

Modern Slavery and Human Trafficking Statement and Report 2024

Section 1: Introduction

This Modern Slavery and Human Trafficking Statement and Report ("Statement and Report") is made according to the *Australian Modern Slavery Act 2018 (Cth)*, section 54(1) of the United Kingdom Modern Slavery Act 2015, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. It sets out the actions taken by Cathay Pacific Airways Limited (the "Company", together with its subsidiaries, "Cathay", the "Cathay Group", "the Group", "we", "us", or "our") to assess and address risks related to modern slavery, human trafficking and child labour in our operations and supply chains during the reporting period from 1st January 2024 to 31st December 2024.

Modern slavery, human trafficking, and child labour are crimes and serious violations of human rights. As a leading aviation business, Cathay recognises our important role in ensuring that our operations and supply chains adhere to the highest ethical standards, including the prevention and identification of related matters in our supply chain.

Section 2: About Cathay – Our Business and Our Supply Chain

1. Our Business

The Company is a limited liability company incorporated pursuant to the Hong Kong Companies Ordinance and listed on the Hong Kong Stock Exchange. We are a premium full-service airline offering products and services across four lines of business – Premium Travel, Cargo, Low-Cost Travel and Lifestyle.

The Cathay Group is comprised of the Company and its subsidiaries, including amongst others, Hong Kong Express Airways Limited ("HK Express") and AHK Hong Kong Limited ("Air Hong Kong"). The Group's headquarters are located at the Hong Kong International Airport. As a member and leader of the Group, the Company implements policies and practices which have been developed at a group level and apply to the activities of Cathay. As such, references throughout the Statement and Report to the initiatives of the Group, should be interpreted to apply equally to the Company as leader of the Group.

As at 31st December 2024, the Company and HK Express combined offered scheduled passenger services to 88 destinations worldwide, including 19 destinations in the Chinese Mainland. Cathay Cargo offered scheduled freighter services to 41 destinations worldwide, in addition to utilising belly capacity on the Group's passenger flights. Air Hong Kong offered scheduled and charter freighter services to 17 destinations in Asia. Furthermore, the Group serves an additional 154 passenger destinations through codeshare agreement. The Group employed more than 30,100 people worldwide, of whom 22,000 were employed by the Company directly.



2. Our Supply Chain

The Company controls several wholly owned subsidiaries providing a comprehensive range of professional and supportive goods and services to the Group, such as Cathay Pacific Catering Services (H.K.) Limited, Vogue Laundry Services Limited and Hong Kong Airport Services Limited.

The Group's Procurement and Aircraft Trading Department manages our supply chain and conducts due diligence to confirm that the suppliers with whom we have a direct business relationship ("suppliers") adhere to our expectations. Cathay is committed to acting ethically and with integrity in all business relationships, including implementing policies and procedures to ensure there is no forced labour, child labour, modern slavery or human trafficking in its supply chains or any part of the business.

The Company has about 6,800 global suppliers active with spend in 2024. As shown in the graphic below, the vast majority of suppliers supporting the Company are located in China and the United States. They provided a range of goods and services to support our operations. Geographic distribution of our active suppliers in 2024 was as follows:



SUPPLIERS BY REGION

Section 3: Our Policies

Through our organisational and governance policies, we communicate our values and expectations, setting a high bar for ourselves and our suppliers, and make it clear that we reject any form of forced labour or child labour. We are committed to consistently evolving and improving our approach. We reject child, forced and bonded labour in any of our operations or by suppliers working for us.



We have implemented policies and procedures that are designed to ensure that our business operations and supply chains remain free from involvement in forced labour, child labour, and other human rights abuses.

We make every effort, including through due diligence to monitor the performance of our suppliers, to prevent our activities from negatively impacting human rights. Our relevant policies are discussed in further detail below:

1. Corporate Code of Conduct

The Group's Code of Conduct sets out our principles for achieving a respectful and diverse workplace. The Code of Conduct applies to the Group's employees globally, including directors, officers, temporary agency workers, interns and secondees and includes policies related to business ethics, anti-discrimination, anti-harassment, diversity and equal opportunity. The Code of Conduct also includes the Group's commitment to human rights, and that we strive to keep our operations free from human rights abuse in any form, including human trafficking and child labour.

All Group employees are expected to read and adhere to the Code of Conduct.

2. Modern Slavery and Human Trafficking Policy Statement

Our Modern Slavery and Human Trafficking Policy Statement ("Modern Slavery Policy") sets out the Group's commitment to conducting business ethically and to uphold human rights. Cathay acknowledges that forced labour and child labour are crimes involving recruitment, transportation, harbouring and exertion of control or influence for exploitation. In practice, we actively:

- **Train** our operational employees to recognise, handle and report potential trafficking situations in airports and on flights to government authorities.
- **Collaborate** with industry bodies, government authorities and civil society on initiatives for the prevention and suppression of modern slavery and human trafficking.
- **Strengthen** our supply chain management to enforce our Supplier Code of Conduct (discussed further below), which strictly prohibits the use of forced and child labour.

3. Supplier Code of Conduct

The Group's Supplier Code of Conduct ("Supplier Code"), updated in March 2024, sets out our expectations with respect to our suppliers and reflects our strong preference for working with suppliers who share our commitment to honesty and integrity, and who seek to integrate principles of sustainable development into all areas of their business. In line with our Sustainable Development Policy, our Supplier Code sets out our commitment to purchasing goods or services on competitive terms without compromising labour standards, health and safety or the environment.



The Supplier Code describes the minimum standards we expect of all our suppliers regarding:

- Legal and regulatory compliance
- Environmental protection and combatting climate change
- Health and safety in the workplace
- Not employing child labour
- Not employing forced labour
- Provision of proper compensation and appropriate working hours for employees
- Diversity and non-discrimination
- Freedom of association and rights to collective bargaining
- Sharing the Supplier Code with subcontractors and other service providers
- Upholding business integrity

We also provide a mechanism for suppliers and their employees to communicate and raise concerns confidentially, as further described in the Statement and Report.

Pursuant to the Supplier Code, suppliers shall ensure that their operations and the products and services supplied to Cathay comply with all national and other applicable laws and regulations. Where any part of the Supplier Code contradicts local legislation, local legislation will take precedence.

Suppliers are responsible for communicating the requirements of the Supplier Code to their employees. Cathay expects that the Supplier Code be made freely available to suppliers' employees in their local language and in a readily accessible place. Suppliers are encouraged to work with their own service providers and subcontractors to ensure that they also strive to meet the principles of this Supplier Code. Cathay expects that the Supplier Code is integrated within the supplier's business processes to select and manage the performance of subcontractors and other service providers.

With respect to forced labour, the Supplier Code provides that suppliers must not use forced, coerced, bonded or indentured labour, military, trafficked or slave or involuntary prison labour. Furthermore, there shall be no unreasonable restrictions on employees' freedom of movement in the facility, and no unreasonable restrictions on entering or existing company-provided facilities. All work, including overtime work, shall be voluntary. Employees should be free to leave employment upon giving reasonable notice. Suppliers should not require employees to hand-over government-issued identification, passports or work permits as a condition of employment. Employees shall not be required to pay suppliers or their agents any recruitment fees or other related fees for their employment.

With respect to child labour, suppliers must:

 Comply with the applicable local laws with regard to the minimum hiring age for employees. If no such law exists or if the existing law permits the hiring of workers younger than 18 years of age (Young Workers), Young Workers shall not perform hazardous work, which is defined as work in dangerous and unhealthy conditions that can lead to a child being killed, injured or made ill as a result of poor safety and health standards or employment conditions.



- Ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations.
- Provide appropriate support and training to all student workers. In the absence of a local law, the wage rate for student workers, interns and apprentices shall be similar to the other entry-level workers performing equal or similar tasks.
- Not employ any person in a manner which conflicts with completion of their compulsory schooling.
- Not employ any person below the age of 16 years on a full-time basis (unless part of a recognised professions apprenticeship programme).
- Not employ any person below the age of 18 years for work at night (unless part of a recognised professional apprenticeship programme) or in hazardous conditions.

Additionally, all young employees must be protected from performing any work that is hazardous, interferes with their education, or is harmful to their health or their physical, mental, social, spiritual or moral development. Suppliers should also adhere to legitimate workplace apprenticeship programmes and comply with all laws and regulations governing child labour and apprenticeship programmes.

Upon request, suppliers shall allow us or our designated auditor to access relevant documentation, permit inspections of their facilities and sites, and maintain accurate, complete and truthful company books, records, accounts and communications to demonstrate their compliance with this Supplier Code.

4. Human Rights Policy

Cathay recognises that respecting the human rights of our employees, customers, workers in our extended supply chain, and the communities in which we operate and all those affected by our operations is a fundamental responsibility. We strive to adopt business practices that respect human rights and keep our global operations free from human rights abuses of any kind. Our commitment to human rights applies to all aspects of our business operations globally and is integrated across our policies and processes. We assess, identify, monitor and manage the human rights impacts of our business activities on an ongoing basis.

Our Human Rights Policy, aligned with the laws of Hong Kong and applicable globally, is driven by the principles and guidance of the United Nations Guiding Principles on Business and Human Rights. It outlines our commitments to workplace diversity, equal opportunity, child labour, modern slavery and human trafficking, and workplace security. The policy prohibits across our operations and extended supply chain child labour and all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any other form of human trafficking. Operating in the airline industry, Cathay is aware of our role in combatting human trafficking, and continuously collaborates with industry bodies, government authorities and civil society on initiatives for prevention and suppression. We are committed to raising awareness amongst our employees and providing employees training on recognising, handling and reporting potential trafficking situations.



The policy also defines our position on protecting human rights in our supply chains. Cathay seeks to prevent and mitigate any adverse human rights impacts that are directly linked to our business relationships by procuring appropriate contractual commitments from suppliers, vendors and contractors.

5. Whistleblowing Policy

The Group provides a mechanism for employees and third parties, including suppliers, to report any concerns of suspected or actual serious wrongdoing relating to the Group. Confidential reports can be made via an online reporting website, "*Speak Up*", administered by an independent service provider. Cases reported through *Speak Up* will be routed to the Group Legal and Compliance department for review. All reports will be investigated independently by appropriate parties, with central oversight of investigations by the Group Legal and Compliance department.

Our Whistleblowing Policy guides how to raise concerns and the steps that will be followed when concerns are reported to us. We encourage employees and third parties to *Speak Up* should they have a concern relating to serious wrongdoing within the Group, including potential breaches of our Code of Conduct.

Section 4: Risk Assessment and Risk Management, Due Diligence and Remediation Measures

1. Risk Assessment and Risk Management

A structured risk management process has been established to identify, assess and mitigate corporate risks faced by the Group, comprising top-down and bottom-up risk identification and management processes. A specific risk taxonomy has also been developed to holistically identify and manage Environmental, social, and governance ("ESG") risks across the business. The assessment of ESG risks is integrated with the wider risk management processes, and the taxonomy covers modern slavery in the supply chain. The key ESG risks identified are incorporated into the existing corporate risk registers, with mitigation plans developed where appropriate. The outcomes of the assessments are reported to the Board Risk Committee.

We recognise that transnational criminal groups and individuals may exploit the air transport system for modern slavery and human trafficking. Whilst detection and prosecution are government responsibilities, Cathay acknowledges its role in raising awareness of such crimes and providing training to our employees on reporting concerns to the authorities. As part of the aviation industry, we call on government authorities to establish clear, practical and discreet mechanisms for the reporting of potential modern slavery and human trafficking activities in the air transport system.

2. Due Diligence

We actively manage risks related to supply chain through appropriate third-party due diligence. In 2024, Cathay rolled out a group-wide third-party risk and sustainability management programme featuring new onboarding, monitoring and due diligence



processes, based on external database screening and third-party responses to due diligence questionnaires. Modern slavery has been covered by the programme as one of the material risk topics. This enhanced the mapping, analysis, and mitigation of modern slavery risks in our supply chain.

We expect third parties who deal with the Group, including suppliers, to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Suppliers are therefore expected to adhere to our Supplier Code of Conduct, which prohibits child labour and forced labour.

3. Remediation Measures

Our Code of Business Conduct and Ethics and our Whistleblowing Policy provide an avenue through which employees, suppliers and customers of the Group to report actual or any concerns of suspected or actual serious wrongdoing relating to the Group possible misconduct. Cathay undertakes due diligence efforts, as further described in the Statement and Report, to mitigate the risks of forced labour and child labour in our business. In the event that we discover any forced labour or child labour in our business and supply chains, the Whistleblowing Policy allows employees to express their concerns relating to serious wrongdoing within the Group, including potential breaches of our Code of Conduct.

Additionally, the Group provides a mechanism for suppliers to raise concerns about suspected or actual wrongdoing relating to Cathay, as outlined in the *Whistleblowing Policy*.

Throughout the year of 2024, no specific remediation measures were required in respect of forced labour or child labour, as no such incidents were reported or made known to us through the *Speak Up* channel. Similarly, no remediation has taken place in 2024 in respect of loss of income to vulnerable families, as no incidents of forced or child labour have been identified or made known to us.

Section 5: Training and Awareness Building

Since early 2020, Cathay has initiated training for our cabin crew to recognise and respond to potential human trafficking activities, including forced or child labour, through online training modules. Our crew members are trained to identify signs and behaviours indicative of human trafficking, ask specific questions to further assess the situation and safely report suspected cases. The training emphasises the importance of all our collaboration among all frontline teams, and coordination with authorities. Additionally, operating manuals for both employee groups have been updated to include procedures for handling and reporting suspected cases. In 2024, 100% of our operating cabin crew completed the anti-human trafficking training, and no suspected human trafficking incidents were reported. Our operating flight crew also have access to our Modern Slavery and Human Trafficking Policy, with 100% completion of the training.

Following the update to our ground operations policy suite in 2021, our focus in 2024 remained on educating and raising awareness among our frontline airport teams about



the impact of human trafficking. In 2024, we organised learning sessions in partnership with an NGO, targeting flight crew, airport ground staff, and office employees. These sessions covered ground and in-flight indicators of human trafficking and provided guidance on observing, documenting, and reporting suspicious activities without confronting the individuals involved. We also plan to extend these sessions to our subsidiary airlines in 2025.

Our recurrent training program is conducted biennially, and mandates that all Cathay employees and our third-party ground handling agents undergo online training on identifying, assessing and appropriately responding to suspected cases of human trafficking, including for the purposes of forced or child labour. Ongoing reviews are expected to ensure the effectiveness of these actions.

Section 6: Assessing Effectiveness

As part of our governance processes, we continuously monitor compliance with our policies. We also review any concerns raised through our Whistleblowing Policy and other informal mechanisms of employee feedback. To date, no significant concerns or complaints have been identified.

We assess the effectiveness of our policies by conducting regular reviews or audits of the organization's policies and procedures related to forced labour and child labour.

As previously outlined in **Section 4**, Cathay is working diligently to enhance the supply chain risk management framework and develop a holistic risk universe for assessing and monitoring supply chain risks. Based on the mapping results, we will then review the effectiveness of our existing policies and guidelines.

Section 7: Consultation

In 2024, we conducted regular consultations with our subsidiaries on the same topic. Annual consultations were held to review the latest status and identify required follow-up actions.

Section 8: Approval & Attestation

Pursuant to the Australian Modern Slavery Act 2018 (Cth), section 54(1) of the United Kingdom Modern Slavery Act 2015, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, the Statement and Report was approved by the Company's Board of Directors on 12 March 2025. The Statement and Report is also available on our company website at <u>www.cathaypacific.com</u>.

I attest that I have reviewed the information contained in the Statement and Report for Cathay Pacific Airways Limited. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Statement and Report is true, accurate and complete in all material respects for the purposes of the requirement, for the reporting year listed above.



Looking forward, Cathay is committed to continuously improving our procedures and processes to mitigate human trafficking risks within our operation and modern slavery risks in our supply chain.

I make the above statement in my capacity as a member of the Board of Directors of Cathay Pacific Airways Limited.

Signed,

Donarr

Ronald Lam Chief Executive Officer Cathay March 2025

I have the authority to bind Cathay Pacific Airways Limited.