

THE TRANSPARENCY ACT DUE DILIGENCE REPORT 2024

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1. INTRODUCTION

The Norwegian act relating to enterprises' transparency and work on fundamental human rights and decent working conditions (the "**Transparency Act**" or the "**Act**") entered into force on 1 July 2022. Norwegian Air Shuttle ASA ("**Norwegian**") and certain of its subsidiaries are subject to the Transparency Act, pursuant to Section 2 and 3 of the Act. The subsidiaries will base its due diligence on the report and due diligence conducted by Norwegian.

Pursuant to Section 4 of the Transparency Act, Norwegian is obliged to conduct due diligence to identify actual and potential threats to fundamental human rights and decent working environment within its own organisation and supply chain. The findings from the due diligence shall be presented by way of an annual due diligence report, no later than 30 June each year, cf. Section 5 of the Act.

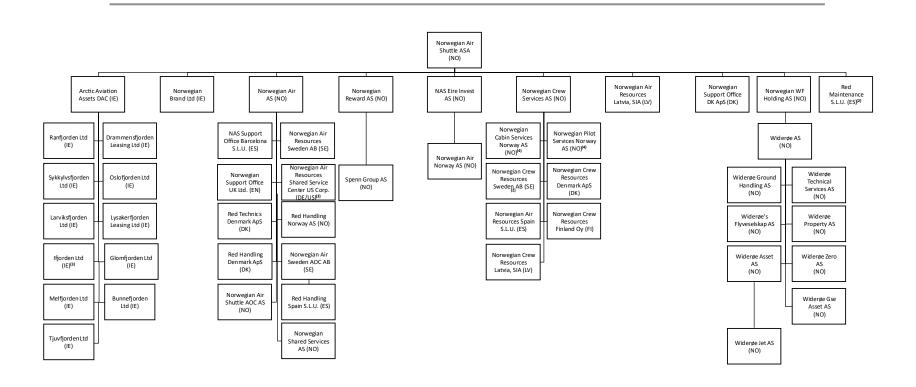
This due diligence report elaborates on the due diligence conducted by Norwegian in the period from 1 January 2024 to 31 December 2024. The purpose of this due diligence report is to give the general public access to the key findings from the due diligence, as well as Norwegian's implemented and ongoing efforts to address and combat any actual or potential risks.

2. GENERAL INFORMATION

2.1 Norwegian's business and corporate structure

Norwegian has a leading position in the Nordic market for air travel, operating short-haul point-to-point domestic and cross-border flights within the Nordics and flights from the Nordics to key destinations in Europe and closely adjacent countries. The corporate structure of the group is organised as follows:

norwegian ×



Norwegian is a multinational corporation, with subsidiaries in Norway, Sweden, Denmark, Finland, Latvia, Spain, Ireland, and the UK. Notably, Norwegian completed the acquisition of Widerøe AS ("Widerøe"), a regional airline carrier in Norway, on 12 January 2024. Widerøe is reporting as a separate entity and its report can be found on Widerøe's website. Thus, this report will contain due diligence covering the Norwegian group, including Norwegian Air Shuttle ASA, which is the ultimate parent company, and its subsidiaries that have duties to carry out due diligence; Norwegian Air AS, Norwegian Air Shuttle AOC AS, Red Handling Norway AS, Norwegian Reward AS, Norwegian Cabin Services Norway AS and Norwegian Pilot Services Norway AS.

2.2 Responsibilities and division of tasks

While it is the company's Board of Directors that has the formal responsibility to adopt compliance with the requirements of the Transparency Act in the organisation, the CEO (Chief Executive Officer) of Norwegian has the formal executive responsibility for compliance with the Act within the organisation, including conducting due diligence and publishing the due diligence report pursuant to Sections 4 and 5. However, it is the CIBSO (Chief IT & Business Services Officer), the CPO (Chief People Officer) and the CFO (Chief Financial Officer) that ensures the day-to-day compliance within their respective lines as executive management within their respective business areas, which involves, among other things, procurement, human resources and legal. At the time of this report, Geir Karlsen is CEO, Knut Olav Høeg is CIBSO, Guro Halvorsen Poulsen is CPO and Hans-Jørgen Wibstad is CFO.

- 1. Conduct due diligence (Section 4 of the Act)
 - A. Formal adoption of compliance within the organisation
 - B. Mapping out actual and potential risks
 - C. Action appropriate measures to combat negative effects
- 2. Due diligence report (Section 5 of the Act)
 - A. Provide a general description of the company
 - B. Inform about actual negative effects and potential risks
 - C. Inform about measures adopted by the company
- 3. Information to general public (Section 6 of the Act)
 - A. Respond to requests regarding the company's due diligence

Board of Directors

Procurement and Human Resources (HR)

Procurement and Human Resources (HR)

Legal

Procurement and Human Resources (HR)

Procurement and Human Resources (HR)

Legal

Norwegian has implemented various tools for ensuring compliance with the Transparency Act, which are presented in chapter 3 and 4 of this report. No particular steps have been taken to produce this report, as the measures are already implemented as a part of Norwegian's general social responsibility conduct.

3. NORWEGIAN'S CONDUCTING OF DUE DILIGENCE

3.1 Overview of the value chain and suppliers

Norwegian's global value chain involves a wide network of suppliers and workers across the locations where it operates. Norwegian recognizes that workers in its value chain do not necessarily have the same rights or experience the same conditions as those in its own workforce. Norwegian is committed to respecting human rights and ensuring decent working conditions for workers in its value chain and transparently reporting on its performance in that regard.

Norwegian consistently maintains an overview over its suppliers through SAP Ariba Supplier Lifecycle & Performance solution, where all new suppliers are registered and data for existing ones is maintained. Norwegian's supplier database in SAP Ariba consists of approximately 12,000 suppliers, which includes all historical suppliers and around 2300 currently active suppliers.

All the contracts with suppliers are registered in SAP Ariba Contracts, which enables thorough monitoring of the contract activity with controlled processes, automated tracking, and a full audit trail.

In the coming year, Norwegian will continue to fulfil its obligations under the Norwegian Transparency Act by conducting systematic due diligence aligned with the OECD Guidelines for Multinational Enterprises. This due diligence is informed by the Company's broader ESG strategy, including a Double Materiality Assessment performed according to CSRD requirements, which supports identification, assessment, and prioritisation of actual and potential adverse impacts on fundamental human rights and decent working conditions across the value chain. We will further develop our risk management processes and enhance stakeholder engagement to ensure effective prevention and mitigation measures. The Company will maintain transparent reporting on due diligence activities and promptly address any grievances or incidents that may arise, ensuring the information remains accessible to the public via our website.

3.2 How Norwegian's due diligence is conducted within its own organisation

At the heart of Norwegian are the people who make it all possible. At year-end 2024 Norwegian had 5,179 employees representing 65 nationalities, compared to 4,470 employees representing 60 nationalities at year-end 2023.

The People Engagement Survey conducted in 2024 measured employees' perception of respect, inclusion as well as job satisfaction. The survey is conducted on an annual basis with the purpose to collect evidence-based input to help the company understand how to continuously improve the work environment, quality of work, employee's wellbeing, and organisational effectiveness.

Norwegian has a well-functioning Health, Safety and Environment (HSE) organisation, including procedures for conducting HSE risk assessments (SRA), audits, handling of Grievance, Whistleblowing and occurrence reports. Sick leave absence and occurrence report trends are presented and discussed in Work Environment Committees (WEC). HSE has been a key contributor to ensuring that Norwegian is compliant to relevant regulations and internal procedures. All aspects of its operations are subject to extensive safety controls and certification. Norwegian's operations meet the strictest standards and the highest level of regulations in the industry, set by the European Aviation Safety Agency (EASA).

Norwegian has skilled and active Health and Safety Representatives (HSR) throughout the entire organisation, actively participating in WEC's and various projects groups. WEC's are established within each legal entity and employees have access to oversight of all HSRs and WEC members, WEC minutes of meeting, HSE SRA reports and all relevant HSE information through the company's intranet. Collaboration meeting between Executive management and the Head of HSR (HHSR) Norway is maintained through bi-annual meetings.

At Norwegian, transparency and the involvement of employee representatives in various decisions is central. Meetings are conducted regularly with all unions and HSR's, to ensure the high standards Norwegian is aiming for. Norwegian depends on continuous feedback and inputs from the employee representatives. In addition to regular meetings, Norwegian conducts an "All HHSR" annual meeting to discuss common HSE topics and solutions across all groups of employees. Furthermore, the company's employees are active through employee representation on the Board of Directors in Norwegian Air Shuttle ASA and several of the group's subsidiaries.

Norwegian listens to its employee's concerns and in Norwegian all employees have the right to report unacceptable circumstances. The company aims to have a culture of transparency with a low threshold for speaking out. If notifying a manager, HR, HSE department or an employee representative of unacceptable circumstances does not lead anywhere, or if an employee is not comfortable raising the matter in any of these channels, it is possible to submit a notification in the Grievance or Whistleblowing channel. The channels are confidential and handled according to GDPR. Norwegian's employees have easy access to the company's reporting systems via the company's intranet.

The Grievance reporting system is used when an employee claims that he/she has personally been treated poorly. Poor treatment could involve a breach of individual employment rights, bullying or harassment, and the complainant is seeking redress or justice for themselves. The person making the complaint therefore has a vested interest in the outcome of the complaint and for this reason is expected to provide evidence to prove their case. Whistleblowing is used when raising a concern about danger or illegality that affects others, for example customers, members of the public, the environment or Norwegian. The person blowing the whistle is usually not directly or personally affected by the danger or illegality. Safety Net is the reporting system used for actual or potential HSE issues in the context of aviation safety, as well as other HSE hazards or concerns that can impact Norwegian's operations.

3.3 How Norwegian's due diligence is conducted with its suppliers

Norwegian engages with suppliers through reliable intermediaries, including the supplier assessor EcoVadis. EcoVadis provides ongoing evaluations of sustainability and ESG risks across Norwegian's value chain using due diligence and evidence-based processes. Regular reports and risk screening results are used by Norwegian to identify potential value chain impacts and inform its response to those impacts, including for vulnerable or marginalized value chain workers.

Monitoring of incidents related to value chain labor rights is undertaken using the EcoVadis supplier monitoring platform, which tracks suppliers' behavior and publishes incidents of poor supplier practices, such as child labor, unsafe working conditions, or other human rights violations. If negative incidents are detected, Norwegian engages with the supplier on a corrective action plan and informs stakeholders about potential risks in the supply chain. As part of its commitment to transparency and accountability, Norwegian is working on the implementation of an external whistleblowing channel, which will be available on the company's website in 2025 and independently operated. Value chain workers will then have the possibility to raise concerns through the Norwegian's whistleblowing system.

Supplier assessments are aligned with the Corporate Code of Business Ethics and Conduct, which establishes clear expectations for suppliers regarding human rights and decent working conditions. Norwegian enforces supplier adherence to its Corporate Code of Business Ethics and Conduct, leveraging SAP Ariba and EcoVadis systems to monitor and assess compliance. Norwegian seeks to ensure that all of its suppliers are registered in SAP Ariba and EcoVadis, which enable suppliers to understand and comply with the Norwegian's expectations regarding value chain workers, including upholding human rights and providing decent working conditions. Risk assessments and ongoing supplier monitoring are carried out using these tools, with corrective actions developed and tracked where necessary. Due diligence is undertaken with the purpose to confirm that any new supplier can meet these conditions before a contract or supplier relationship is entered into.

4. DUE DILIGENCE FINDINGS AND IMPLEMENTATION OF APPROPRIATE MEASURES

4.1 Key findings – own organisation

A culture marked by Diversity, Equity and Inclusion is critical to the company's success. Norwegian works to ensure equal opportunities for all people and offer a safe and inclusive workplace, in addition to recognising individual differences. This is considered vital for every aspect of Norwegian's business practice. Diversity is found in any social identity, such as gender, age, culture, nationality, ethnicity, physical abilities, political and religious beliefs, sexual orientation, and other attributes.

The company's workforce as of year-end 2024 was made up of 47 percent women and 53 percent men.

Norwegian conducted the People Engagement Survey in 2024 identical to survey 2023. The participation rate was 70 percent.

The results from the People Engagement Survey for 2024 shows that 67 percent of the employees said that they believe that everyone can succeed in Norwegian, regardless of gender, age, cultural background, sexual orientation, religious affiliation, and disability.

- 74 percent of employees said they are treated with respect at work
- 76 percent of employees said that their perspective is valued by their colleagues, even if it is different from their view
- 71 percent of employees said that they are overall satisfied with Norwegian as a place to work
- 75 percent of employees said that they will be working at Norwegian in one year's time.

Norwegian promotes equal pay for equal work and ensures that no employee is unlawfully discriminated against in terms of salary, benefits, incentives, or other forms of compensation or remuneration. The airline industry is a diverse industry with many job families and employees with different education and background.

Norwegian differentiates between pay scale-based employees and individually salaried employees. A pay scale, also known as a salary structure, is a fixed system that determines what salary an employee is to receive, often adjusted in yearly increments. Pay scale salaries are independent of gender or age so there is no salary difference between genders. When comparing individual salaried employees regardless of roles or group, the average fixed salary among women amounts to 79 percent of the average fixed salary of men. Norwegian closely monitor and differences in salary and compare groups of employees/roles and constantly strives to ensure a fair pay practice for all.

A safe and healthy workplace is a fundamental right for all of us and a business imperative. One of Norwegian's top priorities is therefore to support the health and well-being, both mental and physical, and minimise absence due to ill-health or injury, through advice, awareness programs and proactive initiatives. Norwegian strives to avoid any kind of incidents and monitor any incidents closely. From 1 July 2024 to 30 June 2025 there were two serious injuries reported (fractures, one technical and one cabin crew), other recorded accidents was limited to minor injuries (e.g.: burns from serving coffee/contact hot surface, musculoskeletal strain, small cuts and bruises).

4.2 Key findings - supply chain

Norwegian's goal is to improve its visibility over its supply chain so that it can identify any critical issues and where action or supplier engagement is required. The company has conducted a mapping of its value chain connected to its core business activities, including those that may have potentially negative effects on value chain workers. Norwegian has gathered information about its suppliers direct and indirect purchases from high-risk countries and have assessed risk against both product and suppliers' management procedures, including controls of their own suppliers. To assess and evaluate its performance in relation to its policies and actions, all suppliers are screened in EcoVadis IQ Plus for instant risk level screening and their compliance with the Norwegian Transparency Act. Three high-risk suppliers have been identified via EcoVadis according to Norwegian Transparency Act criteria during the initial risk screening. A detailed review performed on the identified actual and potential high-risk suppliers has been undertaken during which it was confirmed that these suppliers comply with the required standards of Norwegian.

Norwegian's Corporate Code of Business Ethics and Conduct specifically states the company's responsibility for mitigating any threats to fundamental human rights and decent working environment within its own organization and supply chain. Compliance with the Transparency Act is set out in the Corporate Code of Business Ethics and Conduct.

Norwegian has actively followed up with our suppliers to accept the Corporate Code of Business Ethics and Conduct to ensure the ethical behavior and responsible practices. From July 2024 to June 2025, 98,1 % of our new suppliers who have registered into Ariba system have accepted the Corporate Code of Business Ethics and Conduct.

4.3 Implementation of appropriate measures – own organisation

Norwegian is committed to respecting fundamental human rights and promoting decent working conditions throughout its operations. Diversity, equity and inclusion are core values at every level of Norwegian's business practices, and are essential to fostering a safe, respectful and innovative work environment.

The company maintains and regularly updates internal policies and procedures to prevent discrimination and ensure fair treatment of all employees. These include:

- A Global People Policy, which outlines Norwegian's commitment to a safe, inclusive, and respectful workplace, and sets the standard for how employees
 are treated and supported
- An Equality, Diversity and Inclusion Policy, which defines the company's expectations for equal opportunities across recruitment, training, promotion, pay, and working conditions. The policy applies to all employees, candidates, and relevant third parties and prohibits discrimination based on factors such as gender, age, nationality, ethnicity, physical ability, beliefs, or sexual orientation.

Norwegian conducts regular reviews and evaluations to ensure compliance and continuous improvement in its working environment. Measures are also in place to handle complaints and promote accountability.

As part of its ESG reporting under the Corporate Sustainability Reporting Directive (CSRD), the Norwegian Group conducted a double materiality assessment to identify key sustainability related risks and opportunities. Among the areas identified were issues related to human rights and decent working conditions, which remain central to the Group's social responsibility efforts.

For more information on the identified risks, ongoing and planned actions as well as defined targets, please refer to the Norwegian Group's Sustainability Statement in the Annual Report for 2024.

Amongst the areas defined in the double materiality assessment are gender imbalance and equal gender pay. The Company has adopted a structured approach to addressing and remedying negative impacts through regular reviews, audits and People Engagement Surveys, with focus on remedies are effective. Specific internally established channels are also available for raising concerns and include grievance procedures, systems for reporting and managing gender diversity and unequal pay-related issues.

Gender imbalance has been defined as a potential negative impact on employees over the short, medium and long term. Gender imbalance in organizations has been linked to a lack of diverse perspectives in leadership and operational decision-making, perpetuating stereotypes and limiting opportunities for advancement amongst minority genders. The Company has taken actions in 2024, to prevent or mitigate negative impacts arising from gender imbalance in its own workforce:

- Workforce gender analysis: Conducting an internal audit to evaluate gender distribution among pilots, technicians, ground handling staff and cabin crew, identifying possible underlying causes of imbalances. This analysis helped the Company understand factors impacting gender diversity, including recruitment trends, training access and promotion pathways. While recognizing that it cannot control applicant demographics, the Company is committed to removing any barriers within its control to facilitate a more diverse workforce.
- Gender diversity recruitment initiatives: In 2024 the Company launched targeted outreach efforts to attract underrepresented genders to certain roles, focusing on promoting aviation and technical careers to a wider audience. This includes partnerships with aviation and technical schools, offering career information sessions and building a diverse candidate pipeline. The Company will continue to develop these partnerships in 2025 and maintain contact points with students and potential candidates in the years to come. The Company emphasizes that while it cannot control applicants' choices, it strives to create an inviting, supportive environment for all potential candidates. The Company is planning to implement blind screening in 2025 as part of its recruitment system.

Norwegian has set the following future targets for gender balance:

Norwegian's overall gender target is to have a sound gender balance with a 40/60 ratio either way throughout the company, as well as making a difference in the traditional split between female-dominated and male-dominated roles. The explicit targets to achieve this are as follows:

- In management positions at all levels 40/60 percent either way by 2028
- Cabin crew increase share of male employees with 10 percent by 2028, compared to 2024
- Pilots doble share of female pilots by 2030, compared to 2024
- Technical increase share of female employees with 5 percent by 2030, compared to 2024

Norwegian defines gender pay equality as the absence of salary differenced that can be attributed to gender. Any such disparities may negatively impact employees' morale, wellbeing, and sense of self-worth. Unequal pay is considered not only inappropriate but also detrimental to fairness and trust within the organization.

Norwegian differentiates between employees who are compensated according to structured pay scales and those who have individually set salaries. As of today, 83 percent of the workforce is covered by pay scale-based agreements, while 17% are individually salaried.

Pay scales, also referred to as salary structures, are fixed systems that determine employee salaries, typically subject to annual increments. These structures are defined in Collective Bargaining Agreements (CBAs) negotiated with the relevant unions. At Norwegian employee groups such as Cabin Crew, Flight Deck, Technical, Ground Handling and Operational Control Centre are covered by CBAs that include specific pay scales. Salaries within these pay scales are determined independently of gender or age. Initial placement and subsequent progression within the pay scale are based on pre-agreed criteria, such as seniority in the role. This system ensures that employees receive equal pay for equal work, making pay scales an effective mechanism for maintaining gender pay equality.

For employees not covered by pay scales, primarily those in administrative and support functions, Norwegian applies the Korn Ferry Hay job evaluation methodology to ensure objective and fair compensation practices. This framework evaluates roles based on measurable factors such as job complexity, responsibility, and accountability, thereby ensuring that renumeration aligns with the scope and demands of each role.

Through the consistent application of transparent criteria across all employee groups, Norwegian reinforces its commitment to fair and inclusive compensation practices. These efforts support a workplace culture founded on equality, integrity, and respect for all employees.

Norwegian is committed to ensuring that all employees have equal opportunities to advance. Achieving greater equity within job families require concrete actions both regarding internal advancement and hiring practices. Norwegian have implemented the following measures to achieve this:

- Remuneration data is reviewed annually to identify any potential disparities related to equal pay. Where appropriate, and in compliance with applicable legislation, corrective measures are implemented to address any identified gaps.
- Norwegian ensures that periods of absence related to pregnancy, parental leave, or other family and caregiving responsibilities do not negatively impact
 employees' access to advancement opportunities or violate the Company's commitment to equal employment and pay practices.

Norwegian has clear and firm expectations to record and follow up all incidents through the company's deviation systems, to identify and mitigate root causes. Norwegian believes in continuous learning, a constructive feedback culture and a diverse and inclusive organisation. There have been 7 Whistleblowing reports (3 of the reports on the same issue) and 7 Grievance reports in in this period. All have been followed up in accordance with company polices.

One instance of reported discrimination or harassment is one too many. However, the company's concern also includes instances that might not be brought to the company's attention. Norwegian needs to ensure that guidelines and training offers are constantly communicated to crew and management. To measure the risk of lack of knowledge, the awareness of guidelines was a topic in the People Engagement Survey 2022 and 2023. During the last year Norwegian has simplified the guidelines and clarified the objective, commitment and desired behaviour. Information on where the relevant channels to report such instances, as well as the process of handling reports, has been communicated by top management in relevant town hall meetings. It is part of the HSE onboarding of crew through Computer Based Training (CBT) and for technical personnel through classroom training. The company is continuing the work of creating greater awareness of relevant guidelines throughout 2024 and 2025.

People are the company's greatest asset and Norwegian is committed to ensuring that employees have the opportunity to further develop their skills. By 2025, all managers at Norwegian, ranging from Executive Committee members to first-line leaders with three or more direct reports, will have completed the relevant

leadership development program. This ensures broad adoption and consistent application of the Company's defined leadership behaviors across all levels of the organization.

Recognizing the importance of deep expertise alongside leadership, Norwegian also invested in structured development for Knowledge Experts in 2024. These programs are specifically tailored to support specialists through clear, skill-based career pathways, reinforcing the Company's commitment to professional growth beyond traditional leadership roles.

In total, 214 employees will have participated in either a Leadership or Specialist development program during 2024 and 2025. Of these, 46 percent are women and 54 percent are men. Among them, 61 are Knowledge Leaders and Experts, demonstrating our commitment to inclusive and role-relevant development across the organization.

4.4 Implementation of appropriate measures - supply chain

As an airline operating in a global environment, we acknowledge that our supply chain includes a wide range of suppliers that may be exposed to varying degrees of human rights and labor risks. Our due diligence processes are designed to identify, prevent, and mitigate adverse impacts in line with the OECD Guidelines and the UN Guiding Principles on Business and Human Rights.

Norwegian has implemented a risk-based approach to assess and mitigate human rights and decent working condition risks across our supply chain. Risk assessments are based on supplier location, industry and publicly available data and for certain suppliers, particularly those that are key partners to Norwegian or operate in regions with potentially higher risk we conduct more in-depth investigations.

The EcoVadis platform is helping Norwegian to manage and communicate its supply chain sustainability performance in a clear and actionable way. With the EcoVadis assessment, Norwegian can:

- monitor the performance of its supplier's sustainability performance and manage risks;
- promote transparency on sustainability practices with reliable ratings and global benchmarks;
- get practical insight into the key sustainability issues which are applicable to different industries. EcoVadis industry risk profiles provide an overview of the
 industries' major regulations, strengths and improvement areas; and
- identify high performers and encourage the continuous improvement of sustainability practices across the network.

EcoVadis Scorecard is helping Norwegian to understand its supplier's level of sustainability commitment and it is an actionable tool that helps to drive sustainability improvement throughout the company's supply chain. As the requesting company, Norwegian is enabled to:

- set a minimum score expected from its suppliers, aligned with Norwegian's sustainable procurement goals.
- identify strengths and weaknesses of its suppliers based on the sustainability evidence in the score card; and
- work on a customized corrective action plan for suppliers with low scores that do not meet Norwegian's requirements.

SAP Ariba Risk allows Norwegian to be aware of the wide range of supply chain risks it might face. Norwegian is monitoring supplier risk exposure and alerts on the Supplier Risk dashboard. These can be events affecting the supply chain continuity, including the political situation in the supplier country, natural disasters,

corruption, fraud, compliance information about the supplier, including legal, regulatory, and environmental risks. SAP Ariba Supplier Risk gathers data, including articles, company information, news reports and other third-party content, from multiple public and private service providers.

The above solutions allow Norwegian to address potential risks effectively and ensure adherence to ethical standards across its supply chain. Norwegian is committed to respecting human rights and ensuring decent working conditions for workers in its value chain and transparently reporting on its performance in that regard.

5. HOW TO REQUEST INFORMATION FROM NORWEGIAN

Norwegian has set up a portal for its customers to make requests related to the Transparency Act. You can access this portal through https://www.norwegian.no/om-oss/selskapet/innsyn and file your request relating to suppliers and sub-suppliers, labour rights, reporting, services or others.

/ s / Svein Harald Øygard (Chair)		/ s / Daniel Skjeldam (Board Member)
/ s / Karina Deacon (Board Member)		/ s / Sofia Arhall Bergendorff (Board Member)
/ s / Stephen Thomas Kavanagh (Board Member)		/ s / Torstein Hiorth Soland (Board Member)
/ s / Katrine Gundersen (Board Member)		/ s / Trond Moe (Board Member)
	/ s / Geir Karlsen	

The board of directors of Norwegian Air AS, Norwegian Air Shuttle AOC AS, Red Handling Norway AS, Norwegian Reward AS, Norwegian Cabin Services Norway AS and Norwegian Pilot Services Norway AS have also approved the report on due diligence.