work stoppages	0	0	0
Survey participation	97%	100%	100%
Engagement score	71%	73%	68%
Welfare Committee meetings	4	4	4
Safety Committee meetings	12	12	12
Town hall meetings	4	4	3

LABOR RELATIONS, VOICE & GRIEVANCE

READING THE TWO MISSES

Engagement fell to 68% against a 73% target, driven by compensation fairness at 45% and workload distribution at 49% one Focus Agent priority will be selected as the single action for 2026. Three town halls were held rather than four, on 11 April, 18 July and 24 October the fourth was not held because the fourth-quarter calendar was taken up by other company-wide activities, including the new year party, and the Welfare Committee still met its full quarterly cycle, so the consultation commitment in the collective agreement was satisfied. Participation of 100% is 233 of 233 at the survey date the 2-8 headcount of 239 is the year-end position.

ENGAGEMENT FELL TO 68% AGAINST A 73% TARGET. DRIVEN BY COMPENSATION FAIRNESS AT 45% AND WORKLOAD DISTRIBUTION AT 49%

Source: HR KPI register for Labor Relations, Employee Voice & Grievance, 2024 and 2025 Employee Engagement Survey 2025 versus 2024.



GRI 3-3 · 403

OCCUPATIONAL HEALTH, SAFETY & CONTRACTOR SAFETY

Reporting period 1 January – 31 December 2025 · Boundary: Bangkok manufacturing operation, Thailand

AviusULD closed 2025 with zero recordable injuries and zero cases of work-related ill health, inside an ISO 45001 system certified to May 2028.

Health and safety is material because manufacturing air cargo containers exposes 228 employees, 2 controlled workers and 63 contractor companies to forklift traffic, machinery, chemicals, noise and manual handling every day. The management system is certified to ISO 45001:2018 and reviewed annually by management. In 2025 there were no lost-time injuries, no medical-treatment cases and no occupational disease four minor injuries were treated as first aid or ergonomic cases, and five forklift incidents damaged property. Employees reported 642 yellow cards during the year.

Source: **AviusULD** 2026 HSE Management Review for FY2025 HSE incident, training and health records LRQA ISO 45001:2018 certificate.

KEY 2025 FIGURES

RECORDABLE INJURIES

0

2024: 5 cases

TIFR AND LTIFR

0

targets 2.79 and 1.40 per million hours

DAYS WITHOUT ACCIDENT

426

target 365 days

WORKERS COVERED BY THE OHS SYSTEM

100%

230 workers, externally certified

REPORTING BOUNDARY

- Bangkok manufacturing operation Netherlands and USA offices excluded
- Employees, temporary workers, interns, contractors and visitors on site
- Working hours actual, 652,694 hours in 2025
- Rates stated per 1,000,000 hours, with the GRI 200,000-hour equivalent
- Contractor working hours not centrally recorded, so contractor rates are not reported

WHY THIS TOPIC_ IS MATERIAL

GRI 3-3 **Safety impacts, AviusULD's involvement and stakeholder expectations**

Safety impacts arise from AviusULD's own manufacturing operations and from contractors working on site, and every impact identified in 2025 was managed inside the certified OHS management system.

KEY IMPACTS IDENTIFIED IN 2025

01	**Forklift and Vehicle Movement**	Five property-damage incidents in 2025, all forklift-related. Pedestrian walkway and rack protection improved.
02	**Machinery and Hand Tools**	The four minor injuries of 2025 all occurred in the test-frame area, from clamps, a hole saw, riveting and a door extrusion.
03	**Chemicals and Noise**	27 chemical assessments completed and 7 chemicals removed from use. Sawing-machine noise 85.7 dB(A) against a 85.0 limit.
04	**Ergonomics**	One ergonomic case. Six assessments covered new or changed processes, including the welding transfer.
05	**Contractor Activities**	63 contractor companies on site, each job assessed by JSA with permit-to-work where required.

STAKEHOLDER	MAIN EXPECTATION AND AVIUSULD RESPONSE
Employees	Safe workplace and effective controls; yellow card reporting, 642 cards raised in 2025
Contractors	Clear safety requirements and supervision; induction before work and job-by-job JSA
Management	Zero fatalities and fewer injuries; monthly KPI review and annual management review
Regulators	Legal compliance; 248 registered legal items, 245 compliant, 3 in progress
Customers	Safe and reliable manufacturing; ISO 45001 certification maintained to May 2028
Auditors	Traceable OHS data and risk controls; risk assessments, CAPA log and audit records
Community	Effective emergency preparedness; fire and chemical-spill drills held in November 2025

Impact boundary: caused by AviusULD through its own operations and workplace design contributed to through production planning and workload linked through business relationships for contractor and supplier activities on site.

Source: AviusULD 2026 HSE Management Review for FY2025 HSE risk-assessment and incident records stakeholder confirmation for Occupational Health, Safety & Contractor Safety.

A CERTIFIED SYSTEM WITH NAMED OWNERS AND ANNUAL REVIEW

GRI 403-1 **Management system, policies, responsibilities and review**

Occupational health and safety is managed through an ISO 45001:2018 system covering every worker on site, four documented instruments, appointed safety officers at each level, and an annual management review.

HEALTH, SAFETY AND WORKING CONDITION POLICY

, October 2025, aligned to SDG 3 and SDG 8. Signed policy communicated to 240 employees in 2025 attendance counts cover everyone who attended during the year, including leavers, so they exceed year-end headcount.

HSE Department

SAFETY MANAGEMENT SYSTEM

SMS Policy and SMS Objectives, SPI and SPT issued June 2025, with the Safety Management Manual OP-QUA-018.

HSE and Quality

JUST AND FAIR CULTURE POLICY

2025 policy setting how reports and errors are handled, so workers report hazards and incidents without fear of blame.

Plant Management

HSE MANUAL AND PROCEDURES

OP-HSE-036 manual with risk assessment, incident investigation OP-HSE-009, corrective action OP-HSE-010 and emergency preparedness OP-HSE-007.

HSE Department

CERTIFICATION HELD


LRQA

Certificate of Approval

This is to certify that the Management System of

AviusULD Ltd.

ISO 45001:2018


LRQA

Certificate of Approval

This is to certify that the Management System of

AviusULD Ltd.

ISO 14001:2015

- ISO 45001:2018 occupational health and safety, valid to 19 May 2028, certificate 10674655.
- ISO 14001:2015 environmental management, valid to 21 March 2027, certificate 10584635.
- Green Industry Level 3, valid to 3 February 2028.
- Certified scope: manufacture of air cargo containers and pallets at the Bangkok manufacturing operation, covering all employees and controlled workers on site. The Netherlands and USA offices sit outside the certified scope and outside this topic.
- No external nonconformity was raised in 2025.

SAFETY ORGANISATION

HSE Manager as head of the safety department, one safety officer at professional level, two at management level and three at supervisor level, all appointed as required by the Occupational Safety, Health and Environment Act B.E. 2554 and its ministerial regulations on safety officers and the safety committee. These are the legal requirements the management system is built to meet.

REVIEW AND ESCALATION

KPIs reviewed monthly by plant management, Safety Committee meets monthly, and the HSE management review for FY2025 was held on 10 February 2026.

Source: **AviusULD** HSE policies and procedures SMS Policy and Objectives, Jun 2025 LRQA certificates 2026 HSE Management Review for FY2025.

BASIS OF_ PREPARATION

GRI 403 **Scope, worker groups, data sources, definitions and calculation basis**

Health and safety data cover the Bangkok manufacturing operation for the 2025 calendar year, compiled by HSE from incident, health, training and contractor records, with working hours taken as actual rather than estimated.

ENTITY, PERIOD AND COVERAGE

- Reporting period 1 January to 31 December 2025.
- Boundary: Bangkok manufacturing operation, Thailand, covering the production buildings, assembly stations, warehouses and on-site offices the Netherlands and USA offices are outside this topic.
- Worker groups: 228 employees and 2 controlled workers, plus contractors, temporary workers, interns and visitors on site. The 2 controlled workers are the STC workers inside the ISO 45001 certified scope at 31 December 2025, and are not the same population as the STC production workers reported under GRI 2-8, which covers a wider group reported as a point-in-time headcount and a 12-month average.
- Agency workers are not used.

Data owner HSE, with HR, Production, Facility and Purchasing providing supporting records.

DATA SOURCES

- Incident and accident reports, including property damage.
- First-aid room and medical surveillance records.
- Lost-time and return-to-work records.
- Training and competency records held by HR and the owning department.
- Contractor JSA, induction and evaluation records.
- Workstation, chemical, ergonomic and aviation risk assessments.
- Working-hours records used for rate calculations.

DEFINITIONS USED

- Recordable injury: a work-related injury requiring more than first aid.
- Lost-time injury: an injury causing at least one lost day.
- First-aid case: treated in the first-aid room with no lost time.
- Near miss: reported through the yellow card scheme the scheme also carries safety suggestions and improvement ideas, so not every card is a near miss.
- Work-related ill health is distinguished from general sickness and medical leave.

CALCULATION BASIS

- Rates are calculated on hours actually worked by employees and STC workers on site: 652,694 hours in 2025 and 716,222 hours in 2024.
- AviusULD states TIFR and LTIFR per 1,000,000 hours worked, which is the denominator used in its KPIs and management review.
- The GRI 403-9 equivalent per 200,000 hours is shown beside each rate so the figures can be compared with other reporters.
- Contractor working hours are not centrally recorded, so contractor rates are not reported.

Limitations: contractor working hours are not centrally recorded, so contractor injury rates cannot be calculated and contractor safety is reported as case counts. Yellow-card totals include safety suggestions as well as near misses the two are not separated in the database.

Source: AviusULD HSE incident, health, training and contractor records 2025 2026 HSE Management Review for FY2025 HR reporting confirmation for Occupational Health, Safety & Contractor Safety.

EVERY WORKSTATION WAS ASSESSED IN 2025, LEAVING TWO SIGNIFICANT RISKS

GRI 403-2 **Hazard identification, risk assessment and incident investigation**

Four assessment streams cover the site, and workers report hazards through the yellow card scheme with authority to stop work and to remove themselves from unsafe work without retaliation.

2025 RISK-ASSESSMENT COMPLETION

ASSESSMENT STREAM	COVERAGE	ACTIVITIES	RESULT
General risk assessment	100% of workstations	165	Two significant risks: extrusion saw noise and sheet Deratech
Environmental aspects	100% of workstations	111	No significant risk
Ergonomic assessment	New and changed processes	6	No significant risk
Chemical risk assessment	100% of workstations	27	Seven chemicals removed from Tig-welding and incoming

HOW HAZARDS REACH A DECISION

Any worker reports a hazard or near miss on a yellow card 642 cards were raised in 2025. Stop-work authority is set out in OP-HSE-001, and workers may remove themselves from unsafe work without retaliation, protected by the Just and Fair Culture Policy. Assessments are led by the area owner and reviewed by HSE. The people who carry them out have completed risk-assessment training, and the statutory safety officers at professional, management and supervisor level oversee the process. Incidents are investigated under OP-HSE-009 with root-cause analysis, and corrective actions are set under OP-HSE-010 following the hierarchy of controls: eliminate, substitute, engineer, administer, then PPE. HSE verifies effectiveness before any case is closed. Results feed the monthly KPI review and the annual management review, which sets the following year's objectives.

SIGNIFICANT HAZARDS ASSESSED AT THE SITE

- **Forklift and vehicle movement**
- **Machine guarding**
- **Cutting, shearing and punching**
- **Welding**
- **Manual handling**
- **Working at height**
- **Electrical work**
- **Chemical exposure**
- **Noise**
- **Ergonomics**
- **Heat from laser cutting and engraving**
- **Fire and explosion**
- **Lifting operations**
- **Sharp edges**
- **Confined spaces**
- **Contractor activities**

Hazards that pose a risk of high-consequence injury were determined from these assessments and from incident history: forklift and vehicle movement, machine and hand-tool contact, working at height, electrical work and lifting operations. None caused a high-consequence injury or fatality in 2025. Actions follow the hierarchy of controls: seven chemicals eliminated from Tig-welding and incoming, engineering controls including the pedestrian walkway, rack protection and test-frame guarding, administrative controls through permits and job safety analysis, and PPE as the final layer.

Source: OP-HSE-001 Workstation Risk Assessment OP-HSE-032 Chemical Risk Assessment OP-HSE-018 Basic Ergonomic Assessment FO-QUA-098 Aviation Safety Risk Assessment 2024-2025 2026 HSE Management Review for FY2025.

RECORDABLE AND LOST-TIME INJURIES FELL TO ZERO IN 2025

GRI 403-9 **Work-related injuries for employees and contractors, 2024 against 2025**

No fatality, high-consequence injury, lost-time injury or medical-treatment case occurred in 2025. Four minor injuries were treated as first aid or ergonomic cases, and five forklift incidents damaged property without injury.

FATALITIES AND HIGH-CONSEQUENCE

0

2024: 0

RECORDABLE INJURIES

0

2024: 5 cases

LOST-TIME INJURIES

0

2024: 3 cases

MINOR INJURIES, NO LOST TIME

4

3 first aid, 1 ergonomic

FORKLIFT PROPERTY DAMAGE

5

2024: 8 cases

INDICATOR	2024	2025
Fatalities	0	0
High-consequence injuries	0	0
Recordable injuries	5	0
Lost-time injuries	3	0
Medical-treatment cases	3	0
First-aid and ergonomic cases	2	4
Property-damage incidents	8	5

INDICATOR	2024	2025
Yellow cards raised	648	642
Hours worked	716,222	652,694

INJURY RATES

TIFR per 1,000,000 hours

2024: 6.98 2025: 0

LTIFR per 1,000,000 hours

2024: 4.19 2025: 0

GRI equivalent per 200,000 hours

TIFR 2024: 1.40, 2025: 0

LTIFR 2024: 0.84, 2025: 0

Rates recalculated on 652,694 hours

THE FOUR MINOR INJURIES OF 2025

Main types of injury: struck against object, ergonomic strain, and cut or caught by object. All four cases occurred in the test-frame area.

24 Apr, first aid: head struck against a protruding F-clamp bar on an overhead beam.

21 Jul, ergonomic: shoulder injury from prolonged use of a pneumatic hand drill with a hole saw.

8 Sep, first aid: hand slipped during riveting assembly, linked to insufficient training on the tool.

27 Oct, first aid: finger cut by a door extrusion while twisting the bottom door bar.

CONTRACTORS

- No contractor injury, lost-time injury or fatality was recorded in 2025 across 63 contractor companies.
- Contractor working hours are not centrally recorded, so contractor rates are not reported.

The five property-damage incidents were all forklift-related and all five corrective actions were closed forklift damage carries a 2026 target of no more than three cases. Rates combine employees and STC workers on site in both years the two groups are not reported separately. Contractors are reported as case counts only, because their hours are not recorded centrally, and visitors are excluded from injury reporting. Hazards posing a risk of high-consequence injury and the actions against them are on page 206.

Source: **AviusULD** 2026 HSE Management Review for FY2025 HSE incident register and yellow-card database payroll working-hours records.

NO OCCUPATIONAL DISEASE IN 2025, WITH SURVEILLANCE MATCHED TO EACH HAZARD

GRI 403-3 **Occupational health services and GRI 403-10 | Work-related ill health**

A nurse staffs the first-aid room during working hours, medical surveillance under OP-HSE-008 is matched to the hazards workers are exposed to, and no case of work-related ill health was recognised in 2025.

SERVICES PROVIDED

- Nurse in the first-aid room eight hours a day, five days a week, holding a current professional licence.
- No resident physician a hospital under contract provides doctor consultation and referral.
- Pre-employment health checks as required by Thai law, and an annual health check for every employee.
- Periodic medical surveillance under OP-HSE-008 and workstation ergonomic assessment under OP-HSE-018, carried out by an accredited external provider.
- First-aid arrangements and emergency medical response on site.
- Workers may consult the nurse directly. Health information is kept confidential and is not used for any favourable or unfavourable treatment.

WORK-RELATED ILL HEALTH, 2025

WORK-RELATED ILLNESS CASES	RECOGNISED OCCUPATIONAL DISEASE	FATALITIES FROM WORK-RELATED ILL HEALTH	NOISE-INDUCED HEARING LOSS
RESPIRATORY ILLNESS	SKIN DISEASE	CHEMICAL-RELATED ILLNESS	MUSCULOSKELETAL DISORDERS
OTHER OCCUPATIONAL ILLNESS			

Hazards that could cause ill health are noise, chemicals, dust and manual handling, all controlled through the risk assessments on page 206.

SURVEILLANCE MATCHED TO HAZARD

PROGRAMME	HAZARD COVERED	2024	2025
Hearing test	Noise in production areas	17	18
Chemical - naphthalene, hexane	Screening and cleaning	0	0
Chemical - propane	Screening	0	0
Chemical - fiberglass	Lightweight panel work	0	0
Chemical - methoxymethyls	Printing	0	0
Chemical - benzene, methanol	Printing and screening	0	0
Chemical - aluminium, iron	Grinding and welding	0	0

Cases outside the normal range. Hearing at high frequencies rose by one case re-testing and medical consultation are scheduled for 12 February 2026. No chemical-exposure parameter showed a significant risk in either year.

FIRST-AID ROOM USE

- Visits rose from 771 in 2024 to 1,418 in 2025, an increase of 84%.
- The three largest symptom groups were respiratory at 23.8%, nervous system and brain at 10.4%, and bone and muscle at 9.7%.
- These are general health complaints treated on site, not cases of work-related ill health, and the rise reflects easier access to the nurse rather than a change in workplace exposure.

HOW ILL HEALTH IS PREVENTED

Ill-health hazards were determined from the workstation and chemical risk assessments and from surveillance results: noise, chemical exposure, dust and manual handling. Noise is the one exposure where surveillance shows cases outside the normal range, at 18 workers with high-frequency findings, and the sawing-machine area was above its 85.0 dB(A) target at 85.7 dB(A), where hearing protection is mandatory and engineering controls are under review for 2026. Controls follow the hierarchy of controls: seven chemicals eliminated from Tig-welding and incoming and a study to replace hexane with acetone, engineering work on the sawing machine, administrative rotation and monitoring, and hearing protection as the final layer. Hearing conservation training reached 13 workers in 2025 and the noise corrective action remains open with HSE. Visitors and the Netherlands and USA offices are excluded from this disclosure.

PERIODIC MEDICAL SURVEILLANCE UNDER OP-HSE-008 AND WORKSTATION ERGONOMIC ASSESSMENT UNDER OP-HSE-018, CARRIED OUT BY AN ACCREDITED EXTERNAL PROVIDER.

Source: OP-HSE-008 Performance Measurement, Monitoring and Health Check-up 2026 HSE Management Review for FY2025 first-aid room records 2024 and 2025.

NINE ELECTED SAFETY REPRESENTATIVES AND 642 YELLOW CARDS RAISED_

GRI 403-4 **Worker participation, consultation and communication on health and safety**

Workers are represented on the Safety Committee, which exceeds the legal minimum, and every worker including contractors can raise a safety concern without fear of retaliation.

SAFETY COMMITTEE MEMBERS

9

legal minimum is 7

COMMITTEE MEETINGS

12

monthly through 2025

YELLOW CARDS RAISED

642

against a 2025 target of 579

CARDS PER FRONT-LINE EMPLOYEE (193)

3.3

target 3 per employee

SAFETY DAY ATTENDANCE

300+

18 July 2025

SAFETY COMMITTEE

Nine members representing employees and the employer, against a statutory seven for a site of this size. Meets monthly, with minutes recorded the December 2025 minutes are held as evidence.

It reviews incidents, risk assessments, drills and corrective actions and patrols the site monthly. It can require corrective action from the area owner through the CAPA process decisions needing budget or a policy change go to plant management and the CEO.

Workers are consulted on risk assessments and procedures as well as on incidents.

Contractors and workers who are not employees are not members they use the other channels.

HOW A CONCERN IS RAISED

Yellow card, available to every worker on paper or by QR code.

Aviation safety report under the SMS.

Direct to the supervisor or to a Safety Committee representative.

Email or any established grievance channel.

Workers who are not employees and contractors use the same channels, and the Just and Fair Culture Policy protects anyone who reports.

COMMUNICATION RHYTHM

Daily safety meetings in the production areas.

Safety morning talk each Friday with the plant management team.

Safety breaking news on the public address system on Monday, Wednesday and Friday.

Weekly safety gemba walk and monthly Safety Committee patrol.

Incident review meetings after every case.

Buddy programme and interview for newcomers.

RECOGNITION: THE SUPER YELLOW CARD

Two cards a month are selected as Super Yellow Cards and rewarded with a 500 THB voucher, with departments invited to submit ideas by the 25th of each month. The December 2025 winners show the type of change the scheme produces: anti-fatigue mats and floor markings installed in designated standing areas to reduce work-related fatigue, and the fire evacuation flag point relocated for easier access and safer evacuation to the assembly area. The site also held a Safety Day on 18 July 2025 with more than 300 attendees and a 365 Days of Safety celebration on 21 October 2025. Health and safety is also covered in the three company-level collective agreements signed in June 2025, negotiated with elected Welfare Committee representatives no trade union is present at any AviusULD site.

Source: Safety Committee minutes, December 2025 yellow-card database 2025 HSE communication records Super Yellow Card announcement, 25 December 2025.

TWENTY-ONE SAFETY COURSES DELIVERED IN 2025, ALL COMPLETED

GRI 403-5 **Worker training on occupational health and safety**

Every planned course ran in 2025 and the KPI was met in full: 21 courses against a target of 21, at 100% completion, delivered in-house, on the job, online or by external providers. Attendance counts cover everyone who attended during the year, including leavers, so they exceed year-end headcount.

COURSE, 2025	ATTENDEES	DELIVERY
Health, Safety and Working Condition Policy	240	In-house, online and e-learning
Environmental Policy	241	In-house, online and e-learning
Safety instructions for machines and processes	73	On the job
Safety data sheets for chemicals	53	On the job
Basic firefighting	42	In-house
HSE operating procedures	38	On the job
First aid	30	In-house
Chemical and hazardous substance management and spill response	29	In-house
Forklift driver, reach truck	24	In-house
Onboarding: basic safety and environment for newcomers	24	In-house
Forklift driver, counterbalance	23	In-house
Onboarding: preventing road accidents	13	In-house
Hearing conservation	13	On the job
Safety Committee training	8	Public course

COURSE, 2025	ATTENDEES	DELIVERY
Safety officer at management and supervisor level	6	Public course
Safe Life Safe Work programme	5	In-house
Working at height	4	Public course
ISO 45001:2018 internal audit and requirements	1	Online








WHO IS TRAINED

- Every new employee takes safety induction from HSE and the SMS induction before starting work.
- Contractors take a safety induction before any work on site, with 100% completion across all 63 contractor companies in 2025.
- Supervisors and safety officers hold the statutory qualifications for their level.
- Risk-assessment and incident-investigation training is given to the departments that own the process.

VALIDITY AND REFRESH

- Statutory qualifications are refreshed on the cycle set by Thai law forklift, firefighting, first aid and working-at-height training carry defined validity periods.
- Records are kept by HR and by the department that owns the course, and competency is reviewed in the annual management review.

WHAT THE 2025 RECORD SHOWS

Training completion was one of the eight KPIs met in full. Two of the four minor injuries pointed to task-level gaps rather than course coverage: the September hand injury was linked to insufficient training on the riveting tool, so tool-specific instruction is being reinforced through the SI-HSE machine instructions.

Source: **AviusULD** 2025 training and competency records 2026 HSE Management Review for FY2025.

HEALTH PROMOTION RUNS THROUGH CAMPAIGNS, CLUBS AND DAILY ROUTINES

GRI 403-6

Promotion of worker health beyond occupational exposure

Voluntary health services and programmes are offered to all employees alongside the statutory occupational health services, and access to non-occupational medical care runs through the company insurance and the site nurse.

HEALTH SERVICES ACCESS

Group health insurance for all permanent employees, reported under Employment, Benefits & Working Conditions.

Nurse in the first-aid room during working hours for advice and treatment.

Hospital contract for physician consultation.

Annual health check for every employee, with results explained individually.

Health education delivered through HSE communication channels.

CAMPAIGNS AND WELLNESS

Mission Slim Possible, run as Make me new, addresses overweight and metabolic risk.

Morning exercise, the football, badminton and running clubs and the annual sport day address physical inactivity.

Nutrition guidance through health education addresses diet-related risk.

Conversation with the nurse and the Link to Team channel address stress and mental health.

Participation is voluntary and confidential, and is not used for any favourable or unfavourable treatment of workers.

NOT OFFERED IN 2025

Influenza vaccination is not provided.

Smoking-cessation support is not provided.

There is no formal employee assistance programme workers consult the site nurse for health advice.

These are stated so the disclosure is not read as wider than the services actually available.

HEALTH, SAFETY & CONTRACTOR SAFETY

HOW HEALTH PROMOTION CONNECTS TO THE SAFETY RECORD

The programmes above address general health rather than occupational exposure, and AviusULD does not claim an injury-reduction effect from them. The measurable link in 2025 runs the other way: first-aid room visits rose 84% to 1,418, which indicates that workers use the on-site service readily, and the three largest symptom groups were respiratory, nervous system and brain, and bone and muscle. Ergonomic improvements raised through the yellow card scheme, such as anti-fatigue mats in standing areas, sit between health promotion and hazard control and are managed as risk-assessment actions.









Source: LHR_01 Employee Health and Safety Measures first-aid room records 2024 and 2025 HSE activity records 2025 HR reporting confirmation for Occupational Health, Safety & Contractor Safety.

SIXTY-THREE CONTRACTOR COMPANIES WORKED ON SITE WITH NO INJURY

GRI 403-7

Prevention and mitigation of impacts linked through business relationships

Contractor work is controlled under OP-HSE-016, from prequalification through job-by-job assessment and permit to work, to annual evaluation. No contractor injury, lost-time injury or safety violation was recorded in 2025.

CONTRACTOR COMPANIES ENGAGED

63

9 HR, 1 IT, 1 QA, 47 maintenance, 5 waste

INDUCTION BEFORE STARTING WORK

100%

63 of 63 contractor companies, 2025

CONTRACTOR INJURIES AND LOST-TIME CASES

0

also zero fatalities

SAFETY VIOLATIONS RECORDED

0

across all contractor work

BEFORE WORK STARTS

Hazards linked through contractor work are hot work and fire, falls from height, electrical work, lifting operations, and forklift interaction with contractor vehicles.

Prequalification on licences and qualifications for the type of work.

Safety requirements issued under OP-HSE-016 with the basic HSE rules, FO-HSE-014.

Safety obligations written into the contract and the external service provider evaluation, FO-PUR-003 item 10.

Job safety analysis for each job on FO-HSE-012, with a risk assessment for the work area.

WHILE WORK IS UNDER WAY

Safety induction before any work begins.

Permit to work for hot work and work at height.

PPE requirements set for the task.

Supervision by the area owner, with toolbox talks.

Contractors report incidents and near misses through the same channels as employees.

Subcontractors receive the same training and controls.

AFTER THE JOB

Contractor incidents are investigated under OP-HSE-009 with the same root-cause method.

Performance is evaluated annually on FO-HSE-013.

Contractor inspections and audits feed the evaluation score.

High-risk contractors carry additional controls agreed before mobilisation.

WHAT IS NOT REPORTED

Induction is recorded by contractor company, not by individual worker, so induction coverage is reported as companies inducted rather than people. Contractor working hours are not recorded centrally either, so contractor injury rates cannot be calculated and contractor safety is reported as case counts only. AviusULD plans no change to this for 2025 if rates are required for future reporting, contractor hours would need to be collected at the permit-to-work stage. Contractor training completion is reported as 100% of the 63 contractor companies receiving induction before commencing work, counted by company rather than by individual worker, not as course hours.

Source: OP-HSE-016 Contractor and Supplier Control FO-HSE-012, FO-HSE-013 and FO-HSE-014 FO-PUR-003 external service provider evaluation HSE contractor records 2025.

BOTH EMERGENCY DRILLS WERE COMPLETED IN NOVEMBER 2025

GRI 403-2 **Emergency preparedness, drills and follow-up actions**

Emergency response is governed by OP-HSE-007. The annual fire and evacuation drill and the chemical spillage drill were both held in November 2025, and drill completion was one of the KPIs met in full.

FIRE AND EVACUATION DRILL	CHEMICAL SPILLAGE DRILL	DRILL COMPLETION AGAINST PLAN	FIRE AND ENVIRONMENTAL INCIDENTS
5 NOV 2025	7 NOV 2025	100%	0
day shift, whole site	spill response teams	KPI achieved	2025, no emergency activation

WHAT THE PLAN COVERS

- Emergency Preparedness procedure OP-HSE-007 sets the response for fire, chemical spillage and leakage, injury and evacuation.
- Trained response capability is maintained through basic firefighting training for 42 workers and first-aid training for 30 workers in 2025.
- Chemical and hazardous substance management with spill response was trained for 29 workers.
- Drills are reported annually as required by Thai law, with findings and corrective actions recorded.

FOLLOW-UP AND EVIDENCE

- Drill findings are logged, actions assigned to the owning department and tracked through the corrective action process OP-HSE-010.
- The Safety Committee reviews drill outcomes at its monthly meeting, and the management review covers preparedness for the full year.
- Evidence held: fire drill report, emergency drill report, Safety Committee minutes and the CPAR log for 2025.
- No emergency activation, fire incident or environmental incident occurred during 2025.

HEALTH, SAFETY & CONTRACTOR SAFETY

EMERGENCY MEDICAL RESPONSE

The first-aid room is staffed by a nurse eight hours a day, five days a week, and 30 workers hold current first-aid training so cover extends beyond nurse hours. A hospital contract provides physician consultation and referral. All four minor injuries in 2025 were treated on site with no lost time, which is the practical test of this arrangement.

> THE ANNUAL FIRE AND EVACUATION DRILL AND THE CHEMICAL SPILLAGE DRILL WERE BOTH HELD IN NOVEMBER 2025, AND DRILL COMPLETION WAS ONE OF THE KPIS MET IN FULL.

Source: OP-HSE-007 Emergency Preparedness fire and chemical spillage drill reports, November 2025 CPAR Log 2025 2026 HSE Management Review for FY2025.

ALL 230 WORKERS ARE COVERED BY THE CERTIFIED SYSTEM

GRI 403-8

Workers covered by the management system, with legal compliance and corrective action

The 230 comprises the 228 AviusULD employees at the Bangkok site and 2 workers under AviusULD operational control; contractors, agency workers, interns and visitors work inside the same certified system but are not counted in the 230, which is both internally audited and externally certified. Three legal items remain open and one corrective action was still in progress at year end.

EMPLOYEES COVERED

228

100% of 228 at 31 Dec 2025

CONTROLLED WORKERS COVERED

2

STC workers, 100%

INTERNALLY AUDITED COVERAGE

230

100% of workers on site

EXTERNALLY CERTIFIED COVERAGE

230

100%, LRQA ISO 45001

LEGAL COMPLIANCE

- 248 occupational health, safety and environmental legal items are registered and evaluated.
- 245 are compliant and 3 remain in progress: authorisation as an expert in OHSE professional management, the hazard and workplace assessment that follows that certification, and the Or.5 building permit awaiting government issue.
- No safety notice, labour-authority notice, fine, penalty, prosecution or stop-work order was received in 2025.
- No external nonconformity was raised in the ISO 45001 or ISO 14001 audits.

CORRECTIVE ACTION AT YEAR END

- 28 corrective action requests were raised in 2025: 15 from the ISO internal audit, 12 from workplace measurement of light and noise, and 1 from electrical inspection.
- 27 were closed and 1, the sawing-machine noise action, was still in progress at 31 December.
- All five forklift property-damage actions were closed.
- The CAPA closure KPI was therefore not met, and closure is carried into 2026.

AUDIT AND INSPECTION PROGRAMME

Coverage is tested through the weekly safety gemba walk, the monthly Safety Committee patrol, monthly workplace safety inspections and 5S inspections, the ISO 45001 internal audit, and the LRQA external audit. Workplace monitoring in 2025 covered chemical and dust levels on 20 and 21 May, stack emissions on 7 May and noise on 7 and 8 May chemical, dust and stack results were within standard, while annoyance noise exceeded the limit at the sides of buildings 1 and 8, which Pollution Prevention & Environmental Compliance reports as attributable to a neighbouring factory. Excluded from the coverage disclosure: visitors, who are on site briefly and under escort, and employees of the Netherlands and USA offices, which sit outside the certified scope and outside this topic.

Source: 2026 HSE Management Review for FY2025, sections on legal compliance, workplace monitoring and corrective action CPAR Log 2025 LRQA certificates.

TEN OF TWELVE SAFETY TARGETS WERE MET; **CAPA AND NOISE WERE NOT**

GRI 3-3 **2025 target evaluation and the targets set for 2026**

Injury, property-damage, reporting, training, risk-assessment, contractor and drill targets were all achieved in 2025. Corrective-action closure and the sawing-machine noise limit were not, and both carry into 2026.

SAFETY KPI, 2025	TARGET	RESULT	STATUS
TIFR, cases per million hours	2.79	0	Achieved
LTIFR, cases per million hours	1.40	0	Achieved
Forklift property damage	6 cases	5 cases	Achieved
Days without accident	365 days	426 days	Achieved
Yellow cards raised	579 cards (3 per front-line employee)	642 cards, against 193 front-line employees at the start of 2025	Achieved
S-SCORE, operational area	4.5 year to date	4.8	Achieved
Safety training courses delivered	21 courses	21 courses, 100%	Achieved
Risk assessments completed	100% of workstations	309 assessments, 100%	Achieved
Contractor safety compliance	100%	100% of 63 contractor companies	Achieved
Emergency drill completion	100%	100%	Achieved
Corrective action closure	100%	27 of 28 closed, 96.4%	Not achieved
Noise level, sawing machine area	85.0 dB(A)	85.7 dB(A)	Not achieved

WHAT WORKED

- Injury performance is the clearest result: recordable injuries fell from five to zero and lost-time injuries from three to zero, and the site passed 426 consecutive days without an accident.
- Reporting culture held up, with 642 yellow cards raised against a 579 target, so the fall in injuries did not come with a fall in reporting.

WHAT DID NOT, AND 2026

- Corrective-action closure reached 27 of 28, short of the 100% target, with the sawing-machine noise action open at year end.
- Sawing-machine noise stayed at 85.7 dB(A) against the 85.0 limit and remains the one exposure where health surveillance shows cases outside the normal range.
- 2026 targets tighten: TIFR and LTIFR at zero, forklift damage at no more than three cases, 730 days without accident, a cap on repeat first-aid case types, S-SCORE 4.9 by Q4 and the same 85.0 dB(A) noise limit.







Source: 2026 HSE Management Review for FY2025, 2025 and 2026 HSE objective and target tables CPAR Log 2025.



GRI 3-3 · 404-1 · 404-2 · 404-3

LEARNING, SKILLS & CAREER DEVELOPMENT_

Reporting period 1 January – 31 December 2025

Every eligible employee had a career review, and training averaged 45.4 hours per employee, against the 35-hour commitment.

Training is planned from a departmental needs survey, delivered in-house, externally and through the LearnNwork platform, then evaluated. AviusULD recorded 10,894 training hours across 684 courses in 2025, and every one of the 261 employees who worked during the year trained at least once. The GRI 404-1 average is 45.4 hours per employee, 10,894.0 hours divided by the 240 average employees in 2025 41.7 is hours per employee trained on those 260.

Critical aviation competences rest with a small number of certified people, which is the main risk this topic carries.

Source: **AviusULD** Training Record 2025 FO-HRM-014 Training Budget 2025 OP-HRM-002 and OP-HRM-003 Career Development & Performance Reviews Policy, Mar 2025.

KEY 2025 FIGURES

TRAINING PER EMPLOYEE

45.4 H

10,894.0 h 240 average employees

PERFORMANCE REVIEWS

100%

228 of 228 eligible employees

COURSES DELIVERED

684

10,894 hours, 261 employees

TRAINING INVESTMENT

4.07M

THB, 92% of the approved plan

REPORTING

- 1 January to 31 December 2025
- All AviusULD entities owner Human Resources
- Hours from attendance records, actual not estimated
- Toolbox talks and contractor hours are excluded
- Employees, including fixed-term. Interns are workers who are not employees, reported under GRI 2-8, and are excluded from the employee denominators used in this topic. Agency and STC workers are excluded.
- GRI 3-3, 404-1, 404-2 and 404-3

COMPETENCE CARRIES QUALITY, SAFETY AND AIRWORTHINESS – AND RESTS ON FEW PEOPLE

GRI 3-3 **Actual and potential impacts, whether AviusULD causes them, and where they arise**

NEGATIVE IMPACTS AVIUSULD MANAGES

FOUR ARE LIVE; THE REST WERE SCREENED AND DID NOT OCCUR.

- **Skills gaps.** The shopfloor skill matrix is refreshed each year and surfaces gaps to close indirect staff identify their own development areas in the performance review.
- **Unequal access to the platform.** LearnNwork reaches only employees with an email account, so shopfloor teams receive the same content in classroom sessions instead.
- **Dependence on few experts.** Three assembly trainers, three certified welders and two certifying staff hold competences the business cannot operate without.
- **Career opportunity.** Employees scored career opportunities at 62%, down two points on 2024.

POSITIVE IMPACTS CONFIRMED FOR 2025

EACH WAS CONFIRMED BY HUMAN RESOURCES.

- Employee competence, production quality and safety performance all improve with training.
- Aviation compliance is evidenced, including EASA Part 21G competence for the production and design organisation approvals.
- Productivity rises, careers progress and internal successors develop.
- Retention and engagement improve, and digitalisation and new technology are supported.

WHERE THE IMPACTS ARISE, AND HOW AVIUSULD IS INVOLVED

Every impact above is caused directly by AviusULD and contributed to jointly by Human Resources, the department managers who define the need, and the employees who complete the training. A third route runs through external training providers and through suppliers whose staff AviusULD trains when they work on site.

Two impacts were screened and did not occur in 2025: no employee performed work without the required training, and no critical knowledge holder left the company.

EMPLOYEES SCORED CAREER OPPORTUNITIES AT 62%, DOWN TWO POINTS ON 2024.

Source: HR materiality confirmation for Learning, Skills & Career Development, 2025 Employee Engagement Survey 2025 versus 2024 OP-HRM-003 Training.

ONE POLICY_ AND FOUR PROCEDURES RUN THE CYCLE FROM NEED TO EVIDENCE

GRI 3-3 **Policies and commitments, actions taken, and how their effectiveness is tracked**

OWNER: HR DIRECTOR

CAREER DEVELOPMENT AND PERFORMANCE REVIEWS POLICY

March 2025. Commits the company to develop every employee and to review performance and career direction each year.

OWNER: HR AND MANAGERS

OP-HRM-003 TRAINING

Runs the annual training needs analysis, the plan, delivery, the training matrix in section 6.10, record keeping and effectiveness evaluation.

OWNER: DEPARTMENT MANAGERS

OP-HRM-002 PERFORMANCE APPRAISAL

Annual and mid-year reviews, probation reviews and reviews on significant role change, each covering objectives, competency, career and a development plan.

OWNER: HR DIRECTOR

OP-HRM-001 RECRUITMENT, EMPLOYMENT AND PROMOTION

Sets promotion criteria and the probation evaluation that confirms appointment.

THE REGULATED LAYER ABOVE THE HR CYCLE

Aviation and safety competence is governed separately through the Safety Management Manual, the Design Organisation Exposition CDOE Issue H and OP-HSE-003. Training records are retained under OP-QUA-002 and budgets are approved through the Letter of Authority matrix.

HOW ENGAGEMENT SHAPED THE ACTIONS

Each department states its own needs in the annual survey, and those requests become the plan and the budget. The 2025 engagement survey put career opportunity among the three areas to act on. Appraisal discussions set each employee's development actions, and employee representatives review commitments with the CEO quarterly.

LESSONS LEARNED, AND WHERE THEY WENT

Career opportunity scored lowest of the development questions, so it becomes the 2026 breakthrough priority. An audit found welder training records were not retained well enough, so retention was corrected. The 2024 average of 78.2 hours came from exceptional on-the-job volume, so 2025 planning shifted to structured courses.

HOW EFFECTIVENESS IS TRACKED, AND WHO DOES WHAT

Training and resourcing are reviewed each year in the Quality management review, and an overdue mandatory course triggers corrective action under OP-QUA-001. HR plans, records and reports the KPI department managers identify the need and evaluate competence supervisors deliver on-the-job training and feedback employees complete their development actions HSE, Quality and Engineering own their technical curricula and the CEO approves budget and targets.

Source: Career Development & Performance Reviews Policy, Mar 2025 OP-HRM-001, OP-HRM-002, OP-HRM-003, OP-HSE-003, OP-QUA-001, OP-QUA-002, OP-QUA-018 CDOE Iss H LoA Matrix.

BASIS OF_ PREPARATION

What counts as a training hour, which population it is divided by, and where the numbers come from

DEFINITIONS USED IN THIS TOPIC

Training hour – a recorded hour of attendance at an in-house course, on-the-job instruction delivered against a named course and trainer, an external or public course, e-learning, mandatory compliance training or technical certification.

Excluded – toolbox talks, and training AviusULD delivers to supplier staff working on site, whose hours are not recorded.

Employee category – the five bands AviusULD uses in its workforce table: management, supervisor and professional, engineer and technical, support and office, and operations.

Regular review – a completed performance and career development review, held annually and at mid-year, on probation, and on a significant change of role.

LEARNING, SKILLS & CAREER DEVELOPMENT

TWO REPORTING POPULATIONS

- GRI 404-1: 10,894 h 240 average employees = 45.4 h
- Per employee trained: 261 trained = 41.7 h
- Workforce at 31 Dec: 239 (233 permanent, 4 fixed-term, 2 temporary)
- 227 of 239 eligible for a review
- Interns, agency and STC workers excluded (GRI 2-8)

DATA SOURCES

- Attendance sheets in the HR training record
- LearnNwork platform for e-learning
- FO-HRM-014 training plan and budget 2025
- OP-HRM-002 appraisal records
- No HRIS extract or competency matrix

COUNTING RULES

- Employees are counted by head count, not full-time equivalent.
- Hours are actual each employee-course is counted once.
- On-the-job instruction counts only with a named course, trainer and attendance record: 2,201 of 10,894 h in 2025.
- Day-to-day coaching by supervisors is not counted, in line with GRI 404.

Source: **AviusULD** Training Record 2025 HR reporting confirmation for Learning, Skills & Career Development OP-HRM-002 and OP-HRM-003.

AVIUSULD DELIVERED 10,894 TRAINING HOURS, 45.4 FOR EVERY EMPLOYEE

GRI 404-1

Training hours in total and per employee, against the 35-hour commitment

TOTAL TRAINING HOURS

10,894

across 684 distinct courses

PER EMPLOYEE, GRI 404-1

45.4 H

10,894.0 h ÷ 240 average employees

EMPLOYEES TRAINED

261

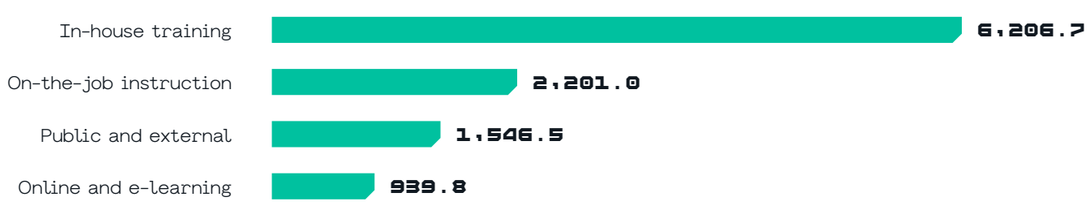
every employee trained at least once

ANTI-CORRUPTION TRAINING

99.6%

238 of 239 employees, GRI 205-2

TRAINING HOURS BY HOW THE TRAINING WAS DELIVERED, 2025



READING THE NUMBERS

DOWN FROM 2024, STILL ABOVE TARGET

2024 recorded 78.2 hours per employee on an exceptional volume of on-the-job instruction. The 2025 average of 45.4 hours per employee, 10,894.0 hours divided by an average headcount of 240, clears the 35-hour commitment. Hours per employee trained, on the 261 who trained, are 41.7.

WHAT WAS COMPLETED

All 23 new hires completed induction. 166 employees gained a technical certification across 125 certified courses, and 3,058 of 8,220 attendance lines carry a completed evaluation.



Components may not sum to the total due to rounding.

Source: AviusULD Training Record 2025 and the GRI 404 analysis by Human Resources Collective Agreement on Career Management, Training and Diversity, Jun 2025.

MANAGERS_ AVERAGED 72 HOURS OF TRAINING, OPERATIONS STAFF 24

GRI 404-1 **Average hours of training per year per employee, by employee category and by gender**

TRAINING HOURS BY EMPLOYEE CATEGORY, 2025

EMPLOYEE CATEGORY	AVERAGE HEADCOUNT	MALE HOURS	FEMALE HOURS	TOTAL HOURS	AVG HRS/ EMPLOYEE
Management	44.0	2,180.60	1,002.68	3,183.28	72.3
Supervisor/Professional	37.0	1,233.87	1,704.80	2,938.67	79.4
Engineer/Technical	20.5	578.92	468.08	1,047.00	51.1
Support/Office	20.0	233.40	698.42	931.82	46.6
Operations	118.5	1,966.74	826.49	2,793.23	23.6
TOTAL	**240.0**	**6,193.53**	**4,700.47**	**10,894.00**	**45.4**

WOMEN

47.2 H

4,700.48 hours across
an average 99.5 employees

MEN

44.1 H

6,193.52 hours across
an average 140.5 employees

THE POPULATION BEHIND THE AVERAGES

Averages are hours per employee trained: 261 trained during 2025, more than the 239 year-end employees under GRI 401 because leavers are included. The GRI 404-1 average is 45.4 hours, total hours divided by the average headcount of 240, being the 241 at 1 January and the 239 at 31 December. Interns are excluded from both the hours and the headcount.

AVERAGES ARE HOURS PER EMPLOYEE TRAINED: 261 TRAINED DURING 2025, MORE THAN THE 239 YEAR-END EMPLOYEES UNDER GRI 401 BECAUSE LEAVERS ARE INCLUDED.

Source: **AviusULD** Training Record 2025, GRI 404-1 analysis by Human Resources. Averages divide recorded hours by the employees in each group.

TRAINING_ STARTS AS A DEPARTMENT REQUEST AND ENDS AS AN EVALUATED RECORD

GRI 3-3 **Actions taken to manage the topic, and the resources committed to them**

COURSES PLANNED

176

from the 2025 needs survey

PLANNED TRAINING COST

162.8K

USD across all three sites

BUDGET UTILISATION

40.7%

Thailand 43.7%, Netherlands 30.6%

SESSIONS EVALUATED

3,058

of 8,220 attendance lines

THE ANNUAL CYCLE, FROM OP-HRM-003

01 IDENTIFY THE NEED

Each function completes the annual training needs survey. Managers state the course, the period, the location, who attends and the cost per person.

02 PLAN AND BUDGET

The requests consolidate into FO-HRM-014, the 2025 plan and budget, approved through the Letter of Authority matrix.

03 DELIVER

Delivery runs in-house, through public providers and through the LearnNwork platform, with classroom sessions for shopfloor teams.

04 EVALUATE

Effectiveness is assessed after the course, records are retained under OP-QUA-002, and overdue mandatory training triggers corrective action.

WHAT THE PLAN BOUGHT, AND WHAT IT DID NOT

The 2025 needs survey carried 176 course lines. Planned cost across the three sites was USD 162.8K, of which Thailand accounted for 137.6K, the Netherlands 20.2K and the United States 5.0K. Budget utilisation closed at 40.7%: 104 of the 176 planned courses were completed (59%), 46 were not conducted and 26 carry over into 2026, with the two United States courses among those not run. Functional competency made up 69% of the programme, soft skills 22% and business or legal requirements the rest. Delivery produced 8,220 attendance lines across 684 courses, 3,058 of them with a completed evaluation.

Source: Survey training needs and training plan 2025 FO-HRM-014 Training Budget 2025 OP-HRM-003 OP-QUA-001 and OP-QUA-002 AviusULD Training Record 2025.

SIX PROGRAMMES CARRY THE SKILLS_ THE BUSINESS RUNS ON

GRI 404-2 A

Type and scope of programmes implemented to upgrade employee skills

STRUCTURED ONBOARDING

Every new employee follows a fixed programme: a full first day on the company, safety and road-risk, a second day shadowing an operator on the line, then quality, company rules and systems in week one and ULD, finance and site-safety modules in month one. The Netherlands and United States run a baseline version.

22 hours per new hire 112 sessions recorded in 2025

AVIATION AND REGULATORY COMPETENCE

EASA Part 21G requirements for the production and design organisation approvals, Part-145 modules, the Safety Management Manual curriculum and quality and inspection training.

Certified competence for design and production approval

TECHNICAL CERTIFICATION

TIG welding qualification for aluminium parts, container assembly training delivered by qualified trainers, forklift licensing and first aid.

888 attendance lines led to a certification

CONTINUOUS IMPROVEMENT

The Ascend programme with the Kaizen Institute, 5S Digital standards, problem-solving and QRQC, and the Pink Card scheme through which employees submit improvement ideas.

203 suggestions received and all 203 implemented

DIGITAL AND PLATFORM SKILLS

LearnNwork as the learning platform, Microsoft 365 and Power BI, Power Apps and system training for the tools that replaced manual work.

870 hours of e-learning across 1,456 sessions

LEADERSHIP AND INCLUSION

The manager conference, leadership modules, and the Women's Mentorship Programme launched in June 2025 as group mentoring.

10 to 15 women with three to four mentors

EASA PART 21G REQUIREMENTS FOR THE PRODUCTION AND DESIGN ORGANISATION APPROVALS. PART-145 MODULES. THE SAFETY MANAGEMENT MANUAL CURRICULUM AND QUALITY AND INSPECTION TRAINING.

Source: AviusULD Onboarding Program 2025 People Training and Development Report, Jul 2025 Working Conditions Improvement Report, Sep 2025 AviusULD Training Record 2025 CDOE Iss H OP-QUA-018 SMM.

EIGHT PEOPLE HOLD THE COMPETENCES_ THE PLANT CANNOT OPERATE WITHOUT

GRI 3-3 **The topic's principal risk, and the controls AviusULD applies to it**

CONTAINER ASSEMBLY TRAINERS

3

two in Europe, one in Thailand

CERTIFIED TIG WELDERS

3

aluminium parts requiring TIG

EASA CERTIFYING STAFF

3

authorised to approve Form 1

WHY THIS IS THE TOPIC'S MAIN RISK

- Three trainers certify the assembly stations AviusULD's partners operate, so their availability limits partner capacity.
- Two certifying staff can sign an EASA Form 1 without them airworthiness release stops.
- The welding, assembly-trainer and certifying authorisations all carry expiry dates.
- AviusULD holds job descriptions for every position but no company-wide competency matrix, so gaps outside these roles are found through the annual skill-matrix review and the performance review rather than a single register.

THE CONTROLS IN PLACE

- Expiry dates for welders and certifying staff are tracked in a monitoring programme for renewal or recertification.
- The three assembly trainers follow a refresher programme.
- Shopfloor skill matrices are refreshed annually and each indirect employee agrees development actions in the performance review.
- No employee performed work without the required training in 2025, no mandatory course was overdue and no certificate expired.

LEARNING, SKILLS & CAREER DEVELOPMENT

THE ONE FINDING, AND WHAT IT MEANS

A 2025 quality audit raised a single opportunity for improvement, on the retention of welder training records. It was actioned through the corrective action process in OP-QUA-001. No regulatory non-compliance and no customer finding on competence arose during the year.

NO EMPLOYEE PERFORMED WORK WITHOUT THE REQUIRED TRAINING IN 2025. NO MANDATORY COURSE WAS OVERDUE AND NO CERTIFICATE EXPIRED.

Source: HR competence confirmation for Learning, Skills & Career Development, 2025 OP-QUA-001 Quality Audits OP-HRM-003 CDOE Iss H.

AVIUSULD HAD NO FORMAL TRANSITION ASSISTANCE PROGRAMME IN 2025

GRI 404-2 b

Transition assistance for continued employability and the management of career endings

TRANSITION SUPPORT AND ITS STATUS IN 2025

TRANSITION SUPPORT	2025 STATUS
Retirement planning	No formal programme
Financial-planning education	Not provided
Reskilling	Not provided
Outplacement support	Not provided
Job-search assistance	Not provided
Counselling	Not provided
Transition to other roles	No formal programme
Redeployment	No formal programme
Severance support	Provided where applicable
Knowledge-transfer plans	Provided where applicable

WHAT THIS MEANS FOR THE DISCLOSURE

REPORTED AS NOT EXISTING, NOT OMITTED

No employee reached retirement age during 2025, and AviusULD has not established a retirement transition programme. GRI allows an organisation to comply with a requirement by reporting that the item does not exist, so this is a complete disclosure rather than a reason for omission.

Succession planning is not yet a formal process. Individual development plans covered all 228 employees eligible for review, 100%.

WHAT WAS PROVIDED WHERE IT APPLIED

Two forms of support were given where circumstances called for them: severance in line with the Labour Protection Act, and knowledge-transfer plans when a departing employee held knowledge the team needed. No critical knowledge holder left the company in 2025.

Career growth is the 2026 breakthrough priority under Hoshin Kanri, which is where the gaps above will be addressed.

Source: HR confirmation for Learning, Skills & Career Development, 2025 Employee Handbook 2025 section 2.2.3 Employee Engagement Survey 2025 versus 2024.

EVERY_ ELIGIBLE EMPLOYEE HAD A PERFORMANCE REVIEW IN 2025

GRI 404-3

Percentage of employees receiving a regular performance and career development review

OF TOTAL EMPLOYEES

100%

228 of 228 eligible employees

OF ELIGIBLE EMPLOYEES

100%

228 of 228, none overdue

MEN REVIEWED

93.6%

133 of 140

WOMEN REVIEWED

97.0%

95 of 99

LEARNING, SKILLS & CAREER DEVELOPMENT

REVIEWS COMPLETED, BY GROUP

- Every eligible employee was reviewed, so completion is 100% in each group below.
- Men 131 reviews, 57.7% of the total
- Women 96 reviews, 42.3% of the total
- Management team 11 reviews, 4.8%
- Manager team 31 reviews, 13.7%
- All other employees 185 reviews, 81.5%
- Thailand / Netherlands / USA 216 / 9 / 2

WHAT A REVIEW COVERS, AND HOW OFTEN

- Governed by OP-HRM-002 and the Career Development and Performance Reviews Policy.
- Each review sets performance objectives, assesses competency against the role, holds a career discussion, agrees a development plan with the training needed to deliver it, and records promotion readiness.
- Reviews run annually, at mid-year, at the end of probation, and on a significant change of role such as promotion, transfer, acting assignment or a substantial change in scope.

WHY 228 AND NOT 239

Eleven employees were outside the review population at 31 December, having joined too late in the year to complete a cycle or still being within probation, which OP-HRM-002 places outside the review scope. The rate of 100% is calculated on the 228 employees eligible for a review, not on the 239 workforce published under GRI 401. Human Resources reports reviews against the three management levels above the five employee categories on page 238 are the training-hours cut. Individual development plans covered all 228 eligible employees, 100%.

Source: OP-HRM-002 Performance Appraisal Career Development & Performance Reviews Policy, Mar 2025 HR confirmation for Learning, Skills & Career Development, 2025.

EMPLOYEES_ STILL RATE CAREER OPPORTUNITY LOWEST, AT 62%

GRI 3-3 **Career development outcomes in 2025 and the action carried into 2026**

PROMOTIONS AND INTERNAL MOBILITY

DIVERSITY, EQUAL PAY & NON-DISCRIMINATION

reported in the diversity topic

CAREER OPPORTUNITY SCORE

62%

down two points on 2024

WHERE CAREER MOVES ARE REPORTED

Internal promotions, their gender split and internal mobility are reported in the diversity topic, at Diversity, Equal Pay & Non-discrimination. Promotion criteria and the probation evaluation that confirms appointment are set in OP-HRM-001. The share of vacancies filled internally is not yet tracked.

WHAT EMPLOYEES SAID, AND WHAT FOLLOWS

Learning and development scored 68%, up two points, but the question on career opportunities fell two points to 62% and the Focus Agent ranked it among the three highest-impact areas to act on.

AviusULD has made career growth a breakthrough priority for 2026 under Hoshin Kanri, with succession planning and development-plan coverage as the two processes to build.

WHAT IS NOT YET MEASURED

What is not yet measured Job rotation participation, employees holding a career development plan, identified successors for critical positions, roles with a succession plan, internally filled vacancies and high-potential numbers are not currently counted. None is required by GRI 404, and each is reported here as not available rather than estimated.

Source: OP-HRM-001 Employee Engagement Survey 2025 versus 2024, Culture Amp.

ALL SIX MEASURED TARGETS WERE MET, AND THE SEVENTH HAS NO TARGET SET

GRI 3-3 **Targets, results and the effectiveness of the actions taken**

LEARNING AND DEVELOPMENT TARGETS, 2024 RESULT AGAINST THE 2025 TARGET AND RESULT

KPI	2024 RESULT	2025 TARGET	2025 RESULT	STATUS
Training hours per employee	78.2	35	45.4	Met
Mandatory training completion	100%	100%	100%	Met
Performance review completion	100%	100%	100%	Met
Competency-gap closure	100%	100%	100%	Met
Induction completion	100%	100%	100%	Met
Technical certification completion	100%	100%	100%	Met
Internal promotion rate	No data	No target	Diversity, Equal Pay & Non-discrimination	No target set

READING THE TRAINING-HOURS LINE

2024 recorded 78.2 hours per employee on exceptional on-the-job volume. The 2025 result of 45.4 hours per employee is 10,894.0 hours divided by an average headcount of 240 at 31 December 2025. The same hours give 41.7 per employee trained on the 261 who trained, and 44 on HR's internal KPI, average monthly headcount basis. Both clear the 35-hour target.

WHERE A TARGET IS STILL MISSING

No target is set for the internal promotion rate, competency-gap closure beyond the current 100%, leadership-development participation, training effectiveness or employee training satisfaction. A satisfaction survey runs but without a target against which to report. For 2026, the training-budget basis is to be agreed with Finance and mandatory-training completion recorded at source.

LEARNING AND DEVELOPMENT TARGETS, 2024 RESULT AGAINST THE 2025 TARGET AND RESULT

Source: HR target confirmation for Learning, Skills & Career Development, 2025 Collective Agreement on Career Management, Training and Diversity, Jun 2025 AviusULD Training Record 2025.



GRI 3-3 · 405-1 · 405-2 · GRI 406-1

DIVERSITY, EQUAL PAY & NON-DISCRIMINATION

Reporting period 1 January – 31 December 2025 · Boundary: AviusULD Thailand, Netherlands and USA

Women hold 41% of jobs at AviusULD, above the 35% policy target, and no discrimination or harassment case was reported in 2025.

AviusULD manufactures air cargo containers and pallets, an industry in which production roles are usually held by men. Its own workforce is not: women are 41% of the 239 employees at 31 December 2025 and hold 76% of support and office roles and 40% of operations roles.

The exposure is not headline gender balance but what sits underneath it. Women hold 3 of 10 places on the Leadership Team and 9 of 32 management roles, pay is set through two different mechanisms for indirect and direct labour, and employees rate the fairness of their total compensation at 45%, the lowest-scoring question in the 2025 engagement survey.

Discrimination and harassment carry legal and reputational consequences in all three countries where AviusULD operates, and customers and certification bodies ask for traceable diversity, pay and incident data.

Source: HR workforce data at 31 December 2025 Ethical Labor and Diversity Policy, October 2025 AviusULD Employee Engagement Survey 2025.

KEY 2025 FIGURES

WOMEN IN THE WORKFORCE

41.4%

99 of 239 at 31 December 2025

WOMEN ON THE EXECUTIVE COMMITTEE

50%

1 of 2 members

DISCRIMINATION AND HARASSMENT INCIDENTS

0

GRI 406-1, every status nil

EMPLOYEES WITH DISABILITIES

2

Registered with the Department of Labor

REPORTING BOUNDARY

- Three entities: AviusULD Ltd. Thailand, AviusULD B.V. Netherlands and AviusULD Inc. USA
- 239 employees at 31 December 2025 agency and contracted workers excluded
- Employee categories are HR's own seven governance-body diversity is not reported for 2025
- Owner: Human Resources, with the Leadership Team accountable for the policy targets
- Reporting period 1 January to 31 December 2025, reviewed annually

WHY THIS TOPIC IS MATERIAL

GRI 3-3 **Diversity and equal opportunity impacts, stakeholders and value-chain relationship**

Women hold 41% of jobs at AviusULD, above the 35% policy target, and no discrimination or harassment case was reported in 2025.

AviusULD manufactures air cargo containers and pallets, an industry in which production roles are usually held by men. Its own workforce is not: women are 41% of the 239 employees at 31 December 2025 and hold 76% of support and office roles and 40% of operations roles.

The exposure is not headline gender balance but what sits underneath it. Women hold 3 of 10 places on the Leadership Team and 9 of 32 management roles, pay is set through two different mechanisms for indirect and direct labour, and employees rate the fairness of their total compensation at 45%, the lowest-scoring question in the 2025 engagement survey.

Discrimination and harassment carry legal and reputational consequences in all three countries where AviusULD operates, and customers and certification bodies ask for traceable diversity, pay and incident data.

WHY IT IS MATERIAL TO AVIUSULD

- Equal treatment is a legal obligation in Thailand, the Netherlands and the USA, and a condition of the customer and certification audits AviusULD is subject to.
- The Ethical Labor and Diversity Policy sets quantitative commitments that are testable: 35% women by 2025, 1% employees with disabilities, a 0% adjusted gender pay gap and zero discrimination incidents.
- Two of those four could not be evidenced for 2025, which is the reason this topic carries reasoned omissions rather than a clean set of results.

WHAT THIS TOPIC REPORTS

- Workforce diversity by gender and employee category, and by age band, under GRI 405-1.
- Recruitment, promotion and pay-setting controls, and the incidents recorded under GRI 406-1.
- Governance-body diversity and the women-to-men remuneration ratio are not reported pages 268 and 270 explain why.

WHERE THE IMPACTS SIT

Own operations, all three sites: recruitment, pay setting, promotion, performance review and day-to-day treatment at the Thailand manufacturing site and the Netherlands and USA offices.

Business relationships: recruitment is partly delivered through JacksonGrant, whose job postings carry AviusULD's equal-opportunity statement.



Source: HR workforce data at 31 December 2025 Ethical Labor and Diversity Policy, October 2025 AviusULD Employee Engagement Survey 2025.

THE RISK SITS IN PAY SETTING AND PROGRESSION, NOT IN GENDER BALANCE

GRI 3-3 **Actual and potential impacts, involvement and stakeholder expectations**

POTENTIAL NEGATIVE IMPACTS, WITH HR'S 2025 ASSESSMENT

PAY INEQUALITY

Indirect labour is benchmarked to market through JacksonGrant direct labour is paid at or above the Thai legal minimum. The women-to-men ratio is not disclosed, so the claim is not externally testable.

UNDERREPRESENTATION OF WOMEN IN LEADERSHIP

Women hold 3 of 10 Leadership Team places and 9 of 32 management roles, against 41% of the workforce overall.

UNEQUAL CAREER OPPORTUNITIES

62% of employees agree there are good career opportunities, down 2 points on 2024 and one of the three focus areas from the survey.

DISCRIMINATION IN RECRUITMENT OR PROMOTION

Selection and promotion run on documented merit criteria under OP-HRM-001 no case was raised in 2025.

HARASSMENT

Recorded separately from general grievances no case in 2025.

LOSS OF EMPLOYEE TRUST

Fairness of total compensation scores 45%, the lowest-rated question in the 2025 survey.

POSITIVE IMPACTS

- Equal employment opportunity, applied through documented recruitment, appraisal and promotion procedures.
- A diverse workforce: 41% women, two employees with disabilities, and a prayer space for Muslim employees.
- Merit-based recruitment and promotion against job descriptions and qualification criteria.
- Equal access to training and career development through the annual training-needs process.

HOW AVIUSULD IS INVOLVED

- Causes: impacts through its own pay setting, recruitment, appraisal and promotion decisions at all three sites.
- Contributes to: impacts through the working conditions and treatment it sets for people working on its premises.
- Directly linked to: impacts in recruitment delivered by JacksonGrant, whose postings carry AviusULD's equal-opportunity statement.

WHAT STAKEHOLDERS EXPECT

- Employees: fair treatment and equal opportunity.
- Job applicants: non-discriminatory recruitment.
- Management: a diverse, capable and engaged workforce.
- Regulators: compliance with employment and equality law in Thailand, the Netherlands and the USA.
- Customers, CCE and HIG: responsible employment practices and diversity performance.
- BSI and auditors: traceable diversity, pay and discrimination data.

Source: Diversity, Equal Pay & Non-discrimination data request confirmed by HR, February 2026 AviusULD Employee Engagement Survey 2025 OP-HRM-001.

BASIS OF_ PREPARATION

GRI 405 AND GRI 406

Scope, employee categories, definitions and limitations

SCOPE AND DATA SOURCE

- Reporting period: 1 January to 31 December 2025.
- Boundary: all three entities. The Bangsaothong manufacturing site in Samutprakan, Thailand, and the offices in the Netherlands and the USA.
- Headcount date: 31 December 2025. 239 employees, being Thailand 228, Netherlands 9 and USA 2.
- Data owner: Human Resources. Figures are drawn from the HR workforce tables, the HRIS and payroll, and are consistent with the population reported under Employment, Benefits & Working Conditions.

EMPLOYEE CATEGORIES

- AviusULD reports against HR's own seven categories, unchanged for GRI purposes: Executive committee, Leadership team, Management, Supervisor and Professional, Engineer and Technician, Support and Officer, and Operations.
- Temporary and fixed-term employees are included. Agency and contracted workers on site are not employees and are excluded from the 239.
- Governance bodies are treated separately from employee categories, as GRI 405-1 requires. The Executive committee and the Leadership team are reported here as employee categories, not as the governance body for 405-1-a.

DEFINITIONS APPLIED

- Discrimination incident: a complaint registered through the grievance or whistleblowing process, or an instance identified by AviusULD through its own procedures, on any ground listed by the ILO.
- Harassment: recorded in a separate register from general grievances. Any case is counted once only, so no case is double-counted between this topic and Labor Relations, Employee Voice & Grievance.
- Promotion rate: promoted employees divided by year-end employees. Eligible-employee data is not maintained, so the year-end population is used as the denominator.

LIMITATIONS AND KNOWN DIFFERENCES

- Governance-body diversity under 405-1-a is not reported, and the ratio of women's to men's basic salary and remuneration under 405-2 is withheld as commercially sensitive. Both are recorded as reasoned omissions on page 446.
- Age is reported group-wide in the three GRI bands but not per employee category, because HR's source table records location, gender and age only.
- Thailand's year-end headcount is reported as 228, taken from HR's workforce table. Section 18 of the HR return shows 229. The 228 figure is used because it cross-foots to the group total of 239 and to the gender split of 140 men and 99 women. The HR employee register records 228 active employees in Thailand at 31 December 2025, which confirms the 228.

AGENCY AND CONTRACTED WORKERS ON SITE ARE NOT EMPLOYEES AND ARE EXCLUDED FROM THE 239.

Source: HR workforce tables at 31 December 2025 Diversity, Equal Pay & Non-discrimination data request confirmed by HR GRI 405: Diversity and Equal Opportunity 2016 and GRI 406: Non-discrimination 2016.

FOUR POLICIES AND FOUR PROCEDURES GOVERN EQUAL OPPORTUNITY ACROSS THE THREE SITES_

GRI 3-3 **Policies, commitments, procedures and accountability**

POLICIES

ETHICAL LABOR AND DIVERSITY POLICY

Issued by the Director of Human Resources, approved by the Chief Executive Officer, effective 31 October 2025 next revision Q4 2026. Carries the commitments on discrimination, harassment, wage equality and inclusion, and every quantitative target reported on page 282.

CAREER DEVELOPMENT AND PERFORMANCE REVIEWS POLICY, MARCH 2025

Approved by the Chief Executive Officer. Commits to equal access to development, a transparent merit-based promotion process, and an annual review for 100% of the permanent workforce.

EMPLOYEE CODE OF CONDUCT

Sets the behaviour expected of every employee, including the prohibition on harassment, and is the reference point for disciplinary action.

EMPLOYEE HANDBOOK 2025

Sets out terms of employment and the elements of pay: base salary, transport, food and shift allowances, fixed and variable bonus, attendance incentive and overtime.

PROCEDURES

OP-HRM-001, RECRUITMENT, EMPLOYMENT & PROMOTION

Requires selection on merit against the job description and qualification criteria, prohibits discrimination and supports vulnerable and underrepresented groups. Internal vacancies are posted and applications recorded on FO-HRM-019 promotions are raised on FO-HRM-009 and approved by the Chief Financial Officer and the Chief Executive Officer.

OP-HRM-002, PERFORMANCE APPRAISAL

Annual cycle issued by HR each March, with three forms by level and four sections covering competence, behaviour, overall assessment and a personal development plan.

OP-HRM-004, REMEDIATION PROCEDURE

Sets the remediation route for anyone identified as a victim of discrimination or harassment, alongside child labour, forced labour and trafficking.

WHISTLEBLOWING POLICY, OCTOBER 2025

Provides the confidential reporting channel. Case handling and grievance volumes are reported under Labor Relations, Employee Voice & Grievance.

WHO IS ACCOUNTABLE

LEADERSHIP TEAM

The Leadership Team sets the expectations in the Ethical Labor and Diversity Policy, oversees progress against its targets and reviews the policy annually.

HUMAN RESOURCES

Human Resources owns the data, runs recruitment, appraisal and remediation, maintains the records and is the data owner for this topic.

EMPLOYEES AND PARTNERS

Employees are expected to follow the policies and raise concerns suppliers and partners are required to comply through the Supplier Code, reported under Responsible Supplier Selection & ESG Due Diligence.

Source: Ethical Labor and Diversity Policy, October 2025 Career Development and Performance Reviews Policy, March 2025 OP-HRM-001 OP-HRM-002 OP-HRM-004 Whistleblowing Policy, October 2025.

WOMEN ARE 41%_ OF THE WORKFORCE, SIX POINTS ABOVE THE 2025 POLICY TARGET

GRI 405-1-b

Employees by gender, 2024 against 2025

41.4%

OF EMPLOYEES ARE WOMEN

99 women and 140 men of 239 employees at 31 December 2025. The share was 41.5% at the end of 2024, on a larger workforce of 241.

SHARE OF EMPLOYEES

2025



99 women and 140 men, 239 employees

2024



100 women and 141 men, 241 employees

BY LOCATION, 2025

LOCATION	EMPLOYEES	SHARE
Thailand	228	96%
Netherlands	9	4%
USA	2	1%

AGAINST THE POLICY TARGET

2025

41.4%

ACHIEVED

35% permanent full-time female employees

2030

38%

On track at the current share

2050

42%

One point above the 2025 result

Target set in the Ethical Labor and Diversity Policy.

WHAT SITS BEHIND THE HEADLINE

The workforce fell from 241 to 239 during 2025 and the share of women held at 41%, so the balance was maintained rather than improved.

Women outnumber men in support and office roles at 76% and hold 40% of operations roles, unusual for container manufacturing.

The gap is in the middle and upper layers: women hold 3 of 10 Leadership Team places and 9 of 32 management roles. page 266 sets out the full category split.

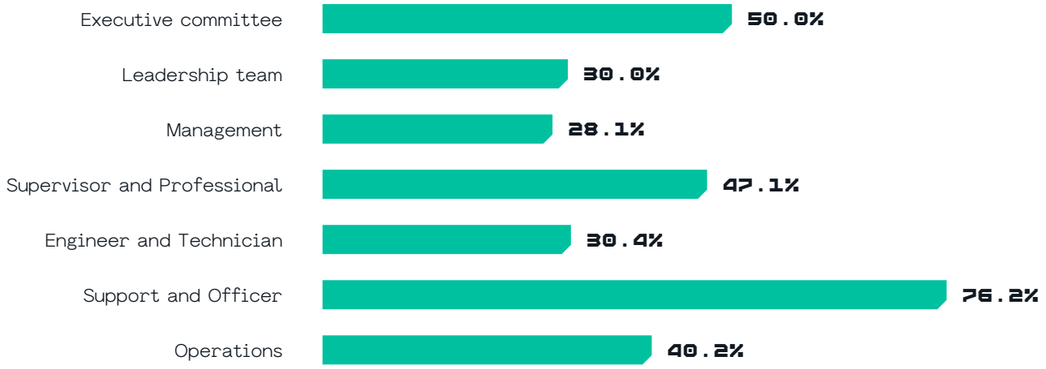
No target is set for women in management or in leadership specifically the only workforce target is the overall share.

Source: HR workforce data at 31 December 2025 and 31 December 2024 Ethical Labor and Diversity Policy, October 2025. Headcount is consistent with Employment, Benefits & Working Conditions.

WOMEN HOLD 76% OF OFFICE ROLES BUT 28% OF MANAGEMENT ROLES

GRI 405-1-b **Employees by employee category and gender**

SHARE OF WOMEN BY EMPLOYEE CATEGORY · %, ALL THREE SITES, 31 DECEMBER 2025



WOMEN AND TOTAL EMPLOYEES BY CATEGORY · HEADCOUNT, 31 DECEMBER

EMPLOYEE CATEGORY	2024 W/TOTAL	2025 W/TOTAL	2025 %
Executive committee	1 / 2	1 / 2	50.0%
Leadership team	2 / 9	3 / 10	30.0%
Management	11 / 33	9 / 32	28.1%
Supervisor and Professional	18 / 40	16 / 34	47.1%
Engineer and Technician	6 / 18	7 / 23	30.4%
Support and Officer	15 / 19	16 / 21	76.2%
Operations	47 / 120	47 / 117	40.2%
Total	100 / 241	99 / 239	41.4%

WHAT THE SPLIT SHOWS

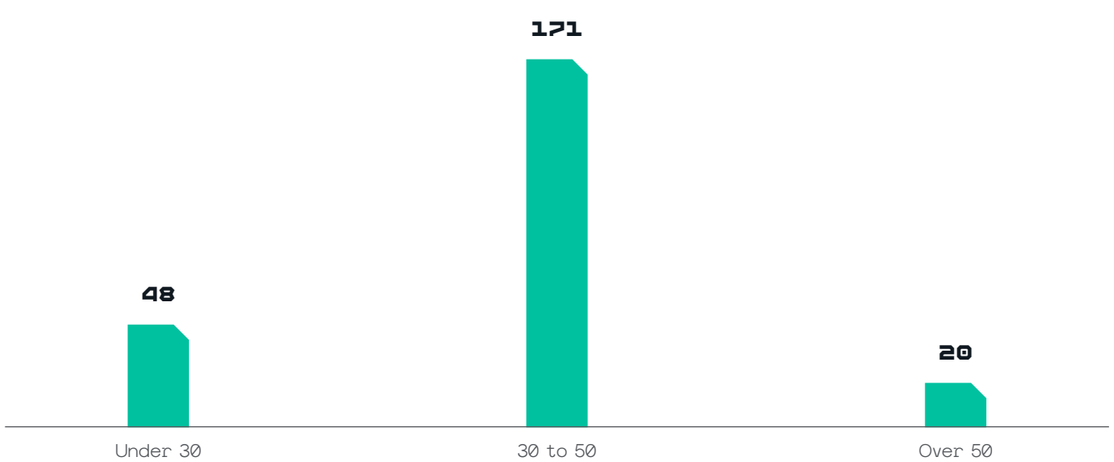
Representation is lowest in management. Women are 76% of support and office roles and 47% of supervisory and professional roles, but 28% of management and 30% of the Leadership Team. The Executive committee reads 50% because it has two members, one of them a woman. The percentage is arithmetically correct but rests on a population of two. Movement against 2024 is small. Women on the Leadership Team rose from 2 to 3, while Management fell from 11 to 9 and Supervisor and Professional from 18 to 16, on a workforce that shrank by two.

Source: HR workforce data at 31 December 2025 and 31 December 2024, on the seven employee categories HR maintains. Percentages are women as a share of the category total.

SEVEN IN TEN EMPLOYEES ARE AGED 30 TO 50, AND ONLY 20 ARE OVER 50

GRI 405-1 **Employees by age group and gender, and the requirements not reported**

EMPLOYEES BY AGE GROUP AND GENDER · HEADCOUNT, ALL THREE SITES, 31 DECEMBER 2025



OF WHICH	UNDER 30	30 TO 50	OVER 50
Women	21	72	6
Men	27	99	14

- The 30 to 50 band holds 171 of 239 employees, 72%. Only 20 employees are over 50 and 48 are under 30.
- Women are distributed in much the same shape as men: 73% of women and 71% of men sit in the 30 to 50 band.
- A workforce this concentrated in one band carries a succession risk rather than a discrimination risk, and it is monitored through the career development process reported under Learning, Skills & Career Development.

WHAT GRI 405-1 REQUIRES THAT IS NOT REPORTED

GOVERNANCE-BODY DIVERSITY, 405-1-A

AviusULD does not report the gender and age composition of its governance body for 2025. The decision was taken by the Chief Executive Officer and is recorded as an omission under confidentiality constraints. The Executive committee and the Leadership team are reported on page 266 as employee categories, which is not the same disclosure.

AGE BY EMPLOYEE CATEGORY, 405-1-B-II

Age is reported group-wide in the three GRI bands. HR's source table records location, gender and age, so the cross-tabulation of age against the seven employee categories cannot be produced for 2025. The group-level split is disclosed the category split is a partial omission.

OTHER INDICATORS OF DIVERSITY, 405-1-A-III AND 405-1-B-III

HR does not track minority or vulnerable-group status beyond disability, which is reported on page 276. Nationality, ethnicity and religion are not recorded. Where these are not maintained, GRI allows the organisation to report that the item does not exist.

Source: HR workforce table at 31 December 2025, on the same 239-employee basis as Employment, Benefits & Working Conditions. Age bands follow GRI 405-1: under 30 years old, 30 to 50 years old, over 50 years old.

PAY IS SET BY TWO MECHANISMS; THE WOMEN-TO-MEN RATIO IS WITHHELD AS COMMERCIALLY SENSITIVE

GRI 405-2 **Ratio of basic salary and remuneration of women to men, and the reason for omission**

HOW PAY IS SET

- **Indirect labour.** Salaries for office, professional, engineering and management roles are benchmarked to the external market through JacksonGrant, which applies market benchmarking to each role.
- **Direct labour.** Production roles are paid at or above the Thai legal minimum wage, with the statutory allowances that apply in Samutprakan.
- **Annual review.** The appraisal cycle under OP-HRM-002 feeds the annual salary review, so pay movement is tied to a documented performance assessment rather than to discretion alone.
- **Policy commitment.** The Ethical Labor and Diversity Policy commits to keeping the average adjusted gender pay gap at 0% from 2025 through 2050.

WHAT COUNTS AS PAY

- Basic salary: the fixed monthly amount for performing the role, excluding overtime and bonuses.
- Remuneration: basic salary plus transport, food and shift allowances, fixed and variable bonus, the attendance incentive and overtime, as set out in the Employee Handbook 2025.

WHAT EMPLOYEES THINK OF IT

Fairness of total compensation relative to similar roles elsewhere scored 45% in the 2025 engagement survey, the lowest-rated of all questions. Recognition improved: 73% agree the right people are rewarded and recognised, up 12 points on 2024.

WHY THE GRI 405-2 RATIO IS NOT REPORTED

What the Standard asks for: the ratio of basic salary and of remuneration of women to men for each employee category, by significant locations of operation, and the definition used for significant locations.

Significant locations of operation: AviusULD treats each country where it has a legal entity and employees as a location of operation. A location is significant where AviusULD carries out manufacturing there, or where it employs a majority of the group workforce. Thailand meets both tests, with the Bangsaothong manufacturing site and 228 of the 239 employees (95.4%), and is the only significant location for 2025 the Netherlands, with 9 employees (3.8%), and the United States, with 2 (0.8%), are sales offices that meet neither test.

What is reported: the definition above. The ratio itself is not reported.

Reason for omission: confidentiality constraints, applying to the ratio only and not to the definition. Pay data broken down by employee category and gender is commercially sensitive and is not released.

A second constraint: the methodology has not been settled: average or median, the treatment of part-time employees and expatriates, working-hour normalisation, and whether allowances and bonus are in scope are all open. No ratio has been calculated on a defensible basis for 2025, so none is published.

Consequence: the 0% adjusted gender pay gap commitment in the policy cannot be evidenced externally for 2025. It is reported on page 282 as no disclosure rather than as achieved.

WHAT HAPPENS IN 2026

Agree a written methodology with Payroll covering the average-versus-median choice, working-hour normalisation, grade, and the treatment of allowances, bonus and expatriates.

Calculate the ratio by employee category for Thailand, then decide with the Chief Executive Officer what can be published without releasing sensitive pay data.

Source: Employee Handbook 2025 Ethical Labor and Diversity Policy, October 2025 OP-HRM-002 AviusULD Employee Engagement Survey 2025. Reason for omission follows Requirement 6 of GRI 1: Foundation 2021.

SELECTION_ RUNS ON WRITTEN CRITERIA, AND EVERY OFFER IS APPROVED BY TWO OFFICERS

GRI 3-3 **Recruitment controls and equal opportunity in hiring, OP-HRM-001**

THE RECRUITMENT SEQUENCE, INTERNAL AND EXTERNAL

01 MANPOWER REQUEST

Department manager submits the requisition and the job description with qualification criteria.

02 ADVERTISE

Internal vacancies posted and logged on FO-HRM-019 external roles advertised through JacksonGrant, media or job fair.

03 SCREEN AND FIRST INTERVIEW

HR reviews applications against the written criteria and runs the initial interview.

04 SECOND INTERVIEW

Held jointly by HR and the requesting department manager, with a test where the role requires one.

05 APPROVAL

Application and the offered-salary analysis go to the Chief Financial Officer and the Chief Executive Officer.

06 CONTRACT AND ONBOARDING

HR informs every applicant of the outcome and issues the employment contract.

CONTROLS THAT KEEP SELECTION NON-DISCRIMINATORY

Criteria are fixed before the role is advertised. The job description and qualification criteria are submitted with the requisition, so candidates are assessed against a standard set in advance.

Two parties assess every candidate. Testing and interviewing are carried out jointly by HR and the requesting department, which removes single-person selection.

Two officers approve every offer. The employment application and the offered-salary analysis require approval by the Chief Financial Officer and the Chief Executive Officer. Internal promotions follow the same route on FO-HRM-009.

The procedure states the commitment. OP-HRM-001 requires recruitment, employment and promotion to respect human rights, prevent discrimination, promote inclusion and support vulnerable and underrepresented groups. No role carries a gender restriction.

THE EXTERNAL RECRUITMENT PARTNER

JacksonGrant sources candidates against AviusULD's hiring requirements under a documented process flow agreed between the two organisations.

Job postings placed by JacksonGrant carry AviusULD's diversity, equity and inclusion statement alongside the responsibilities and qualifications, so the equal-opportunity commitment reaches the external market.

WHAT IS NOT TRACKED

Applicants are not counted by gender, so no applicant-to-hire ratio by gender can be given for 2025. Total hires and their age and gender profile are reported under Employment, Benefits & Working Conditions and are not repeated here.

Recording applicant gender is added to the 2026 recruitment data set so that selection ratios can be tested.

RECORDS RETAINED FOR 2025

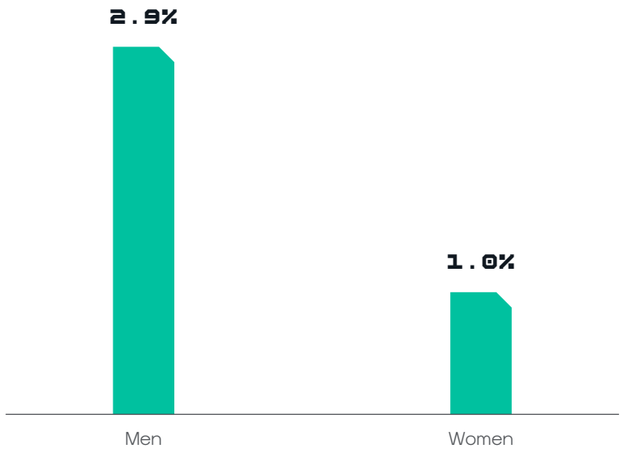
RECORD	WHAT IT EVIDENCES
FO-HRM-019	List of employees applying for vacant positions, evidencing that internal candidates were invited before external advertising.
FO-HRM-020	Employment applications and interview records held against the job description and qualification criteria.
FO-HRM-009	Employee promotion forms carrying the approval of the Chief Financial Officer and the Chief Executive Officer.
JacksonGrant pack	Agreed process flow, the recruiter's job postings and the diversity, equity and inclusion statement they carry.

Source: OP-HRM-001, Recruitment, Employment and Promotion Diversity, Equity and Inclusion Report, June 2025, section 01. Hiring volumes are reported under Employment, Benefits & Working Conditions.

FIVE EMPLOYEES WERE PROMOTED IN 2025: FOUR MEN AND ONE WOMAN

GRI 3-3 **Promotion by gender and how the rate is calculated**

PROMOTION RATE BY GENDER · %, PROMOTED EMPLOYEES AS A SHARE OF YEAR-END EMPLOYEES OF THAT GENDER, 2025



WHAT THE SPLIT SHOWS

Men were promoted at close to three times the rate of women in 2025: 2.9% against 1.0%. On five promotions, one additional woman would have closed most of the gap, so the difference is not statistically meaningful on its own.

It matters because it points the same way as the category split on page 266, where women hold 28% of management and 30% of the Leadership Team. Two consecutive years at this rate would widen that gap rather than close it.

No target is set for promotion rate by gender. The 2026 commitment on page 282 is to record the rate by gender each year so the trend can be seen.

PROMOTIONS IN 2025

	MEN	WOMEN
Employees at 31 December 2025	140	99
Promoted during 2025	4	1
Promotion rate	2.9%	1.0%

All employees 5 promoted of 239, a rate of 2.1%

HOW THE RATE IS BUILT

- **Denominator.** Promoted employees divided by employees at 31 December. HR does not maintain a population of employees eligible for promotion, so the year-end headcount is used instead. The rate therefore understates the chance of promotion for anyone who was eligible.
- **Criteria.** Promotions are decided on the appraisal under OP-HRM-002, which scores competence, behaviour and overall performance and sets a personal development plan. The promotion is raised on FO-HRM-009 and approved by the Chief Financial Officer and the Chief Executive Officer.

Equal access to training and development is reported under Learning, Skills & Career Development, which records annual performance and career development reviews for 228 of 228 eligible employees, 100%.

Source: HR promotion data for 2025 on the 239-employee year-end basis OP-HRM-002, Performance Appraisal OP-HRM-001. Rates are calculated on employees of that gender at 31 December 2025.

TWO EMPLOYEES WITH DISABILITIES, AGAINST A POLICY TARGET OF 1% OF THE WORKFORCE

GRI 3-3 AND GRI 405-1-b-iii

Inclusion measures and other indicators of diversity

EMPLOYEES WITH DISABILITIES	OF THE WORKFORCE	REACHED BY THE DIVERSITY AND INCLUSION COURSE
2	0.84%	99.6%
Both in the Production Department, Packing Section	Against the 1% annual target in the policy	Ethical Labor and Diversity Policy training, against a 100% target

EMPLOYMENT OF PEOPLE WITH DISABILITIES

AviusULD employed two people with disabilities during 2025 and reported the employment to the Department of Labor, which publishes the return on its website.

Both work in the Production Department, Packing Section. One has an underdeveloped right arm the other has lost four fingers on the right hand.

They carry the same responsibilities as colleagues in the same job descriptions and receive the same compensation, benefits and career opportunities. Job assignments are matched to each person's capabilities and to the requirements of the role.

No accessibility modification or facility improvement was required during 2025: both employees access the workplace and perform their duties in the existing environment.

At two employees the share is 0.84%, below the 1% the policy commits to each year. The shortfall is reported on page 282.

RELIGIOUS AND CULTURAL ACCOMMODATION

A dedicated prayer space is provided for employees of the Islamic faith at the Thailand site.

It is the one standing measure for a group that may be a minority in the workforce, and it responds to a need employees raised rather than to a legal requirement.

Beyond disability, HR does not record minority or vulnerable-group status. Nationality, ethnicity and religion are not held, so no count by those characteristics can be given under GRI 405-1-a-iii or 405-1-b-iii.

AWARENESS AND TRAINING

The Ethical Labor and Diversity Policy course carries the content on diversity, equity, inclusion and workplace harassment, including how to act and how to prevent it.

It is delivered as a five-minute video with a quiz through the Learn N Work application for employees with computer access, and in classroom sessions run by HR for shop-floor operators.

The course reached 99.6% of employees in 2025 against a 100% target. The same figure is reported under Human Rights & Fair Labor Practices for human-rights training, because it is the same course.

Training hours and completion by course are reported in full under Learning, Skills & Career Development.

AVIUSULD EMPLOYED TWO PEOPLE WITH DISABILITIES DURING 2025 AND REPORTED THE EMPLOYMENT TO THE DEPARTMENT OF LABOR, WHICH PUBLISHES THE RETURN ON ITS WEBSITE.

Source: Diversity, Equity and Inclusion Report, June 2025, sections 02, 03 and 04 Diversity, Equal Pay & Non-discrimination data request confirmed by HR Ethical Labor and Diversity Policy, October 2025. Disability share is 2 of 239 employees at 31 December 2025.

NO DISCRIMINATION OR HARASSMENT INCIDENT WAS REPORTED IN 2025

GRI 406-1 Total incidents of discrimination and the status of actions taken

INCIDENTS AND THEIR STATUS, 2025 · CASES, ALL THREE SITES, REPORTED UNDER GRI 406-1-A AND 406-1-B

STATUS	CASES
Incidents of discrimination reported	0
Incidents reviewed by the organisation	0
Incidents substantiated	0
Remediation plans being implemented	0
Remediation plans implemented and results reviewed	0
Incidents no longer subject to action	0
Incidents outstanding at 31 December	0

Harassment and sexual harassment are recorded in a separate register. No case was reported in 2025. Any case is counted once only, so nothing is double-counted between this topic and the grievance figures in Labor Relations, Employee Voice & Grievance.

LEGAL AND REGULATORY OUTCOMES

No discrimination or harassment legal case, court case, labour authority finding, fine, penalty or regulatory notice arose in 2025 in Thailand, the Netherlands or the USA.

WHAT AN INCIDENT WOULD MEAN, AND HOW IT WOULD SURFACE

DEFINITION

Definition. A complaint registered through the grievance or whistleblowing process, or an instance AviusULD identifies through its own procedures, including management review and internal audit.

Grounds covered. Race, colour, sex, religion, political opinion, national extraction and social origin as defined by the ILO, and the further grounds named in the Ethical Labor and Diversity Policy: age, disability, nationality and other personal characteristics. Harassment is treated as a form of discrimination.

THE CHANNELS THAT WOULD CAPTURE ONE

The grievance mechanism and the Welfare Committee route, reported in full under Labor Relations, Employee Voice & Grievance.

The Whistleblowing Policy, of October 2025, which provides a confidential channel and commits to investigating and resolving every report.

Direct escalation to HR under the Employee Code of Conduct, and detection through management review.

WHAT WOULD HAPPEN NEXT

OP-HRM-004 sets the remediation route for anyone identified as a victim of discrimination or harassment, alongside child labour, forced labour and trafficking. It covers investigation, the remediation plan, and review of whether the remedy worked.

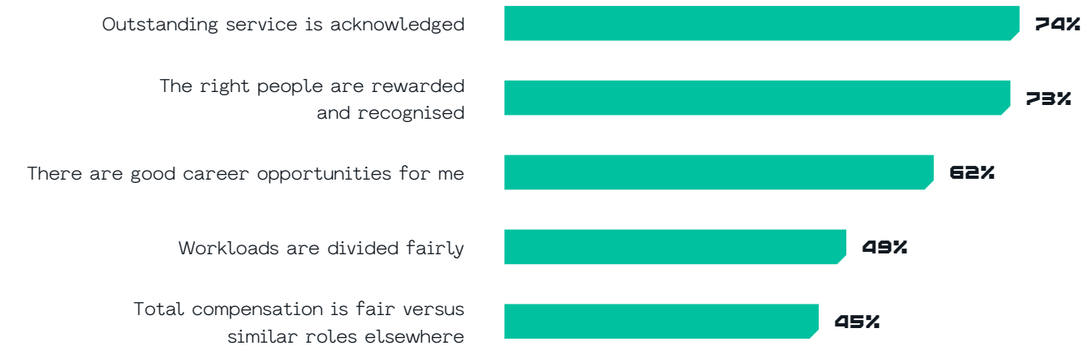
Because no case arose, none of these steps was triggered in 2025. The procedure has not been tested in practice, which is itself worth stating.

Source: Diversity, Equal Pay & Non-discrimination data request confirmed by HR OP-HRM-004 Whistleblowing Policy, October 2025 Employee Code of Conduct. Grievance volumes are reported under Labor Relations, Employee Voice & Grievance.

EMPLOYEES_ RATE PAY FAIRNESS AT 45%, THE LOWEST-SCORING QUESTION IN THE SURVEY

GRI 3-3 **Effectiveness of the management approach, tested through the 2025 engagement survey**

FAVOURABLE RESPONSES ON FAIRNESS, REWARD AND OPPORTUNITY · % FAVOURABLE, 233 RESPONDENTS, 2025



HOW THE SURVEY WAS RUN

Participation was 100%: 233 responses from 233 people on the survey roll. That is the population at the survey date, not the 239 year-end headcount reported under Employment, Benefits & Working Conditions, so the two figures are not the same base.

Overall engagement was 68%, three points below 2024.

WHAT IMPROVED AND WHAT DID NOT

Recognition improved sharply. 73% agree the right people are rewarded and recognised, up 12 points, and 74% agree outstanding service is acknowledged, up 11. The Feedback and Recognition factor rose 5 points to 64.

Pay fairness did not. 45% believe their total compensation is fair relative to similar roles elsewhere. It is the single lowest score in the survey, and it sits directly against the equal-pay commitment on page 270 that cannot be evidenced with a published ratio.

Career opportunity slipped. 62% believe there are good career opportunities, down 2 points, and the survey's own focus algorithm named it one of the three areas to act on.

Workload fairness is low. 49% agree workloads are divided fairly where they work, the second-lowest score.

WHAT THIS MEANS FOR THE TOPIC

There were no discrimination complaints in 2025, but a 45% score on pay fairness says the absence of complaints is not the same as confidence in fairness. Publishing a defensible pay ratio, or at least the methodology behind it, is the measure most likely to move this score.

Source: **AviusULD** Employee Engagement Survey 2025 compared with 2024, run on Culture Amp. Scores are the percentage of favourable responses. Participation was 233 of 233 at the survey date.

TARGETS AND 2026 OUTLOOK

GRI 3-3 **Goals, targets and performance against them**

INDICATOR	2024	2025 TARGET	2025 RESULT	STATUS
Women in the workforce	41.5%	35%	41.4%	Achieved
Women on the Executive committee	33%	25%	50%	Achieved, on a body of two members
Employees with disabilities	n/a	1%	0.84%	Not achieved: 2 of 239 employees, 0.84% against a 1% commitment
Discrimination incidents	0	0	0	Achieved
Harassment incidents	0	0	0	Achieved
Diversity and non-discrimination training	n/a	100%	99.6%	Not achieved
Adjusted gender pay gap	n/a	0%	Not disclosed	No disclosure, see page 270
Women-to-men remuneration ratio	n/a	No target	Not disclosed	No disclosure, see page 270
Promotion rate by gender	n/a	No target	2.9% men, 1.0% women	Reported, no target set

WHAT WE ACHIEVED IN 2025

- Women held 41% of jobs, six points above the 2025 target and level with 2024 on a smaller workforce.
- No discrimination or harassment case was reported, and no legal case, authority finding, fine or penalty arose in any of the three countries.
- Recognition scores rose 11 to 12 points, and the diversity and inclusion course reached 99.6% of employees.

WHAT WE DID NOT

- The women-to-men remuneration ratio was not calculated or published, so the commitment to a 0% adjusted gender pay gap is unevidenced for 2025. A written methodology will be agreed with Payroll and the ratio calculated by employee category during 2026.
- Employees with disabilities stood at 0.84% against the 1% commitment, and diversity training reached 99.6% against 100%. Governance-body diversity and age by employee category were not reported both are to be produced for 2026.

WOMEN HELD 41% OF JOBS, SIX POINTS ABOVE THE 2025 TARGET AND LEVEL WITH 2024 ON A SMALLER WORKFORCE.

Source: Diversity, Equal Pay & Non-discrimination data request confirmed by HR Ethical Labor and Diversity Policy, October 2025 AviusULD Employee Engagement Survey 2025. Percentages are calculated on 239 employees at 31 December 2025 and 241 at 31 December 2024.



GRI 3-3 · 407 · 408 · GRI 409 · 410 · 412

HUMAN RIGHTS & FAIR LABOR PRACTICES

Reporting period 1 January – 31 December 2025 · Boundary: AviusULD Thailand, Netherlands and USA

No case of child labour, forced labour or human trafficking was identified in 2025, and due diligence now covers all three sites and Tier-1 suppliers.

Human rights is material because AviusULD's own workforce, its on-site contractors and subcontracted workers, and the workers of its Tier-1 suppliers can all be exposed to child labour, forced labour, trafficking, restricted representation and unfair treatment. Commitments sit in the Ethical Labor and Diversity Policy, the two codes of conduct and the Supplier Code of Conduct, and are tested through a documented risk assessment run under OP-QUA-013. The 2025 assessment found no confirmed incident, and the residual risk on every labour-rights category was rated low or very low after mitigation.

Source: AviusULD 38_Human Rights Risk Assessment Report, Jun 2025 54_Sustainable Procurement Risk Assessment Report, 2025 HR training and supplier records 2025.

KEY 2025 FIGURES

CONFIRMED CASES

0

child labour, forced labour and trafficking

WORKFORCE VERIFIED

100%

employees and STC subcontracted workers

SITES REVIEWED FOR HUMAN RIGHTS

3 OF 3

Thailand, Netherlands and USA

EMPLOYEES TRAINED ON HUMAN RIGHTS

99.6%

238 of 239 employees at 31 Dec 2025

REPORTING BOUNDARY

- Three entities: AviusULD Ltd. Thailand, AviusULD B.V. Netherlands and AviusULD Inc. USA
- Employees, including fixed-term, plus on-site contractors, subcontracted workers and security personnel
- Tier-1 suppliers screened Tier-2 assessment planned for 2027
- Owners: Human Resources, Purchasing and HSE with Compliance
- Risk assessment period January to June 2025, reviewed annually

WHY THIS TOPIC_ IS MATERIAL

GRI 3-3 **Human-rights impacts, AviusULD's involvement and stakeholder expectations**

Human-rights impacts reach beyond AviusULD's own payroll: they touch subcontracted workers on site, outsourced security personnel and the workforces of Tier-1 suppliers, which is why due diligence is run across operations and the supply chain.

IMPACTS ASSESSED IN 2025

01	**Child Labour in the Subcontracted Workforce**	Rated 8 before mitigation, the highest internal score. Age verification, ID checks, contract clauses and spot audits brought residual risk to 4.
02	**Forced Labour and Coercive Practice**	Excessive overtime, withheld wages or document retention by subcontractors. Contract clauses, Code of Conduct signature and monitoring of hours and payments reduced residual risk to 4.
03	**Trafficking through recruitment channels**	Unverified agencies or brokers. Only licensed agencies are approved, with due diligence on subcontractor hiring and a whistleblowing route for workers.
04	**Worker Representation**	Insufficient employee representation to top management. Managed through the elected Welfare Committee and regular meetings the action was still open at year end.
05	**Supply-Chain Labour Rights**	Forced and child labour risk in regions with weaker enforcement. Supplier Code signature, labour audits and on-site audit at the aluminium mill reduced residual risk.

STAKEHOLDER	MAIN EXPECTATION AND AVIUSULD RESPONSE
Employees	Fair treatment and fundamental labour rights; policy training reached 238 of the 239 employees at 31 December 2025, 99.6%
Contractors	Fair and lawful working conditions; contract clauses, Code of Conduct signature and spot audits
Suppliers	Clear human-rights expectations; Supplier Code of Conduct and the FO-SOU-001 questionnaire
Customers	Responsible and ethical supply chain; screening, audits and EcoVadis assessment
Regulators	Compliance with labour and human-rights law; zero violations, fines or cases in 2025
CCE and HIG	Effective human-rights due diligence; documented assessment under OP-QUA-013, reviewed annually
Auditors	Evidence of risk assessment and controls; risk register, audit records and CAPA log

Involvement: **AviusULD** causes impacts through its own employment and recruitment practices contributes to impacts through the working conditions it sets for subcontracted workers on its site and is linked through business relationships to impacts in supplier and outsourced-service workforces, including the four outsourced security personnel.

Source: 38_Human Rights Risk Assessment Report and Human Rights Risk Register, 16 Jun 2025 54_Sustainable Procurement Risk Assessment Report stakeholder confirmation for Human Rights & Fair Labor Practices.

COMMITMENTS_ SIT ACROSS SIX DOCUMENTS, NOT A SINGLE POLICY

GRI 3-3 **Policies, commitments and how they reach workers, contractors and suppliers**

AviusULD has no standalone human-rights policy. The commitments that GRI 3-3 asks for are carried by the Ethical Labor and Diversity Policy and five supporting documents, each with an owner and an audience.

HUMAN RESOURCES

ETHICAL LABOR AND DIVERSITY POLICY

October 2025. Carries the prohibitions on child labour, forced labour and discrimination and the commitment to equal opportunity. Trained to 238 of the 239 employees at 31 December 2025.

HUMAN RESOURCES

EMPLOYEE CODE OF CONDUCT AND CODE OF ETHICS

Set the expected conduct on fair treatment, harassment and reporting. Both were delivered as training courses in 2025.

HUMAN RESOURCES

EMPLOYEE HANDBOOK 2025

Translates the commitments into employment terms: wages, working hours, overtime consent, leave and the right to resign on notice.

PURCHASING

SUPPLIER CODE OF CONDUCT

Requires suppliers to respect labour rights, prohibit child and forced labour and comply with labour law. Issued to 100% of active suppliers.

PURCHASING

SUSTAINABLE PURCHASING POLICY

October 2025. Sets ethical, social and environmental expectations in sourcing decisions, applied through OP-SOU-001.

HR AND COMPLIANCE

OP-HRM-001 AND OP-HRM-004

Recruitment, employment and promotion sets age and document verification OP-HRM-004 sets remediation for identified victims of child labour, forced labour, trafficking, discrimination or harassment.

INTERNATIONAL FRAMEWORKS

AviusULD references the UN Global Compact as a participant, and the Sustainable Procurement Risk Assessment aligns sourcing with UN SDG 12 and SDG 13.

The Ethical Labor and Diversity Policy is written to Thai labour law and customer requirements rather than to a named international instrument.

No formal public commitment to the UN Guiding Principles or the OECD Guidelines is claimed for 2025.

HOW COMMITMENTS ARE GOVERNED

The Human Rights Risk Assessment is run under OP-QUA-013 Operational Risk Assessment, the same methodology used for the company's other risk domains.

HR and Compliance monitor the risk register quarterly Purchasing and the ESG team monitor the supplier register quarterly.

Quality Assurance audited the requisition and training activities in 2025.

There was no dedicated ESG internal audit in 2025 one is planned for 2026.

Source: Ethical Labor and Diversity Policy, Oct 2025 Employee Code of Conduct Code of Ethics Employee Handbook 2025 Supplier Code of Conduct Sustainable Purchasing Policy, Oct 2025 OP-HRM-001 OP-HRM-004.

BASIS OF_ PREPARATION

GRI 407 · 408 · GRI 409 · 410 · 412

Scope, worker groups, data sources and limitations

Human-rights data cover the 2025 calendar year across all three AviusULD entities, compiled by Human Resources with Purchasing and HSE, from the risk assessments, HR records, supplier assessments and grievance records.

ENTITY, PERIOD AND COVERAGE

- Reporting period 1 January to 31 December 2025.
- Entities: AviusULD Ltd. Thailand, AviusULD B.V. Netherlands and AviusULD Inc. USA. All three were subject to human-rights review.
- Worker groups: employees, including fixed-term, plus on-site contractors and subcontracted workers, and four outsourced security personnel. No agency workers are used.
- Suppliers: Tier-1 in scope Tier-2 assessment planned for 2027.
- The risk assessment itself covers Thailand operations and ran January to June 2025.

DATA SOURCES

- 38_Human Rights Risk Assessment Report and its risk register, updated 16 June 2025.
- 54_Sustainable Procurement Risk Assessment Report.
- HR recruitment, age-verification and training records.
- Supplier assessments: FO-SOU-001 questionnaire, on-site audits and EcoVadis.
- Grievance, whistleblowing and remediation records under OP-HRM-004.
- Security training records and the Guardforce service agreement.

DEFINITIONS USED

- Child labour, forced labour and trafficking follow the definitions in the Ethical Labor and Diversity Policy and Thai labour law.
- Confirmed case: an allegation investigated and substantiated. Zero confirmed cases is not the same as no risk identified, and the two are reported separately.
- Significant business partner: one of the top ten suppliers by annual direct-material procurement spend.
- Residual risk: the likelihood and consequence score after mitigation, on the 1 to 5 scale in the assessment.

LIMITATIONS STATED IN THIS TOPIC

- Freedom of association was not evaluated as a separate supplier risk category in 2025.
- ESG criteria entered the standing supplier selection set during 2025, and 3 of the 9 new suppliers onboarded in 2025 were screened (33%). The six approved earlier in the year were assessed on quality, technical, delivery and financial criteria only, and the existing base is being brought up through re-verification and audits.
- Security personnel had received no human-rights, Code of Conduct, non-discrimination or use-of-force training by year end.
- The 2025 supplier ESG finding count is 1 corrective action, closed in 2025, within 188 minor findings of all types across the audit programme.

THE RISK ASSESSMENT ITSELF COVERS THAILAND OPERATIONS AND RAN JANUARY TO JUNE 2025.

Source: Human Rights Risk Assessment Report, Jun 2025 Sustainable Procurement Risk Assessment Report HR and Purchasing records 2025 Responsible Supplier Selection & ESG Due Diligence supplier dataset.

DUE DILIGENCE RUNS AS A FIVE-STEP CYCLE WITH QUARTERLY MONITORING

GRI 3-3 **Identifying, assessing, mitigating, monitoring and remediating human-rights impacts**

The process is documented under OP-QUA-013 Operational Risk Assessment, prioritises harm to people over financial impact, and is reviewed annually with quarterly monitoring by HR and Compliance.

01 IDENTIFY
HR interviews, Welfare Committee feedback, internal audits and supplier evaluations

02 ASSESS IMPACT
Potential harm to employees, subcontracted workers and community members

03 RATE RISK
Likelihood and consequence scored 1 to 5, giving a risk band

04 MITIGATE
Actions with a named owner and a target completion date

05 MONITOR AND REVIEW
Effectiveness verified, ratings updated annually, register reviewed quarterly

HOW RISK IS SCORED

Likelihood runs from 1 rare to 5 almost certain consequence from 1 negligible to 5 catastrophic. The impact score is likelihood multiplied by consequence.

Bands: 1 to 4 low, 5 to 9 moderate, 10 to 15 high, 16 to 25 very high and critical priority.

Every labour-rights risk in the 2025 register closed the year in the low band after mitigation.

REMEDIATION IF AN IMPACT OCCURS

OP-HRM-004 sets the route for identified victims of child labour, forced labour, trafficking, discrimination or harassment: immediate protection, investigation, referral of criminal matters to the labour authorities, and support for the person affected.

No case required activation in 2025.

Workers, contractors and suppliers can report through the grievance and whistleblowing channels described in Labor Relations, Employee Voice & Grievance.

WHAT THE 2026 CYCLE ADDS

The assessment carries four improvement commitments: run an annual human-rights impact assessment that integrates stakeholder feedback include employee representatives in the risk-review sessions extend assessment to Tier-2 suppliers by 2027 and link identified risks directly to training programmes such as forced-labour prevention and ethical recruitment. An ESG internal audit is also planned for 2026, which the 2025 cycle did not have.

Source: Human Rights Risk Assessment Report, Jun 2025, sections 3 and 5 and Appendix B OP-QUA-013 Operational Risk Assessment OP-HRM-004.

EVERY LABOUR-RIGHTS RISK CLOSED THE YEAR IN THE LOW BAND

GRI 3-3

Human Rights Risk Register, own operations and supply chain, updated 16 June 2025

Ten risks were assessed. The three labour-rights risks in AviusULD's own operations and the three in the aluminium supply chain all scored moderate before mitigation and low after it; one action, on worker representation, was still open at year end.

RISK	SOURCE	BEFORE	AFTER	OWNER	STATUS
Child labour in AviusULD and the STC subcontracted workforce	Own operations	8	4	HR Director	Closed 30 Jun 2025
Forced labour in AviusULD and the STC subcontracted workforce	Own operations	8	4	HR Director	Closed 30 Jun 2025
Human trafficking through recruitment channels	Own operations	5	4	HR Director	Closed 30 Jun 2025
Worker representation to top management	Own operations	4	Open	HR Director	Open at 31 Dec 2025
Job insecurity from headcount reduction and reorganisation	Own operations	4	2	HR Director	Closed 18 Jun 2025
Work-life balance and work-related stress	Own operations	4	In progress	HR Director	In progress Q4 2025

RISK	SOURCE	BEFORE	AFTER	OWNER	STATUS
Communication between teams and management	Own operations	4	4	HR Director	Closed 31 May 2025
Forced and child labour in the aluminium supply chain	Supply chain	6	4	Purchasing Director	Closed 18 Jul 2025
Worker health and safety in the supply chain	Supply chain	6	3	Purchasing Director	Closed 18 Jul 2025
Environmental impact of aluminium production	Supply chain	8	2	Purchasing Director	Closed 30 Jul 2025

READING THE REGISTER

Scores are likelihood multiplied by consequence on a 1 to 5 scale, so 8 is moderate and 4 or below is low. Child labour and forced labour carried the highest internal scores because subcontracted labour is engaged through STC both were closed by requiring official identity and age verification, labour-compliance clauses and Code of Conduct signature, with random audits and spot checks. The supply-chain risks were closed by an on-site audit at the primary aluminium mill in July 2025. Worker representation remains the one open action, tracked on the HR KPI dashboard.

SCORES ARE LIKELIHOOD MULTIPLIED BY CONSEQUENCE ON A 1 TO 5 SCALE, SO 8 IS MODERATE AND 4 OR BELOW IS LOW.

REPRESENTATION IS OPEN AND ELECTED, AND SUPPLIERS WERE NOT ASSESSED FOR IT

GRI 407-1 **Operations and suppliers where freedom of association may be at risk**

Employees are free to form or join worker organisations and to elect their own representatives, and no restriction, allegation or incident of interference was recorded in 2025. One representation risk was identified internally; suppliers were not assessed for this right specifically.

RESTRICTIONS ON FREEDOM OF ASSOCIATION

0

none identified in 2025

ALLEGATIONS OR INCIDENTS OF INTERFERENCE

0

own operations

OPERATION WITH AN IDENTIFIED REPRESENTATION RISK

1

residual risk low mitigation open

SUPPLIERS EVALUATED FOR THIS RIGHT

NOT ASSESSED

stated as a limitation

OWN OPERATIONS

- Type of operation and location: the Bangkok manufacturing operation in Thailand is the only operation where a risk to this right was identified.
- AviusULD has no trade union. Employees elect representatives to the Welfare Committee, which meets management regularly Labor Relations, Employee Voice & Grievance reports its composition, cadence and authority.
- The risk identified is insufficient employee representation to top management, scored 4 and therefore low.
- Measures taken in 2025: the elected Welfare Committee was maintained with regular meetings with top management, representation was tracked on the HR KPI dashboard, and the action remained open at 31 December 2025 for completion in the 2026 cycle.

  No employee was prevented from joining or forming an organisation, and no allegation of interference was received.

SUPPLIERS: WHAT WAS AND WAS NOT DONE

- Type of supplier and location: Tier-1 suppliers across Thailand, China and other sourcing countries are screened for human rights through the FO-SOU-001 questionnaire, the Supplier Code of Conduct and on-site audits, and the Code requires respect for labour rights.
- Freedom of association was not evaluated as a separate supplier risk category in 2025, so no count of suppliers at risk, by type or by country, can be given.
- This is a limitation, not a finding of zero risk.
- Measures taken in 2025: Supplier Code issued to 100% of active suppliers, 38 suppliers audited and labour criteria assessed through the questionnaire. The 2026 cycle adds freedom of association as a named category, with Tier-2 coverage by 2027.

WHERE THIS SITS AGAINST THE REST OF THE REPORT

Labor Relations, Employee Voice & Grievance covers the mechanics of representation: the nine-member Safety Committee, the elected Welfare Committee, the three company-level agreements signed in June 2025 with the elected representatives, and the absence of a trade union at any site. This slide adds only what GRI 407-1 asks beyond that, namely whether any operation or supplier carries a risk to the right itself. For AviusULD's own operations the answer is one low-rated representation risk under active management for suppliers the honest answer is that the question was not asked in 2025.

Source: 38_Human Rights Risk Assessment Report and risk register item 1, Jun 2025 Supplier Code of Conduct FO-SOU-001 Labor Relations, Employee Voice & Grievance employee representation disclosures.

NO CHILD LABOUR FOUND; AND THE SUBCONTRACTED_ WORKFORCE IS THE CONTROL POINT

GRI 408-1 **Operations and suppliers at significant risk for incidents of child labour**

Age and legal employment status were verified for 100% of the workforce and no case of child labour was identified in AviusULD's operations or supply chain. The risk that was found sat with subcontracted labour engaged through STC, and was closed in June 2025.

CASES OF CHILD LABOUR IDENTIFIED

0

own operations and suppliers

WORKFORCE AGE-VERIFIED

100%

age and legal employment status

RISK SCORE BEFORE AND AFTER MITIGATION

8 TO 4

closed 30 June 2025

SUPPLIER FLAGGED FOR CHILD-LABOUR RISK

1

Thailand, finding closed in 2025

CONTROLS IN AVIUSULD'S OWN OPERATIONS

- Type of operation and location: the Bangkok manufacturing operation in Thailand, including subcontracted labour engaged through STC.
- Recruitment, employment and promotion under OP-HRM-001 sets identity and age verification at hiring.
- No worker under 18 was employed during 2025, so no young worker was exposed to hazardous work the hazardous processes identified in Occupational Health, Safety & Contractor Safety are worked only by adult employees.
- Measures taken in 2025 toward the abolition of child labour: official identity and age verification required for subcontractor employees as well as direct hires age-compliance clauses written into subcontractor contracts random audits and spot checks on site age and legal employment status verified for 100% of the workforce, meaning the 239 employees at 31 December 2025 and the STC subcontracted workers, whose number is reported under GRI 2-8 and is not counted in this topic.
- Remediation for any identified victim follows OP-HRM-004 no case required it in 2025.

SUPPLIERS

- Type of supplier and location: one Tier-1 supplier in Thailand was identified with elevated child-labour risk: its employment requirements did not specify its child labour regulations, a corrective action was agreed, the detail was documented and the action closed within 2025, the human-rights finding for the year the primary aluminium mill carried a combined forced and child labour risk, closed in July 2025.
- Screening runs through the FO-SOU-001 questionnaire, which covers child labour alongside migrant-worker practice, legal compliance, health and safety and environmental criteria, supported by on-site audits.
- The Supplier Code of Conduct prohibits child labour and requires compliance with labour law it is issued to 100% of active suppliers and signed by 67 of 100, covering 93% of material spend.
- Measures taken in 2025: 3 of 9 new suppliers (33%) screened on social criteria, being all those approved after ESG criteria entered the selection set the six approved earlier in the year were assessed on quality, technical, delivery and financial criteria only 38 suppliers audited, an on-site audit at the aluminium mill and a signed code of conduct. From 2026 every new supplier is screened before approval.

HOW A RISK IS DISTINGUISHED FROM A CASE

AviusULD reports zero confirmed cases and, separately, the risks it identified. The child-labour risk scored 8 before mitigation, the highest internal score in the register, because subcontracted labour is recruited by a third party verification, contract clauses and spot checks brought it to 4. Supplier coverage is still being built out: ESG criteria entered the standing selection set during 2025 and 3 of 9 new suppliers (33%) were screened, being all those approved after that point, while the six approved earlier in the year and the existing base are being brought up through the two-year re-verification cycle and the audit programme rather than re-screened at once.

Source: 38_Human Rights Risk Assessment Report, register items 5 and 11 OP-HRM-001 OP-HRM-004 Supplier Code of Conduct Responsible Supplier Selection & ESG Due Diligence supplier screening and audit dataset 2025.

NO FEES, NO DEPOSITS, NO RETAINED DOCUMENTS AND VOLUNTARY OVERTIME

GRI 409-1 **Operations and suppliers at significant risk for incidents of forced or compulsory labour**

No case of forced, bonded, prison or compulsory labour was identified in 2025. The control set is stated positively below so an assurer can test each element, and the residual risk on both the internal and the supply-chain exposure was rated low.

CASES OF FORCED OR COMPULSORY LABOUR	RECRUITMENT FEES OR DEPOSITS CHARGED	SUPPLIERS ASSESSED ON LABOUR CRITERIA	SUPPLIER FINDINGS ON FORCED LABOUR
0	0	28	0
own operations and suppliers	to employees or applicants	FO-SOU-001 questionnaire	Aluminium mill risk closed Jul 2025

THE CONTROL SET, OWN OPERATIONS

- Type of operation and location: the Bangkok manufacturing operation in Thailand, including the subcontracted workforce engaged through STC.
- Measures in place and taken during 2025 toward the elimination of forced and compulsory labour:
- No recruitment fee is charged to any employee or applicant, and no deposit is taken before employment.
- Employees keep their own passports, identity cards and personal documents.
- No restriction is placed on worker movement no locked accommodation, no confinement, no document retention.
- No threat, coercion or intimidation is used the Just and Fair Culture Policy protects anyone who reports.
- Overtime is voluntary and paid under Thai labour law, with consent required each time.
- Employees may resign subject to contractual notice. Bonded and prison labour are not used in any form.

FOREIGN NATIONALS AND SUPPLIERS

- Type of supplier and location: no supplier finding on forced or compulsory labour was raised in 2025 the one human-rights finding concerned child labour regulations and is reported under GRI 408-1. The primary aluminium mill carried a combined forced and child labour risk, closed in July 2025.
- AviusULD employed a small number of foreign nationals in 2025, all in management and leadership roles, all legally employed with valid work permits, holding their own documents, on the same terms, benefits and grievance access as other employees. No migrant production workers and no agency-recruited migrant labour were employed.
- Measures taken in 2025: 28 suppliers assessed on labour criteria including migrant-worker practice and legal compliance, audits performed, and no supplier suspended or terminated on forced-labour grounds.

INTERNAL AND SUPPLY-CHAIN RISK RATINGS

The internal forced-labour risk, covering excessive overtime, withheld wages and coercive practice by subcontractors, scored 8 before mitigation and 4 after, closed on 30 June 2025 through labour-compliance clauses in contracts, Code of Conduct signature and HR monitoring of working hours and payment records. In the aluminium supply chain, the combined forced and child labour risk scored 6 and closed at 4 in July 2025 after an on-site audit at the mill and a signed code of conduct.

Source: 38_Human Rights Risk Assessment Report, register items 6, 7 and 11 Employee Handbook 2025 Ethical Labor and Diversity Policy Responsible Supplier Selection & ESG Due Diligence supplier assessment and corrective-action dataset 2025.

SECURITY TRAINING COVERS_ CONDUCT AND EMERGENCIES

GRI 410-1 **Security personnel trained in human-rights policies or procedures**

Site security is outsourced to four guards employed by Guardforce. They are trained on the treatment of employees and visitors and on emergency response. The four human-rights related topics were not delivered in 2025 and are scheduled for 2026.

TRAINING TOPIC	GUARDS	TRAINED	STATUS
Ethical Labor and Diversity Policy	4	0	Scheduled 2026
Employee Code of Conduct	4	0	Scheduled 2026
Code of Ethics	4	0	Scheduled 2026
Appropriate use of force	4	0	Scheduled 2026, by provider
Treatment of employees and visitors	4	4	Complete
Emergency response	4	4	Complete
Human-rights policies, GRI 410-1 basis	4	0	0 of 4, scheduled 2026

WHAT THIS MEANS FOR THE DISCLOSURE

GRI 410-1 asks for the percentage of security personnel who have received formal training in the organisation's human-rights policies or specific procedures. On that basis the 2025 figure is 0 of 4 guards, because the Ethical Labor and Diversity Policy, the Employee Code of Conduct, the Code of Ethics and use-of-force training were not delivered during the year. All four are scheduled for 2026.

The 33.33% figure AviusULD reports internally is the average across all six training topics and is not human-rights coverage.

All four guards are employees of a third-party provider and are included in the calculation AviusULD has no in-house security personnel.

Training requirements do not yet sit in the service agreement. Expectations reach the provider through company policy and the Supplier Code of Conduct, AviusULD delivers the treatment and emergency-response training itself through HR and HSE, and Guardforce is to deliver the use-of-force training in 2026.

THE CONTRACT, AND WHAT IT DOES NOT SAY

The 2026 manned security guarding service agreement with Guardforce Cash Solutions Security (Thailand) requires the provider to comply with applicable law and regulation, keep company information confidential, supply competent and properly supervised personnel, support site security requirements, and respond to abnormal and emergency events. Those terms support AviusULD's human-rights expectations indirectly, covering lawful employment, protection of personnel, privacy, and health and safety at work.

The agreement contains no explicit human-rights clause and no express requirement on non-discrimination, forced labour, child labour or human-rights due diligence. Expectations therefore reach the provider through company policy and the Supplier Code of Conduct rather than through the contract, and AviusULD plans to communicate and train these topics with the outsourced guards during 2026. Adding an explicit clause at the next contract renewal would close the gap at source.

Source: security training record 2025; 2026_Manned Security Guarding Service Agreement, Guardforce Cash Solutions Security (Thailand) Company Limited; Supplier Code of Conduct.

HUMAN-RIGHTS TRAINING REACHED 99.6% OF EMPLOYEES IN 2025

GRI 412-2

Employee training on human-rights policies and procedures

The Ethical Labor and Diversity Policy course carries the human-rights content and ran for 79.3 hours in 2025, reaching 238 of the 239 employees at 31 December 2025, 99.6% against a 100% target. Managers and purchasing staff were fully covered.

TRAINING HOURS DELIVERED

79.3

Ethical Labor and Diversity Policy

EMPLOYEES TRAINED

238

of 239 employees at 31 December 2025

COVERAGE AGAINST A 100% TARGET

99.6%

99.6% against a 100% target

MANAGERS AND PURCHASING STAFF

100%

both populations complete

WHAT THE TRAINING COVERS

- Ethical Labor and Diversity Policy: the prohibitions on child labour, forced labour and discrimination, equal opportunity and the reporting route.
- Employee Code of Conduct: expected conduct, fair treatment and harassment.
- Code of Ethics: business ethics and the duty to report.
- Anti-discrimination and anti-harassment content sits inside those courses rather than as separate titles.
- Forced and child labour awareness is delivered as part of the policy course.
- Purchasing staff additionally complete supplier-responsibility training on the EcoVadis platform.

TARGET POPULATION AND EVIDENCE

- Target population is the 239 employees on the payroll at 31 December 2025 238 completed the course, giving 99.6%. Year-end headcount was 239 at 31 December 2025. Managers and purchasing staff are priority groups and both reached 100%.
- The shortfall to 99.6% is one employee on extended sick leave, who completed the course after returning in 2026.
- Delivered hours (79.3) and employees completing (238) are different measures the earlier equal figures were a recording error, corrected from the 2025 training records. Evidence held: the three training decks for the Ethical Labor and Diversity Policy, the Employee Code of Conduct and the Code of Ethics, with HR attendance records behind each.
- The 2026 cycle links identified risks directly to training, adding forced-labour prevention and ethical recruitment as named topics.

SECURITY PERSONNEL ARE COUNTED SEPARATELY

The four outsourced security guards are not part of the 99.6%. GRI 410-1 treats them as their own population, and none had completed human-rights, Code of Conduct, non-discrimination or use-of-force training by the end of 2025, as page 302 sets out. Reporting them inside the employee figure would overstate coverage, so the two populations are kept apart throughout this topic.

TARGET POPULATION IS THE 239 EMPLOYEES ON THE PAYROLL AT 31 DECEMBER 2025.

Source: AviusULD 2025 training records Training Materials for Ethical Labor and Diversity Policy, Employee Code of Conduct and Code of Ethics Human Rights & Fair Labor Practices KPI table.

ALL THREE SITES WERE REVIEWED; NO INVESTMENT_ AGREEMENT REQUIRED SCREENING

GRI 412-1 **Operations subject to human-rights review and GRI 412-3 | Agreements with human-rights clauses**

The human-rights review covered Thailand, the Netherlands and the United States. Eight suppliers are defined as critical (above 2% of spend), and all eight are covered by human-rights requirements, seven by signature and one through an equivalent corporate code.

SITES SUBJECT TO HUMAN-RIGHTS REVIEW

3 OF 9

Thailand, Netherlands, USA

OPERATIONS ASSESSED

100%

412-1 coverage

SIGNIFICANT PARTNERS COVERED

7 OF 8

by human-rights requirements

MATERIAL SPEND UNDER SIGNED CODES

93%

67 of 100 suppliers signed

OPERATIONS REVIEWED. 412-1

- AviusULD operates three significant locations and all three were subject to the 2025 human-rights review, giving 100% coverage.
- By country: Thailand 1 of 1, the Bangkok manufacturing operation the Netherlands 1 of 1, the sales office the United States 1 of 1, the sales office.
- The detailed risk assessment under OP-QUA-013 covers Thailand operations, including employees, on-site contractors and service providers, and Tier-1 suppliers.
- The review is repeated annually, and from 2026 it becomes a human-rights impact assessment that integrates stakeholder feedback, with employee representatives included in the review sessions.

AGREEMENTS. 412-3

- GRI 412-3 covers significant investment agreements and contracts, meaning agreements that move the company into a position of ownership in another entity or that start a capital investment project material to the financial accounts.
- No significant investment agreement or contract of that kind was finalised during 2025, so there is no population to report against and no human-rights screening of investment agreements to disclose.
- Supplier commitments are reported separately, under GRI 3-3 and Responsible Supplier Selection & ESG Due Diligence, because they are procurement contracts rather than investment agreements: the Supplier Code of Conduct is issued to 100% of active suppliers and signed by 67 of 100, covering 93% of material spend, and seven of the eight critical suppliers by direct-material spend have signed, with the tenth, Howmet Aerospace, recognised as meeting the intent through its own equivalent corporate code.

THE ONE AGREEMENT WITHOUT A HUMAN-RIGHTS CLAUSE

The security guarding agreement is the exception. It requires lawful conduct, confidentiality, competent supervised personnel and emergency response, but carries no explicit human-rights, non-discrimination, forced-labour or child-labour clause. Human-rights expectations therefore reach the security provider through company policy and the Supplier Code rather than the contract, and the gap is scheduled to be addressed through communication and training in 2026.

Source: 38_Human Rights Risk Assessment Report, Jun 2025 Supplier Code of Conduct and signature register Responsible Supplier Selection & ESG Due Diligence supplier dataset 2025 2026_Manned Security Guarding Service Agreement.

3 OF 9 NEW SUPPLIERS WERE SCREENED ON ESG AND HUMAN-RIGHTS CRITERIA IN 2025

GRI 408-1 · 409-1 · 412-1 **Human-rights due diligence in the supply chain**

ESG and human-rights criteria became part of the standing supplier selection set during 2025, and 3 of the 9 new suppliers (33%) were screened. The six approved earlier in the year were assessed on quality, technical, delivery and financial criteria only. The audit programme carried the rest of the assurance, and the figures below are the ones reported in Responsible Supplier Selection & ESG Due Diligence.

SUPPLIERS SCREENED ON SOCIAL AND ENVIRONMENTAL CRITERIA

3 OF 9

33% of new suppliers, FO-SOU-001

SUPPLIERS AUDITED IN 2025

38

28 assessed on ESG, 74%

SUPPLIERS SIGNING THE CODE

67 OF 100

93% of material spend

ESG CORRECTIVE ACTION RAISED

1

closed within 2025

HOW SUPPLIERS ARE SCREENED AND MONITORED

- The FO-SOU-001 questionnaire covers environmental, labour and human rights, health and safety and ethics in one exercise, which is why the same three new suppliers count under both social and environmental screening.
- Screening method is questionnaire and on-site audit EcoVadis assessment supports it.
- The Supplier Code of Conduct is issued to every active supplier and required as a condition of the relationship.
- The existing supplier base is being brought up through the two-year re-verification cycle and the audit programme rather than re-screened at once. From 2026 every new supplier passes ESG screening before approval.

WHAT WAS FOUND, AND WHAT FOLLOWED

- One Thai supplier's employment requirements did not specify its child labour regulations. A corrective action was agreed, the supplier documented the detail and the action closed within 2025. This is the human-rights finding for the year.
- The primary aluminium mill carried three risks: environmental damage from aluminium production, worker exposure to unsafe conditions, and forced or child labour. All three were closed in July 2025 after an on-site audit, with the labour risk also secured by a signed code of conduct.
- No other supplier was identified with elevated child-labour risk.
- No supplier relationship was ended on environmental or social grounds in 2025.

CAVEATS CARRIED WITH THESE FIGURES

The 2025 ESG finding count is settled: 1 ESG corrective action from the supplier audit programme (child labour regulations not specified), closed in 2025, with 188 minor findings of all types across that programme reported in Responsible Supplier Selection & ESG Due Diligence that one corrective action is the human-rights finding. Purchasing's return records 28 suppliers assessed for environmental impacts and nil against every other requirement, with no significant negative environmental impact identified the aluminium mill risks were reviewed by on-site audit and were not a finding. The 38_Human Rights Risk Assessment Report states that 100% of suppliers were screened under the Supplier Code and human-rights criteria that figure describes Code issuance, which is 100%, not screening, which is 3 of 9 new suppliers, 33%.

Source: Responsible Supplier Selection & ESG Due Diligence supplier dataset 2025, Approved Supplier List, FO-SOU-001, audit and corrective-action records 54_Sustainable Procurement Risk Assessment Report 38_Human Rights Risk Assessment Report.

ZERO-CASE AND SUPPLIER TARGETS WERE MET; HUMAN-RIGHTS TRAINING COVERAGE WAS NOT

GRI 3-3 **2025 target evaluation and the 2026 commitments**

Every zero-case target and both supplier targets were achieved in 2025. Employee training fell just short of full coverage, and security training has no human-rights component yet.

KPI	2024	2025 TARGET	2025 RESULT	STATUS
Child-labour cases	0	0	0	Achieved
Forced-labour cases	0	0	0	Achieved
Human-rights grievances	0	0	0	Achieved
Employees receiving human-rights training	0	100%	99.6%, 238 of 239	Not achieved
Security personnel trained, all topics	0	No target set	33.33%	No target set
Suppliers screened for ESG and human rights	n/a	All suppliers approved after criteria applied	3 of 9 new suppliers, 33%	Achieved
Suppliers with identified labour risk assessed	n/a	100%	100%	Achieved
Supplier ESG corrective-action closure, Responsible Supplier Selection & ESG Due Diligence basis	n/a	100%	1 of 1 closed within the year, 100%	Achieved

WHAT WORKED

- No case of child labour, forced labour, trafficking or human-rights grievance arose in 2025, and every labour-rights risk in the register closed the year in the low band.
- Age and legal employment status were verified for the whole workforce, and all three sites were reviewed.

WHAT DID NOT

- Training stopped at 238 of the 239 employees at 31 December 2025, and security personnel have no human-rights, Code of Conduct, non-discrimination or use-of-force training.
- ESG screening covered the 3 suppliers approved after the criteria entered the selection set, but the six approved earlier in the year were assessed on commercial criteria only. Across all corrective-action types, 31 supplier actions were open at year end Responsible Supplier Selection & ESG Due Diligence does not publish an ageing split, so no overdue count is given.

2026 COMMITMENTS

Run an annual human-rights impact assessment that integrates stakeholder feedback, and include employee representatives in the risk-review sessions. Screen every new supplier on ESG criteria before approval, and continue bringing the existing base up through the two-year re-verification cycle. Extend assessment to Tier-2 suppliers by 2027. Deliver human rights, Code of Conduct, non-discrimination and use-of-force training to the outsourced security personnel, and add an explicit human-rights clause at the next security contract renewal. Link identified risks to named training programmes such as forced-labour prevention and ethical recruitment, and carry out the ESG internal audit that 2025 did not have.

EVERY ZERO-CASE TARGET AND BOTH SUPPLIER TARGETS WERE ACHIEVED IN 2025.

Source: Human Rights & Fair Labor Practices KPI table 2024 and 2025 38_Human Rights Risk Assessment Report improvement actions 54_Sustainable Procurement Risk Assessment Report Responsible Supplier Selection & ESG Due Diligence supplier dataset.

GRI 416 · 417

PRODUCT RESPONSIBILITY, CUSTOMER SAFETY & TRUST

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE

Reporting period 1 January – 31 December 2025. AviusULD manages product responsibility through aviation safety governance, EASA Part-21G production approval, product conformity controls, traceability, and customer feedback management.

100%
significant product categories assessed

0
product safety incidents/recalls

+31
2025 Net Promoter Score

98%
satisfied / very satisfied with products

Source: AviusULD quality, aviation safety and customer records, 2025.

PRODUCT RESPONSIBILITY & CUSTOMER TRUST



EXECUTIVE MESSAGE

Customer safety and trust are core to AviusULD's role in the aviation ULD value chain. In 2025, all significant product categories were covered by product safety and conformity controls, and no incidents of non-compliance with regulations or voluntary codes were identified concerning product health and safety, product information and labeling, or marketing communications. AviusULD will continue strengthening SMS maturity, traceability, complaint prevention and customer feedback loops.

PRODUCTION APPROVAL

NL.21G.2401 – EASA Part-21G Production Organisation Approval, issued by the Civil Aviation Authority of the Netherlands. Scope: C1 appliances, unit load devices C2 parts, spare parts for C1 appliances. Approved locations: Alkmaar, Netherlands Bangsaothong, Samut Prakan, Thailand. Original issue 3 March 2023 latest revision 11 December 2025 unlimited duration while compliance is maintained. Prior to approval of a product design, an EASA Form 1 may be issued for conformity purposes only.

WHY THIS TOPIC_ IS MATERIAL

ULD safety and trust directly affect customers, aviation operations and regulatory confidence

TOPIC SCOPE

AviusULD manufactures and sells aviation Unit Load Devices and related parts, including containers, FRC ULDs, pallets and SmartULD devices. Product responsibility is material because defects, incorrect identification, insufficient product information or non-conforming parts could affect aviation operations, customer confidence and regulatory standing. AviusULD causes some of these impacts directly, contributes to others, and is linked to further impacts through suppliers, contractors and customers.

MATERIAL IMPACT PATHWAY

DESIGN & APPROVAL

Product requirements, approved design and conformity scope

PRODUCTION CONTROLS

Inspection, FAI, special process, traceability, release

IN-SERVICE FEEDBACK

Customer complaints, aviation safety reports, NPS

CORRECTIVE ACTION

Containment, 8D root cause, CAPA and verification

GRI MAPPING

DISCLOSURE	TOPIC	2025 POSITION
GRI 416-1	Health & safety impacts	100% of significant product categories assessed
GRI 416-2	Safety non-compliance	0 fines or penalties, 0 warnings, 0 voluntary-code non-compliances
GRI 417-1	Information & labeling requirements	5 information types addressed; 100% of categories covered and assessed
GRI 417-2	Labeling non-compliance	0 fines or penalties, 0 warnings, 0 voluntary-code non-compliances
GRI 417-3	Marketing communications	0 incidents concerning marketing communications, including advertising, promotion and sponsorship

SCOPE AND PRODUCT CATEGORIES

The Bangkok manufacturing operation is the main manufacturing scope the Netherlands supports design safety and the USA supports customer safety. The four significant product categories are containers, FRC ULDs, pallets and SmartULD. Spare parts are components of these categories, supplied to customers for repair. SmartULD is manufactured by ELoc8 and sold under AviusULD.

Source: AviusULD quality, aviation safety and customer records, 2025.

PRODUCT SAFETY_ GOVERNANCE

Aviation safety is governed through EASA Part-21G, SMS, QMS and cross-functional controls


Human Environment and Transport Inspectorate
Ministry of Infrastructure and Water Management

The Netherlands
A Member of the European Union
Civil Aviation Authority The Netherlands

PRODUCTION ORGANISATION APPROVAL CERTIFICATE

Reference: NL.21G.2401

Pursuant to Regulation (EU) 2018/1139 of the European Parliament and of the Council and to Commission Regulation (EU) No 748/2012, for the time being in force and subject to the conditions specified below, the Civil Aviation Authority The Netherlands, hereby certifies:

AviusULD B.V.

Saffierstraat 10

1812 RM Alkmaar

as a production organisation in compliance with Annex I (Part 21) Section A of Regulation (EU) No 748/2012, is approved to produce products, parts and appliances listed in the attached approval schedule and issue the related certificates using the above references.

CONDITIONS:

1. This approval is limited to that specified in the enclosed terms of approval.
2. This approval requires compliance with the procedures specified in the approved production organisation exposition.
3. This approval is valid while the approved production organisation remains in compliance with Annex I (Part 21) to Regulation (EU) No 748/2012.
4. Subject to compliance with the foregoing conditions, this approval shall remain valid for an unlimited period of time unless it has previously been surrendered, superseded, suspended or revoked.

Date of original issue:	March 03, 2023	For the competent authority: The Minister of Infrastructure and Water management, On behalf: The Inspector Civil Aviation Authority The Netherlands
Date of this revision:	December 11, 2025	
Revision no:	2	
Page 1 of 2		Amsterdam, December 11, 2025

EASA Form 55a issue 3 — Page 1 of 2

EASA Part-21G approval certificate

NL.21G.2401

PRODUCTION ORGANISATION APPROVAL REFERENCE

03 MAR 2023

ORIGINAL ISSUE DATE

11 DEC 2025

LATEST REVISION DATE

UNLIMITED

VALIDITY WHILE COMPLIANT

PRODUCT RESPONSIBILITY & CUSTOMER TRUST

GOVERNANCE SYSTEM

EASA PART-21G/POA

Approval to produce Unit Load Devices and related spare parts.

SAFETY MANAGEMENT MANUAL (OP-QUA-018)

Documents SMS scope, safety policy, responsibilities, risk management, assurance and promotion.

QUALITY & NCR/CAPA CONTROLS (OP-QUA-007)

Incoming, in-process and final controls MRB 8D problem solving traceability.

CROSS-FUNCTIONAL OWNERSHIP

Quality/SMS, Engineering, Production, Aviation Safety, Customer Service/Sales.

ASSURANCE STATUS

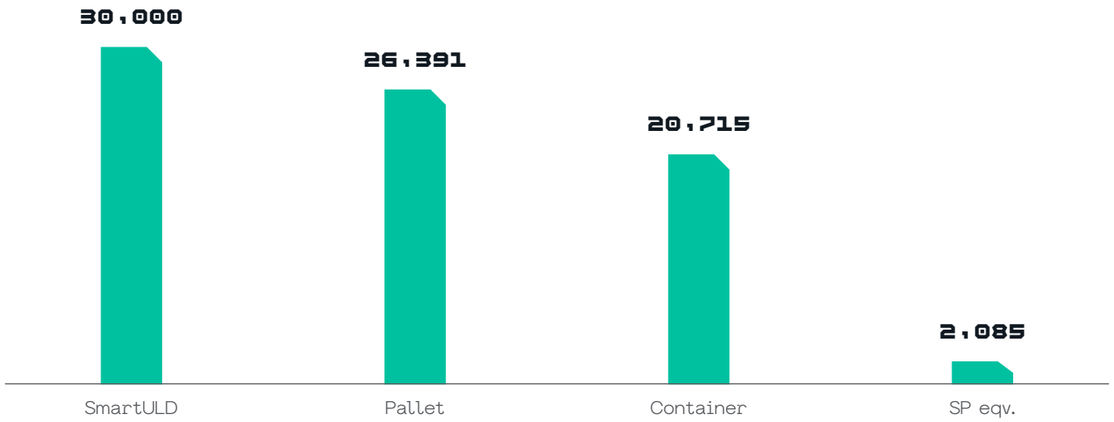
AviusULD was subject to two separate CAA-NL audits during the Part-21G production management system transition. The on-desk SMS audit of 2 June 2025 (report 25.00017478B) covered SMS elements 1 to 3 and raised one transition observation and four Level 2 transition findings AviusULD responded with substantiating documents. A second, separate audit raised observations under reference 25.00034357, formally closed on 31 March 2026. Evaluation of SMS elements 4 to 6 follows at a later stage. No approval restrictions or suspensions were reported for 2025.

Source: **AviusULD** quality, aviation safety and customer records, 2025.

2025 PRODUCT SCOPE AND SAFETY ASSESSMENT_

GRI 416-1: 100% of significant product categories were assessed for health and safety impacts

2025 PRODUCT AND SALES VOLUME BY PRODUCT LINE, UNITS (79,191 TOTAL)



ASSESSMENT COVERAGE

SIGNIFICANT PRODUCT CATEGORIES ASSESSED

100%

SIGNIFICANT CATEGORIES: CONTAINER, FRC, PALLET, SMARTULD

4

ASSESSMENT STAGES ACROSS LIFECYCLE

8

ASSESSMENT STAGES

DESIGN → MATERIAL SELECTION → SUPPLIER APPROVAL → MANUFACTURING

INSPECTION → TESTING → RELEASE → CUSTOMER FEEDBACK

DISCLOSURE NARRATIVE

AviusULD assesses the health and safety impacts of all four significant product categories for improvement spare parts are components of these categories. The eight lifecycle stages below are the assessment criteria. Assessments are embedded from design and material selection through supplier qualification, manufacturing, inspection, testing, release and in-service feedback. The process is supported by EASA Part-21G production approval, SMS risk assessment, quality inspections, material certification, and corrective action management.

VOLUME BASIS

Units sold in 2025 by product line across the three legal entities: 79,191 units in total, including 30,000 SmartULD units manufactured by business partner ELoc8 and 2,085 spare-part equivalents. This is not the same basis as the 45,055 finished ULD units produced at the Bangkok manufacturing operation, which is the denominator for energy and GHG intensity in the climate topic.

Reporting boundary Design approval, production controls, conformity, traceability and NCR/CAPA data cover the manufacturing operations under operational control: the Bangkok manufacturing operation and Alkmaar, Netherlands. This boundary is wider than the Bangkok manufacturing boundary used by the environmental and safety topics in this report. In-service and field use of delivered products sits outside operational control and is captured only through complaints, aviation safety reports and customer surveys received by AviusULD. SmartULD units are manufactured by ELoc8 outside operational control and are included in volume and safety assessment figures because they are sold under the AviusULD name.

Source: AviusULD quality, aviation safety and customer records, 2025.

SAFETY MANAGEMENT SYSTEM AND AVIATION RISK ASSESSMENT

SMS links policy, risk management, assurance, promotion and compliance monitoring

POLICY & OBJECTIVES

Safety policy, safety objectives, Just & Fair Culture, accountability.

RISK MANAGEMENT

Hazard identification, safety risk assessment, mitigation actions.

SAFETY ASSURANCE

SPI/SPT, management of change, internal audit, continuous improvement.

SAFETY PROMOTION

SMS training, safety communication and awareness.

2025 SMS ASSURANCE EVIDENCE

SAFETY REPORTS

2 aviation safety reports received and investigated in 2025.

8D CLOSURE

Both cases were investigated under 8D and closed, on 30 November 2025 and 30 January 2026.

CAA-NL AUDIT

One transition observation and four Level 2 findings from the June 2025 on-desk audit a separate audit's observations closed in March 2026.

RISK REGISTER

Aviation Safety Risk Assessment captures hazards, risk index and mitigation.

2025 AVIATION SAFETY CASES

CASE	EVENT AND RISK RATING	INVESTIGATION AND CLOSURE
001-2025	GOH extrusion PN 4-128169: hole position outside drawing tolerance left a sharp edge after milling; 200 parts affected. Likelihood 3 weak, severity D minor; not classified an unsafe condition and not delivered to the customer.	8D NCR_2025_00105. Safety board review 19 Aug 2025. CAPA validated and risk assessment updated 30 Jan 2026; report closed 30 Jan 2026.
002-2025	FRC door PN 50-71142: stitching outside drawing exposed canvas fibres, raising flame-spread potential; 1 part affected. Likelihood 3 weak, severity D minor; not classified an unsafe condition and not delivered to the customer.	8D NCR_2025_00106. Safety board review 19 Aug 2025. CAPA validated 30 Nov 2025; report closed 30 Nov 2025.

The Aviation Safety Risk Assessment (FO-QUA-098) records hazard source, process, potential cause, undesirable event, current controls, risk index, action plan, owner, closure and post-action risk review.

Source: **AviusULD** quality, aviation safety and customer records, 2025.

PRODUCT_ CONFORMITY, TRACEABILITY AND NCR/CAPA

Non-conforming products: quarantine, MRB disposition, 8D root cause and verified actions

2025 CASE VOLUME

01 35 cases logged through the 8D process between February and December 2025.

02 2 aviation safety reports received, investigated and closed through 8D.

03 100% CAPA closure on cases raised in the reporting period.

04 Case example: engraved identification plate found partially loose (NCR 2025-00134).

35 CASES LOGGED THROUGH THE 8D PROCESS BETWEEN FEBRUARY AND DECEMBER 2025.

CONTROL FLOW

DETECT → IDENTIFY & SEGREGATE → CONTAIN → MRB DISPOSITION

ROOT CAUSE 8D → CAPA & VERIFY → CLOSE & COMMUNICATE

TRACEABILITY RECORDS

Serial Number	**Part Number**	**Batch/Lot**	**Material Certs**
Inspection Records	**Production Records**	**EASA Form 1 / Coc**	**Customer Delivery Records**

8D TIMESCALES

D1-D3: 7 DAYS	D4-D5: 30 DAYS	D6-D8: 60 DAYS
Team, problem, containment	Root cause and corrective plan	Implement, prevent, close

Source: **AviusULD** quality, aviation safety and customer records, 2025.

2025_ PRODUCT SAFETY PERFORMANCE

GRI 416-2: no product safety incidents, recalls, fines or significant product failures reported

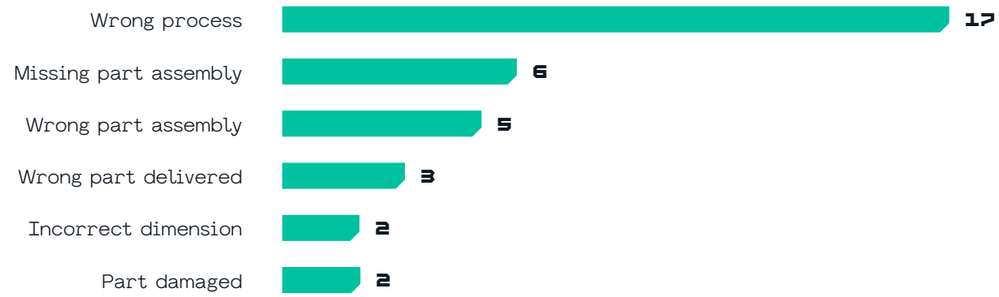
Product safety incidents	**Product recalls/field safety actions**	Fines or penalties
Warnings	Voluntary-code non-compliances	**100%** CAPA closure rate

CUSTOMER COMPLAINT TREND

Complaints



COMPLAINT PROFILE, 2025



PERFORMANCE NOTE

Counting basis Counted across all four significant product categories manufactured or sold by the three legal entities, for all units delivered between 1 January and 31 December 2025, and including events notified in the period that relate to units delivered earlier. Recall or field safety action means any customer safety notification, fleet inspection request or return-to-manufacturer action initiated by AviusULD or by a regulator. Non-compliance counts cover regulatory findings and voluntary-code findings notified in the period.

Safety-related complaints were recorded and investigated, but did not result in reportable regulatory non-compliance, product recall, customer safety notification, field safety action, fine or penalty in 2025. Counts include only cases assessed as aviation safety-related the 2025 8D log records 35 quality cases in total. Six aviation safety-related customer complaints and no significant product failures were recorded. No incidents related to events in prior periods. Product information and labeling incidents are reported under GRI 417-2, page 326.

Source: AviusULD quality, aviation safety and customer records, 2025.

PRODUCT_ INFORMATION AND LABELING

GRI 417-1/2: identification and conformity information sit in ULD marking and documentation

INFORMATION REQUIRED BY PROCEDURES (GRI 417-1-A)

1. Sourcing of components	Required — traceability records
2. Content and substances	Required — EBOM / PBOM / ERP-LN
3. Safe use	Required — Component Maintenance Manual
4. Disposal and its impacts	Not required by current procedures
5. Other: identification and conformity	Required — identification plate

100%

of significant categories covered by and assessed for compliance

0

fines or penalties, warnings and voluntary-code non-compliances

INTERNAL PRODUCT-INFORMATION CASES, 2025 (7 IN TOTAL)



EXAMPLE ULD IDENTIFICATION PLATE

AVIUSULD B.V.
PART NO. M4F-XTFA2FX
TYPE M4F
SERIAL NO. XXXXXX
NOMINAL WEIGHT 378 KG
DATE OF MANUFACTURE MM/YY
ETSO/EASA APPROVAL
OWNER/BURN RATE INFO

REPORTING NOTE

Identification and conformity information comprises manufacturer, product type, part number, serial number, manufacturing date, nominal and maximum gross weight, and certification or approval. Seven internal product-information quality cases were recorded and closed through 8D in 2025 none constituted non-compliance with regulations or voluntary codes, and no fines, warnings or penalties were incurred. Reported under GRI 417-2: 0 incidents of non-compliance resulting in a fine or penalty, 0 resulting in a warning, and 0 concerning voluntary codes.

Source: **AviusULD** quality, aviation safety and customer records, 2025.

CUSTOMER TRUST_ AND FEEDBACK

2025 customer survey confirms reliability lead time and after-sales are the areas to improve

+31

2025 net promoter score

98%

satisfied / very satisfied with products

WHAT CUSTOMERS VALUE

Product reliability and consistent quality.

Innovative product design.

AviusULD seen as a dependable business partner across the ULD value chain.

WHERE CUSTOMERS WANT IMPROVEMENT

Lead-time predictability.

Spare-parts availability.

Proactive communication on order status.

After-sales and technical support.

HOW THE FINDINGS WERE USED

The findings set the 2026 improvement priorities: proactive customer updates on spare-parts lead time, and stronger customer-oriented spare-parts and technical support processes.

Both priorities are tracked through the quality and SMS improvement cycle.

AN INDEPENDENT CUSTOMER SURVEY WAS CARRIED OUT IN 2025. DETAILED SURVEY RESULTS ARE COMMERCIALLY CONFIDENTIAL AND ARE USED INTERNALLY TO SET IMPROVEMENT PRIORITIES.

THE FINDINGS SET THE 2026 IMPROVEMENT PRIORITIES: PROACTIVE CUSTOMER UPDATES ON SPARE-PARTS LEAD TIME, AND STRONGER CUSTOMER-ORIENTED SPARE-PARTS AND TECHNICAL SUPPORT PROCESSES.

Source: AviusULD customer feedback programme, 2025.

PERFORMANCE EVALUATION AND NEXT FOCUS_

Core aviation safety controls stay customer experience and prevention loops improve

2025 HIGHLIGHTS

100% ASSESSED

All significant product categories assessed for health and safety impacts.

NO REPORTABLE SAFETY EVENTS

0 incidents of non-compliance with regulations or voluntary codes 0 recalls and 0 significant product failures.

SMS MATURITY IMPROVED

SMM issued the June 2025 SMS audit observation and findings were answered with substantiating documents, and a separate audit's observations closed in March 2026.

CUSTOMER TRUST VALIDATED

NPS +31 and 98% customer product satisfaction from 2025 independent survey.

TRANSPARENT LABELING IMPROVEMENT

Seven internal product-information cases tracked and closed no regulatory or voluntary-code non-compliance.

Source: **AviusULD** quality, aviation safety and customer records, 2025.

2026 FOCUS AREAS

01 SMS PERFORMANCE-BASED ASSURANCE

Move beyond compliance-based checks into performance-based SMS indicators and audits.

02 LESSONS LEARNED, APPLIED

Lessons from 2025 8D reviews are embedded as standing controls: Critical Process Control at QRQC for rework, FAI and design or process changes Poka-Yoke on base assembly and 100% cam-buckle inspection with the SOP extended to the JAS NL, APAC and US warehouses.

03 LEAD-TIME COMMUNICATION

Improve proactive customer updates, especially for spare-parts lead time.

04 AFTER-SALES SUPPORT

Strengthen customer-oriented spare-parts and technical support processes.

05 SUPPLIER SAFETY CONTROLS

Maintain supplier qualification, material certification and supplier CAPA for safety-critical inputs.

OUTLOOK

AviusULD considers product responsibility a core enabler of aviation safety and customer trust. The company will continue to strengthen SMS maturity, product traceability, complaint prevention and customer communication, while maintaining conformity with approved specifications and regulatory expectations.

100% ASSESSED ALL SIGNIFICANT PRODUCT CATEGORIES ASSESSED FOR HEALTH AND SAFETY IMPACTS.

GRI 3-3 · 205-1 · 205-2 · 205-3

BUSINESS ETHICS, ANTI-CORRUPTION & WHISTLEBLOWING

16 PEACE, JUSTICE AND STRONG INSTITUTIONS

Reporting period 1 January – 31 December 2025

Every operation was assessed for corruption risk, and no incident of corruption was confirmed anywhere in the business.

AviusULD assessed all three entities against five corruption risk categories in 2025 and rated every residual risk low. Controls run through segregation of duties, a minimum two-quotation rule, dual bank-account verification and the Limit of Authority matrix.

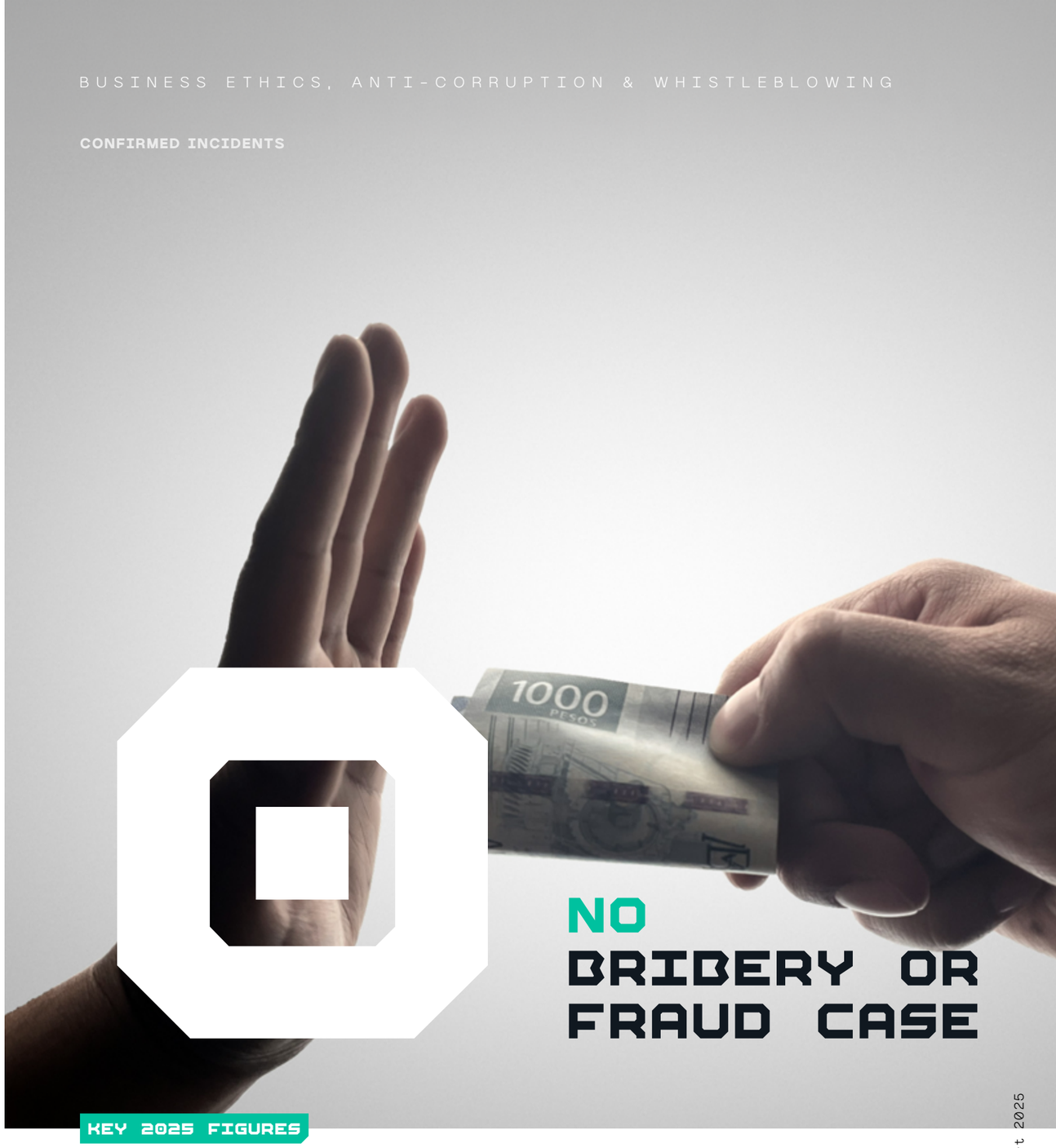
The Gifts, Hospitality and Expenses procedure (OP-FIN-003) was issued company-wide on 23 July 2025.

REPORTING

1 January to 31 December 2025	Suppliers and third parties in purchasing, finance and logistics
All three entities: Thailand, the Netherlands and the USA	GRI 3-3, 205-1, 205-2 and 205-3
Employees, managers, directors and contracted staff	

Source: Anti-Corruption Risk Assessment Report 2025 Anti-Corruption Policy Mar 2025 Whistleblowing Policy Oct 2025 Conflicts of Interest Charter, Jun 2025 OP-SOU-001 Sourcing Management.

CONFIRMED INCIDENTS



KEY 2025 FIGURES

OPERATIONS ASSESSED

100%

all three entities assessed

EMPLOYEES TRAINED

99.6%

238 of 239 on anti-corruption

FINES AND SANCTIONS

THB 0

no reportable legal case

CORRUPTION_ RISK CONCENTRATES WHERE MONEY AND SUPPLIER DECISIONS MEET

GRI 3-3 **Actual and potential impacts, whether AviusULD causes them, and where they arise**

− POTENTIAL NEGATIVE IMPACTS

All five were screened in the 2025 risk assessment and rated low residual risk; none occurred.

- − Undue influence on decisions where a manager or buyer has a personal interest.
- − Supplier favouritism or anti-competitive practice, damaging reputation and inviting legal sanction.
- − Bribery or perceived bias through gifts and hospitality.
- − Financial misreporting, distorting performance data and creating regulatory risk.
- − Fraud through unauthorised changes to supplier bank details.

+ POSITIVE IMPACTS OF THE CONTROLS

What integrity buys the business, confirmed for 2025.

- + Procurement decisions are defensible: a minimum two-quotation rule and an audit trail in the ERP system.
- + Transparent decision-making in procurement, finance and HR protects employees from being put in a compromising position.
- + Customers, regulators and the group receive evidence of integrity rather than assurances.
- + A culture of integrity consistent with UN Global Compact Principle 10, which AviusULD actively participates in.

WHERE THE IMPACTS ARISE, AND HOW AVIUSULD IS INVOLVED

The impacts would be caused directly by AviusULD through its own procurement, finance and HR decisions, and could also arise through business relationships with suppliers and third-party service providers engaged in purchasing, finance, logistics and administration. The assessment covers all three entities and reaches employees, managers, directors and temporary or contracted staff.

Corruption is understood here as GRI defines it: bribery, facilitation payments, fraud, extortion, collusion and money laundering, and the offer or receipt of any advantage as an inducement to act dishonestly or in breach of trust.

ALL FIVE WERE SCREENED IN THE 2025 RISK ASSESSMENT AND RATED LOW RESIDUAL RISK.

Source: Anti-Corruption Risk Assessment Report 2025, sections 2 and 4 OP-QUA-013 Operational Risk Assessment GRI 205: Anti-corruption 2016.

SIX INSTRUMENTS CARRY THE COMMITMENT, EACH WITH AN OWNER AND A CONTROL

GRI 3-3 **Policies and commitments, and the controls through which they operate**

ANTI-CORRUPTION POLICY

March 2025. Prohibits bribery, facilitation payments, fraud and improper advantage, and aligns to the Thai Organic Act on Anti-Corruption 2018 and UN Global Compact Principle 10.

Owner: Finance and Compliance

EMPLOYEE CODE OF CONDUCT

Sets the standard for integrity, legal compliance, confidentiality and responsible conduct, and is acknowledged by employees.

Owner: Human Resources

CONFLICTS OF INTEREST CHARTER

Announced June 2025. Requires a signed disclosure statement from designated groups, with records held by HR and Purchasing.

Owner: Human Resources

GIFTS, HOSPITALITY AND EXPENSES

OP-FIN-003. Sets approval thresholds and a declaration log maintained by Finance. Issued company-wide on 23 July 2025.

Owner: Finance

WHISTLEBLOWING POLICY

October 2025. Two reporting mailboxes and a QR code, the formal whistleblowing routes within the wider channel set reported by Labor Relations, Employee Voice & Grievance. Anonymous reports are accepted under this policy.

Owner: Whistleblowing Committee

SUPPLIER CODE OF CONDUCT AND SUSTAINABLE PURCHASING

Extends the commitment to suppliers, covering human rights, anti-corruption, conflict minerals, counterfeit prevention and reporting obligations.

Owner: Purchasing

WHO OVERSEES IT

CCE SUPERVISORY BOARD

CEO

ETHICS COMMITTEE · QUARTERLY

FUNCTIONAL OWNERS

The CCE Supervisory Board is the highest governance body and oversees through the Reserved Matters framework and the AviusULD Limit of Authority matrix. Day-to-day management is delegated to the CEO and functional owners. A quarterly Ethics Committee reviews the anti-corruption risk register and reports to the CEO there was no separate ESG committee during 2025.

Source: the policies named above Anti-Corruption Risk Assessment Report 2025, sections 3 and 4 AviusULD GRI 2 disclosures 2-15, 2-23 and 2-24.

BASIS OF_ PREPARATION

The definitions GRI sets, the populations each percentage divides by, and where the numbers come from

DEFINITIONS USED IN THIS TOPIC

CORRUPTION — as GRI defines it: bribery, facilitation payments, fraud, extortion, collusion and money laundering, and the offer or receipt of any advantage as an inducement to act dishonestly, illegally or in breach of trust.

OPERATION — a single location used for production, storage, distribution or administration. AviusULD has three: the Thailand manufacturing site and the offices in the Netherlands and the USA.

CONFIRMED INCIDENT — an incident that an investigation has established did occur. Allegations still under investigation are not counted.

BUSINESS PARTNER — suppliers, agents, intermediaries, joint venture partners, governments, customers and clients.

POPULATIONS BEHIND THE PERCENTAGES

3 operations, the denominator for 205-1

239 employees at 31 Dec 2025, the 205-2 training denominator

238 trained in 2025 on all four ESG courses 261 on at least one course

6 members and representatives of the CCE Supervisory Board

DATA SOURCES

- Anti-Corruption Risk Assessment Report 2025
- Training record 2025, by course, category and location
- The six policies on page 336
- OP-SOU-001 and the FO-SOU-001 supplier questionnaire
- AviusULD GRI 2 disclosures 2-15, 2-23 to 2-27

ESG TRAINING COURSES IN 2025

1. Anti-corruption
2. Code of Conduct
3. Code of Ethics
4. Ethical Labor and Diversity Policy

COUNTING RULES

An incident is counted in the year the investigation confirms it. Training completion counts employees who finished all four ESG courses: 238 of 239 employees at 31 December 2025, 99.6% 261 employees completed at least one course. All monetary amounts are Thai baht.

Source: GRI 205: Anti-corruption 2016 Anti-Corruption Risk Assessment Report 2025 AviusULD training record 2025.

ALL THREE OPERATIONS WERE ASSESSED, AND EVERY RESIDUAL RISK CAME OUT LOW

GRI 205-1 **Operations assessed for corruption risks, and the significant risks identified**

OPERATIONS ASSESSED	PERCENTAGE ASSESSED	RISK CATEGORIES IDENTIFIED	ASSESSMENT PERIOD
3 OF 3	100%	5	JAN–JUN 2025
Thailand, Netherlands, USA	every location in scope	all rated low residual risk	reviewed annually or on change

HOW THE ASSESSMENT WAS DONE

Five steps under OP-QUA-013: risk identification through audits, interviews and finance and procurement reviews stakeholder impact analysis rating on a 1-to-5 likelihood and consequence matrix mitigation planning with owners and due dates then quarterly verification by Compliance and Finance and annual Ethics Committee review.

WHAT THE ASSESSMENT COVERED

Gifts and hospitality, facilitation payments, donations and sponsorships conflicts of interest, fraudulent reporting and misrepresentation procurement and tendering financial controls and supplier payments and whistleblower protection and investigation procedures.

SIGNIFICANT RISKS IDENTIFIED, AND THE RESIDUAL RATING AFTER CONTROLS

RISK CATEGORY	POTENTIAL IMPACT ON STAKEHOLDERS	CURRENT CONTROL MEASURES	RESIDUAL RISK
CONFLICTS OF INTEREST IN MANAGEMENT AND PROCUREMENT	Undue influence in decision-making	Conflict-of-interest disclosure statement for management and purchasing staff multiple approval requirement ethics training	Low
SUPPLIER FAVOURITISM OR ANTI-COMPETITIVE PRACTICE	Reputational damage or legal sanction	Minimum two-quotation rule sustainable procurement training audit trail in the ERP system	Low
GIFTS AND HOSPITALITY MISUSE	Risk of bribery and perceived bias	Approval thresholds declaration log maintained by Finance procedure issued company-wide on 23 Jul 2025	Low
FINANCIAL MISREPORTING	Distorted performance data and regulatory risk	Segregation of duties internal audit control external financial audit	Low
UNAUTHORISED BANK ACCOUNT CHANGES	Fraud and financial loss	Dual verification with the supplier bank account validation protocol	Low

Source: Anti-Corruption Risk Assessment Report 2025, sections 2 to 4 and Appendix A risk register OP-QUA-013 Operational Risk Assessment.

NO SINGLE PERSON CAN COMMIT THE COMPANY, APPROVE IT AND PAY FOR IT

GRI 3-3

The actions that hold each identified risk at a low residual level

SEGREGATION OF DUTIES

Requesting, approving, receiving and paying are separated across roles in the finance function, so no single person controls a transaction end to end.

HOLDS DOWN: Financial Misreporting

MINIMUM TWO QUOTATIONS

Every indirect purchase requires at least two quotations, and the request-to-order trail is held in the ERP system and reviewable after the fact.

HOLDS DOWN: Supplier Favouritism

DUAL BANK VERIFICATION

A change to a supplier's bank details is verified directly with the supplier under a bank account validation protocol before any payment is released.

HOLDS DOWN: Payment Fraud

DECLARED INTERESTS

Designated managers and all purchasing employees sign a conflict-of-interest disclosure, and affected decisions require multiple approvals.

HOLDS DOWN: Undue Influence

THRESHOLDS AND A LOG

Gifts and hospitality are subject to approval thresholds, with a declaration log maintained by Finance.

HOLDS DOWN: Bribery and Perceived Bias

AUDIT, INSIDE AND OUT

Internal audit control, the annual quality audit programme under OP-QUA-001 and an external financial audit each test the controls above.

HOLDS DOWN: All Five Categories

ABOVE THE CONTROLS SITS THE LIMIT OF AUTHORITY MATRIX



Supplier contracts up to USD 3M · claims up to USD 100K · projects below USD or EUR 1M

Above those levels approval passes to CCE Group

Supplier contracts above USD 5M · claims above USD 250K · sales projects above USD or EUR 3M

Decisions escalate by value. AviusULD manages supplier contracts up to USD 3M, claims up to USD 100K and projects below USD or EUR 1M. Above those levels approval passes to CCE Group, and supplier contracts above USD 5M, claims above USD 250K and sales projects above USD or EUR 3M require the Board. The matrix is signed, and related-party balances are captured in financial reporting.

Source: Anti-Corruption Risk Assessment Report 2025, section 4 OP-SOU-001 Sourcing Management OP-QUA-001 Quality Audits AviusULD Limit of Authority matrix.

EVERY EMPLOYEE RECEIVED THE_POLICIES, AND 99.6% COMPLETED THE TRAINING

GRI 205-2

Communication and training on anti-corruption policies and procedures, by group and region

EMPLOYEES RECEIVING THE POLICIES

100%

by internal note, all entities

EMPLOYEES TRAINED

99.6%

238 of 239 employees, as reported in Learning, Skills & Career Development

SUPPLIERS ISSUED THE CODE

100 OF 100

every active supplier, 100%

ACCEPTANCE RETURNED

67 OF 100

67%, and 93% of material spend

COMMUNICATION, AND ESG TRAINING (FOUR COURSES), BY EMPLOYEE CATEGORY AND REGION

GROUP	COMMUNICATED	TRAINED	IN POPULATION	%
Management	100%	44	44	100%
Supervisor/ Professional	100%	34	34	100%
Engineer/ Technical	100%	23	23	100%
Support/Office	100%	21	21	100%
Operations	100%	116	117	99.1%
Thailand	100%	227	228	99.6%
Netherlands	100%	9	9	100%
United States	100%	2	2	100%

TWO GROUPS OUTSIDE THE 2025 PROGRAMME

THE GOVERNANCE BODY

0 of 6 members and representatives of the CCE Supervisory Board received the policies, and 0 of 6 received training: 0% on both counts. Oversight reached the Board through the Reserved Matters framework and quarterly management reporting instead. Extending the roll-out and the course to it is a 2026 action.

BUSINESS PARTNERS, BY TYPE AND GEOGRAPHY

All 100 active suppliers received the policies through the Supplier Code of Conduct: 71 direct material, 29 indirect material or services. By supplier location, 75 Thailand, 11 Europe, 7 rest of Asia, 7 other. Procurement sits with the Thailand entity, so no Netherlands or USA split arises.

All eight critical suppliers (spend above 2%) were informed: seven signed the code and Howmet Aerospace applies its own equivalent code, accepted. Customers were not part of the 2025 communication, and there are no agents or intermediaries.

0 OF 6 MEMBERS AND REPRESENTATIVES OF THE CCE SUPERVISORY BOARD RECEIVED THE POLICIES, AND 0 OF 6 RECEIVED TRAINING: 0% ON BOTH COUNTS.

Trained means completed all four ESG courses (Anti-corruption, Code of Conduct, Code of Ethics, Ethical Labor and Diversity Policy): 238 of 239 employees at 31 December 2025, 99.6% 261 completed at least one course.

Source: AviusULD training record 2025 internal note to all employees Supplier Code of Conduct FO-SOU-002.

EVERYONE WHO CAN INFLUENCE A PURCHASE DECLARED THEIR INTERESTS

GRI 2-15 AND 3-3

How conflicts of interest are identified, declared and mitigated

DECLARATIONS RETURNED

100%

of managerial and purchasing staff

CHARTER ISSUED

JUN 2025

signed statements due 20 June

CONFLICTS REQUIRING MITIGATION

0

none disclosed for 2025

WHO MUST DECLARE

- Executive committee members and their direct reports
- Heads of function and department directors, and their direct reports
- The executive committees of AviusULD companies and their direct reports
- Plant management directors and their direct reports
- Every employee in the Purchasing department

HOW A DECLARATION IS HANDLED

Declarations are submitted through an electronic signature workflow or as a signed hard copy to Human Resources, which holds the records alongside Purchasing. Where an interest is disclosed, mitigation runs through abstention from the decision, confidentiality controls, investigation and, if warranted, disciplinary action. In a board or steering committee setting the individual discloses the conflict and withdraws from the discussion and decision, and the HR and Purchasing Directors report to the CEAC once a year.

THE SIX STEPS THE CHARTER SETS OUT

01 IDENTIFY
An interest that could influence a decision is recognised.

02 DECLARE
A signed disclosure statement goes to HR.

03 REVIEW
HR or Purchasing and the relevant manager assess it.

04 MITIGATE
Abstention, controls, investigation or discipline.

05 INVESTIGATE
Suspected breaches investigated; corrective or legal action.

06 REPORT
Declarations held by HR and Purchasing; annual report to the CEAC.

DECLARATIONS ARE SUBMITTED THROUGH AN ELECTRONIC SIGNATURE WORKFLOW OR AS A SIGNED HARD COPY TO HUMAN RESOURCES, WHICH HOLDS THE RECORDS ALONGSIDE PURCHASING.

Source: AviusULD Conflicts of Interest Charter and the internal note of 13 June 2025 Anti-Corruption Risk Assessment Report 2025.

GIFTS ARE CONTROLLED BY THRESHOLD AND LOGGED, UNDER A PROCEDURE ISSUED IN JULY 2025

GRI 3-3 **How gifts, hospitality and expenses were controlled in 2025**

OP-FIN-003

23 JUL 2025

HOW THE PROCEDURE WORKS

- Approval thresholds applied to gifts and hospitality under OP-FIN-003.
- A declaration log maintained by Finance, so accepted and declined offers are recorded.
- Facilitation and speed payments prohibited outright, with no threshold that permits them.
- The risk assessment rated residual risk in this category low on the strength of those controls.

ISSUED COMPANY-WIDE ON 23 JULY 2025

OP-FIN-003 Gifts, Hospitality and Expenses, Rev. 00, was announced to all employees and managers by Internal Communication on 23 July 2025, in Thai and English, with the procedure attached.

It sets one rule for giving and receiving gifts, hospitality and expenses across the Company, applies wherever AviusULD operates, and took effect on the date of announcement. Employees are asked to read it, follow it strictly and share it with team members without e-mail access.

APPROVAL THRESHOLDS APPLIED TO GIFTS AND HOSPITALITY UNDER OP-FIN-003.

THE RED LINES EMPLOYEES ARE GIVEN, FROM THE WHISTLEBLOWING POLICY GUIDANCE

A SUPPLIER OFFERS A GIFT ABOVE THE POLICY LIMIT

Decline it politely and report the offer through the whistleblowing channel.

A SUPPLIER OFFERS TO PAY FOR TRAVEL OR ACCOMMODATION

Decline, and inform the head of function or the executive committee. Business travel is approved and paid by AviusULD directly.

A CUSTOMER ASKS FOR A FACILITATION FEE TO SPEED UP APPROVAL

Refuse. Facilitation and speed payments are strictly prohibited, and the request is reported.

AN INSPECTOR SUGGESTS A DONATION WOULD HELP A CERTIFICATION

Refuse and report immediately. Such a request may constitute bribery.

Source: OP-FIN-003 Gifts, Hospitality and Expenses, Rev. 00, and Internal Communication announcement, 23 July 2025 Anti-Corruption Risk Assessment Report 2025, sections 4 and 5 Whistleblowing Policy, Oct 2025, Annex A.

ANYONE CAN REPORT ANONYMOUSLY UNDER THE WHISTLEBLOWING POLICY

GRI 2-26 **Mechanisms for seeking advice and raising concerns about ethics and corruption**

5 WORKING DAYS

Acknowledgement
from submission of a report

15 WORKING DAYS

Confirmed retaliation acted on
zero tolerance cases reported by Labor Relations, Employee Voice & Grievance

30 WORKING DAYS

Investigation closed
unless the case is complex

0 5 10 15 20 25 30

AWARENESS COMMUNICATED

2X A YEAR
with a 100% annual training target

ZERO TOLERANCE FOR RETALIATION, WITH CONFIRMED CASES ADDRESSED WITHIN 15 WORKING DAYS.

THE FORMAL WHISTLEBLOWING ROUTES, AND WHO MAY USE THEM

Two dedicated reporting mailboxes and a QR code, reachable without going through a manager. These are the formal whistleblowing routes the full set of channels for raising concerns, with per-channel ownership and escalation times, is reported by Labor Relations, Employee Voice & Grievance.

The line manager, head of function, Human Resources or the Leadership Team.

Purchasing, for concerns involving a supplier.

Open to employees, temporary, contracted and agency staff, suppliers and other stakeholders, across Thailand, the Netherlands and the USA.

WHAT PROTECTS THE PERSON WHO REPORTS

Anonymous reporting is accepted under the Whistleblowing Policy, and the reporter's identity is protected where given. Anonymous reports are not accepted under the grievance procedure, which Labor Relations, Employee Voice & Grievance reports.

Zero tolerance for retaliation, with confirmed cases addressed within 15 working days.

Impartial and confidential investigation by the Whistleblowing Committee, reporting outcomes to senior management.

Where a report concerns forced or child labour, trafficking, discrimination or harassment, OP-HRM-004 adds fact-finding within five working days and HR follow-up within 30 days.

WHAT THE CHANNELS CARRIED IN 2025

No whistleblowing report or ethics concern relating to business ethics or corruption was recorded in 2025, and none was outstanding at year end. Grievances, labour disputes and retaliation cases are reported by Labor Relations, Employee Voice & Grievance. The policy was reissued in October 2025 to add a question-and-answer annex covering bribery, conflicts of interest, fraud and money-laundering red flags, and the next scheduled review is Q4 2026.

Source: Whistleblowing Policy, Oct 2025, sections 4 to 6 and Annex A OP-HRM-004 Remediation Procedure Anti-Corruption Risk Assessment Report 2025.

NO INCIDENT OF CORRUPTION WAS CONFIRMED ANYWHERE IN THE BUSINESS

GRI 205-3 **Confirmed incidents of corruption and actions taken, and public legal cases**

EVERY REQUIREMENT OF THE DISCLOSURE, REPORTED FOR 2025

GRI 205-3 REQUIREMENT | 2025 RESULT | NATURE AND DETAIL

A. CONFIRMED INCIDENTS OF CORRUPTION

No incident of bribery, facilitation payment, fraud, extortion, collusion or money laundering was confirmed at any of the three entities.

B. INCIDENTS WHERE EMPLOYEES WERE DISMISSED OR DISCIPLINED FOR CORRUPTION

No disciplinary action for corruption arose, since no incident was confirmed.

C. INCIDENTS WHERE CONTRACTS WITH BUSINESS PARTNERS WERE TERMINATED OR NOT RENEWED FOR CORRUPTION

No supplier or other business-partner contract was terminated or left unrenewed on corruption grounds.

D. PUBLIC LEGAL CASES REGARDING CORRUPTION AGAINST AVIUSULD OR ITS EMPLOYEES

No public investigation, prosecution or closed case was brought during the period, and none was outstanding at year end.

HOW AVIUSULD KNOWS

The position is drawn from the anti-corruption risk register, quarterly Ethics Committee review, internal audit, the external financial audit and the whistleblowing channels, none of which recorded a case. Management confirmed the same position to the external auditor in the 2025 management representation letter.

WHAT WOULD HAPPEN IF ONE WERE CONFIRMED

A confirmed incident triggers investigation by the Whistleblowing Committee, disciplinary action up to dismissal under the Employee Code of Conduct, referral of criminal conduct to the authorities, and for a supplier a corrective action plan within 30 days followed by a verification audit, or termination of the contract.

MANAGEMENT CONFIRMED THE SAME POSITION TO THE EXTERNAL AUDITOR IN THE 2025 MANAGEMENT REPRESENTATION LETTER.

Consistent with GRI 2-27, which reports nil significant instances of non-compliance, nil fines and nil non-monetary sanctions for 2025, and THB 0 paid for current and prior-period instances.

Source: Anti-Corruption Risk Assessment Report 2025 Management Representation Letter 2025 Whistleblowing Policy Supplier Code of Conduct FO-SOU-002.

ALL 100 ACTIVE SUPPLIERS RECEIVED THE CODE; 67 HAVE SIGNED IT BACK

GRI 205-2 C AND 3-3

How the commitment reaches business partners, and how it is verified

ACTIVE SUPPLIERS ISSUED THE CODE

100 OF 100

71 direct, 29 indirect material

ACCEPTANCE RETURNED

67 OF 100

67%, and 93% of material spend

SIGNIFICANT BUSINESS PARTNERS

7 OF 8

largest by direct-material spend

DOMESTIC AND OVERSEAS

75 / 25

Thailand and overseas suppliers

HOW A SUPPLIER ENTERS AND STAYS ON THE APPROVED LIST, UNDER OP-SOU-001

01 CODE ISSUED

The Supplier Code of Conduct sets the requirements on human rights, anti-corruption, conflict minerals, counterfeit prevention and reporting.

02 QUESTIONNAIRE

FO-SOU-001 scores the supplier on labour and human rights, ethics, its own code of conduct and its complaint process, with evidence cited.

03 RISK ASSESSED

FO-SOU-004 rates overall supplier risk, and ESG maturity is graded on certifications and participation in platforms such as EcoVadis.

04 APPROVED LIST

The supplier joins the Approved Supplier List, valid up to two years, followed up monthly by Sourcing and renewed annually from expiry.

05 RE-VERIFIED

Main suppliers, those above 2% of total purchases, are re-questionnaired every two years; weak performance triggers stricter terms, more audits or improvement plans.



THE GAP, AND THE 2026 ACTION

Sixty-seven of the 100 active suppliers returned a signed acceptance, so 33 received the code without acknowledging it. Those 67 represent 93% of material spend, so the unsigned tail is small by value. All eight critical suppliers were informed: nine signed and one operates its own equivalent corporate code. Tier-1 supplier training starts in 2026 and raising acceptance is the measure to watch.

WHAT THE CONTRACT ADDS

The Products Purchase Agreement carries the anti-corruption and conduct clauses into the commercial relationship, so the obligation is contractual and not only a policy expectation. Purchasing is the named channel for any concern involving a supplier.

FO-SOU-001 SCORES THE SUPPLIER ON LABOUR AND HUMAN RIGHTS, ETHICS, ITS OWN CODE OF CONDUCT AND ITS COMPLAINT PROCESS, WITH EVIDENCE CITED.

Source: Supplier Code of Conduct FO-SOU-002 OP-SOU-001 Sourcing Management FO-SOU-001 supplier questionnaire Products Purchase Agreement Anti-Corruption Risk Assessment Report 2025, section 5.

EVERY ZERO-TOLERANCE TARGET WAS MET; TWO BUILD-OUT ACTIONS CARRY INTO 2026

GRI 3-3 **Targets, results and the effectiveness of the actions taken**

BUSINESS ETHICS AND ANTI-CORRUPTION COMMITMENTS, 2025 RESULT AGAINST TARGET

COMMITMENT	2025 TARGET	2025 RESULT	STATUS
Confirmed incidents of corruption	Zero	0	**Met**
Operations assessed for corruption risk	All operations	3 of 3, 100%	**Met**
Employees receiving the anti-corruption policies	100%	100% by internal note	**Met**
Anti-corruption training completion	100%	99.6%, 238 of 239	**Just short**
Conflict-of-interest declarations from designated staff	100%	100%	**Met**
Confirmed retaliation against a reporter	Zero	Reported by Labor Relations, Employee Voice & Grievance	**See Labor Relations, Employee Voice & Grievance**
Fines and non-monetary sanctions	Zero	THB 0	**Met**
Suppliers issued the Supplier Code of Conduct	All suppliers	100%	**Met**
Supplier acceptance of the code	Not set for 2025	67%	**No target set**

Source: Anti-Corruption Risk Assessment Report 2025, section 5 AviusULD training record 2025 Purchasing records AviusULD GRI 2 disclosure 2-27.

HOW EFFECTIVENESS IS JUDGED

The Ethics Committee reviews the risk register quarterly and reports to the CEO, the risk assessment is refreshed annually or on a major process change, and internal and external audit test the controls. The whistleblowing channels provide the independent check.

LESSONS LEARNED, AND WHERE THEY WENT

Three lessons shaped the plan. The gifts control needed a single company-wide rule, so OP-FIN-003 was issued to all employees on 23 July 2025. Issuing the supplier code proved easier than securing acceptance, so Tier-1 training is added from 2026. Assurance reached the Board through reporting, so the roll-out and course are being extended to it.

HOW ENGAGEMENT SHAPED THE ACTIONS

The risk assessment was built from management interviews and finance and procurement reviews, so the five risk categories reflect what the people running those processes identified. The supplier questionnaire returns evidence on each supplier's own ethics and complaint process, and that scoring governs approved-list status. The whistleblowing channels are open to suppliers and other stakeholders.

THE GIFTS CONTROL NEEDED A SINGLE COMPANY-WIDE RULE, SO OP-FIN-003 WAS ISSUED TO ALL EMPLOYEES ON 23 JULY 2025.

GRI 3-3 · 418-1

INFORMATION_ SECURITY, CYBERSECURITY & DATA PRIVACY

Reporting period 1 January – 31 December 2025 · Boundary: all entities – Thailand, Netherlands and USA

AviusULD manages information security and data privacy through an Information Security Policy, cybersecurity monitoring, access controls, backup and recovery procedures, incident response, employee training and privacy controls. This topic is material because digital systems, customer data, employee personal data and operational information support product delivery, business continuity and stakeholder trust. The disclosure focuses on GRI 3-3 management approach and GRI 418-1 customer privacy performance, complemented by internal cybersecurity KPIs and control evidence.

REPORTING BOUNDARY

All entities: Thailand, Netherlands, USA

Systems covered: ERP, SMARTEAM, SolidWorks/CAD and core Microsoft 365 environment

Customer, employee and business data handled through internal processes and authorized service providers

GRI 418-1 reports customer-privacy complaints and losses of customer data

Training completion is reported as assigned-and-completed population, numerator and denominator are defined on page 374

This information-security boundary covers all three legal entities and provider-held systems, and is wider than the Bangkok manufacturing boundary used by the environmental and safety topics

INFORMATION SECURITY, CYBERSECURITY & DATA PRIVACY



CONFIRMED CYBER INCIDENTS

0

2025 result

CUSTOMER-DATA BREACHES

0

GRI 418-1

TRAINING COMPLETION

100%

of assigned population

BACKUP SUCCESS RATE

100%

2025 backups

WHY THIS TOPIC_ IS MATERIAL

GRI 3-3 **Security, privacy, stakeholder expectations and business continuity**

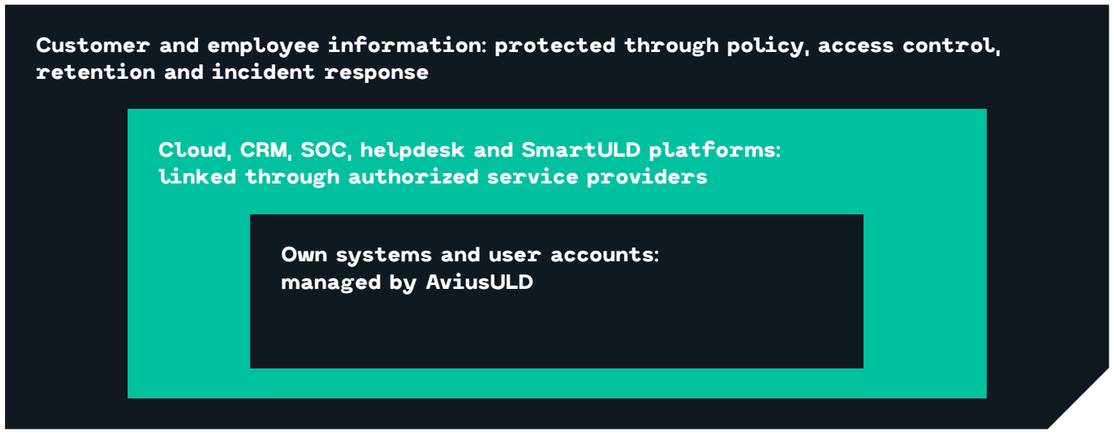
Information security is material because AviusULD relies on digital infrastructure, customer information, technical product information and employee personal data to operate effectively and protect stakeholder trust. Cybersecurity incidents, system disruption, unauthorized access or privacy breaches could affect business continuity, customer confidence, regulatory compliance and the safe flow of product and quality information. The material topic covers both risks directly managed by AviusULD and risks linked through IT vendors, cloud service providers and shared digital platforms.

KEY IMPACT AREAS

01	**Business Continuity**	System resilience, backups and recovery support operations.
02	**Customer Trust**	Protection of customer and commercial data supports long-term relationships.
03	**Employee Privacy**	HR and payroll data require appropriate access and retention controls.
04	**Regulatory Compliance**	PDPA/data protection and contractual expectations must be respected.
05	**Third-Party Exposure**	Service providers and cloud platforms require monitoring and control.

STAKEHOLDER	MAIN EXPECTATION	AVIUSULD RESPONSE
Employees	Protection of personal information	Privacy notice, HR controls and access restrictions
Customers	Confidentiality of business/ product data	Customer-data protection, access controls and NDAs
Management/ Shareholders	Continuity and cyber-risk management	KPIs, risk assessment, DRP and monitoring
Suppliers/IT Partners	Secure information exchange	Contracts, authorization and remote-access controls
Regulators/ Auditors	Traceable controls and privacy data	Audit trails, policy evidence and incident reporting

VALUE-CHAIN RELATIONSHIP



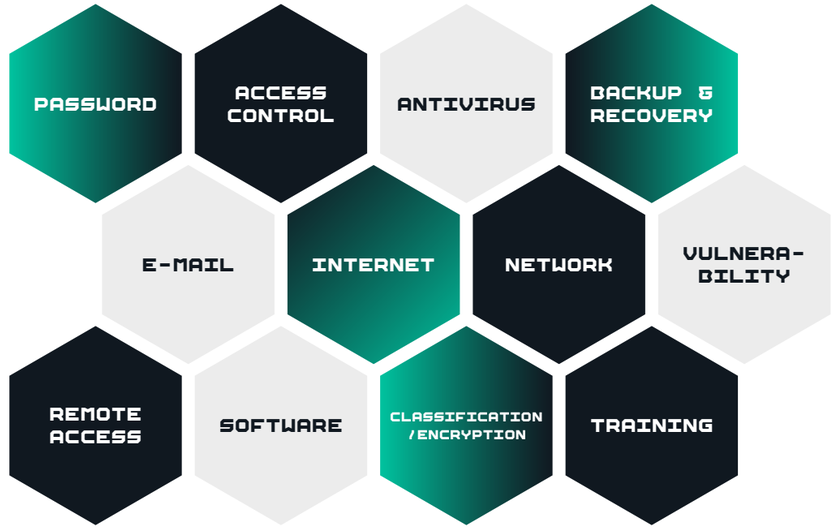
GOVERNANCE, POLICY_ AND OWNERSHIP

GRI 3-3 **Responsibilities, policy commitments and implementation controls**

AviusULD manages information security through a company-wide Information Security Policy issued in January 2025, approved by the CEO and based on ISO/IEC 27001 principles. The policy applies to Thailand, the Netherlands and the USA and covers password security, access control, antivirus, backup and recovery, e-mail, internet, network, vulnerability management, remote access, software, information classification, encryption, record retention and training. IT/IS owns technical controls, management provides oversight, HR manages employee personal data and Sales/Customer Support handle relevant customer data.

OWNER	RESPONSIBILITY
IT/IS	Cybersecurity controls, monitoring, risk assessment, access and recovery
Management	Oversight, resources, escalation and report approval
HR	Employee personal data, consent and privacy requests
Sales/CS	Customer contact, commercial and service-related records
External Providers	CRM, SOC, helpdesk, customer portal and cloud services under authorization

INFORMATION SECURITY POLICY COVERAGE



AVIUSULD MANAGES INFORMATION SECURITY THROUGH A COMPANY-WIDE INFORMATION SECURITY POLICY ISSUED IN JANUARY 2025, APPROVED BY THE CEO AND BASED ON ISO/IEC 27001 PRINCIPLES.

CYBERSECURITY RISK ASSESSMENT AND PRIORITY CONTROLS

GRI 3-3

Risk identification, assessment, controls and residual risk

AviusULD assesses IT/IS risks through a structured risk-management process covering databases, network services, applications, infrastructure and hardware. The latest review was conducted on 3 October 2025 and is led by the IT Manager with IT/IS Director oversight. Key risk categories include phishing, ransomware, malware, unauthorized access, data leakage and loss of customer or employee data. High and medium risks are prioritized for management action and monitored through the risk process.

2025 IT/IS RISK PROFILE



High 0 Medium 2 Low 18

Total Operation Risks: 20 identified | 0 high | 2 medium | 18 low

THE LATEST REVIEW WAS CONDUCTED ON 3 OCTOBER 2025 AND IS LED BY THE IT MANAGER WITH IT/IS DIRECTOR OVERSIGHT.

RISK-MANAGEMENT CYCLE



MAIN 2025 RISKS CONSIDERED

- Phishing, ransomware and malware
- Unauthorized access and data leakage
- Loss of customer or employee data
- Supplier/cloud service exposure where applicable

ACCESS CONTROL AND DATA PRIVACY SAFEGUARDS

GRI 3-3 **User lifecycle, MFA, access reviews and PDPA controls**

Access to **AviusULD** systems is managed through defined user-account control and user-access review procedures. Account creation, modification and deletion are initiated by HR or the relevant manager and implemented by IT/IS according to approved access requirements. Access reviews are performed every six months for Active Directory, folders, ERP users and application roles. The company applies role-based access, MFA, password control, privileged access management and leaver access removal to reduce unauthorized-access risk.

100%
MFA COVERAGE
all users

2X
ACCESS REVIEW
per year

0
DORMANT ACCOUNTS
identified

YES
LEAVER REMOVAL
HR request basis

PRIVACY CONTROLS

Privacy notice and consent process under Thailand PDPA

Data-subject requests and consent withdrawal managed by HR

Record retention and disposal governed by Control of Record and Retention procedure

2025 employee privacy complaints, breaches and regulatory cases: 0

> ACCESS TO AVIUSULD SYSTEMS IS MANAGED THROUGH DEFINED USER-ACCOUNT CONTROL AND USER-ACCESS REVIEW PROCEDURES.

CYBERSECURITY CONTROLS_ AND MONITORING

GRI 3-3

Technical safeguards, monitoring and measured security objectives

AviusULD operates multiple technical controls to protect information assets and maintain system resilience. These include firewall, antivirus, endpoint detection and response, e-mail filtering, anti-phishing, web filtering, network segmentation, encryption, patch management, vulnerability scanning, USB/device control, logging and monitoring, intrusion detection/prevention, mobile-device management and cloud-security controls. Sensitive configurations are not disclosed publicly, but the control set is supported by IT/IS policies, dashboards and monitoring evidence.

CONTROL SET

- Firewall
- Antivirus
- Endpoint Detection and Response
- E-Mail Filtering
- Anti-Phishing
- Web Filtering
- Network Segmentation
- Encryption
- Patch Management
- Vulnerability Scanning
- USB/Device Control
- Logging and Monitoring
- Intrusion Detection/Prevention
- Mobile-Device Management
- Cloud-Security Controls

2025 SECURITY OBJECTIVES



Microsoft Secure Score

Target 80% · 2025 result 81.75% in Nov

KPI	TARGET	2025 RESULT
Security Patching	>= 97%	Achieved
Bitlocker Encryption	100%	Achieved
Critical Security Incidents	0	Achieved
Antivirus Compliance	100%	Achieved

INCIDENT DEFINITIONS

a confirmed cybersecurity incident is an event validated through the incident-response procedure as an actual compromise of a system, account or data. A critical security incident is the subset of confirmed incidents rated high severity: material disruption, confirmed data loss or regulatory exposure. Both counts are zero for 2025 on their own definitions – no event was validated as a confirmed incident in the reporting period, so none could be rated critical.

BACKUP, RECOVERY AND OPERATIONAL RESILIENCE

GRI 3-3 **Backup controls, recovery testing and disaster recovery readiness**

Backup and recovery controls support business continuity and data availability. The Backup and Recovery procedure defines risk-based backup and recovery planning, backup execution, monitoring via PRTG/ Veeam, review, reporting and recovery testing. The Disaster Recovery Plan covers network infrastructure, servers, telephony, data storage and backup systems, end-user computers, organizational software, databases and IT documentation. In 2025, AviusULD completed a restore test covering key systems including ERP LN, ECQ, BioSoft, ESS and SmarTeam.

BACKUP SUCCESS
100%
2025 result

RESTORE TESTS
100%
performed

FAILED BACKUPS
0
2025 result

RTO/RPO
24H
formal basis

RECOVERY PROCESS

01 PLAN › 02 BACKUP › 03 MONITOR › 04 RESTORE TEST › 05 REVIEW

IMPORTANT NOTE

A formal Business Continuity Plan is not separately established in 2025 IT resilience is covered through the Disaster Recovery Plan and backup/recovery procedures.

IN 2025, AVIUSULD COMPLETED A RESTORE TEST COVERING KEY SYSTEMS INCLUDING ERP LN, ECQ, BIOSOFT, ESS AND SMARTEAM.

INCIDENT RESPONSE AND GRI 418-1 PERFORMANCE

GRI 418-1

Substantiated privacy complaints and customer-data losses

AviusULD has an incident-response procedure covering the lifecycle from identification and classification to containment, investigation, eradication, recovery, communication, escalation and post-incident review. Incident responsibilities are assigned to the Information Security Team, IT Operations, Executive Management, HR, Legal/Compliance and all employees/contractors. For 2025, no confirmed cybersecurity incidents, customer-data breaches, employee-data breaches or privacy complaints were reported.

INCIDENT LIFECYCLE

01	02	03	04	05	06	07	08	09
Identi-fication	Classi-fication	Contain-ment	Investi-gation	Eradica-tion	Recovery	Commu-nication	Escala-tion	Post-in-cident review

GRI 418-1/PRIVACY METRIC	2024	2025
Substantiated External Privacy Complaints	0	0
Regulatory Privacy Complaints	0	0
Customer-Data Leaks/Thefts/Losses	0	0
Employee-Data Breaches/Losses	0	0
PDPA findings/violations/fines	0	0

Reporting treatment: GRI 418-1 focuses on customer privacy. Employee personal-data metrics are disclosed as part of GRI 3-3 management approach for this material topic.

SCOPE OF THE ZERO FIGURES

counted: substantiated customer-privacy complaints and identified customer-data leaks, thefts or losses (GRI 418-1), plus employee-data breaches and PDPA findings (GRI 3-3), for all data subjects and systems of the three entities, 1 Jan–31 Dec 2025. Intake: customer and Sales/CS contact, IT/IS helpdesk and incident register, HR privacy requests, regulator correspondence. Substantiated: an investigation under the incident-response and privacy procedures finds a customer-privacy breach occurred withdrawn or unfounded complaints excluded. No regulatory notification threshold was met in 2025, so none was made and no regulator opened a case.

FOR 2025, NO CONFIRMED CYBERSECURITY INCIDENTS, CUSTOMER-DATA BREACHES, EMPLOYEE-DATA BREACHES OR PRIVACY COMPLAINTS WERE REPORTED.

AWARENESS, AUDITS AND IMPROVEMENT ACTIONS

GRI 3-3

Security culture, testing, audit findings and continuous improvement

AviusULD builds security culture through mandatory online cybersecurity awareness training and annual phishing simulations. Training covered cybersecurity awareness and phishing awareness with 100% completion in 2025. A simulated phishing campaign was conducted across 11 functions, with 33 campaigns and 105 users tested. The 2025 IT/IS internal audit identified one opportunity for improvement related to backup-record traceability corrective action was completed by revising the Backup and Recovery procedure, cancelling the obsolete manual form and using the PRTG Monitoring Dashboard.

TRAINING

100%

completion

PHISHING

33

campaigns

USERS TESTED

105

employees

PHISHING SIMULATION RESULT

Click/Failure Rate 22.3

Reporting Rate 5.9



AUDIT AND CLOSURE STATUS

- Internal IT/IS audit conducted once in 2025
- Findings: 0 NC / 1 OFI
- High-risk findings: none
- OFI closed no outstanding findings

BASIS OF THE 100% TRAINING COMPLETION FIGURE

Numerator: employees who completed the mandatory online cybersecurity and phishing-awareness course during 2025. Denominator: the 106 people assigned the course across 11 functions spanning the three legal entities. All 106 completed within 2025, so completion is 100%

The assigned population is not the 239 employees at 31 December 2025 (GRI 2-8) and not the 261 trained-during-2025 base used by other topics in this report STC, agency and intern workers sit outside the 239 by definition, and non-employee account holders are counted only where the course is assigned to them

Assignment is counted per individual user account shared and system accounts are excluded, as are STC contractors. Source: KnowBe4 training record, owner Information Security

Phishing simulations run at least quarterly across the same 11-function population 105 users were tested in the reported simulation

LIMITATIONS_ AND OUTLOOK

GRI 3-3 **Remaining improvement areas and the 2026 to 2027 outlook**

OUTLOOK PRIORITIES

1. EVALUATE FORMAL PENETRATION TESTING AND EXTERNAL CYBERSECURITY ASSESSMENT
2. PREPARE ROADMAP TOWARD ISO/IEC 27001/NIST ALIGNMENT AS PLANNED FOR 2027
3. DEVELOP PDPA/PRIVACY REFRESHER TRAINING AND PRIVACY RISK ASSESSMENT/DPIA APPROACH
4. STRENGTHEN FORMAL IT-VENDOR CYBERSECURITY RISK ASSESSMENT AND PERIODIC REVIEW
5. CONTINUE MFA, PATCHING, VULNERABILITY REMEDIATION, BACKUP VALIDATION AND PHISHING AWARENESS

INFORMATION SECURITY, CYBERSECURITY & DATA PRIVACY

BALANCED DISCLOSURE

NO CONFIRMED INCIDENTS WERE RECORDED IN 2025, BUT AVIUSULD CONTINUES TO STRENGTHEN SECURITY MATURITY, PRIVACY GOVERNANCE AND THIRD-PARTY CYBER CONTROLS.



GRI 3-3 · 204-1 · 308-1, 308-2 · 414-1, 414-2

RESPONSIBLE SUPPLIER_ SELECTION & ESG DUE DILIGENCE

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

Reporting period 1 January – 31 December 2025

ESG screening entered supplier selection in 2025, and reached a third of the new suppliers onboarded that year.

AviusULD purchased 870.1 MTHB from 100 active suppliers in 2025. Selection now tests twelve criteria including environmental, health and safety, labour and human rights, ethics and legal compliance, and 38 suppliers were audited against them. The honest position is that ESG screening began this year: 3 of 9 new suppliers were screened, and the Supplier Code has been signed by 67 of 100.

REPORTING

1 January to 31 December 2025

Thailand manufacturing site, where all direct-material procurement is managed

Owner: Purchasing, with Supplier Quality and the ESG team

GRI 3-3, 204-1, 308-1, 308-2, 414-1 and 414-2

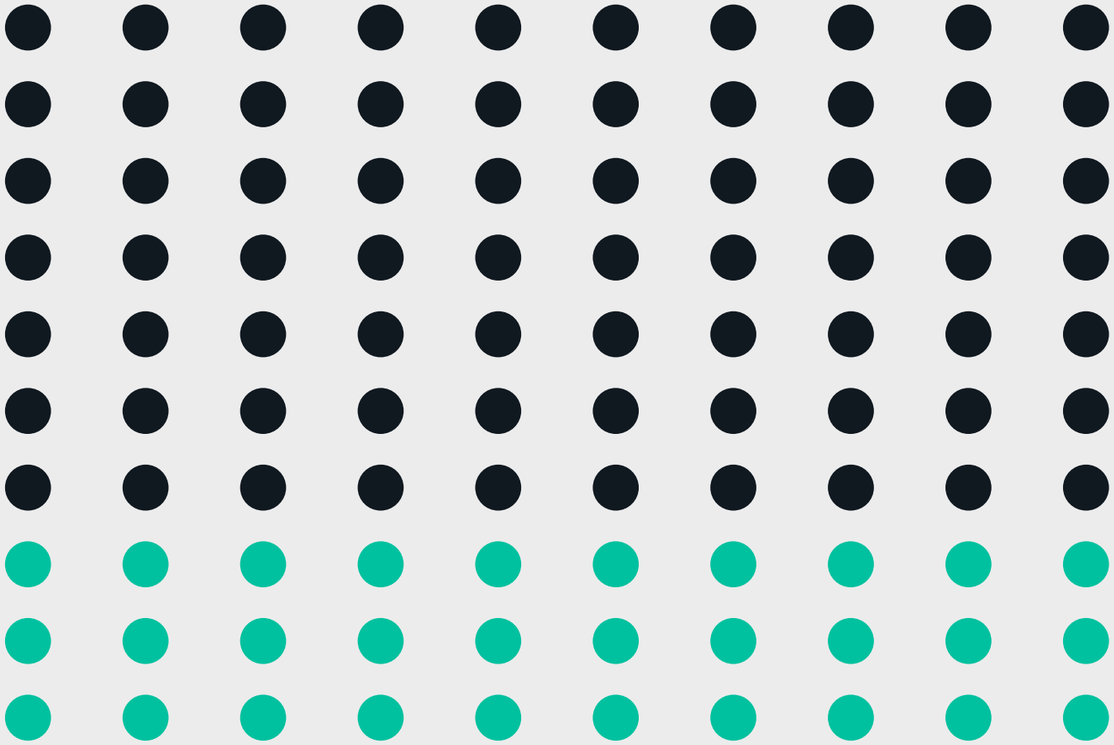
Source: Sustainable Procurement Risk Assessment Report 2025 OP-SOU-001 OP-PUR-001

RESPONSIBLE SUPPLIER SELECTION & ESG DUE DILIGENCE

100

ACTIVE SUPPLIERS

71 direct, 29 indirect



71 direct 29 indirect

KEY 2025 FIGURES

NEW SUPPLIERS SCREENED

3 OF 9

33% on ESG criteria

LOCAL PROCUREMENT

10.95%

95.3 of 870.1 MTHB, up from 9.7%

SUPPLIERS AUDITED

38

suppliers audited 28 assessed on ESG

MOST OF AVIUSULD'S ENVIRONMENTAL AND SOCIAL FOOTPRINT SITS WITH ITS SUPPLIERS

GRI 3-3 **Actual and potential impacts, whether AviusULD causes them, and where they arise**

POTENTIAL NEGATIVE IMPACTS

Identified in the 2025 supplier risk assessment and held at low to moderate residual risk.

- Aluminium production, the largest purchased category at 582 MTHB across sheets, extrusion and coil, carries environmental damage affecting local communities and ecosystems.
- Workers in the supply chain may face unsafe conditions and health hazards where oversight is weak.
- Forced or child labour risk exists in regions with weaker labour law and monitoring.
- Single-source dependence on aluminium and fabric suppliers threatens continuity.

POSITIVE IMPACTS OF THE CONTROLS

What responsible selection buys, confirmed for 2025.

- Twelve selection criteria now include environmental, health and safety, labour and human rights, ethics and legal compliance.
- 38 suppliers were audited in 2025 against 24 in 2024, and 28 of them were assessed on ESG criteria.
- One ESG corrective action was raised and closed, so the finding led to change rather than sitting open.
- Local procurement rose from 9.7% to 10.95%, keeping value and jobs closer to the plant.

WHERE THE IMPACTS ARISE, AND HOW AVIUSULD IS INVOLVED

These impacts arise in the supply chain rather than in AviusULD's own operations, so the company is connected to them through its business relationships and contributes to them through what it chooses to buy and from whom. Its leverage is the selection decision, the Supplier Code of Conduct, the questionnaire and the audit programme.

The topic covers the Thailand manufacturing site, where all direct-material procurement is managed, and the 100 suppliers on the Approved Supplier List during 2025.

IDENTIFIED IN THE 2025 SUPPLIER RISK ASSESSMENT AND HELD AT LOW TO MODERATE RESIDUAL RISK.

Source: Sustainable Procurement Risk Assessment Report 2025, sections 2 and 4 and Appendix A Operation Risk Assessment (Purchasing) and Supplier Risk Assessment 2025 Responsible Supplier Selection & ESG Due Diligence data collection, Purchasing.

ONE POLICY AND FOUR_ PROCEDURES GOVERN WHO MAY SUPPLY AVIUSULD

GRI 3-3 **Policies and commitments, and the procedures through which they operate**

SUSTAINABLE PROCUREMENT POLICY

October 2025. Commits AviusULD to integrate ethical, social and environmental criteria into sourcing, and aligns procurement to UN SDGs 12 and 13.

Owner: Purchasing Director

OP-SOU-001 SOURCING MANAGEMENT

Governs supplier identification, the FO-SOU-001 questionnaire, the FO-SOU-004 risk assessment, Approved Supplier List entry and the two-year re-verification cycle.

Owner: Sourcing

OP-PUR-001 PROCUREMENT MANAGEMENT

Runs supplier evaluation and monitoring, including monthly quality, delivery and price-variance tracking.

Owner: Purchasing

SUPPLIER CODE OF CONDUCT

FO-SOU-002. Sets requirements on environment, health and safety, human rights, child and forced labour, wages and hours, non-discrimination, anti-corruption and reporting, and extends to sub-tier suppliers.

Owner: Sourcing

OP-QUA-001 QUALITY AUDITS

Provides the audit and corrective-action route used for supplier findings, aligned to ISO 9001:2015 clause 10.

Owner: Quality

RISK ASSESSMENTS

The Sustainable Procurement Risk Assessment and the Operation and Supplier Risk Assessment, both refreshed annually under OP-QUA-013 and tracked quarterly.

Owner: Purchasing and ESG team

HOW EFFECTIVENESS IS TRACKED

Supplier performance is monitored monthly on quality through non-conformance reports, on delivery through on-time performance and on price variance. ESG risks sit in the supplier risk register, tracked quarterly by the Purchasing Director and the Quality department and fed into supplier audits and management review. Findings run through the corrective action process in OP-QUA-001 to verified closure.

> COMMITS AVIUSULD TO INTEGRATE ETHICAL, SOCIAL AND ENVIRONMENTAL CRITERIA INTO SOURCING, AND ALIGNS PROCUREMENT TO UN SDGS 12 AND 13.

Source: Sustainable Procurement Policy, Oct 2025 OP-SOU-001 OP-PUR-001 FO-SOU-002 OP-QUA-001 Sustainable Procurement Risk Assessment Report 2025.

BASIS OF_ PREPARATION

The definitions GRI requires, the population behind each figure, and where the numbers come from

DEFINITIONS USED IN THIS TOPIC

SIGNIFICANT LOCATION OF OPERATION

– a location where AviusULD manufactures and from which direct-material procurement is managed. In 2025 there is one: the manufacturing site at Bangsaothong, Samut Prakan, Thailand. The Netherlands and United States offices buy office supplies locally but hold no direct-material procurement, and that spend is outside this disclosure.

LOCAL

– a Thai-registered supplier located in Thailand.

ACTIVE SUPPLIER

– a supplier on the Approved Supplier List at any point between 1 January and 31 December 2025.

CRITICAL SUPPLIER

– a supplier above 2% of annual procurement spend. Eight of the 100 are critical, together 85.24% of 2025 spend.

POPULATIONS BEHIND THE PERCENTAGES

100

active suppliers, 71 direct material and 29 indirect

9

new suppliers onboarded during 2025, the denominator for 308-1 and 414-1

870.1 MTHB

of total procurement spend, direct and indirect, the denominator for 204-1

DATA SOURCES

01 Approved Supplier List and Purchasing spend records

02 FO-SOU-001 supplier questionnaire and FO-SOU-004 risk assessment

03 Sustainable Procurement and Supplier Risk Assessments 2025

04 Supplier audit and corrective action records under OP-QUA-001

COUNTING RULES

- Each supplier is counted once, however many orders it received.
- A supplier counts as screened when it has completed the FO-SOU-001 questionnaire or an on-site audit covering ESG criteria.
- 38 suppliers were audited in 2025 28 of them were assessed on ESG criteria, and 1 ESG finding was raised and closed.

Source: Responsible Supplier Selection & ESG Due Diligence data collection, Purchasing, 2025 OP-SOU-001 GRI 204, GRI 308 and GRI 414, 2016.

THREE QUARTERS OF SUPPLIERS ARE THAI, BUT 89% OF SPEND GOES OVERSEAS

GRI 204-1 AND 3-3

The supplier population, where it sits and what it supplies

ACTIVE SUPPLIERS	PROCUREMENT SPEND	THAI SUPPLIERS	OVERSEAS SUPPLIERS
100	870.1 MTHB	75	25
71 direct, 29 indirect material	across all categories	95.3 MTHB, 10.95% of spend	774.8 MTHB, 89.05% of spend

PROCUREMENT SPEND BY SUPPLIER LOCATION, MTHB



WHAT AVIUSULD BUYS
ALUMINIUM DOMINATES THE BASKET



Metallic sheets 280 · Extrusion 252 · Woven textile 98 · Fasteners 76 · Coil 50 · NA 19.6 · Sheet metal parts 14 · Forging 13 · Webbings 7 MTHB

Metallic sheets at 280 MTHB, extrusion at 252 MTHB and coil at 50 MTHB together make 582 MTHB, two thirds of all spend. Woven textile follows at 98 MTHB, then fasteners at 76 MTHB, sheet metal parts at 14 MTHB, forging at 13 MTHB and webbings at 7 MTHB. A further 19.6 MTHB, shown as NA in the source table, is industrial manufacturing services.

That concentration is why aluminium suppliers and single-source suppliers are classified critical, and why the aluminium mill was audited on site in 2025.

CERTIFICATIONS HELD ACROSS THE BASE



Of the 100 active suppliers, 61 hold ISO 9001, 33 hold ISO 14001, 10 hold ISO 45001 and 8 hold AS9100. None currently holds an EcoVadis rating, so AviusULD relies on its own questionnaire and audits rather than a third-party ESG score.

Source: Responsible Supplier Selection & ESG Due Diligence data collection, Purchasing, 2025, Approved Supplier List and spend records. 2025 spend by supplier country (Power BI Spend Overview, refreshed 21 Oct 2026): Asia excluding Thailand 630.7 MTHB (China 626.9, Japan 3.0, Singapore 0.8) Europe 89.1 MTHB (Netherlands 52.0, Germany 24.3, UK 11.9, Italy 0.8) other regions 55.0 MTHB (Australia 55.0, USA 0.05).

A SUPPLIER_ PASSES TWELVE CRITERIA BEFORE IT CAN TAKE AN ORDER

GRI 3-3 **How AviusULD selects suppliers, approves them and keeps them approved, under OP-SOU-001**

THE ROUTE FROM \IDENTIFICATION TO THE APPROVED SUPPLIER LIST

01

IDENTIFY AND QUALIFY

Sourcing issues the request for quotation and collects the supplier's documents, certifications and financial standing.

02

ASSESS

Quality and technical capability are tested, including EASA or AS9100 requirements where the part demands it, alongside first-article inspection.

03

SCREEN ON ESG

The FO-SOU-001 questionnaire scores environmental management, labour and human rights, health and safety, ethics and the supplier's own code and complaint process.

04

RATE THE RISK

FO-SOU-004 rates overall supplier risk and grades ESG maturity on certifications held and participation in reporting platforms.

05

APPROVE AND LIST

The supplier joins the Approved Supplier List for up to two years, renewed annually from expiry and followed up monthly by Sourcing.

06

MONITOR AND RE-VERIFY

Quality, delivery and price variance are tracked monthly. Main suppliers, those above 2% of purchases, are re-questionnaired every two years.

THE TWELVE CRITERIA A SUPPLIER MUST PASS

01 Quality

02 Price

03 Delivery

04 Technical Capability

05 Aviation requirements under EASA or AS9100

06 Environmental Performance

07 Health and Safety

08 Labour and Human Rights

09 Ethics

10 Legal Compliance

11 Business Continuity

12 Financial Risk

Quality, price, delivery, technical capability, aviation requirements under EASA or AS9100, environmental performance, health and safety, labour and human rights, ethics, legal compliance, business continuity and financial risk. Environmental, social and ethical criteria were added to the standing set in 2025.

WHAT HAPPENS WHEN A SUPPLIER FALLS SHORT

Findings run through the corrective action process in OP-QUA-001: notification, root cause, corrective action with a due date, verification and closure. Persistent weakness triggers stricter contract terms, more frequent audits or a joint improvement plan, and in the last resort removal from the Approved Supplier List.

Source: OP-SOU-001 Sourcing Management, sections 6.2 to 6.11 OP-PUR-001 Procurement Management FO-SOU-001 supplier questionnaire OP-QUA-001 Quality Audits.

THE EXISTING SUPPLIER QUESTIONNAIRE_ ALREADY COVERS WHAT GRI 308 AND 414 ASK

GRI 308-1 AND 414-1

What environmental and social screening means at AviusULD

ENVIRONMENTAL CRITERIA

Maps to GRI 308

- Environmental management system and policy
- ISO 14001 evaluation, held by 33 suppliers
- Notice of any supply with a negative environmental impact
- Hazardous substances and REACH compliance
- Safety data sheets for chemicals
- Environmental law, with buyer audit rights
- Environmental law, with buyer audit rights

SOCIAL CRITERIA

Maps to GRI 414

- Labour law compliance documents
- Child labour, forced labour and human trafficking
- Migrant-worker compliance
- Worker voice surveys and grievance mechanisms
- Diversity, equity and inclusion
- Health and safety, with ISO 45001 evaluation

GOVERNANCE CRITERIA

Maps to GRI 205 and 2-26

- Business ethics and anti-corruption
- The supplier's own code of conduct
- Whistleblowing and complaint process
- Conflict of interest
- Legal and regulatory compliance
- Expectations passed to sub-tier suppliers

HOW A QUESTIONNAIRE IS SCORED AND USED

Each section is scored and the supplier must cite the evidence behind its answers, naming its own policies and procedures. The completed FO-SOU-001 questionnaire feeds the FO-SOU-004 risk rating, which decides whether the supplier joins the Approved Supplier List and how often it is re-verified.

WHAT THE QUESTIONNAIRE DOES NOT DO

It is a self-declaration with evidence cited, not an independent assessment. Verification comes from the on-site audit programme, and no supplier currently holds an EcoVadis rating, so there is no third-party ESG score behind any of these answers. It also asks nothing about a supplier's energy use, greenhouse gas emissions, water use or pollution control, so those topics sit outside the screening until the form is extended. It does not cover supplier IT or information security, which is reported as a 2026 development in the information-security topic.

THE COMPLETED FO-SOU-001 QUESTIONNAIRE FEEDS THE FO-SOU-004 RISK RATING. WHICH DECIDES WHETHER THE SUPPLIER JOINS THE APPROVED SUPPLIER LIST AND HOW OFTEN IT IS RE-VERIFIED.

Source: FO-SOU-001 supplier and service-provider questionnaire OP-SOU-001 Responsible Supplier Selection & ESG Due Diligence data collection, Purchasing, 2025.

THREE OF NINE NEW SUPPLIERS WERE SCREENED ON ESG CRITERIA IN THE FIRST YEAR

GRI 308-1 AND 414-1

Percentage of new suppliers screened using environmental and social criteria

NEW SUPPLIERS ONBOARDED	SCREENED ON ENVIRONMENTAL CRITERIA	SCREENED ON SOCIAL CRITERIA	SCREENING METHOD
9	3 OF 9	3 OF 9	FO-SOU-001
8 direct, 1 indirect material	33%, GRI 308-1	33%, GRI 414-1	questionnaire and on-site audit

SCREENED ON ENVIRONMENTAL CRITERIA/SCREENED ON SOCIAL CRITERIA



3 OF 9 33%, GRI 308-1

WHY THE FIGURE IS A THIRD, AND NOT HIGHER

Environmental, social and ethical criteria became part of the standing selection set during 2025, so only suppliers onboarded after they took effect were screened against them. Six of the nine were approved earlier in the year on quality, technical, delivery and financial criteria alone.

The same three suppliers were screened on both environmental and social criteria, because the FO-SOU-001 questionnaire covers both in one exercise rather than as two separate reviews.

WHAT SCREENING CONSISTED OF

A completed FO-SOU-001 questionnaire scoring environmental management, labour and human rights, health and safety, ethics and the supplier's own code and complaint process, with evidence cited for each answer, followed where warranted by an on-site audit.

The result feeds the FO-SOU-004 risk rating, which determines Approved Supplier List entry and the re-verification interval.

WHERE THIS GOES IN 2026

With the criteria now embedded in OP-SOU-001, every supplier onboarded from 2026 passes ESG screening before approval, so the rate should approach 100% next year. The existing base is being brought up through the two-year re-verification cycle and the audit programme rather than re-screened at once.

Source: Responsible Supplier Selection & ESG Due Diligence data collection, Purchasing, 2025, sections 5 and 6 OP-SOU-001 FO-SOU-001.

NO ENVIRONMENTAL IMPACT WAS FOUND AND ONE SOCIAL FINDING WAS CLOSED IN 2025

GRI 308-2 AND 414-2 **Negative impacts in the supply chain and the actions taken**

BOTH DISCLOSURES, REQUIREMENT BY REQUIREMENT

REQUIREMENT	GRI 308-2 ENVIRONMENTAL	GRI 414-2 SOCIAL
a. Suppliers assessed for impacts	28	28 the same suppliers as 308-2
b. Suppliers identified with significant actual or potential negative impacts	0	1 child labour regulations not specified
c. The significant impacts identified	0	1
d. Suppliers where improvements were agreed	N/A no supplier with significant negative environmental impacts	1 OF 1 100%
e. Suppliers where the relationship was terminated	0	0

WHAT WAS FOUND, AND WHAT WAS DONE

The supplier risk register identified three risks at an aluminium mill: environmental damage associated with aluminium production, exposure of workers to unsafe conditions, and forced or child labour risk in regions with weaker labour law. Each was addressed by an on-site audit at the mill, and all three closed in July 2025, with the labour risk also secured by a signed code of conduct.

HOW THE IMPACT COUNTS ARE REPORTED

FO-SOU-001 scores environment, labour and human rights, health and safety and ethics in one section, so the 28 suppliers assessed in 2025 were assessed on environmental and social criteria in one exercise. They are 28 of the 38 suppliers audited in 2025. No significant actual or potential negative environmental impacts were identified from supplier assessments in the reporting period, so improvements agreed is N/A. One supplier, on foreign-worker permits, carried a significant negative social impact a corrective action was agreed and closed in 2025. The aluminium mill risks were reviewed by on-site audit and were not a finding. No relationship was ended.

EACH WAS ADDRESSED BY AN ON-SITE AUDIT AT THE MILL, AND ALL THREE CLOSED IN JULY 2025, WITH THE LABOUR RISK ALSO SECURED BY A SIGNED CODE OF CONDUCT.

Source: Sustainable Procurement Risk Assessment Report 2025, Appendix A Operation Risk Assessment (Purchasing) and Supplier Risk Assessment 2025 Responsible Supplier Selection & ESG Due Diligence data collection, Purchasing, sections 7 to 9.

SIXTY-SEVEN SUPPLIERS HAVE SIGNED, AND THEY CARRY 93% OF THE SPEND

GRI 3-3 AND 414-1

The commitment asked of every supplier, and how far it is accepted

ISSUED THE CODE	SIGNED ACCEPTANCE	SPEND THOSE 67 REPRESENT	SIGNIFICANT PARTNERS SIGNED
100 OF 100	67 OF 100	93%	7 OF 8
every active supplier	67% by supplier count	of direct and indirect material	88%, 85.24% of 2025 spend

SIGNED ACCEPTANCE: 67% BY SUPPLIER COUNT · 93% OF DIRECT AND INDIRECT MATERIAL



WHAT THE CODE REQUIRES

01 Environmental protection and legal compliance

02 Health and safety, and safe working conditions

03 Human rights, with no child or forced labour

04 Fair working hours, wages and non-discrimination

05 Freedom of association

06 Anti-corruption and conflict-of-interest control

07 Reporting and whistleblowing access

08 The same expectations passed to sub-tier suppliers

THE 33 THAT HAVE NOT SIGNED

Thirty-three suppliers received the code without returning a signed acceptance. Because the unsigned tail sits among smaller accounts, the 67 who signed still represent 93% of direct and indirect material spend, so the exposure is narrower than the headcount suggests.

One of the eight critical suppliers declined to sign AviusULD's code because it operates its own corporate code. AviusULD reviewed that document and determined it carries equivalent requirements on human rights, child and forced labour, non-discrimination, harassment, business ethics, anti-corruption, whistleblowing, health and safety and the environment, so the partner is recognised as meeting the intent.

HOW THE CODE IS ENFORCED

The code is issued at qualification and its requirements are carried into the Products Purchase Agreement, so the obligation is contractual rather than an expectation. Purchasing is the named channel for any concern involving a supplier, and the whistleblowing channels are open to suppliers directly. From 2026 anti-corruption training extends to Tier-1 suppliers, owned by Purchasing through Supplier Code implementation.

Source: FO-SOU-002 Supplier Code of Conduct Responsible Supplier Selection & ESG Due Diligence data collection, Purchasing, section 11 Products Purchase Agreement Anti-Corruption Risk Assessment Report 2025.

38 SUPPLIERS WERE AUDITED IN 2025, WITH ONE ESG CORRECTIVE ACTION

GRI 308-2 AND 414-2

Where audit found a problem, and what was done about it

SUPPLIERS AUDITED	SIGNED ACCEPTANCE	ESG CORRECTIVE ACTIONS	RELATIONSHIPS TERMINATED
38	28	1	0
of 100 active, plus 2 inactive	of the 38 suppliers audited, 74%	social no environmental finding	none on ESG grounds

THE ESG FINDING AND WHAT FOLLOWED

Closed 2025

CHILD LABOUR REGULATIONS

A supplier's employment requirements did not specify its child labour regulations. Corrective action agreed, detail documented and the finding closed in 2025.

No finding

ALUMINIUM MILL (NO FINDING)

Fire risk, water consumption and emissions were reviewed in the July 2025 on-site audit. No significant negative environmental impact was identified.

The finding was closed within the year. No supplier relationship was ended on environmental or social grounds in 2025.

OPEN CORRECTIVE ACTIONS

31

31 supplier corrective actions of all types were open at year end, including quality and delivery findings as well as ESG.

All 31 are past their agreed due date. The ESG action is not among them: it was raised and closed in 2025.



The audit programme recorded 188 minor findings in 2025 against 16 in 2024, and no major findings.

HOW AUDITS ARE TARGETED

Audits are targeted on spend, quality performance and any specific identified risk, under the approved-supplier programme in OP-QUA-001. The 38 audited in 2025 are drawn from the Approved Supplier List 28 of them were assessed on ESG criteria.

Source: OP-QUA-001 Quality Audits Responsible Supplier Selection & ESG Due Diligence data collection, Purchasing, sections 8 to 10 Sustainable Procurement Risk Assessment Report 2025.

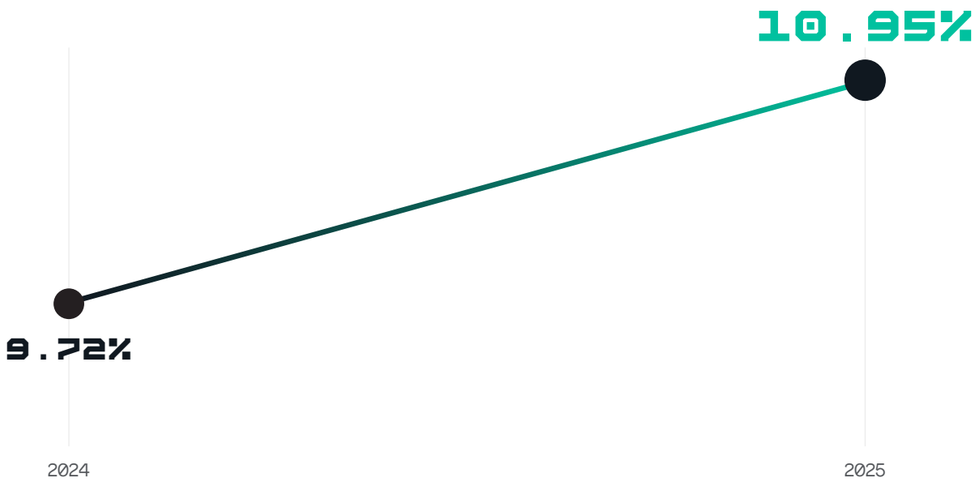
LOCAL_ SUPPLIERS ARE THREE QUARTERS OF THE BASE BUT 11% OF THE SPEND

GRI 204-1

Proportion of spending on local suppliers at the Bangsaothong manufacturing site

SPEND WITH LOCAL SUPPLIERS	LOCAL SUPPLIERS	2024 COMPARATIVE	SIGNIFICANT LOCATIONS
10.95%	75 OF 100	9.72%	1
95.3 of 870.1 MTHB	Thai-registered, operating in Thailand	same definition and spend base	Bangsaothong, Samut Prakan

SHARE OF PROCUREMENT SPEND WITH LOCAL SUPPLIERS, %



SEVENTY-FIVE OF THE HUNDRED ACTIVE SUPPLIERS ARE THAI, BUT THEY SUPPLY CONSUMABLES, PACKAGING, SERVICES AND SUB-CONTRACTED WORK.

WHY THE TWO NUMBERS DIFFER

Seventy-five of the hundred active suppliers are Thai, but they supply consumables, packaging, services and sub-contracted work. The aluminium, hardware and specialist components that make up most of the bill of materials are bought from Europe and the rest of Asia, where the qualified sources sit, and those four categories carry 89% of the spend.

Local sourcing is therefore limited by qualification and certification, not by preference. The Sustainable Procurement Policy directs buyers to local sources where a qualified supplier exists, and the local share rose about one point year on year.

Local means a supplier registered in Thailand and operating in Thailand. Spend covers direct and indirect material managed from Bangsaothong the Netherlands and United States offices buy office supplies locally but hold no direct-material procurement, and that spend is outside this disclosure.

Source: Responsible Supplier Selection & ESG Due Diligence data collection, Purchasing, sections 2 and 3 AviusULD Sustainable Procurement Policy Oct.2025 OP-PUR-001 Procurement Management.

NINE OF TEN COMMITMENTS WERE MET; SUPPLIER TRAINING STARTS IN 2026

GRI 3-3 **What AviusULD committed to for 2025 and where it landed**

COMMITMENT · 2025 TARGET · RESULT · STATUS

COMMITMENT	2025 TARGET	RESULT	STATUS
Issue the Supplier Code to every active supplier	100%	100 of 100 issued	Met
Obtain signed acceptance of the Code	15%	67 of 100 signed, 67%	Met
Cover every significant partner	7 OF 8	7 of 8; Howmet Aerospace applies an equivalent code, accepted	Met
Screen new suppliers on ESG criteria	3 OF 9	3 of 9 screened	Met
Complete the supplier audit programme	AS PLANNED	38 suppliers audited; 28 assessed on ESG	Met
End no relationship on ESG grounds before remedy	0 TERMINATIONS	0 terminations, remedy agreed both times	Met
Close ESG corrective actions raised	100%	1 of 1 closed in 2025	Met
Raise the local procurement share	ABOVE 2024	10.95% against 9.7%	Met
Maintain environmental certification in the base	MONITOR	33 of 100 hold ISO 14001	Met
Extend anti-corruption training to Tier-1 suppliers	LAUNCH 2026	programme scheduled for 2026	On Track

WHERE THE EFFORT GOES NEXT

Code acceptance stays open with the 33 suppliers who have not signed they sit among smaller accounts, which is why signed coverage reaches 93% of spend at 67% of suppliers. Tier-1 anti-corruption training from 2026 is the lever. ESG screening becomes a gate in the qualification step rather than a follow-up, so the 2026 cohort is screened before approval.

BASIS OF THE CERTIFICATION COUNTS

The certification counts of 61 ISO 9001, 33 ISO 14001, 10 ISO 45001 and 8 AS9100 are reported against all 100 active suppliers. Purchasing owns the register, with Sourcing and Supplier Quality sitting under it. The earlier queries on acceptance, audits and minor findings are settled and reflected above.

CODE ACCEPTANCE STAYS OPEN WITH THE 33 SUPPLIERS WHO HAVE NOT SIGNED.

Source: Responsible Supplier Selection & ESG Due Diligence data collection, Purchasing, sections 4 to 12 OP-SOU-001 Sourcing Management OP-QUA-001 Quality Audits.

GRI 204 · 205 · GRI 407 · 408 · 409 · 414

ETHICAL PROCUREMENT & SUPPLY CHAIN_ HUMAN RIGHTS

Reporting period 1 January – 31 December 2025 · Boundary: AviusULD Thailand, Netherlands and USA; Tier-1 suppliers

Procurement controls held in 2025 with no corruption case and no supplier terminated, while ESG screening reached only the newest suppliers.

Ethical procurement is material because AviusULD buys 870.1 MTHB of material and services a year from 100 active suppliers, and the labour and integrity risks in that chain sit outside its direct control. The controls are the Sustainable Procurement Policy, the Supplier Code of Conduct, the anti-corruption and gifts rules and the approval matrix, applied through the sourcing and procurement procedures. This topic reports how those controls work in procurement the underlying case data are reported once, under Human Rights & Fair Labor Practices for human rights, Business Ethics, Anti-corruption & Whistleblowing for business ethics and Responsible Supplier Selection & ESG Due Diligence for supplier selection.

REPORTING BOUNDARY

Three entities: AviusULD Ltd. Thailand, AviusULD B.V. Netherlands and AviusULD Inc. USA

All procurement, sourcing and supplier-management activity, direct and indirect material

100 active suppliers on the Approved Supplier List 71 direct and 29 indirect 75 Thai

Tier-1 suppliers in scope Tier-2 assessment planned for 2027

Owner: Purchasing, with Compliance, Finance and HR figures shared with Topics 10, 12 and 14

Source: AviusULD Sustainable Purchasing Policy, Oct 2025 Supplier Code of Conduct 49_Anti-Corruption Risk Assessment Report 54_Sustainable Procurement Risk Assessment Report Responsible Supplier Selection & ESG Due Diligence supplier dataset 2025.

ETHICAL PROCUREMENT & SUPPLY CHAIN HUMAN RIGHTS

0

CONFIRMED SUPPLIER CORRUPTION CASES

also zero ethics findings in audits

67 OF 100

SUPPLIERS SIGNING THE SUPPLIER CODE

93% of material spend

38

SUPPLIERS AUDITED IN 2025

28 assessed on ESG criteria

1

ESG CORRECTIVE ACTION RAISED

one social, closed no environmental finding

WHY THIS TOPIC_ IS MATERIAL

GRI 3-3 **Procurement-related impacts, AviusULD's involvement and stakeholder expectations**

Procurement decides who AviusULD buys from and on what terms, so it is the point where supply-chain labour risk and integrity risk are either screened out or let in. Both sides are reported here in the procurement context.

IMPACTS THAT ARISE THROUGH PROCUREMENT

01 LABOUR RIGHTS IN THE SUPPLY CHAIN

Forced and child labour risk concentrated in the aluminium chain and in regions with weaker enforcement. One ESG corrective action was raised from audits in 2025, a social finding on child labour regulations, and it was closed.

02 CHILD LABOUR CONTROLS AT SUPPLIERS

One Thai supplier did not specify its child labour regulations the detail was documented and the action closed in the year.

03 INTEGRITY OF PURCHASING DECISIONS

Conflicts of interest, supplier favouritism and gifts could distort supplier selection. Controls are the two-quotation rule, approval limits and declarations.

04 PAYMENT AND FRAUD EXPOSURE

Unauthorised bank-account changes and financial misreporting, controlled by dual verification, segregation of duties and audit.

05 COVERAGE OF THE CONTROLS THEMSELVES

The Supplier Code reaches 93% of spend but only 67 of 100 suppliers, and ESG screening covered the three suppliers approved after ESG criteria entered the selection set during 2025.

STAKEHOLDER · MAIN EXPECTATION AND AVIUSULD RESPONSE

EMPLOYEES IN PURCHASING
Clear ethical rules; Code of Conduct, conflict-of-interest declarations and gifts thresholds, with 100% of the team trained

SUPPLIERS
Fair and transparent selection; minimum two quotations, documented criteria and an ERP audit trail

SUPPLY-CHAIN WORKERS
Labour rights respected; Supplier Code prohibitions, questionnaire screening and on-site audits

CUSTOMERS
A responsible supply chain; Code coverage at 93% of spend and audits of 38 suppliers

REGULATORS
Compliance with anti-corruption law; Anti-Corruption Policy aligned to the Thai Organic Act 2018, zero cases

CCE AND HIG
Effective third-party due diligence; documented supplier and corruption risk assessments under OP-QUA-013

AUDITORS
Traceable evidence; risk registers, audit records, CAPA log and signature register

Involvement: **AviusULD** causes impacts through its own purchasing decisions and the terms it sets contributes to impacts where price and lead-time pressure shapes supplier conditions and is linked through business relationships to labour conditions in Tier-1 and deeper supplier workforces. This topic does not restate the case counts held in Topics 10, 12 and 14 it reports how procurement controls act on them.

Source: 49_Anti-Corruption Risk Assessment Report 54_Sustainable Procurement Risk Assessment Report 55_ Operation Risk Assessment (Purchasing) and Supplier Risk Assessment Responsible Supplier Selection & ESG Due Diligence supplier dataset stakeholder confirmation for Ethical Procurement & Supply Chain Human Rights.

EIGHT_ INSTRUMENTS GOVERN HOW AVIUSULD BUYS

GRI 3-3 **Policies and commitments applying to Purchasing employees and to suppliers**

Half of the framework binds AviusULD's own staff and half binds suppliers. Both halves are approved by the CEO and carry a named owner and a revision cycle.

SUSTAINABLE PROCUREMENT POLICY

Purchasing

Applies to staff

Staff · Both · Suppliers

October 2025, issued by the Director of Purchasing, approved by the CEO, next revision Q4 2026. Global scope including temporary, contracted and agency staff. Defines ethical sourcing as procurement respecting human rights, labour standards and ethical conduct; aligned to SDG 12 and 13.

SUPPLIER CODE OF CONDUCT

Purchasing

Applies to suppliers

Staff · Both · **Suppliers**

Binds suppliers on labour rights, prohibition of child and forced labour, non-discrimination, business ethics, anti-corruption, whistleblowing, health and safety and environmental responsibility. Issued to 100% of active suppliers; signature is the condition of the relationship.

ANTI-CORRUPTION POLICY

Human Resources

Applies to staff

Staff · Both · Suppliers

January 2025, approved by the CEO, next revision Q2 2026. Covers corruption, fraud, money laundering, anti-competitive practice, conflicts of interest, bribery and improper gifting; aligned to the Thai Organic Act on Anti-Corruption 2018 and UN Global Compact Principle 10.

CONFLICTS OF INTEREST CHARTER

HR and Purchasing

Applies to staff

Staff · Both · Suppliers

Requires a Disclosure Statement from covered employees including purchasing staff, recordkeeping by HR and by Purchasing, review with the relevant manager, recusal from the decision, and annual reporting by the HR and Purchasing Directors.

GIFTS, HOSPITALITY AND EXPENSES, OP-FIN-003

Finance

Applies to staff

Staff · Both · Suppliers

Sets the rules for giving and receiving gifts and hospitality with approval thresholds and a declaration log maintained by Finance, to prevent conflicts of interest and comply with anti-corruption law.

WHISTLEBLOWING POLICY

Human Resources

Both

Staff · Both · Suppliers

October 2025. Open to employees, suppliers and stakeholders, confidential, with protection from retaliation. Suppliers report to myconcern@aviusuld.com, the channel published in the Supplier Code.

LIMIT OF AUTHORITY MATRIX

CFO

Applies to staff

Staff · Both · Suppliers

Sets who may approve what: AviusULD up to 3M USD per transaction, CCE Group above that, Board and the Group investor above 5M USD, with separate thresholds for non-budgeted spend and dual signature requirements.

OP-SOU-001 AND OP-PUR-001

Purchasing

Both

Staff · Both · Suppliers

Sourcing management and procurement management: the operating procedures that turn the policies into the steps on page 412, for direct and indirect material.

Source: Sustainable Procurement Policy Oct 2025 Supplier Code of Conduct Anti-Corruption Policy Jan 2025 Conflicts of Interest Charter OP-FIN-003 Whistleblowing Policy Oct 2025 LoA matrix OP-SOU-001 OP-PUR-001.

BASIS OF_ PREPARATION

GRI 204 · 205 · 407 · 408 · 409 · 414

Scope, reuse rules, data sources and limitations

Ethical Procurement & Supply Chain Human Rights is a connecting topic. It reports procurement's own controls and reuses the case data held in Topics 10, 12 and 14 rather than counting it twice.

ENTITY, PERIOD AND COVERAGE

Reporting period 1 January to 31 December 2025.

Entities: AviusULD Ltd. Thailand, AviusULD B.V. Netherlands and AviusULD Inc. USA.

Activities: all procurement, sourcing and supplier-management activity for direct and indirect material and services.

Suppliers: 100 active on the Approved Supplier List, 71 direct and 29 indirect, of which 75 Thai 9 suppliers were onboarded during 2025.

Spend: 870.1 MTHB of procurement in the year.

Owner: Purchasing, with Compliance, Finance and HR.

HOW DOUBLE COUNTING IS AVOIDED

Human-rights case data, the risk register and the security-provider position are reported under Human Rights & Fair Labor Practices and referenced here.

Gifts, conflict-of-interest declarations, whistleblowing cases and the corruption case record are reported under Business Ethics, Anti-corruption & Whistleblowing.

Supplier screening, audit and corrective-action counts are reported under Responsible Supplier Selection & ESG Due Diligence, and this topic uses Responsible Supplier Selection & ESG Due Diligence's figures verbatim.

Where a figure appears in more than one topic it is the same figure from the same source, not a second count.

DEFINITIONS USED

Active Supplier	a supplier on the Approved Supplier List during 2025.
Significant Business Partner	one of the top ten suppliers by annual direct-material procurement spend.
Local Supplier	a supplier registered in Thailand, the country of the manufacturing operation.
Esg Screening	assessment against environmental, labour and human-rights, health and safety and ethics criteria through the FO-SOU-001 questionnaire.
Confirmed Case	an allegation investigated and substantiated.

LIMITATIONS STATED IN THIS TOPIC

⚠ No supplier was separately assessed for corruption risk in 2025 assurance came from the audit programme and the Code, not from corruption-specific screening.

⚠ ESG criteria entered the standing selection set during 2025, so screening applied to the three suppliers approved after that point, 3 of 9 new suppliers (33%) the six approved earlier in the year were assessed on quality, technical, delivery and financial criteria only.

⚠ Freedom of association was not evaluated as a separate supplier risk category.

⚠ The 2025 count is confirmed: one ESG corrective action, social, closed minor audit findings of all types are reported under Responsible Supplier Selection & ESG Due Diligence.

Source: Responsible Supplier Selection & ESG Due Diligence supplier dataset 2025 49_Anti-Corruption Risk Assessment Report 54_Sustainable Procurement Risk Assessment Report OP-PUR-001 Purchasing records 2025.

NINE STEPS FROM REQUISITION TO PAYMENT, EACH WITH A CONTROL

GRI 3-3 · GRI 205

How a purchase is controlled under OP-PUR-001 and OP-SOU-001

Procurement runs under OP-PUR-001 for direct and indirect material, with sourcing decisions under OP-SOU-001. The controls below are the ones an assurer can test.

1

REQUISITION

Requisition raised by the requesting function, not by Purchasing

2

QUOTATION

Minimum two quotations sought for comparable scope

3

COMPARISON

Documented comparison on price, quality, delivery and ESG criteria

4

SELECTION

Supplier selected against the criteria in OP-SOU-001, from the Approved Supplier List

5

APPROVAL

Approved within the Limit of Authority thresholds; higher values escalate to Group or Board

6

PURCHASE ORDER

PO issued in the ERP system, creating the audit trail

7

RECEIPT

Goods or service receipt recorded separately from ordering

8

INVOICE CHECK

Invoice verified against PO and receipt; segregation of duties applies

9

PAYMENT

Payment released by Finance; bank-account changes require dual verification with the supplier

CONTROLS ON THE PEOPLE, NOT JUST THE PROCESS

Purchasing employees make a conflict-of-interest declaration under the Charter, with records kept by HR and by Purchasing and review with the relevant manager a conflicted person recuses from the decision.

Gifts and hospitality follow OP-FIN-003 with approval thresholds and a Finance declaration log. In 2025, for all AviusULD employees across the three entities, the log recorded no declarations, no rejected gifts, no violations and no disciplinary cases.

WHAT THE ASSESSMENT FOUND

The anti-corruption assessment rated conflicts of interest in management and procurement, supplier favouritism and anti-competitive practice, gifts misuse, financial misreporting and unauthorised bank-account changes all residual low, with the controls above named as the mitigation. The gifts procedure OP-FIN-003 was issued company-wide on 23 July 2025.

No confirmed case of bribery, fraud or unethical behaviour arose in the year.

PROCUREMENT RUNS UNDER OP-PUR-001 FOR DIRECT AND INDIRECT MATERIAL, WITH SOURCING DECISIONS UNDER OP-SOU-001.

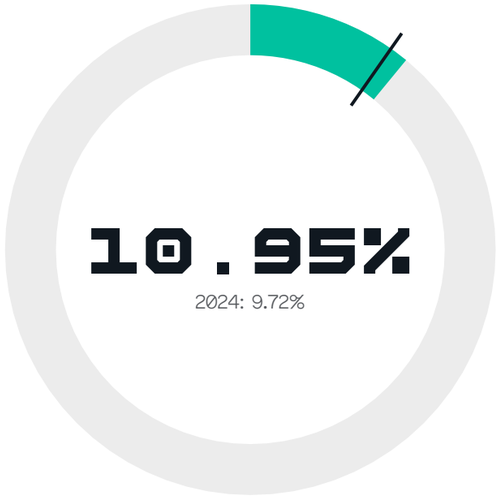
Source: OP-PUR-001 OP-SOU-001 LoA matrix Conflicts of Interest Charter OP-FIN-003 49_Anti-Corruption Risk Assessment Report.

LOCAL SPEND ROSE_ TO 10.95% OF PROCUREMENT

GRI 204-1

Proportion of spending on local suppliers at the significant location of operation

The Bangsaothong manufacturing site in Thailand is AviusULD's significant location of operation. Local means a supplier registered in Thailand, and local spend grew against 2024 while total procurement stayed at 870.1 MTHB.



Share of procurement spent locally

LOCAL SPEND, MTHB

95.3

of 870.1 MTHB total

SUPPLIERS REGISTERED IN THAILAND

75 OF 100

by supplier count

NEW SUPPLIERS ONBOARDED IN 2025

9

3 screened on ESG criteria

DEFINITION AND BASIS

Significant location of operation: the Bangsaothong manufacturing site, Samut Prakan, Thailand, which is where production and the great majority of procurement sit.

Local supplier: a supplier registered in Thailand. Registration is used rather than ownership or plant location because it is the field held on the Approved Supplier List.

Spend basis: procurement spend on direct and indirect material and services during 2025, 870.1 MTHB in total.

The 75 Thai suppliers account for a smaller share of spend than of count, because the highest-value direct-material suppliers, including the primary aluminium mill, sit outside Thailand.

WHY THE SHARE IS WHAT IT IS, AND WHERE IT GOES

ULD manufacture depends on aluminium and engineered materials that are not produced in Thailand at the specification required, so the direct-material chain is international by necessity. Indirect material and services are sourced locally where capability exists.

Local spend rose from 9.7% to 10.95% in 2025 without a formal local-sourcing target.

AviusULD has no localisation target for 2026. The Sustainable Procurement Policy sets ethical and environmental criteria rather than a geographic preference, so any increase follows capability rather than policy.

READING THIS ALONGSIDE THE REST OF THE TOPIC

Local sourcing is not presented here as a human-rights control. The relevant point for this topic is the opposite: because the highest-spend suppliers are international, including in regions with weaker labour-law enforcement, the assurance has to come from the Supplier Code, the questionnaire and the audit programme rather than from proximity. That is why the aluminium chain carries the only supplier risks that were rated above low before mitigation, and why the audit at the mill in July 2025 mattered.

Source: Responsible Supplier Selection & ESG Due Diligence procurement spend dataset 2025 and Approved Supplier List Sustainable Procurement Policy Oct 2025.

EVERY SUPPLIER GETS THE ANTI-CORRUPTION REQUIREMENTS; 67 HAVE SIGNED

GRI 205-2 **Communication of anti-corruption policies and GRI 205-3 | Confirmed incidents**

The Supplier Code of Conduct carries the anti-corruption requirements and is issued to every active supplier. Signature is the measure of acceptance, and it is where coverage falls short of issuance.

100 OF 100

Suppliers issued the requirements
by supplier count

67 OF 100

Suppliers signing the Code
67% by count

93%

Material spend under signed Codes
of 870.1 MTHB material spend

7 OF 8

Significant business partners covered
about 90% of direct-material spend

WHAT SUPPLIERS ARE REQUIRED TO ACCEPT

The Supplier Code of Conduct requires compliance with anti-bribery and anti-corruption rules, prohibits kickbacks, requires disclosure of conflicts of interest, restricts gifts and hospitality, requires fraud prevention and fair competition, provides a reporting channel, and requires compliance with applicable law.

The requirement appears in the Supplier Code, which is issued with the supplier pack and referenced in the purchase agreement terms.

Seven of the eight critical suppliers signed. The eighth, Howmet Aerospace, operates its own corporate code, which AviusULD reviewed and found equivalent on human rights, child and forced labour, non-discrimination, anti-harassment, business ethics, anti-corruption, whistleblowing, health and safety and environmental responsibility, so it is recognised as meeting the intent.

CONFIRMED INCIDENTS, 205-3

- No confirmed incident of corruption involving AviusULD or its suppliers arose in 2025.
- No contract with a business partner was terminated or not renewed because of a corruption-related violation.
- No public legal case relating to corruption was brought against AviusULD or its employees during the year.
- No ethics or anti-corruption finding was raised in the 39 supplier audits performed.
- The case record itself, including the whistleblowing channel and the gifts register, is reported under Business Ethics, Anti-corruption & Whistleblowing this topic reports only the procurement view.

WHERE COVERAGE STOPS, AND WHY IT MATTERS

Issuance is universal but signature is not: 33 suppliers had not signed the Code at year end. They sit among the smaller accounts, which is why the spend figure of 93% runs far ahead of the 67% headcount. The practical exposure is therefore concentrated in low-value indirect purchases rather than in the direct-material chain, and the 2025 target was set on spend for that reason. Bringing the remaining 33 into signature, and re-verifying the existing base on the two-year cycle, is the work carried into 2026.

Source: Supplier Code of Conduct and signature register Responsible Supplier Selection & ESG Due Diligence supplier dataset 2025 49_Anti-Corruption Risk Assessment Report Business Ethics, Anti-corruption & Whistleblowing business ethics disclosures.

FIVE CORRUPTION RISKS IN PROCUREMENT, ALL RATED LOW AFTER CONTROL

GRI 205-1 **Operations assessed for risks related to corruption**

The anti-corruption risk assessment covers all three entities and the third parties engaged in purchasing, finance, logistics and administration. Five of its risk categories sit in or next to procurement.

	POTENTIAL IMPACT	CONTROL IN PLACE	RESIDUAL
CONFLICTS OF INTEREST IN MANAGEMENT AND PROCUREMENT	Undue influence in decision-making	Disclosure Statement for management and purchasing staff, multiple approval requirement, ethics training	Low
SUPPLIER FAVOURITISM AND ANTI-COMPETITIVE PRACTICE	Reputational damage or legal sanction	Minimum two-quotation rule sustainable procurement training audit trail in the ERP system	Low
GIFTS AND HOSPITALITY MISUSE	Risk of bribery and perceived bias	Approval thresholds and a declaration log maintained by Finance; gifts procedure OPFIN-003 issued company-wide on 23 July 2025	Low
FINANCIAL MISREPORTING	Distorted performance data and regulatory risk	Segregation of duties internal audit control external financial audit	Low
UNAUTHORISED BANK ACCOUNT CHANGES	Fraud and financial loss	Dual verification with the supplier bank account validation protocol	Low

HOW THE ASSESSMENT WAS RUN

Under OP-QUA-013 Operational Risk Assessment, the same five-step method used for the human-rights and procurement assessments: identify, analyse stakeholder impact, rate on the 1 to 5 likelihood and consequence scale, plan mitigation with owners and dates, then monitor.

Scope: all three entities, employees, managers, directors, temporary and contracted staff, and suppliers and third parties in purchasing, finance, logistics and administration.

Period January to June 2025, reviewed annually or on major process change.

Monitoring is quarterly by Compliance and Finance, with annual Ethics Committee review and reporting to the CEO.

THE GAP IN THIS DISCLOSURE

GRI 205-1 asks for operations assessed for corruption risk. AviusULD assessed its operations, and all three entities are covered by the assessment above, so operational coverage is 100%.

No supplier was separately assessed for corruption risk in 2025: the count is zero. Supplier assurance came from the Supplier Code, the FO-SOU-001 questionnaire and the audit programme, none of which is a corruption-specific risk assessment.

This is stated as a limitation rather than reported as an absence of risk, and supplier corruption-risk screening is a candidate for the 2026 cycle.

Source: 49_Anti-Corruption Risk Assessment Report, sections 2 to 4 and Appendix A OP-QUA-013 Operational Risk Assessment Ethical Procurement & Supply Chain Human Rights indicator table.

THE SUPPLIER CODE CARRIES THE LABOUR PROHIBITIONS; SCREENING CARRIES THE PROOF

GRI 407-1 · 408-1 · 409-1

Supplier requirements and what was assessed in 2025

What suppliers must accept is comprehensive. What was verified in 2025 is narrower, and the two are reported separately so the disclosure is not read as assurance it does not have.

WHAT THE SUPPLIER CODE REQUIRES

- Prohibition of child labour and compliance with minimum-age law.
- Prohibition of forced and compulsory labour, modern slavery and human trafficking.
- Respect for freedom of association and collective bargaining.
- Working hours and wages in line with applicable law.
- Non-discrimination and freedom from harassment.
- Health and safety at work.
- Protection of migrant workers, no recruitment fees charged to workers and no retention of passports or identity documents.
- A reporting channel, published in the Code, with protection from retaliation.

WHAT WAS VERIFIED IN 2025

- 38 suppliers audited, of which 28 were assessed on ESG criteria including labour.
- The three suppliers approved after ESG criteria entered the selection set were screened on social and environmental criteria through FO-SOU-001, 3 of 9 new suppliers (33%), which covers child labour, migrant-worker practice, legal compliance, health and safety and ethics in one exercise.
- The primary aluminium mill was audited on site in July 2025, closing its forced and child labour risk, with a signed code of conduct as the additional control.
- One Thai supplier's missing child labour regulations were documented and the action closed.

ETHICAL PROCUREMENT & SUPPLY CHAIN HUMAN RIGHTS

WHAT WAS NOT ASSESSED

- ⚠ Freedom of association was not evaluated as a separate supplier risk category in 2025, so no count of suppliers at risk can be given for 407-1.
- ⚠ No supplier was separately assessed for corruption risk.
- ⚠ The existing supplier base was not re-screened it is being brought up through the two-year re-verification cycle and the audit programme.
- ⚠ Tier-2 suppliers are outside the 2025 assessment coverage is planned by 2027.
- ⚠ These are stated as limitations, not as findings of zero risk.

THE 2025 POSITION ON EACH STANDARD

407-1

one operation-level representation risk at the Bangkok manufacturing operation, rated low and under management; supplier risk to this right not assessed.

408-1

no case of child labour, one Tier-1 supplier in Thailand identified with elevated risk (child labour regulations not specified), finding closed, no young worker employed anywhere in the group.

409-1

no case of forced or compulsory labour and no supplier finding, and the aluminium chain risk closed in July 2025.

Measures taken during the year are the Code issuance, the questionnaire screening of new suppliers and the audit programme.

WHERE THE UNDERLYING DATA LIVE

The case counts, risk register and residual ratings behind these statements are reported once under Human Rights & Fair Labor Practices for human rights and Responsible Supplier Selection & ESG Due Diligence for supplier assessment. This slide reports the procurement view of the same facts and does not create a second count.

Source: Supplier Code of Conduct FO-SOU-001 38_Human Rights Risk Assessment Report Responsible Supplier Selection & ESG Due Diligence supplier audit dataset 2025 Human Rights & Fair Labor Practices human-rights disclosures.

3 OF 9 NEW SUPPLIERS WERE SCREENED ON SOCIAL CRITERIA IN 2025

GRI 414-1 **New suppliers screened using social criteria and GRI 414-2 | Negative social impacts and actions taken**

ESG criteria became part of the standing supplier selection set during 2025, and 3 of the 9 new suppliers onboarded in 2025 were screened (33%). All figures are Responsible Supplier Selection & ESG Due Diligence's, used here without restatement.

NEW SUPPLIERS SCREENED ON SOCIAL CRITERIA	SUPPLIERS AUDITED IN 2025	SUPPLIER WITH A SIGNIFICANT NEGATIVE SOCIAL IMPACT	RELATIONSHIPS ENDED ON SOCIAL GROUNDS
3 OF 9	38	1	0
33% of new suppliers onboarded in 2025	24 in 2024	0 environmental closed in 2025	no suspension or termination

414-1: SCREENING OF NEW SUPPLIERS

Nine suppliers were onboarded during 2025. ESG criteria entered the standing selection set during the year, and all three suppliers approved after that point were screened against social criteria, giving 3 of 9 new suppliers, or 33%. The same three were screened on environmental criteria, because FO-SOU-001 covers both in one exercise.

The six approved earlier in the year were assessed on quality, technical, delivery and financial criteria only.

From 2026 every new supplier passes ESG screening before approval, and the existing base is brought up through the two-year re-verification cycle.

414-2: IMPACTS IDENTIFIED AND ACTION TAKEN

Supplier assessments identified no significant negative environmental impact (308-2: 0) and one significant negative social impact (414-2: 1).

The one case is a supplier whose employment requirements did not specify its child labour regulations a corrective action was agreed and closed within the year.

The primary aluminium mill was audited on site in July 2025 to review its forced and child labour risk, with a signed code of conduct as an added control no finding was raised.

No relationship was ended on social grounds.

HOW TO READ THE COVERAGE FIGURES

Code issuance
100% of active suppliers

Code signature
67 of 100 suppliers, or 93% of material spend

Social screening
3 of 9 new suppliers, GRI 414-1

Four figures appear in AviusULD's records and they measure different things. Code issuance is 100% of active suppliers. Code signature is 67 of 100 suppliers, or 93% of material spend. Social screening is 3 of 9 new suppliers onboarded in the year, or 33%, which is the GRI 414-1 figure. Audit coverage is 38 suppliers, of which 28 were assessed on ESG criteria. The earlier claim in the human-rights risk report that 100% of suppliers were screened describes Code issuance rather than screening. One ESG corrective action came from the 2025 audit programme, on migrant-worker permits, and it was closed this is the one 414-2 social impact. No significant negative environmental impact was identified (308-2: 0). Minor audit findings of all types are reported under Responsible Supplier Selection & ESG Due Diligence.

Source: Responsible Supplier Selection & ESG Due Diligence supplier dataset 2025, Approved Supplier List, FO-SOU-001, audit and corrective-action records 54_Sustainable Procurement Risk Assessment Report.

RISK IS IDENTIFIED SUPPLIER BY SUPPLIER, NOT BY CATEGORY LABEL

GRI 3-3 **How AviusULD identifies higher-risk suppliers and sourcing categories**

AviusULD does not publish a list of high-risk sourcing categories. Risk is assessed per supplier and per operational exposure, through two registers maintained under OP-QUA-013.

CRITERIA ACTUALLY APPLIED

- Country and geographic exposure, considered where suppliers operate in regions with weaker labour-law enforcement.
- Commodity and material risk, which is how the aluminium chain came to carry the only above-low supplier risks.
- Labour intensity and migrant-worker exposure, assessed through the FO-SOU-001 questionnaire.
- ESG assessment results and EcoVadis scores.
- Audit history and regulatory history.
- Criticality of supply and single-source dependence.
- Spend and supplier performance.
- Risks are scored on the 1 to 5 likelihood and consequence scale, with the same bands used across the company's other risk domains.

THE TWO REGISTERS

The Sustainable Procurement Risk Assessment covers procurement and supplier management across all three locations, and rates material shortage and single-supplier dependence, delivery and quality, counterfeit parts, supplier health, safety and environmental compliance, forced and child labour in the supply chain, conflict of interest and favouritism in procurement, and supplier data security. Residual ratings run low to moderate.

The Purchasing operational risk register tracks the department's own exposures, such as single-source fabric lead times and delayed material release, with owners and due dates most 2025 entries closed in May 2025 and one remained open.

Both are reviewed quarterly by the Purchasing Director and Quality, and feed the supplier audit programme and management review.

CATEGORIES AVIUSULD TREATS AS HIGHER EXPOSURE, AND WHY

01 ALUMINIUM AND ENGINEERED MATERIALS

the direct-material chain is international and concentrated, and the primary mill carried three risks in 2025, environmental damage from production, worker exposure to unsafe conditions, and forced or child labour. All three closed in July 2025 after an on-site audit.

02 OUTSOURCED ON-SITE SERVICES

contractor and security work brings third-party workers onto AviusULD premises, which is why contractor safety is controlled under Occupational Health, Safety & Contractor Safety and the security provider's human-rights training gap is disclosed under Human Rights & Fair Labor Practices.

03 LABOUR PRACTICES AT THAI SUPPLIERS

the one child labour regulations finding of 2025 came from this category.

Categories are not labelled high risk merely because they commonly appear on such lists. Textiles, chemicals, packaging, logistics and cleaning were assessed on the same criteria and did not produce an above-low labour finding in 2025.

Source: 54_Sustainable Procurement Risk Assessment Report 55_Operation Risk Assessment (Purchasing) and Supplier Risk Assessment 38_Human Rights Risk Assessment Report Responsible Supplier Selection & ESG Due Diligence audit records.

SUPPLIERS HAVE A NAMED_REPORTING CHANNEL AND USED IT ZERO TIMES

GRI 3-3 **Supplier access to grievance channels, and the remediation path when a finding arises**

The Whistleblowing Policy is open to suppliers as well as employees, and the channel is published in the Supplier Code so supplier employees can use it directly.

SUPPLIER-RELATED COMPLAINTS RECEIVED	HUMAN-RIGHTS COMPLAINTS FROM THE SUPPLY CHAIN	CORRUPTION COMPLAINTS	SUBSTANTIATED CASES
0	0	0	0
Suppliers and their workers, 2025	Suppliers and their workers, 2025	Suppliers and employees, 2025	Of all reports received, 2025

HOW A SUPPLIER OR ITS WORKERS CAN REPORT

Open to suppliers, their employees and other stakeholders, not only to AviusULD employees.

Anonymous reporting is accepted.

Non-retaliation applies, under the Whistleblowing Policy, October 2025, which states that employees, suppliers and stakeholders should feel safe raising concerns about unethical, illegal or improper conduct without fear of retaliation.

The case record and the investigation process are reported under Business Ethics, Anti-corruption & Whistleblowing.

MYCONCERN@AVIUSULD.COM

the address published in the Supplier Code of Conduct.

WHAT HAPPENS WHEN A FINDING ARISES

01 Finding raised, from an audit, a questionnaire response or a report.

02 Risk assessed and the supplier asked for a corrective action plan with a due date.

03 Evidence provided by the supplier and verified by Purchasing with Quality.

04 **Closure recorded, or escalation if evidence is not produced.**

The 2025 ESG corrective action followed this path and closed within the year: child labour regulations documented by the Thai supplier.

No serious case or major finding arose, so no suspension, termination or regulatory referral was required.

WHAT IS NOT YET FORMALISED

AviusULD has no written criteria specific to serious supply-chain human-rights cases: immediate containment, remediation for affected workers, escalation thresholds, supplier suspension and termination triggers, and regulatory reporting are handled case by case rather than by procedure. For its own operations the company does have OP-HRM-004, the remediation procedure for identified victims of child labour, forced labour, trafficking, discrimination or harassment. Extending equivalent criteria to the supply chain is the honest gap on this slide, and no case in 2025 tested it.

Source: Whistleblowing Policy, Oct 2025 Supplier Code of Conduct OP-HRM-004 Responsible Supplier Selection & ESG Due Diligence corrective-action records Business Ethics, Anti-corruption & Whistleblowing whistleblowing disclosures.

A FOUR-PERSON PURCHASING FUNCTION, FULLY TRAINED_ ON ESG SOURCING

GRI 3-3 · GRI 205-2

Capability and training of the people who make purchasing decisions

Procurement decisions rest with a small team, so capability is a control in its own right. All four completed the ethics and sustainable-sourcing training set for 2025.

PEOPLE IN THE PURCHASING FUNCTION

4

Director plus three sourcing roles

COMPLETING ETHICS AND CODE TRAINING

100%

2025 KPI met

ECOVADIS ACADEMY MODULES COMPLETED

6

by all three sourcing staff

SOURCING ROLES COVERING DIRECT AND INDIRECT

3

plus the Director of Purchasing

WHO MAKES THE DECISIONS

DIRECTOR OF PURCHASING

- **Indirect Material Sourcing Manager**
- **Direct Material Sourcing Manager**
- **Further sourcing role**

The Director of Purchasing leads the function. Three employees hold sourcing responsibility: an Indirect Material Sourcing Manager, a Direct Material Sourcing Manager and a further sourcing role.

Each carries an individual performance and development review, which is where the ethics and sustainable-procurement objectives are recorded.

Approval authority sits above the function: purchases are approved within the Limit of Authority thresholds, and values above the company limit escalate to CCE Group or to the Board and the Group investor.

The small team size is why segregation of duties, the two-quotation rule and the ERP audit trail carry the control weight.

TRAINING COMPLETED IN 2025



All six modules were taken on the EcoVadis Academy platform by all three sourcing employees, with the Director of Purchasing separately certified.

The team also completes the company-wide Code of Conduct, Code of Ethics, anti-corruption, conflict-of-interest, gifts and hospitality, and human-rights training reported under Topics 10 and 12.

WHAT THIS DOES AND DOES NOT EVIDENCE

Training completion is a leading indicator: it shows the people who select suppliers know the Code, the contract clauses and the risk framework. It does not by itself evidence supplier assurance, which comes from screening and audits. The honest reading of 2025 is that capability was built ahead of coverage: the team was fully trained while ESG screening applied only to the three suppliers approved after the criteria entered the selection set, and the corruption-specific supplier assessment had not begun. The 2026 commitments close that order of operations by putting screening in front of approval for every new supplier.

Source: 12_Sustainable_Procurement_Diversity_and_REACH_Report, Jun 2025 EcoVadis Academy records 58_FO-HRM-082 performance and development review 2025 Ethical Procurement & Supply Chain Human Rights KPI table.

EVERY 2025 TARGET WAS MET EXCEPT THE ZERO-FINDINGS TARGET

GRI 3-3 **2025 target evaluation and the 2026 commitments**

Code coverage, the audit plan, ESG screening of applicable new suppliers, ethics training and corrective-action closure were all met, and no corruption case arose. One ESG corrective action was raised against a target of zero, a social finding from audits, closed in year.

KPI	2024	2025 TARGET	2025 RESULT	STATUS
Supplier Code acceptance, Responsible Supplier Selection & ESG Due Diligence basis	82.24% of direct-material spend	15% of suppliers by count	67 of 100 suppliers, 67%; 93% of 870.1 MTHB material spend	Achieved
Suppliers socially screened, audit programme	n/a	39	39	Achieved
Suppliers with identified labour risk assessed	n/a	0	0	No Case Arose
Supplier ESG corrective actions raised	n/a	0	1	Not Achieved
Ethics and corruption supplier cases	n/a	0	0	Achieved
Supplier ESG corrective-action closure, Responsible Supplier Selection & ESG Due Diligence basis	n/a	100%	1 of 1 closed within the year, 100%	Achieved
Purchasing ethics and Code training	n/a	100% of the team	100%	Achieved
New suppliers screened on ESG criteria, from the point the criteria applied	n/a	All applicable new suppliers	3 of 9, 33%	Achieved

WHAT WORKED

Code coverage on direct-material spend passed its target by a wide margin, the audit programme met its 39-supplier plan, and no corruption or ethics case arose anywhere in the chain.

The Purchasing team completed every ethics and sustainable-sourcing module set for the year.

WHAT DID NOT

One ESG corrective action was raised against a target of zero, a social finding from audits, closed in year.

ESG screening applied only from the point the criteria entered the selection set, so six of the nine suppliers onboarded in 2025 were approved without it.

Across all corrective-action types, 31 supplier actions were open at year end Responsible Supplier Selection & ESG Due Diligence does not publish an ageing split, so no overdue count is given.

2026 COMMITMENTS

01 Screen every new supplier on ESG criteria before approval, so the six suppliers approved in 2025 before the criteria applied are not repeated, and continue bringing the existing base up through the two-year re-verification cycle.

02 Raise Supplier Code signature beyond 67 of 100 suppliers, concentrating on the unsigned smaller accounts.

03 Add supplier corruption-risk screening, which 2025 did not have.

04 Extend supplier assessment to Tier-2 by 2027.

05 Set written criteria for serious supply-chain human-rights cases covering containment, remediation, escalation, suspension and termination.

06 Carry out the ESG internal audit that 2025 lacked, and publish an ageing split for open supplier corrective actions.

Source: Ethical Procurement & Supply Chain Human Rights KPI table 2024 and 2025 Responsible Supplier Selection & ESG Due Diligence supplier dataset 49_Anti-Corruption Risk Assessment Report 54_Sustainable Procurement Risk Assessment Report.

COMMUNITY AND CSR

COMMUNITY AND CSR ACTIVITIES 2025

Four community activities in 2025: an elderly care home visit, safety equipment for schools, marine conservation and a beach clean-up run.

30 AUG
Elderly care home visit

10 NOV
Safety equipment for schools

15 NOV
Marine conservation

15-16 NOV
Run Clean Care



FOUR COMMUNITY_ ACTIVITIES IN 2025

Community and CSR activities

OVERVIEW

AviusULD ran four community activities in 2025, the CSR figure reported on the KPI page.

2025 CSR ACTIVITIES: DATE, PLACE, PARTICIPATION AND WHAT WAS DONE

AUG 2025 — **30**

ELDERLY CARE HOME VISIT

PLACE

Waiwatthananivas Foundation, Samut Prakan

PARTICIPATION

More than 30 executives and employees

WHAT WAS DONE

Recreational activities with residents donation of rice, dry food, milk and daily necessities

NOV 2025 — **10**

SAFETY EQUIPMENT FOR SCHOOLS

PLACE

Ban Hong Khung School, Bang Bo, Samut Prakan, via the Samut Prakan Provincial Labour Protection and Welfare Office

PARTICIPATION

AviusULD HSE team, at the provincial Labour Safety Officer Day ceremony

WHAT WAS DONE

Donation of 3 fire extinguishers, 3 extinguisher stands and 4 warning posts

NOV 2025 — **15**

MARINE CONSERVATION

PLACE

Nang Rong Beach, Chonburi

PARTICIPATION

Employees, guided by marine specialists

WHAT WAS DONE

Coral planting and release of juvenile butterflyfish and bamboo sharks

NOV 2025 — **15 -16**

RUN CLEAN CARE

PLACE

Nang Rong Beach, Sattahip

PARTICIPATION

AviusULD Running Club and employees at the company outing

WHAT WAS DONE

Beach run combined with litter collection along the beach

EMPLOYEE ENGAGEMENT, REPORTED SEPARATELY

The Town Hall (18 July), Rewards & Recognition (July) and Sports Day (8 August) are employee engagement events. They are not counted as CSR activities town halls are reported under social dialogue on page 178.

SAFETY EQUIPMENT FOR SCHOOLS, 10 NOVEMBER 2025

On the Samut Prakan Labour Safety Officer Day, the AviusULD HSE team handed fire extinguishers, extinguisher stands and warning posts to the Provincial Labour Protection and Welfare Office for Ban Hong Khung School, Bang Bo. The Deputy Governor of Samut Prakan presided.







EMPLOYEES SUPPORTED AN ELDERLY CARE HOME AND RESTORED CORAL REEFS

Community and CSR activities 2025



ELDERLY CARE HOME VISIT, 30 AUGUST 2025

More than 30 executives and employees visited the Waiwatthananivas Foundation elderly care home in Samut Prakan. The team ran singing and recreational activities with residents and donated rice, dry food, seasonings, milk and other daily necessities.



MARINE CONSERVATION, 15 NOVEMBER 2025

Employees planted coral at Nang Rong Beach, Chonburi, under the guidance of marine specialists, and released juvenile butterflyfish and bamboo sharks to support the reef ecosystem.

30+

executives and employees

- **Coral Planting**
- **Juvenile Butterflyfish**
- **Bamboo Sharks**

RUNNERS_ COLLECTED LITTER ALONG NANG RONG BEACH

Community and CSR activities 2025









RUN CLEAN CARE - STRIDES THAT MAKE A DIFFERENCE

RUN CLEAN CARE, 15-16 NOVEMBER 2025

During the annual company outing at Nang Rong Beach, Sattahip, the AviusULD Running Club organised a beach run under the theme "Run Clean Care – Strides that Make a Difference". Runners collected litter along the beach as they ran, combining employee health with a cleaner coastline.



GRI CONTENT INDEX

WHERE EACH DISCLOSURE SITS

Every GRI disclosure reported, its location in this report, and the requirement, reason and explanation for each omission.

- **2** General Disclosures 2021
- **3** Material Topics 2021
- **302** Energy 2016
- **305** Emissions 2016
- **301** Materials 2016
- **306** Waste 2020
- **303** Water and Effluents 2018
- **401** Employment 2016
- **402** Labor/Management Relations 2016
- **403** Occupational Health and Safety 2018
- **404** Training and Education 2016
- **405** Diversity and Equal Opportunity 2016
- **406** Non-discrimination 2016
- **407** Freedom of Association and Collective Bargaining 2016
- **408** Child Labor 2016
- **409** Forced or Compulsory Labor 2016
- **410** Security Practices 2016
- **412** Human Rights Assessment 2016
- **416** Customer Health and Safety 2016
- **417** Marketing and Labeling 2016
- **205** Anti-corruption 2016
- **418** Customer Privacy 2016
- **204** Procurement Practices 2016
- **308** Supplier Environmental Assessment 2016
- **414** Supplier Social Assessment 2016

GRI CONTENT INDEX_

GRI 1: Foundation 2021

STATEMENT OF USE

AviusULD has reported in accordance with the GRI Standards for the period 1 January to 31 December 2025.

GRI 1 USED

GRI 1: Foundation 2021

APPLICABLE GRI SECTOR STANDARD(S)

No GRI Sector Standard has been published for AviusULD's sector (aviation unit load device manufacturing and repair).

DISCLOSURE INDEX AND REASONS FOR OMISSION

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION: REQUIREMENT(S) OMITTED	OMISSION: REASON	OMISSION: EXPLANATION
GENERAL DISCLOSURES 2-1 TO 2-10, WITH LOCATIONS AND OMISSIONS					
GENERAL DISCLOSURES					
GRI 2: General Disclosur'es 2021	**2-1 Organizational details**	Page 38			
	2-2 Entities included in sustainability reporting	Pages 39, 40			
	2-3 Reporting period, frequency and contact point	Page 41			
	2-4 Restatements of information	Page 42			
	2-5 External assurance	Page 44, 458			
	2-6 Activities, value chain and other business relationships	Pages 46, 47			
	2-7 Employees	Pages 48, 49			
	2-8 Workers who are not employees	Pages 50, 51			
	2-9 Governance structure and composition	Page 52	2-9-c	Information unavailable	Board composition held by CCE Group; requested for the 2026 cycle
	2-10 Nomination and selection of the highest governance body	Omitted	2-10-a, 2-10-b	Information unavailable	Held by CCE Group; requested for the 2026 cycle

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION: REQUIREMENT(S) OMITTED	OMISSION: REASON	OMISSION: EXPLANATION
GOVERNANCE DISCLOSURES 2-11 TO 2-23, WITH LOCATIONS AND OMISSIONS					
GENERAL DISCLOSURES					
	2-11 Chair of the highest governance body	Omitted	2-11-a, 2-11-b	Information unavailable	Held by CCE Group; requested for the 2026 cycle
	2-12 Role of the highest governance body in overseeing management of impacts	Omitted	2-12-a, 2-12-b, 2-12-c	Information unavailable	Held by CCE Group; requested for the 2026 cycle. Management review is reported under 2-13, page 54
	2-13 Delegation of responsibility for managing impacts	Page 54			
	2-14 Role of the highest governance body in sustainability reporting	Page 56			
	2-15 Conflicts of interest	Page 58	2-15-b	Information unavailable	Cross-board, cross-shareholding, controlling shareholder and related-party items held at Group level
	2-16 Communication of critical concerns	Page 60			
	2-17 Collective knowledge of the highest governance body	Omitted	2-17	Information unavailable	Managed at Group level and not documented for AviusULD in 2025
	2-18 Evaluation of the performance of the highest governance body	Omitted	2-18	Information unavailable	Performance evaluation is carried out at Group level; entity-level information was not available
	2-19 Remuneration policies	Omitted	2-19	Confidentiality constraints	Confidential and set at Group level for the body and senior executives
	2-20 Process to determine remuneration	Omitted	2-20	Confidentiality constraints	The remuneration-setting process is confidential and managed at Group level
	2-21 Annual total compensation ratio	Omitted	2-21	Confidentiality constraints	The compensation data required to calculate the ratio is confidential
	2-22 Statement on sustainable development strategy	Page 8			
	2-23 Policy commitments	Pages 62, 64			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION: REQUIREMENT(S) OMITTED	OMISSION: REASON	OMISSION: EXPLANATION
GOVERNANCE DISCLOSURES 2-24 TO 2-30, WITH LOCATIONS AND OMISSIONS					
GENERAL DISCLOSURES					
	2-24 Embedding policy commitments	Page 66			
	2-25 Processes to remediate negative impacts	Page 68			
	2-26 Mechanisms for seeking advice and raising concerns	Page 70			
	2-27 Compliance with laws and regulations	Page 72			
	2-28 Membership associations	Page 73			
	2-29 Approach to stakeholder engagement	Page 74			
	2-30 Collective bargaining agreements	Page 76			
MATERIAL TOPICS					
GRI 3: Material Topics 2021	**3-1 Process to determine material topics**	Pages 28, 30, 32			
	3-2 Material topics	Pages 34, 35			
TOPIC-SPECIFIC DISCLOSURES					
CLIMATE CHANGE, ENERGY & GREENHOUSE GAS EMISSIONS					
GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 82–87, 94, 96			
GRI 302: Energy 2016	**302-1 Energy consumption within the organization**	Page 92			
	302-2 Energy consumption outside of the organization		302-2	Information unavailable	Value chain energy use is captured as Scope 3 emissions; energy-unit data are not collected from suppliers.
	302-3 Energy intensity	Page 92			
	302-4 Reduction of energy consumption	Page 94			
	302-5 Reductions in energy requirements of products and services		302-5	Not applicable	ULDs are passive load devices and consume no energy during use.
GRI 305: Emissions 2016	**305-1 Direct (Scope 1) GHG emissions**	Pages 86, 88			
	305-2 Energy indirect (Scope 2) GHG emissions	Pages 86, 88			
	305-3 Other indirect (Scope 3) GHG emissions	Pages 88, 90			
	305-4 GHG emissions intensity	Page 88			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION: REQUIREMENT(S) OMITTED	OMISSION: REASON	OMISSION: EXPLANATION
	305-5 Reduction of GHG emissions	Page 94			
	305-6 Emissions of ozone-depleting substances (ODS)		305-6	Not applicable	The Company does not produce, import or export ODS refrigerant losses are reported as Scope 1 fugitive emissions.
	305-7 Nitrogen oxides, sulfur oxides and other significant air emissions	Pages 140, 142			
MATERIALS, CIRCULAR RESOURCE USE & WASTE MANAGEMENT					
GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 100, 102, 104, 108, 114, 116			
GRI 301: Materials 2016	**301-1 Materials used by weight or volume**	Pages 100, 106, 116			
	301-2 Recycled input materials used	Page 108	301-2-a	Information unavailable	Suppliers declared recycled content but provided no certification, so recycled input is not reported for 2025; certified data will be requested from 2026.
	301-3 Reclaimed products and their packaging materials		301-3	Not applicable	No product or customer-packaging take-back programme operated in 2025.
GRI 306: Waste 2020	**306-1 Waste generation and significant waste-related impacts**	Page 100			
	306-2 Management of significant waste-related impacts	Pages 102, 104, 108			
	306-3 Waste generated	Page 112			
	306-4 Waste diverted from disposal	Page 112			
	306-5 Waste directed to disposal	Page 112			
WATER & EFFLUENT MANAGEMENT					
GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 120–127, 130–133			
GRI 303: Water and Effluents 2018	**303-1 Interactions with water as a shared resource**	Pages 120, 122			
	303-2 Management of water discharge-related impacts	Pages 122, 128, 132			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION: REQUIREMENT (S) OMITTED	OMISSION: REASON	OMISSION: EXPLANATION
	303-3 Water withdrawal	Page 124	303-3-b	Information incomplete	A site-level water-stress assessment has not been completed; it will be carried out for the 2026 reporting cycle.
	303-4 Water discharge	Page 128	303-4-a, 303-4-b, 303-4-c	Information incomplete	Discharge is not metered. An estimation method based on site population including contractors and agency workers, not the GRI 2-7 employee figure, and average daily use per person will be applied for 2026.
	303-5 Water consumption	Page 131	303-5-a, 303-5-b	Information incomplete	Consumption is withdrawal minus discharge and discharge is not metered; an estimation method based on site population including contractors and agency workers, not the GRI 2-7 employee figure, and average daily use per person will be applied for 2026. No significant change in water storage occurred in 2025.

POLLUTION PREVENTION & ENVIRONMENTAL COMPLIANCE

GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 136, 138, 144–151
GRI 305: Emissions 2016	**305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions**	Pages 140, 142
GRI 2: General Disclosures 2021	**2-27 Compliance with laws and regulations**	Pages 134, 138

EMPLOYMENT, BENEFITS & WORKING CONDITIONS

GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 154, 156, 164–169
GRI 401: Employment 2016	**401-1 New employee hires and employee turnover**	Pages 160, 168
	401-2 Benefits provided to full-time employees	Page 162
	401-3 Parental leave	Page 162

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION: REQUIREMENT (S) OMITTED	OMISSION: REASON	OMISSION: EXPLANATION

LABOUR RELATIONS, EMPLOYEE VOICE & GRIEVANCE

GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 172–177, 190, 194, 196
GRI 2: General Disclosures 2021	**2-26 Mechanisms for seeking advice and raising concerns**	Pages 180, 182
	2-29 Approach to stakeholder engagement	Page 178
	2-30 Collective bargaining agreements	Page 184
GRI 402: Labor/ Management Relations 2016	**402-1 Minimum notice periods regarding operational changes**	Pages 186, 188

OCCUPATIONAL HEALTH, SAFETY & CONTRACTOR SAFETY

GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 200–205, 226
GRI 403: Occupational Health and Safety 2018	**403-1 Occupational health and safety management system**	Page 202
	403-2 Hazard identification, risk assessment and incident investigation	Pages 206, 222
	403-3 Occupational health services	Page 210
	403-4 Worker participation, consultation and communication on OHS	Page 214
	403-5 Worker training on OHS	Page 216
	403-6 Promotion of worker health	Page 218
	403-7 Prevention and mitigation of OHS impacts linked by business relationships	Page 220
	403-8 Workers covered by an OHS management system	Page 224
	403-9 Work-related injuries	Pages 206, 208
	403-10 Work-related ill health	Pages 206, 210

LEARNING, SKILLS & CAREER DEVELOPMENT

GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 230–235, 240, 244, 250, 252

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION: REQUIREMENT(S) OMITTED	OMISSION: REASON	OMISSION: EXPLANATION
GRI 404: Training and Education 2016	**404-1 Average hours of training per year per employee**	Pages 236, 238			
	404-2 Programs for upgrading employee skills and transition assistance programs	Pages 242, 246			
	404-3 Percentage of employees receiving regular performance and career development reviews	Page 248			
DIVERSITY, EQUAL PAY & NON-DISCRIMINATION					
GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 254–263, 270–281			
GRI 405: Diversity and Equal Opportunity 2016	**405-1 Diversity of governance bodies and employees**	Pages 264–269	405-1-a i, ii and iii	Confidentiality constraints	Governance-body composition is withheld by decision of the Chief Executive Officer; the data exists in HR records. The Executive committee and Leadership team appear on Page 266 as employee categories, a different disclosure. To be reported for 2026.
	405-1-b-ii Employees by age group per employee category	Page 268	Age group per employee category	Information unavailable or incomplete	HR's workforce table records location, gender and age only. The group-level split in the three GRI bands is disclosed; the cross-tabulation against the seven employee categories cannot be produced for 2025.
	405-1-a-iii and 405-1-b-iii Other indicators of diversity	Page 276	Indicators other than disability	Not applicable	Nationality, ethnicity, religion and other minority status are not recorded by HR. Disability is reported. GRI permits reporting that the item does not exist.

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION: REQUIREMENT(S) OMITTED	OMISSION: REASON	OMISSION: EXPLANATION
	405-2 Ratio of basic salary and remuneration of women to men	Page 270	405-2-a, and the ratio by location in 405-2-b	Confidentiality constraints	Pay data by category and gender is commercially sensitive and is not released, and the methodology is unsettled, so no ratio is published. The definition of significant locations required by 405-2-b is disclosed on Page 270. Ratio to be agreed with Payroll in 2026.
GRI 406: Non-discrimination 2016	**406-1 Incidents of discrimination and corrective actions taken**	Page 278			
HUMAN RIGHTS & FAIR LABOR PRACTICES					
GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 286–293, 310			
GRI 407: Freedom of Association and Collective Bargaining 2016	**407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk**	Page 296	Suppliers at significant risk, 407-1-a	Information unavailable	Freedom of association was not evaluated as a separate supplier risk category in 2025, so no count of suppliers at risk by type or country can be given. Suppliers are screened for human rights through FO-SOU-001 and the Supplier Code. The category is added in the 2026 cycle, with Tier-2 coverage by 2027.
GRI 408: Child Labor 2016	**408-1 Operations and suppliers at significant risk for incidents of child labor**	Pages 298, 308			
GRI 409: Forced or Compulsory Labor 2016	**409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor**	Pages 300, 308			
GRI 410: Security Practices 2016	**410-1 Security personnel trained in human rights policies or procedures**	Page 302			
GRI 412: Human Rights Assessment 2016	**412-1 Operations that have been subject to human rights reviews or impact assessments**	Page 306			
	412-2 Employee training on human rights policies or procedures	Page 304			

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION: REQUIREMENT (S) OMITTED	OMISSION: REASON	OMISSION: EXPLANATION
	412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	Page 306	Entire disclosure	Not applicable	No significant investment agreement or contract, as defined by GRI 412-3, was finalised in 2025, so there is no population to report. Supplier Code coverage is reported under GRI 3-3 and Responsible Supplier Selection & ESG Due Diligence.

PRODUCT RESPONSIBILITY, CUSTOMER SAFETY & TRUST

GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 314, 316, 320, 322, 328, 330
GRI 416: Customer Health and Safety 2016	**416-1 Assessment of the health and safety impacts of product and service categories**	Page 318
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Page 324
GRI 417: Marketing and Labeling 2016	**417-1 Requirements for product and service information and labeling**	Page 326
	417-2 Incidents of non-compliance concerning product and service information and labeling	Page 326
	417-3 Incidents of non-compliance concerning marketing communications	Page 314

BUSINESS ETHICS, ANTI-CORRUPTION & WHISTLEBLOWING

GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 334, 336, 338, 342, 346, 348, 350, 354, 356
GRI 205: Anti-corruption 2016	**205-1 Operations assessed for risks related to corruption**	Page 340
	205-2 Communication and training about anti-corruption policies and procedures	Pages 344, 354
	205-3 Confirmed incidents of corruption and actions taken	Page 352

GRI STANDARD/ OTHER SOURCE	DISCLOSURE	LOCATION	OMISSION: REQUIREMENT (S) OMITTED	OMISSION: REASON	OMISSION: EXPLANATION

INFORMATION SECURITY, CYBERSECURITY & DATA PRIVACY

GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 360–375
GRI 418: Customer Privacy 2016	**418-1 Substantiated complaints concerning breaches of customer privacy, and identified leaks, thefts or losses of customer data**	Page 372

RESPONSIBLE SUPPLIER SELECTION & ESG DUE DILIGENCE

GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 380, 382, 384, 388, 402
GRI 204: Procurement Practices 2016	**204-1 Proportion of spending on local suppliers**	Pages 384, 400
GRI 308: Supplier Environmental Assessment 2016	**308-1 New suppliers that were screened using environmental criteria**	Page 392
	308-2 Negative environmental impacts in the supply chain and actions taken	Pages 394, 398
GRI 414: Supplier Social Assessment 2016	**414-1 New suppliers that were screened using social criteria**	Page 392
	414-2 Negative social impacts in the supply chain and actions taken	Pages 394, 398
GRI 205: Anti-corruption 2016	**205-2-c Communication of anti-corruption policies to business partners**	Page 396; Business Ethics, Anti-corruption & Whistleblowing

ETHICAL PROCUREMENT & SUPPLY CHAIN HUMAN RIGHTS

GRI 3: Material Topics 2021	**3-3 Management of material topics**	Pages 406, 408, 410, 412, 430
GRI 204: Procurement Practices 2016	**204-1 Proportion of spending on local suppliers**	Page 414

			OMISSION		
GRI STANDARD/ OTHER SOURCE	**DISCLOSURE**	**LOCATION**	**REQUIREMENT (S) OMITTED**	**REASON**	**EXPLANATION**
GRI 407: Freedom of Association and Collective Bargaining 2016	**407-1 Operations and suppliers in which the right may be at risk**	**Page 420**	Suppliers at significant risk	Information unavailable	Freedom of association was not evaluated as a separate supplier risk category in 2025, so no count of suppliers at risk by type or country can be given. The category is added in the 2026 cycle, with Tier-2 coverage by 2027.
GRI 408: Child Labor 2016	**408-1 Operations and suppliers at significant risk for incidents of child labor**	**Pages 420, 422**			
GRI 409: Forced or Compulsory Labor 2016	**409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor**	**Pages 420, 422**			
GRI 414: Supplier Social Assessment 2016	**414-1 New suppliers that were screened using social criteria**	**Page 422**			
	414-2 Negative social impacts in the supply chain and actions taken	**Page 422**			

Source: **AviusULD** 2025 disclosure records reasons for omission per GRI 1: Foundation 2021.





KPI

AVIUSULD KPI

2022 — 2023 — 2024 — 2025

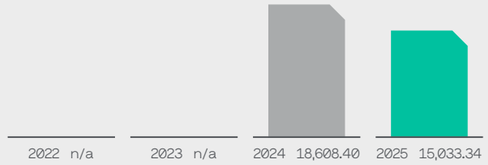
FOUR YEARS OF ESG PERFORMANCE

The ESG KPI dashboard for 2022 to 2025, aligned to the figures in this report where they are available.

Total GHG emissions (Scopes 1–3)

tCO_2e

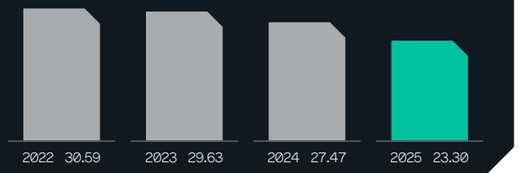
15,033.34



Energy intensity

MWh/mUSD sales

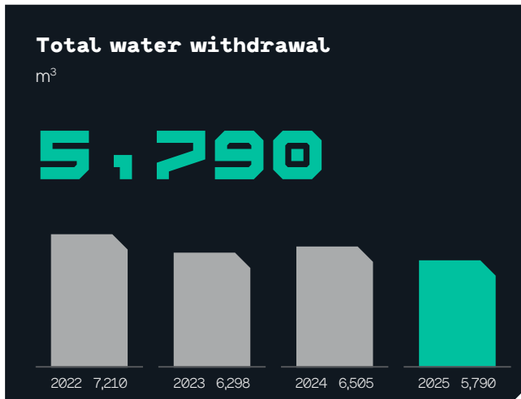
23.30



Total water withdrawal

m^3

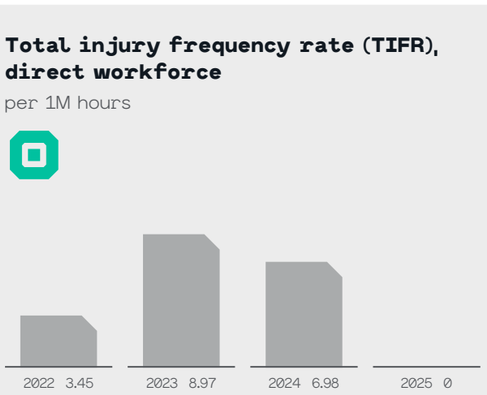
5,790



Total injury frequency rate (TIFR), direct workforce

per 1M hours

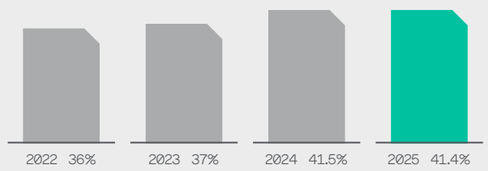
0



Women in the whole organisation

%

41.4%



Confirmed corruption incidents

#

0



AVIUSULD KPI DASHBOARD

KEY PERFORMANCE INDICATORS

KPI	UNIT	2022	2023	2024	2025	2022–2025
ENVIRONMENT (1/2): GHG, ENERGY AND WATER, 2022–2025						
GHG						
Total Scope 1 GHG emissions	tCO_2e	n/a	n/a	53.78	59.64	
Total Scope 2 GHG emissions	tCO_2e	n/a	n/a	811.84	688.75	
Total gross Scope 3 GHG emissions	tCO_2e	n/a	n/a	17,742.78	14,284.94	
Scope 3 upstream GHG emissions	tCO_2e	n/a	n/a	-	13,298.9	
Scope 3 downstream GHG emissions	tCO_2e	n/a	n/a	-	986.0	
Total GHG emissions (Scopes 1–3)	tCO_2e	n/a	n/a	18,608.40	15,033.34	
ENERGY						
Electricity (purchased, non-renewable)	MWh	2,158	1,787	1,624	1,450	
Electricity (purchased, non-renewable)	GJ	7,768.8	6,433.2	5,846.4	5,220.0	
Total renewable energy used	MWh	-	-	-	0	
Total LPG used	kg	695	262	2,730	3,030	
Total diesel used	litres	10,261	3,850	4,006.7	3,948.4	
Total gasoline used	litres	-	-	0	20	
Total energy consumption	MWh	2,637	1,967	1,701.9	1,531.6	
Energy intensity	MWh/mUSD sales	30.59	29.63	27.47	23.30	
Energy intensity (GRI 302-3)	GJ per finished ULD	n/a	n/a	0.1287	0.1224	

KPI	UNIT	2022	2023	2024	2025	2022–2025
WATER						
Total water withdrawal	m^3	7,210	6,298	6,505	5,790	
Water intensity	m^3/mUSD sales	83.7	94.9	105.0	88.1	
ENVIRONMENT (2/2): WASTE, MATERIALS AND CUSTOMER SAFETY, 2022–2025						
WASTE						
Total non-hazardous waste	t	n/a	241.9	414.8	380.3	
Total hazardous waste	t	n/a	1.77	3.76	4.15	
Waste directed to disposal (landfill, incineration, fuel blending)	t	n/a	91.6	178.5	174.0	
Waste diverted from disposal (recycled)	t	n/a	154.2	240.1	210.5	
Total waste generated	t	n/a	243.6	418.6	384.5	
MATERIALS						
Total materials used	t	7,671	3,399	4,861.6	4,063.8	
Non-renewable materials used	t	n/a	n/a	4,591.0	3,841.8	
Renewable materials used (packaging)	t	n/a	n/a	270.6	222.0	
Total chemicals used	kg	33,306	23,765	20,418	19,984	
Recycled input materials	t	0	0	n/a	N/A	
Materials intensity	t/mUSD sales	89	51	78.5	61.8	
CUSTOMER HEALTH AND SAFETY						
Customer health and safety incidents	#	0	0	0	0	

SOCIAL: HEALTH AND SAFETY, DIVERSITY, WORKING CONDITIONS, DIALOGUE, TRAINING, HUMAN RIGHTS AND CSR, 2022–2025

EMPLOYEE HEALTH AND SAFETY

KPI	UNIT	2022	2023	2024	2025	2022–2025
Number of hours worked	hours	309,457	360,429	716,222	652.694	
Total injury frequency rate (TIFR), direct workforce	per 1M hours	3.45	8.97	6.98	0	
Lost-time injury frequency rate (LTIFR), direct workforce	per 1M hours	3.45	5.13	4.19	0	

DIVERSITY

KPI	UNIT	2022	2023	2024	2025	2022–2025
Women in the whole organisation	%	36%	37%	41.5%	41.4%	
Women at top management level (Leadership Team)	%	0%	25%	22%	30%	
Employees from a vulnerable group (disability)	%	1%	1%	1%	0.8%	

WORKING CONDITIONS

KPI	UNIT	2022	2023	2024	2025	2022–2025
Permanent employees covered by health insurance	%	100%	100%	100%	100%	
Employee engagement survey score	%	n/a	n/a	71%	68%	

SOCIAL DIALOGUE

KPI	UNIT	2022	2023	2024	2025	2022–2025
Meetings between the CEO and employee representatives	#	6	4	4	3	

CAREER MANAGEMENT AND TRAINING

KPI	UNIT	2022	2023	2024	2025	2022–2025
Average training hours per employee	hours	30	42	78.2	45.4	

HUMAN RIGHTS

KPI	UNIT	2022	2023	2024	2025	2022–2025
Child or forced labour incidents reported	#	0	0	0	0	
Confirmed discrimination incidents	#	0	0	0	0	

CORPORATE SOCIAL RESPONSIBILITY

KPI	UNIT	2022	2023	2024	2025	2022–2025
CSR activities conducted	#	0	1	1	4	

GOVERNANCE: ETHICS AND SUSTAINABLE PROCUREMENT, 2022–2025

ETHICS

KPI	UNIT	2022	2023	2024	2025	2022–2025
Workforce trained on ethics	%	n/a	n/a	n/a	99.6%	
Reports received under the whistleblower procedure	#	0	0	0	0	
Confirmed corruption incidents	#	0	0	0	0	
Critical confirmed information security incidents	#	0	0	0	0	

SUSTAINABLE PROCUREMENT

KPI	UNIT	2022	2023	2024	2025	2022–2025
Targeted suppliers by spend with a sustainability assessment or certificate	%	0%	0%	0%	33%	
Targeted suppliers covered by an on-site sustainability and CSR audit	%	0%	0%	0%	33%	
Targeted suppliers by spend that signed the Supplier Code of Conduct	%	0%	0%	0%	93%	
Active suppliers that signed the Supplier Code of Conduct, by count	%	0%	0%	0%	67%	
Audited suppliers engaged in corrective actions or capacity building	%	0%	0%	0%	100%	
Buyers trained on sustainable procurement, all locations	%	0%	0%	0%	100%	

Conversion factors used: 1 kWh = 0.0036 GJ (1 MWh = 3.6 GJ) LPG 0.0137 MWh/kg diesel 0.0101 MWh/L gasoline 0.0087 MWh/L (DEDE net heating values).

INDEPENDENT ASSURANCE OPINION STATEMENT

To Chief Executive Officer of AviusULD Limited

Holds Statement No.: SRA 842679

The British Standards Institution **(BSI)** has conducted a **limited assurance** engagement on the sustainability information (described in the "Scope") in the Sustainability Report 2025 of AviusULD Limited **(AviusULD)**.

Scope The scope of engagement agreed upon with **AviusULD** includes the following:

The assurance covers the information of the following subject matters in the Sustainability Report for the 2025.

1. Anti Corruption (GRI 205 - 2016)
2. Materials (GRI 301 - 2016)
3. Energy (GRI 302 - 2016)
4. Emission (GRI 305 - 2016)
5. Waste (GRI 306 - 2020)
6. Supplier Environmental Assessment (GRI 308 - 2016)
7. Employment (GRI 401 - 2016)
8. Labor/Management Relations (GRI 402 - 2016)
9. Occupational Health and Safety (GRI 403 - 2018)
10. Supplier Social Assessment (GRI 414 - 2016)

The assurance engagement covers selected sustainability information reported by AviusULD Limited for the period from 1 January to 31 December 2025.
The reporting boundary varies according to the nature of each selected subject matter and the organizational coverage defined in the Sustainability Report 2025.
Environmental information, including materials, energy consumption, greenhouse gas emissions and waste management (GRI 301, 302, 305 and 306), covers the manufacturing operations of AviusULD Limited in Bang Sao Thong, Samut Prakan, Thailand. Social and governance information, including anti-corruption (GRI 205), employment (GRI 401) and labor/management relations (GRI 402), covers AviusULD Limited (Thailand), AviusULD B.V. (the Netherlands) and AviusULD Inc. (USA), except where specific disclosures indicate a narrower reporting boundary.

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Occupational health and safety information (GRI 403) covers the manufacturing operations in Thailand, including the worker populations specified in the relevant disclosures.

Supplier environmental and social assessment information (GRI 308 and GRI 414) covers supplier assessment activities managed by AviusULD Limited in Thailand.

The specific organizational and operational boundaries applicable to each selected subject matter are presented in Appendix B of this statement.

The selected sustainability information was prepared in accordance with the GRI Standards as the reporting framework and was assured in accordance with ISAE 3000 (Revised) and and ISO 14064-3:2019.

Opinion Statement
We have conducted a limited assurance engagement on the sustainability information described in the "Scope" above (**Sustainability Information**).

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the accompanying Sustainability Information is not prepared, in all material respects, in accordance with ISAE 3000 (Revised) and ISO 140643:2019.

Methodology
Our assurance engagements were carried out in accordance with ISAE3000 (Revised) and ISO 140643:2019. Our work was designed to gather evidence on which to base our conclusion. We undertook the following activities:

- a top level review of issues raised by external parties that could be relevant to AviusULD's policies to provide a check on the appropriateness of statements made in the report.
- discussion with managers and staff on AviusULD's approach to stakeholder engagement. However, we had no direct contact with external stakeholders.
- interviews with staff involved in sustainability management, report preparation and provision of report information were carried out.
- document review of relevant systems, policies, and procedures where available.
- review of supporting evidence for claims made in the reports.
- visit of the AviusULD's factory in Thailand to confirm the data collection processes, record management practices, and check GHG emission sources physically.

Responsibility
AviusULD is responsible for the preparation and fair presentation of the sustainability information and report in accordance with the agreed criteria. BSI is responsible for providing an independent assurance opinion statement to stakeholders giving our professional opinion based on the scope and methodology described.

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Independence, Quality Control and Competence
BSI is independent of AviusULD and has no financial interest in the operation of AviusULD other than for the assurance of the sustainability statements contained in this report.

This independent assurance opinion statement has been prepared for the stakeholders of AviusULD only for the purposes of verifying its statements relating to its environmental, social and governance (ESG), more particularly described in the Scope above.

This independent assurance opinion statement is prepared on the basis of review by BSI of information presented to it by AviusULD. In making this independent assurance opinion statement, BSI has assumed that all information provided to it by AviusULD is true, accurate and complete. BSI accepts no liability to any third party who places reliance on this statement. BSI applies its own management standards and compliance policies for quality control, in accordance with ISO/IEC 17021-1:2015 and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

BSI is a leading global standards and assessment body founded in 1901. The BSI assurance team has extensive experience in conducting verification over environmental, social and governance (ESG), management systems and processes.

Issue Date: 03 November 2026

For and on behalf of BSI:

Parnuwat Usapein

Parnuwat Usapein, Lead Assurer

For and on behalf of BSI:

Kuldhaj Bunbongkarn, Managing Director Assurance, Thailand

Thailand Headquarters: 127/29 Panjathani Tower, 24th Floor, Nonsee Road, Chongnonsee, Yannawa, Bangkok 10120, Thailand. A Member of the BSI Group of Companies.

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INDEPENDENT ASSURANCE STATEMENT

Appendix A: Quantitative Data of subject matters within the scope

Subject matters / selected disclosures	2025	Units
GRI 205 Anti-corruption		
205-1 Operations assessed for corruption risks; number, percentage, significant risks	3 of 3 operations (100%); five corruption risk categories assessed	operations; %
205-2 Communication and training on anti-corruption policies, by governance body / employee category and region; business partners		
• Anti-corruption policies communicated to employees	239/239 (100%)	persons; %
• Anti-corruption training for employees	238/239 (99.6%)	persons; %
• Anti-corruption policies communicated to business partners	100/100 (100%)	persons; %
205-3 Confirmed corruption incidents and actions, disciplinary actions, contracts terminated, public legal cases		
• Number of confirmed incidents of corruption	0	cases
• Employee disciplinary/dismissal cases	0	cases
• Business-partner terminations cases	0	cases
• Public legal cases	0	cases
GRI 301 Materials		
301-1 Materials used by weight or volume, renewable/non-renewable		
• Non-renewable materials used	3,841.8	tonnes
- Production materials	3,825.7	tonnes
- Packaging materials	16.1	tonnes
• Renewable materials used	222.0	tonnes
- Production materials	0.0	tonnes
- Packaging materials	222.0	tonnes
GRI 302 Energy		
302-1(e) Energy consumption within organization — TOTAL	5,513.80	GJ
302-1(a) Non-renewable fuel consumed	293.80	GJ
302-1(b) Renewable fuel consumed	0.00	GJ
302-1(c) Electricity purchased for consumption	5,220.00 GJ	GJ
302-1(d) Electricity, heating, cooling, and steam sold	0.00	GJ
302-3 Energy intensity	0.1224	GJ/ULD
302-4 Reduction of energy consumption, - Total 11 projects for Energy reduction in 2025. - Project-level engineering estimates.	4,341 kWh (15.6 GJ) in 2025	kWh; GJ

Subject matters / selected disclosures	2025	Units
GRI 305 Emissions ISO14064-1: 2018, Operational control, GWPAR5, GHG gases (CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3)		
305-1 Direct GHG emissions (Scope 1)	59.64	tCO_2e
305-1(c) Biogenic CO2 emissions	0.46	tCO_2e
305-2 Energy indirect GHG emissions (Scope 2) (purchased electricity; location-based)	688.75	tCO_2e
305-3 Other indirect GHG emissions (Scope 3) — TOTAL	14,284.94	tCO_2e
• Category 3 — Indirect GHG emissions from transportation	1,778.52	tCO_2e
• Category 4 — Indirect GHG emissions from products used by the organization	12,490.08	tCO_2e
• Category 5 — Indirect GHG emissions associated with the use of products from the organization	16.33	tCO_2e
305-4 GHG emissions intensity		
• GHG intensity (Scope 1+2)	0.0166	tCO_2e/ULD
• GHG intensity (Scope 1+2+3)	0.3337	tCO_2e/ULD
305-5 Reduction of GHG emissions - Total 11 projects for Energy reduction in 2025. - Project-level engineering estimates.	2.06 tCO_2e in 2025	tCO_2e
305-7 NOx, SOx and other significant air emissions		
• Particulate (carbon black) - Printing stack	<10.1	kg/year
• Methanol - Printing stack	<10.1	kg/year
• CO - Cutting Strap stack (1)	<5.9	kg/year
• TSP/CO - Cutting Strap stack (2)	<6.3 / <6.9	kg/year
GRI 306 Waste		
306-3 Waste generated — Total	384.46	tonnes
• Hazardous waste	4.15	tonnes
• Non-hazardous waste	380.31	tonnes
306-4 Waste diverted from disposal — Total	210.45	tonnes
• Hazardous waste	0.00	tonnes
• Non-hazardous waste (Recycling)	210.45	tonnes
306-5 Waste directed to disposal — Total	174.01	tonnes
• Hazardous waste	4.15	tonnes
- Landfill	1.95	tonnes
- Incineration with energy recovery	2.20	tonnes
• Non-hazardous waste	169.86	tonnes
- Landfill	99.76	tonnes
- Incineration with energy recovery	70.10	tonnes

Subject matters / selected disclosures	2025	Units
GRI 308 Supplier Environmental Assessment		
308-1 New suppliers screened using environmental criteria — number and percentage	3 of 9 new suppliers (33%)	suppliers; %
308-2 Negative environmental impacts in the supply chain and actions taken		
• Number of suppliers assessed for environmental impacts	28	suppliers
• Number of suppliers identified as having significant actual and potential negative environmental impacts.	0	suppliers
• Significant actual and potential negative environmental impacts identified in the supply chain.	0	suppliers
• Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment.	N/A	%
• Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment.	N/A	%
GRI 401 Employment		
401-1 New employee hires and employee turnover		
• Total number and rate of new employee hires	23 new hires (21 TH, 2 NL, 0 USA), hire rate 9.6%	persons; %
• Total number and rate of employee turnover	25 departures (24 TH, 1 NL), turnover 10.5%	persons; %
401-3 Parental leave entitlement, leave taken, returned, retained and rates by gender (Thailand location only)		
• Total number of employees that were entitled to parental leave, by gender.	131 men/97 women (total 228)	persons
• Total number of employees that took parental leave, by gender.	Leave taken 0; Returned 0	persons
• Total number of employees that returned to work after parental leave ended that were still employed 12 months after their return to work, by gender.	0	persons
• Return to work and retention rates of employees that took parental leave, by gender.	N/A	%
GRI 402 Labor/Management Relations		
402-1 Minimum notice periods for operational changes; whether collective bargaining agreements specify notice		
• Restructuring reducing headcount	60 days (8.6 weeks)	days; weeks
• Relocation	30 days (4.3 weeks)	days; weeks
• Temporary suspension	3 working days	days; weeks
GRI 403 Occupational Health and Safety		
403-8 Workers covered by an occupational health and safety management system (Internally audited and externally ISO 45001 certified) *Contractor/ intern coverage excluded from counted group.	230; 100%	workers; %
403-9 work-related injuries: fatalities, highconsequence, recordable injuries and hours worked, employees.		
• Fatalities	0	cases
• Highconsequence	0	cases
• Recordable injuries	0	cases
• Firstaid/ergonomic cases	4	cases
• Actual work hours	652,694	hours
• TIFR and LTIFR	0	per million hours.

Subject matters / selected disclosures	2025	Units
403-10 Workrelated ill health: fatalities, recordable cases and main types, employees.		
• The number of fatalities as a result of workrelated ill health	0	cases
• The number of cases of recordable workrelated ill health	0	cases
GRI 414 Supplier Social Assessment		
414-1 New suppliers screened using social criteria — number and percentage	3 of 9 new suppliers (33%)	suppliers; %
414-2 Negative social impacts in the supply chain and actions taken		
• Number of suppliers assessed for social impacts.	28	suppliers
• Number of suppliers identified as having significant actual and potential negative social impacts.	1	suppliers
• Significant actual and potential negative social impacts identified in the supply chain.	1	suppliers
• Percentage of suppliers identified as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment.	100	%
• Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment.	0	%

Appedix B: Locations and Reporting Boundaries of Selected Subject Matters

B.1 Locations within the reporting boundary

Corporate and Registered Offices

- AviusULD B.V., Saffierstraat 10, 1812 RM Alkmaar, The Netherlands
- 1808 B Street NW, Bldg B, Suite 170, Auburn, Washington 98001, USA
    - 999/146–153 Moo 15, Bang Sao Thong, Samut Prakan 10570, Thailand

Manufacturing Facility Locations

- 999/146–153 Moo 15, Bang Sao Thong, Samut Prakan 10570, Thailand

B.2 Reporting Boundaries by Selected Subject Matter

GRI Topic	Reporting Boundary	Coverage
GRI 205 – Anti-corruption	Thailand, Netherlands, USA	All three AviusULD entities
GRI 301 – Materials	Thailand	Manufacturing operations
GRI 302 – Energy	Thailand	Manufacturing operations
GRI 305 – Emissions	Thailand	Manufacturing operations and selected valuechain emissions
GRI 306 – Waste	Thailand	Manufacturing operations
GRI 308 – Supplier Environmental Assessment	Thailand	Procurement managed from Thailand
GRI 401 – Employment	Thailand, Netherlands, USA	All three entities; GRI 4012 and 4013 Thailand only
GRI 402 – Labor/Management Relations	Thailand, Netherlands, USA	All three entities, subject to disclosurespecific coverage
GRI 403 – Occupational Health and Safety	Thailand	Manufacturing operations and defined worker groups
GRI 414 – Supplier Social Assessment	Thailand	Procurement managed from Thailand

Boundary Clarification

The assurance applies only to the selected sustainability information and reporting boundaries specified in this statement. The inclusion of an entity or location in Appendix B does not imply that all its activities or sustainability disclosures have been independently assured.

The Netherlands and USA operations are excluded from the environmental and occupational health and safety reporting boundaries, unless otherwise specified in the relevant disclosures.

The assurance does not extend to the Sustainability Report 2025 in its entirety or to information outside the agreed assurance scope.



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