

Airswift Sustainability Report 2024

ESG Progress Update
& ESRS Brief



About This Report

Airswift has published this report to demonstrate the Company's sustainability-related actions, commitments and outcomes during the reporting period of January 1, 2024, to December 31, 2024.

In 2025, Airswift published its first Corporate Sustainability Reporting Directive (CSRD) Sustainability Statement aligned with the European Sustainability Reporting Standards (ESRS). This document presents selected excerpts from Airswift Global AS's sustainability reporting, compiled in alignment with the ESRS under the CSRD. The following report is intended to provide a snapshot of key disclosures, initiatives, and performance highlights for the reporting year 2024, including a summary of ESRS-aligned metrics. The excerpts included do not constitute the full CSRD-compliant sustainability statement and should be read as illustrative or preliminary in nature. For the complete report, please refer to the Sustainability Section of the 2024 Director's Report and Financial Statements, [found on our website](#).



Table of Contents

About this Report	2	Social: People and Participation	12
Key Figures 2024	3	Workforce and Well-being	13
Powering Global Projects with Top Talent	3	Responsibility Across the Value Chain	15
A Message from the CEO	4	Engaging with Consumers and End-users	16
		Case Study - Transforming Lives through Global Opportunity	17
Overview	5		
About Airswift	5	Governance: People and Policy	18
Our Approach to Sustainability	6	Business Ethics	19
Double Materiality Assessment	7	Corporate Culture	20
		Responsible Business Practices	21
Environment: People and the Planet	8	Case Study - ISO27001 Certification	22
Climate and Energy	9		
Carbon Management	10	Index I - Double Materiality Assessment Results	23
Resource Use	11		
Case Study - World Environment Week	11		

Key Figures 2024

+7,300 
volunteer hours
since 2021

837 
employees

+72,000 
trees planted
since 2021

8,304 
contractors paid

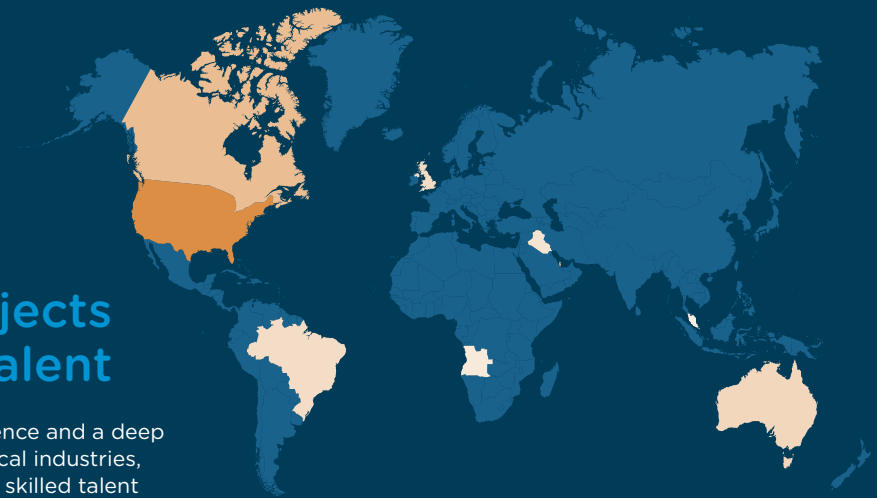
+\$126k 
raised for
Relay for Life in 2024,
+500k since 2016

11+ 
industries
supported

Powering Global Projects with Top Talent

With decades of experience and a deep understanding of technical industries, Airswift connects highly skilled talent with the world's most demanding STEM projects. Our expertise spans energy, infrastructure, life sciences, technology, and advanced manufacturing, enabling tailored workforce solutions that meet evolving project demands and global talent shortages.

Supported by proprietary technology, robust recruitment systems, and a global talent network, we deliver top-tier candidates quickly, compliantly, and at scale. As a trusted partner, we help shape the future of STEM through strategic workforce placement.



Top 10 Global Talent Placements 2024

1	United States	1254
2	Qatar	730
3	Canada	581
4	Australia	359
5	United Kingdom	310
6	Brazil	294
7	Singapore	276
8	Iraq	249
9	Angola	192
10	Malaysia	155

A Message from the CEO

It is a privilege to share Airswift's fourth ESG report, one that captures the continued efforts of our teams to make a positive impact in the places where we live and work. Rather than being led from the top, our progress is built from the ground up, shaped by colleagues across departments and regions who bring care, creativity and purpose to everything they do. Their actions continue to move us forward.

In 2024, we deepened our efforts in several areas. Our teams logged more than 7,300 volunteer hours, including 2,272 hours during World Environment Week alone, where colleagues across offices came together for clean-ups, educational campaigns and sustainability challenges. We also continued our long-standing support for cancer-related charities, raising over \$500,000 since 2016 to support research and access to care. This effort holds deep personal meaning for many in our organisation.

At the same time, we have strengthened the foundations that support this work. We completed our first full carbon footprint, improved how we monitor supplier practices and earned ISO 27001 certification to further safeguard the data entrusted to us. These aren't just operational milestones. They reflect our broader

commitment to quality, accountability and long-term success.

2024 also marked our first-year reporting under the European Sustainability Reporting Standards (ESRS). As a first-time reporter, we laid the groundwork for structured data collection, cross-functional collaboration and broader stakeholder engagement. A key part of this process was conducting a Double Materiality Assessment, which helped us identify and prioritise the topics with the greatest significance to both our business and society. While the shift was regulatory in nature, it prompted a more focused, transparent and forward-looking approach to sustainability that better reflects where we stand today and where we are heading.

More importantly, we have seen a growing number of employees take ownership of this journey. Whether by joining a volunteer committee, leading local initiatives or offering feedback that shapes our approach, our people are the reason this work continues to evolve. They remind us that progress does not happen through policy alone, it happens when individuals care enough to act.

Thank you to everyone across the Airswift network, employees, clients, contractors and partners, for continuing to push this work forward. Your ideas, your energy, and your actions are what make our commitments a reality.

Janette Marx
CEO
Airswift



About Airswift

Airswift operates as a global workforce solutions provider, specialising in contract hire, professional search, employer of record, and managed service provider solutions within the STEM industries. We connect specialised talent with leading organisations in sectors like energy, infrastructure and technology delivering tailored recruitment and workforce services.



EXPERTS IN STEM PLACEMENT

Airswift has offices across the globe, including the Americas, Asia Pacific, Europe, Middle East and Africa. This expansive network enables us to provide local expertise and support to clients and candidates across regions. Airswift's value creation begins with key inputs such as a highly skilled talent base, experienced recruitment professionals, proprietary technology platforms, and robust industry partnerships. These inputs are secured through our extensive global network, sophisticated recruitment systems, and a strong adherence to ethical and compliance standards. Our core outputs include the effective placement of top-tier talent into critical roles and projects. The resulting outcomes are reflected in client satisfaction, career advancement for candidates, and sustained long-term value through consistent growth and operational excellence.

OUR VALUE CHAIN ACTIVITIES

Upstream: Talent sourcing through global partnerships, networks, and recruitment platforms. Key suppliers include technology providers, compliance services and education partners.

Downstream: Workforce solutions to STEM industry clients. Activities include sales, candidate placement and follow-up services.

Position in the Value Chain: Airswift acts as a strategic intermediary, bridging the gap between skilled professionals and client organisations.



EcoVadis, which rates companies on sustainability across environment, labor, ethics and sustainable procurement, awarded Airswift a "Committed" badge in December 2024 after our latest submission. We scored 56 out of 100, reflecting ongoing efforts to strengthen areas such as diversity and advance long-term sustainable growth.

OUR GUIDING PRINCIPLES



GROWTH

We grow by empowering our people. Through continuous learning and career development, we challenge the status quo, embrace new goals and support our teams to do the same.



EXCELLENCE

Excellence means pushing boundaries with determination and purpose. It is embedded in our culture, policies and the behaviours we reward.



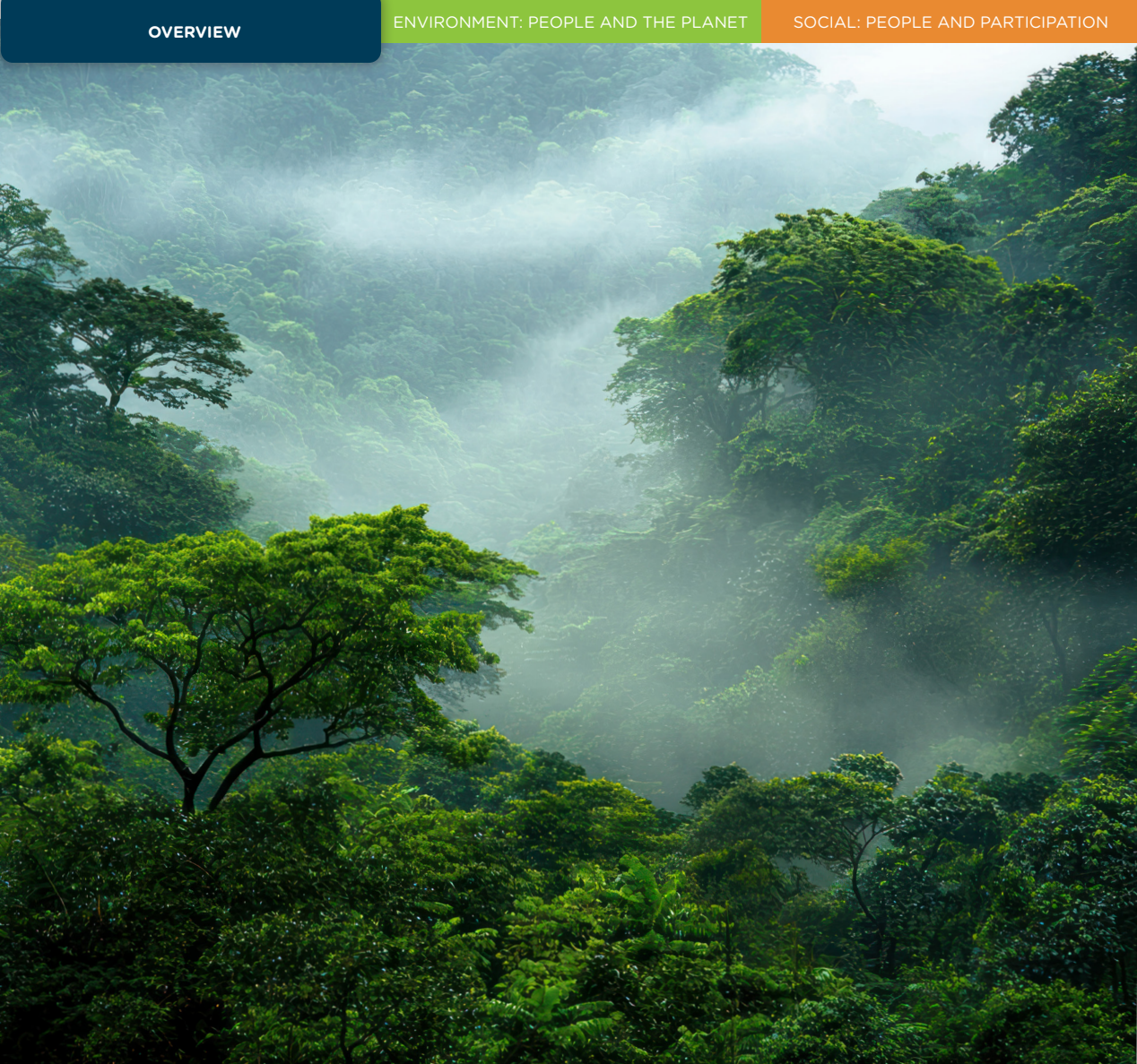
LIFE

People are our core. We foster an inclusive, healthy workplace that supports well-being and balance, enabling our teams to thrive both personally and professionally.



INTEGRITY

Integrity guides everything we do. We act with honesty, empathy and openness, ensuring our work, including ESG practices, reflects our values.



Our Approach to Sustainability

In previous years, our sustainability reporting was guided by the United Nations Sustainable Development Goals (SDGs), offering a global lens for showcasing our environmental and social contributions.

As regulations evolved, particularly with the introduction of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), we have adopted a more structured, comprehensive and assurance-ready approach.

This year, we have aligned our reporting with ESRS requirements, focusing on double materiality, value chain transparency and strong governance. While doing so, we have mapped our historical SDG priorities to the ESRS framework to maintain continuity and honour past commitments.

For instance, SDG 13 (Climate Action) aligns with ESRS E1 – Climate Change, and SDG 8 (Decent Work) corresponds with ESRS S1 – Own Workforce and S2 – Workers in the Value Chain. This integration offers stakeholders a transparent, consistent view of our journey from voluntary reporting to regulatory compliance.

Double Materiality Assessment

Airswift conducted a materiality assessment to identify material impacts, risks and opportunities across our own operations, upstream suppliers and downstream value chain. This ensured that all economic activities and relevant industries were considered in the assessment while identifying the impacts, risks and opportunities (IROs) material to Airswift. Detailed information on each material IRO can be found in the [Index](#) of this report.

Connection to Strategy and Business Model

Our business model and strategy are closely linked to environmental and social impacts, particularly through global workforce operations and placement activities that drive emissions and resource use. While these create value through job creation and development, they also pose risks if not managed responsibly. Regulatory, reputational and governance-related challenges may affect financial performance, but we mitigate these through strong policy and procedures. At the same time, growth in clients focused on renewable energy and sustainability initiatives such as carbon management, climate adaptation and mitigation and responsible materials use strengthens our market position. These developments also fortify stakeholder relationships and enhance our long-term resilience.

ESRS TOPIC	AIRSWIFT-ALIGNED SDGS
E1 - Climate change	SDG 13: Climate impact
E5 - <i>Resource use and circular economy*</i>	SDG 12: Responsible consumption and production
S1 - Own workforce	SDG 3: Good health and well-being SDG 5: Gender equality SDG 10: Reduced inequalities
S2 - Workers in the value chain	SDG 3: Good health and well-being SDG 8: Decent work and economic growth SDG 10: Reduced inequalities
S3 - Affected communities	SDG 3: Good health and well-being SDG 10: Reduced inequalities
S4 - Consumers and end-users	SDG 8: Decent work and economic growth
G1 - Business conduct	SDG 3: Good health and well-being SDG 8: Decent work and economic growth

**Resource use and circular economy was ultimately deemed not material to the business by ESRS definitions, however given our legacy work in waste reduction we still intend to report on policies and initiatives to reduce waste.*

Environment: People and the Planet

2024 Progress Updates

- 1,693 Verified Carbon Units purchased for offsetting emissions
- 6,734 trees planted
- Shifted from basic tree-planting to a Verified Carbon Unit (VCU) accredited program
- 1% increase in paper purchases in 2024 compared to 2023, highlighting need for renewed focus on digital alternatives and awareness campaigns
 - An e-Waste Policy has been integrated into the Physical & Environmental Policy, to be audited under ISO27001
- Internal ESG competencies developed through e-learning courses and voluntary ESG training modules were added to our Learning Management System (LMS)
- Determined that carbon offsetting service for clients and contractors falls outside of our core operational focus, will instead support clients in sharing best practices and guidance on credible offsetting schemes where relevant
- Environmental credentials for supplier onboarding have not yet been implemented due to a social focus for suppliers in 2024



Airswift is committed to addressing climate risks and supporting the global energy transition. In 2024, we completed our first carbon inventory and offset emissions through nature-based projects in Brazil's Cerrado biome. We continue to integrate sustainability into daily operations through hybrid work, energy-efficient policies and responsible IT practices—laying the foundation for a more climate-resilient future.

Summary of Material IROs

ESRS E1 – CLIMATE CHANGE

Shifts in the oil and gas market present transition risks, while growth in renewables creates new opportunities. By adapting to changing demand, we strengthen long-term resilience. Airswift continues to explore ways to reduce emissions from travel, commuting and purchased goods, and sees further opportunity to improve energy efficiency across our global office network.



Climate and Energy

Resilience and Sustainability Integration at Airswift

Airswift is committed to operational resilience and environmental stewardship. Through our Business Continuity Plan and Environmental & Sustainability Policy, we address climate change mitigation, adaptation and energy use across all global operations. Over the next year, we will assess whether further adjustments need to be made to better operationalise our management of material topics.

BUSINESS CONTINUITY PLAN

Airswift's Business Continuity Plan ensures global operational resilience and employee safety during unexpected disruptions, including those caused by climate-related events. The plan prioritises employee well-being through evacuation and remote work strategies, maintains service delivery via redundancy and recovery protocols and extends support to local communities in times of crisis. With a strong focus on risk assessment, incident response and rapid recovery, the plan reinforces Airswift's commitment to protecting key stakeholders and sustaining business continuity under adverse conditions.



ENVIRONMENTAL & SUSTAINABILITY POLICY

Airswift's Environmental & Sustainability Policy reflects our commitment to reducing our environmental footprint and supporting a low-carbon future. Covering all offices and operational activities, the policy targets emissions reductions through energy-efficient practices, renewable energy adoption and carbon offset initiatives like tree planting. By promoting hybrid work, sustainable travel, and supplier engagement, we aim to embed environmental responsibility across our operations and value chain.



Carbon Management

In 2024, we completed our first company-wide carbon inventory, establishing a clear baseline of emissions across our global operations. We implemented carbon accounting software, trained internal teams and followed the Greenhouse Gas Protocol to ensure consistency and credibility in our reporting. This effort provided valuable insights into where emissions occur within our operations and value chain, and how we can improve data and systems moving forward.

Our total emissions for the year were 15,487.8 tCO₂e (market-based), with Scope 3 accounting for over 76 percent. This is in line with expectations for a service-based organisation like ours, where most emissions stem from activities such as purchased goods, commuting and travel. Our largest individual sources were purchased goods and services (6,541.5 tCO₂e), employee commuting (2,511.5 tCO₂e), and business travel (1,036.4 tCO₂e). Company-operated vehicles accounted for all of our Scope 1 emissions at 3,413.7 tCO₂e.

This inventory gives us a strong starting point for understanding our environmental footprint. Going forward, our focus will remain on enhancing data accuracy, improving coordination across teams and suppliers and embedding emissions reporting more fully into our business operations. We have not set formal reduction targets at this stage, but we see this baseline as an important step toward more meaningful tracking and long-term accountability.

SCOPE	tCO ₂ e
SCOPE 1 GHG EMISSIONS	
Gross Scope 1 GHG emissions	3,413.7
SCOPE 2 GHG EMISSIONS	
Gross location-based Scope 2 GHG emissions	229.6
Gross market-based Scope 2 GHG emissions	240.6
SCOPE 3 GHG EMISSIONS	
Total Gross indirect (Scope 3) GHG emissions	11,833.5
1. Purchased goods and services	6,541.5
2. Capital goods	170.5
3. Fuel and energy-related activities	986.5
5. Waste generated in operations	173.3
6. Business travel	1,036.4
7. Employee commuting	2,511.5
8. Upstream leased assets	413.9
TOTAL GHG EMISSIONS	
Total GHG emissions (location-based)	15,476.8
Total GHG emissions (market-based)	15,487.8



Carbon Credits

To mitigate the impacts of business activities on the planet, Airswift purchased carbon offsets in 2024. In 2024, Airswift purchased a total of 1,693 Verified Carbon Units (VCUs) administered by Verra and certified through the Verified Carbon Standard (VCS) Program. These credits covered estimated emissions from office energy use and business travel, prior to the full emissions inventory was calculated. In future years, we will use our calculated emissions totals to determine the number of credits to purchase.

Airswift chose to purchase VCUs from Cerrado Biome project, (ID Verra/2465), a REDD+ project focusing on the second largest biome in Brazil, where one of Airswift's largest offices by headcount is located.

Every year, Airswift is also committed to planting one tree per placed contractor. The total number of employees placed in 2024 was 6,374, which means as many trees will be planted in their honour as part of our reforestation efforts.

Resource Use

We are committed to minimising our environmental impact through various sustainability initiatives, such as reducing waste and promoting recycling during World Environment Week. The main waste types include office waste from day-to-day operations (i.e. kitchen materials), paper and IT equipment.

While our double materiality assessment found these areas to be non-material from an impact and financial standpoint, we continue to uphold responsible waste practices. This includes limiting single-use items, reducing paper and printing and promoting IT reuse and recycling.

Airswift complies with all local and national waste disposal regulations and works with licensed disposal organisations across our global offices. E-waste disposal is certified under the WEEE Directive 2012/19/EU, RoHS and Data Protection Legislation, ensuring proper treatment and regulatory adherence.

To further reduce e-waste, we have extended the lifecycle of IT assets from three to five years. We also support local charities through partnerships with disposal organisations that align with circular economy principles.

Case Study: World Environment Week

From June 3-7, 2024, our global team came together to celebrate World Environment Week in alignment with the United Nations Environment Programme and World Environment Day. Through a series of activities across our regions, we reaffirmed our commitment to sustainability, community engagement and environmental stewardship.

This year, we pledged 2,250 hours toward volunteerism, education and advocacy as part of the #GenerationRestoration campaign—and exceeded that goal with 2,272 hours donated. Our engagement has grown steadily over the years:

2024: 2,250 hours pledged | 2,272 hours donated
2023: 1,000 hours pledged | 2,058 hours donated
2022: 1,000 hours pledged | 1,500 hours donated
2021: 600 hours pledged | 1,700 hours donated

Guided by four key goals—education, participation, empowerment and long-term action—our teams hosted a range of initiatives: litter cleanups, energy-saving “Power Hours,” sustainability trivia with 145 participants and regional events like Meatless Monday cook-offs and plastic-free challenges.

A standout initiative was the “Boots at the Roots” global volunteer challenge. Nine volunteer events were held across key hubs, including Port Moresby, Kuala Lumpur, The Hague, Houston and Manchester, showcasing our collective dedication to creating a positive local impact through hands-on environmental work.



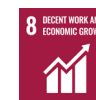
Social: People and Participation

2024 Progress Updates

- 38% of Operations Board are women
- 62% of employees are women
- 0.16 Total Recordable Incident Rate (TRIR)
- 15.6 hours formal training (average per employee)
- 52% employee participation in Fit2Be Cancer Free wellness initiatives
- \$126,052 raised for cancer organisations through Relay For Life
- 47 interns, apprentices and work experience placements across Finance, Quality, Service and Recruitment — many transitioning into full-time roles
- Enhanced sexual harassment training to include third-party scenarios and bystander intervention
- Introduced a Domestic Violence Policy in the Global Employee Guide
- Delivered DEI training for all client or contractor-facing roles, covering inclusive communication, unconscious bias and cultural awareness
- Launched fully-funded Gympass programme in Brazil, supporting employee physical and mental well-being

- Financial well-being training delivered in Rio, Papua New Guinea, Indonesia and Malaysia
- No new Equal Opportunity Employment metrics in 2024, we however continue to encourage employees globally to voluntarily share demographic information to understand workforce makeup and aid in identifying areas for improvement
- No formal Veteran outreach programme was launched in 2024 due to other focus areas
- In 2024, we evolved our Mental Health First Aid (MHFA) programme into a more proactive and holistic initiative, the Well-being Champions, reflecting our commitment to expanding well-being support across the organisation
- Strengthened our supplier onboarding process by incorporating Human Trafficking & Modern Slavery compliance checks

Airswift's success is powered by our diverse, talented workforce. We aim to provide a safe, inclusive and supportive environment where people can thrive. By prioritising well-being, safety and diversity we create a resilient workplace aligned with ethical and long-term goals. This approach strengthens engagement, enhances our reputation and supports operational excellence.



Workforce and Well-being

Summary of Material IROs

ESRS S1 – OWN WORKFORCE

We are committed to a safe, healthy and inclusive workplace. Our policies help prevent harassment, support occupational safety and promote equity in pay and access. We uphold human rights across our operations and supply chain, actively working to prevent exploitation while supporting our employees' economic and physical security.



We maintain open communication with employees through:

- Regular feedback sessions and surveys
- Accessible grievance mechanisms
- A Whistleblowing Policy that ensures confidentiality, protects against retaliation, and encourages ethical conduct

To address and remediate potential or actual human rights impacts, Airswift has established:

- Corrective action protocols
- Transparent investigation procedures with confidentiality safeguards
- Non-financial remedies and where appropriate, compensation
- Ongoing compliance monitoring through audits, risk assessments and grievance data analysis

Supporting Human Rights, Health and Safety, and Employee Wellness

Airswift's Human Rights Policy ensures all employees are treated with dignity and respect. It prohibits discrimination and harassment and upholds key labour rights, including:

- Freedom of association and collective bargaining
- Equality and non-discrimination in the workplace
- Provisions against human trafficking, forced or compulsory labour and child labour



Health and Safety

We are committed to protecting employee well-being through a suite of health and safety policies, including:

- **HSE Manual:** Outlines our vision and implementation of the Health, Safety and Environmental Management System.
- **Job Hazard Analysis Policy:** Prevents workplace accidents by identifying and mitigating risks before work begins.
- **Office Safety Policy:** Sets minimum safety requirements for employees and visitors in office settings, reducing everyday workplace hazards.

Well-Being Programmes

Airswift promotes physical and mental health through global initiatives, including:

- A network of Mental Health First Aiders providing early support
- Employee Assistance Programme (EAP) with counselling resources
- Health-focused events like fitness challenges and cancer awareness campaigns
- A Well-being Policy emphasising shared responsibility across the organisation

Professional Development

As a company that specialises in workplace opportunities, we understand the value of investing in our employees. We have several programs in place to foster personal and professional development, as well as providing recognition for achievements.

- **High Flyers:** Celebrates top performers across all departments globally through an annual recognition event that highlights excellence and embodies company values.
- **InteGREAT:** A peer-led learning initiative that connects employees across regions to promote skills sharing, cultural exchange and leadership development through self-organised learning groups.
- **Global Leadership Team (GLT):** A year-long program offering mid- and senior-level employees leadership development, promotion pathways and access to leadership summits. Open to all functions and regions, with members selected by senior leadership. Many past participants have advanced to executive roles.
- **Transforming Lives through Global Opportunity:** Airswift leverages our global network of offices and the adventurous spirit of our employee basis. From career growth to personal milestones, our global footprint has enabled individuals to pursue international roles, advance professionally and build fulfilling lives across continents.

Diversity in the Workplace

Airswift is committed to a workplace free from discrimination and harassment, where equal opportunities and diversity thrives. These principles are embedded in our Equal Opportunities Policy, Code of Business Ethics (CoBE), Global Employee Guide and other related policies.

- 2024 Employee Gender Diversity:
 - Male: 322
 - Female: 515
 - Total: 837
- 2024 Employees by Country
 - United Kingdom: 182
 - Brazil: 142
 - United States: 125
 - Malaysia: 88
 - Other countries < 50 employees: 300

We monitor our efforts through regular audits, employee feedback and engagement surveys. These measures help ensure compliance with international standards and continuous improvement. Airswift's DEI commitment is clear: eliminate discrimination, create opportunity and champion diversity across all global operations.

Responsibility Across the Value Chain

Summary of Material IROs

ESRS S2 – WORKERS IN THE VALUE CHAIN

We recognise that poor labour practices in the value chain pose risks to worker welfare and our reputation. Improving contractor engagement, feedback mechanisms and issue resolution helps strengthen satisfaction, foster inclusion and support ethical labour standards. As a preferred recruiter, we aim to build stable, trusted relationships that support long-term business growth.



Upholding Human Rights Across our Value Chain

Airswift is committed to promoting and protecting human rights throughout our global operations and value chain. Governance of human rights is led by the Business Ethics Officer (BEO), with oversight from the Operations Board. Airswift enforces ethical and transparent recruitment practices, prohibits forced labour, human trafficking and child labour and ensures written employment contracts are provided in a language understood by the worker.

To ensure consistent application of our values, we require suppliers, consultants and partners to adhere to our CoBE, Anti-Bribery Policy and Modern Slavery & Human Trafficking Procedure. These standards are reinforced during onboarding through signed commitments and regular communication, helping extend protections across the value chain.

We actively incorporate the perspectives of value chain workers in our decision-making. Surveys and feedback mechanisms provide insights into recruitment experiences, working conditions and well-being. Grievance channels—offered confidentially and without retaliation—enable workers to raise concerns.

All reports are centrally logged and fairly investigated, with corrective action taken when needed. No human rights violations were reported in 2024.

To monitor and improve outcomes, Airswift conducts regular internal and external audits, including those tied to ISO 9001 certification.

Key initiatives include:

- **Contractor surveys**, which drove a 2024 satisfaction score of 88.9% and an NPS of 67.3.
- **Health and safety risk assessments**, resulting in just three recordable incidents in 2024.
- **Supplier screening**, aligning partners with Airswift's labour standards.
- **Implementation of labour policies**, offering protection from discrimination, exploitation, and unsafe working conditions.

Effectiveness is continuously assessed using key performance indicators (KPIs) such as issue resolution times, audit findings and survey results. These efforts reflect Airswift's broader aim to build a value chain rooted in fairness, dignity and accountability.

Engaging with Consumers and End-users

We take the protection of client and candidate data seriously and uphold strong standards for information security, ethical data use and vendor oversight. Our recruitment practices include safeguards to reduce safety, legal and financial risks—helping us build trusted, long-term partnerships.

Summary of Material IROs

ESRS S4 CONSUMERS & END-USERS

We prioritise the protection of client and candidate data, recognising the risks of breaches, misuse or poor vendor oversight. Strong safeguards help us maintain trust, avoid reputational harm and meet legal obligations. We also uphold strict recruitment and onboarding standards to protect downstream partners from legal, safety or financial risks tied to personnel placements.

Relationship Management

Airswift prioritises ethical, transparent engagement with consumers and end-users—including contractors and clients—through a combination of strong governance, open feedback channels and robust data protection practices. Our commitment is supported by policies such as the CoBE, Human Rights Policy and the Modern Slavery and Human Trafficking Procedure,

which apply across all operations and business relationships.

The Quality Manager oversees consumer engagement, ensuring regular collection of feedback via surveys and service interactions. This input informs continuous improvements in onboarding, recruitment and satisfaction across the contractor and client experience. In 2024, satisfaction scores remained strong, with 89% for contractors and 88% for clients.

Effectiveness is continuously assessed using key performance indicators (KPIs) such as issue resolution times, audit findings and survey results. These efforts reflect Airswift's broader aim to build a value chain rooted in fairness, dignity and accountability.

Summary of Material IROs

ESRS S3 - AFFECTED COMMUNITIES

We support local communities through hiring and outreach, though barriers like limited STEM access or non-local leadership can affect trust and inclusion. Over time, investing in local business development creates opportunities for shared value. We also uphold civil rights within our operations and engage openly with stakeholders to minimise social risk. Respect for Indigenous rights remains a priority, particularly in sensitive regions, ensuring alignment with global human rights standards.

Types of Affected Communities

Airswift has identified two primary community groups that may be materially impacted by our operations and business relationships:

1. Communities around client operating sites

These communities may be indirectly affected by project-related activities such as increased local economic activity, infrastructure development and shifts in local job markets. The impacts stem from Airswift's support of large-scale client operations.

2. Indigenous communities

In regions like Papua New Guinea and Brazil, Indigenous communities may face risks tied to client-led development. These communities often hold unique cultural and land-use rights that may not be fully protected under local law. Airswift addresses this by partnering with clients who uphold ethical and inclusive practices, helping reduce risks to these vulnerable populations.

Community Engagement

Airswift plays an important role in shaping positive community outcomes:

- Local hiring practices that promote regional economic development
- Support for education to expand access to STEM opportunities
- Client partnerships that align with responsible and ethical standards

At the same time, we recognise potential challenges such as:

- Limited access to STEM opportunities in underserved regions
- Reduced community inclusion due to non-local leadership
- Downstream impacts of client operations in sensitive areas

Through our charity and community impact initiatives we support:

- Education, sustainability and community well-being
- Ongoing risk assessments and internal compliance reviews to ensure alignment with our human rights commitments

Airswift's people-first culture strengthens our community impact. Employee experiences with global mobility, new career paths and shared philanthropy drive personal growth and help us build lasting, positive community relationships.

Case Study: Transforming Lives through Global Opportunity

Airswift's people-first culture is built on a belief that work can be a powerful force for personal transformation. From early careers to executive roles, employees around the world credit our mobility programs with shaping new paths and redefining their journeys.

One employee relocated from the UK to Australia, where they were supported in completing a professional diploma. Beyond career advancement, the move led to meaningful personal milestones including building a new life, friendships and family abroad. Another employee began their journey in Brazil as the first hire in a newly formed recruitment team. With management support and cross-cultural collaboration, they built a high-performing team before relocating to the U.S. to take on a new opportunity within the company.

Many employees have transformed their careers through international assignments. One began in the UK and took on roles in Mozambique, the UAE, Bahrain and Qatar. With early mentorship and a clear growth path, global work became a defining part of their journey.

Through career growth, global opportunities and purpose-driven work, we empower our people to grow in ways they may never have imagined.



Governance: People and Policy

2024 Progress Updates

- ISO 27001 — Certification complete
- ISO 37001 — Completed an external audit readiness assessment and identified a conflict in the Business Ethics Officer (BEO) role due to P&L duties—function will shift to the CHRO in 2025, with ISO 37001 certification to be reassessed in future years
- ISO 14001 — We appointed an Internal Audit Manager and implemented a company-wide Internal Control Framework over Financial Reporting (ICFR) to strengthen governance, enhance the integrity of financial reporting and reinforce transparency and accountability across all operations.

Airswift promotes ethical conduct through strong culture, clear policies and supplier accountability. We address risks like low employee engagement and bribery exposure with robust oversight, improved whistleblower protections and staff training. No corruption incidents were reported in 2024. We have a comprehensive set of policies that drive our corporate culture and business ethics inspired by global best practice.

Summary of Material IROs

ESRS G1 – BUSINESS CONDUCT

We work to strengthen employee engagement and well-being through inclusive practices and flexible policies. Clear reporting systems and whistleblower protections are in place to maintain accountability and trust. To guard against corruption and misconduct, we uphold strong internal controls and conduct regular policy reviews.



Business Ethics

Airswift has established clear procedures to independently and objectively investigate business conduct issues, including corruption and bribery, in line with its Code of Business Ethics (CoBE) and Anti-Bribery and Corruption policies. Investigations are led by the Quality Manager or BEO, tracked centrally and supported by proactive audits in high-risk areas. These procedures are reviewed regularly to ensure effectiveness and alignment with evolving regulations.

Key functions most exposed to bribery and corruption risks include:

- **Sales and business development** where contract negotiations may face undue influence
- **In-country leadership** due to involvement in supplier selection and sourcing
- **Finance and accounting** where improper payments could arise
- **Third-party management** where contractors or agents may engage in unethical practices

These risks are mitigated through due diligence, regular training, strict policy enforcement and financial oversight.

In 2024, there were no reported incidents of fraud, corruption or bribery, nor any legal actions or fines related to such violations.

Functions-at-risk

	AT-RISK FUNCTIONS	MANAGERS	AMSB	OTHER OWN WORKERS
TRAINING COVERAGE				
Total:	1,200	226	6	968
Total receiving training:	1,180	226	6	948
Percent total (%):	98	100	100	98
DELIVERY METHOD AND DURATION				
Classroom training (hours):				
Computer-based training (hours):	0.5	0.5	0.5	
FREQUENCY				
How often training is required:	Upon hiring, then every 3 years	Upon hiring, then every 3 years	Upon hiring, then every 3 years	
TOPICS COVERED				
Corruption	X	X	X	
Policy	X	X	X	
Procedures on suspicion/detention	X	X	X	
Tax evasion	X	X	X	
Modern slavery & human trafficking	X	X	X	

AMSB: Advisory, Supervisory and Management Bodies

Corporate Culture

Airswift's corporate culture is shaped by shared values and ethical standards embedded in the CoBE and employee handbooks. These values are reinforced through onboarding, training and leadership communications.

Leaders model core values daily, supported by tools like surveys and town halls to promote transparency. Culture is evaluated via annual engagement surveys, bi-annual performance reviews and ongoing feedback. Metrics like satisfaction, retention and ethics adherence guide continuous improvement and ensure alignment with employee and business needs.



Responsible Business Practices

Airswift maintains a comprehensive system to prevent, detect and address corruption and bribery, overseen by the BEO and grounded in global standards.

Preventative measures:

- Airswift's BEO ensures all anti-corruption policies are up-to-date and align with international best practices, including compliance with the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act.
- Policies articulate our zero-tolerance stance on bribery and corruption, emphasising education and training for employees, clients and suppliers on ethical practices.

Detection mechanisms:

- Whistleblowers can report suspected misconduct via confidential email or phone lines, with assurance of confidentiality and protection from retaliation.

Investigation protocols:

- The BEO oversees fair and impartial investigations into all allegations, ensuring no conflicts of interest.
- Investigations proceed through defined steps: initial logging of reports, preliminary assessments and, if warranted, comprehensive reviews conducted by internal teams or independent third parties.

Responsive actions:

- Outcomes of investigations may lead to corrective actions, including disciplinary measures or legal referrals for confirmed incidents.
- Airswift actively mitigates future risks by addressing systemic gaps identified during investigations.

Training and awareness:

- All employees undergo mandatory training on anti-bribery and corruption policies during onboarding and periodic refresher courses to reinforce compliance.

Governance and accountability:

- Top-level commitment from the CEO, CFO and Governance Board underlines the importance of integrity in all operations.
- Periodic audits and reporting to the Governance Board ensure ongoing effectiveness and adherence to ethical standards.



Case Study: – ISO27001 Certification

In 2024, Airswift received ISO 27001 certification, an international standard focused on information security, cybersecurity, and privacy protection. This significant milestone reflects our unwavering commitment to information security and underscores our dedication to excellence in all aspects of our operations. It is the first time we have held this prestigious certification, which demonstrates commitment to our digital transformation journey.



Significance of ISO 27001 for Airswift

- **Highest standard of security:** ISO 27001 is the gold standard for information security management systems. This certification assures our clients, partners and stakeholders that we adhere to the most stringent security practices to safeguard their valuable data.
- **Customer trust and confidence:** With ISO 27001 certification, we demonstrate our dedication to protecting the confidentiality, integrity and availability of information. Our clients can trust that their sensitive information is in safe hands, fostering stronger relationships and enhancing their confidence in our services.
- **Competitive advantage:** ISO 27001 certification sets us apart in the marketplace, demonstrating our proactive approach to security and our willingness to go above and beyond to meet the highest standards. It strengthens our competitive position and opens up new opportunities for growth and collaboration.
- **Global recognition:** ISO 27001 is recognised worldwide, providing us with international credibility and demonstrating our ability to meet the requirements of global clients and partners.
- **Continuous improvement:** Achieving ISO 27001 certification is not the end of our journey—it is just the beginning. This certification reflects our commitment to continuous improvement, as we continually assess and enhance our security measures to adapt to evolving threats and industry best practices.

Index I – Double Materiality Assessment Results

E1 Climate Change Material risks, impacts and opportunities

		LOCATION IN VALUE CHAIN	TIME HORIZON
CLIMATE CHANGE ADAPTATION			
Oil and gas downturn	Transition risk	Downstream	Short, medium and long-term
Increased share of renewable energy market	Opportunity	Downstream	Medium and long-term
Increased clients in energy transition	Opportunity	Downstream	Short, medium and long-term
CLIMATE CHANGE MITIGATION			
Business travel generates greenhouse gas emissions	Potential negative impact	Own operations	Short-term
Employee commuting generates greenhouse gas emissions	Potential negative impact	Own operations	Short-term
Environmental impact of company operations	Potential negative impact	Own operations	Medium and long-term
Supporting climate change mitigation through community initiatives	Actual positive impact	Own operations	Ongoing
ENERGY			
Energy consumption in office spaces results in greenhouse gas emissions	Actual negative impact	Own operations	Ongoing

S1 Own workforce Material risks, impacts and opportunities

SBM-3		LOCATION IN VALUE CHAIN	TIME HORIZON
WORKING CONDITIONS			
Violating working conditions and labour practices without proper audits	Potential negative impact	Own operations	Short-term
Undetected health issues affecting employee welfare	Potential negative impact	Own operations	Medium-term
Workplace accidents or impaired employee performance	Potential negative impact	Own operations	Short and medium-term
Insufficient emergency preparedness and employee safety	Potential negative impact	Own operations	Short-term
Employee burnout and low morale due to insufficient time off	Potential negative impact	Own operations	Medium-term
Reputational damage	Risk	Own operations	Medium and long-term
EQUAL TREATMENT & OPPORTUNITIES FOR ALL			
Violation of human rights such as discrimination, harassment, or bias in the workplace	Potential negative impact	Own operations	Short and medium-term
Limited career development opportunities and employee recognition leading to lower retention	Potential negative impact	Own operations	Medium-term
Strengthened diversity, equity, and inclusion within the workplace	Actual positive impact	Own operations	Ongoing
Inaccessibility of site or hardware for individuals with disabilities	Potential negative impact	Own operations	Short-term
Gender pay disparity or inequity in compensation	Potential negative impact	Own operations	Medium-term
Reputational damage	Risk	Own operations	Short, medium and long-term
Loss of diverse thought	Risk	Own operations	Medium-term
Positive reputation for equal representation	Opportunity	Own operations, Downstream	Medium and long-term
OTHER WORK-RELATED RIGHTS			
Employee stress or financial hardship due to insufficient support systems	Potential negative impact	Own operations	Medium-term
Lack of employee motivation without adequate incentives	Potential negative impact	Own operations	Medium-term
Comprehensive employee engagement through feedback and leadership involvement	Actual positive impact	Own operations	Ongoing
Addressing domestic violence in at-risk regions enhances employee well-being and safety	Actual positive impact	Own operations	Short-term
Healthy employees	Opportunity	Own operations	Short-term

S2 Workers in the value chain Material risks, impacts and opportunities

SBM-3		LOCATION IN VALUE CHAIN	TIME HORIZON
WORKING CONDITIONS			
Poor working conditions or unethical practices within the supply chain such as child labour and modern slavery	Potential negative impact	Own operations, Upstream, Downstream	Medium and long-term
Human rights violations and exploitation in the workplace	Potential negative impact	Own operations	Short and medium-term
Unsafe or unhealthy working conditions for value chain workers	Potential negative impact	Own operations, Upstream, Downstream	Short-term
EQUAL TREATMENT & OPPORTUNITIES FOR ALL			
Low contractor satisfaction due to lack of feedback and issue resolution mechanisms	Potential negative impact	Downstream	Medium-term
Favoured business partner	Opportunity	Downstream	Medium and long-term
OTHER WORK-RELATED RIGHTS			
Inadequate worker accommodations and health/safety risks on customer sites	Potential negative impact	Own operations	Medium-term
Favoured recruiter	Opportunity	Downstream	Medium and long-term

S3 Affected communities Material risks, impacts and opportunities

SBM-3		LOCATION IN VALUE CHAIN	TIME HORIZON
COMMUNITIES' ECONOMIC, SOCIAL AND CULTURAL RIGHTS			
Positive contribution to local economies and communities through local hiring	Actual positive impact	Own operations	Ongoing
Lack of access to STEM education and career opportunities	Potential negative impact	Own operations, Downstream	Long-term
Non-local hiring at the management level	Actual negative impact	Own operations	Ongoing
Opportunities for business development	Opportunity	Downstream	Medium and long-term
COMMUNITIES' CIVIL AND POLITICAL RIGHTS			
Protection of workers' rights through freedom of assembly	Potential negative impact	Own operations	Medium and long-term
Suppressed freedom of expression and freedom of assembly could lead to harm in the community	Potential negative impact	Own operations	Medium and long-term
RIGHTS OF INDIGENOUS PEOPLES			
Harm to indigenous communities from non-compliance with protections	Potential negative impact	Own operations	Medium and long-term

G1 Business conduct Material risks, impacts and opportunities

SBM-3		LOCATION IN VALUE CHAIN	TIME HORIZON
CORPORATE CULTURE			
Harm to corporate culture due to lack of employee engagement and feedback mechanisms	Potential negative impact	Own operations	Medium-term
Harm to corporate culture due to insufficient focus on employee well-being	Potential negative impact	Own operations	Medium-term
Lack of transparency and accountability due to insufficient reporting mechanisms	Potential negative impact	Own operations	Medium-term
Harm to corporate culture due to lack of employee work-life balance and rigid work policies	Potential negative impact	Own operations	Medium-term
Benefit to corporate culture due to enhanced employee financial well-being	Actual positive impact	Own operations	Ongoing
PROTECTION OF WHISTLEBLOWERS			
Insufficient whistleblowing process	Potential negative impact	Own operations	Short-term
Safety incidents and oversight gaps due to lack of timely incident reporting	Potential negative impact	Own operations	Short-term
Reputation – Failure to protect whistleblower	Risk	Own operations	Medium-term
MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS			
Insufficient whistleblowing process	Potential negative impact	Upstream	Medium-term
Safety incidents and oversight gaps due to lack of timely incident reporting	Potential negative impact	Upstream	Medium and long-term
CORRUPTION AND BRIBERY			
Increased risk of corruption and unethical practices due to lack of clear policies	Potential negative impact	Own operations	Medium and long-term
Corruption and unethical business practices	Potential negative impact	Own operations	Medium and long-term
Reputational damage	Risk	Own operations	Short, medium and long-term
Legal damage	Risk	Own operations	Medium and long-term



www.airswift.com