

Emirates Group Sustainable Procurement Policy

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1 Introduction

Emirates Group, a global leader in aviation, travel and related services, is committed to operational excellence while supporting a sustainable, resilient and responsible future. Sustainable procurement is a key enabler of this commitment and supports the Group's long-term value creation, risk management and reputation.

Sustainable Procurement at Emirates Group refers to the integration of environmental, social and governance (ESG) considerations into sourcing, supplier selection and supplier management decisions across the full lifecycle of goods, services and works. This approach supports responsible business conduct, strengthens supply-chain resilience and helps manage material ESG risks while delivering value for money.

This Policy provides a framework for integrating ESG considerations into procurement activities across Emirates Group. It is informed by and aligned with internationally recognised frameworks, including the United Nations Global Compact principles, ISO 20400 Sustainable Procurement Guidance, relevant International Labour Organization (ILO) conventions, and applicable regulatory requirements.

Emirates Group commits to a risk-based approach to environmental and human-rights due diligence across its value chain, consistent with applicable laws and internationally recognised standards.

2 Purpose

This Policy sets out Emirates Group's commitment to sustainable procurement and aims to:

- Integrate ESG considerations into procurement decision making in a consistent, proportionate and risk-based manner.
- Reduce adverse environmental impacts and support improved environmental outcomes across the supply chain, including resource efficiency and emissions reduction.
- Uphold internationally recognised human rights and fair labour practices across the supply chain.
- Support responsible economic development, innovation, supplier diversity and supply-base resilience.
- Ensure that suppliers and contractors operate in line with Emirates Group's expectations for sustainability, transparency and continuous improvement.
- Comply with applicable regulatory, industry and stakeholder expectations relating to responsible sourcing, due diligence and risk management.
- Contribute to the UAE's sustainability strategies' and Emirates Group's sustainability ambition.

Sustainable procurement is a shared responsibility across all departments and levels of the organisation. Supplier-specific requirements and minimum standards are detailed in the Emirates Group Supplier Code of Conduct and supporting procurement guidelines.

3 Scope

This Policy applies to all Emirates Group entities, subsidiaries, employees and third parties involved in procurement activities and governs the procurement of all goods, services and works across the Group.

Specific regulatory obligations, including mandatory due diligence requirements, apply where legally required and may differ by jurisdiction or Group entity.

Certain categories of procurement may present elevated ESG risks due to factors such as geography, sector, labour intensity, environmental impact or regulatory exposure. Examples may include labour intensive services, environmentally sensitive materials, high risk geographies or sectors subject to heightened regulatory scrutiny.

High ESG risk categories are identified through a formal, risk based process, with Procurement responsible for implementing proportionate due diligence and risk mitigation measures in collaboration with relevant stakeholders.

4 Principles

Emirates Group's approach to sustainable procurement is guided by the following principles. These principles inform procurement decision making, while detailed procedures, tools and controls are set out in supporting policies, manuals and guidelines.

4.1 Ethical and Responsible Business Conduct

Procurement activities are conducted with integrity, transparency and fairness, free from conflicts of interest, and in compliance with applicable laws, regulations and internal policies. These principles are applied in a manner proportionate to the nature, value and risk of the procurement activity.

- Corruption, bribery and unethical practices are not tolerated.
- Suppliers are expected to meet defined qualification requirements and comply with the Emirates Group Supplier Code of Conduct.
- Procurement decisions aim to foster responsible, long term supplier relationships that create sustainable value over time.

4.2 Environmental Responsibility

Environmental considerations are integrated into procurement activities where relevant, with the objective of minimising adverse environmental impacts and supporting improved environmental outcomes across the supply chain.

- Resource efficiency: Where feasible, prioritise goods and services that demonstrate improved resource efficiency and reduced environmental impact over their lifecycle.
- Emissions and climate: Encourage suppliers to measure, manage and progressively reduce greenhouse gas emissions and other environmentally harmful emissions.
- Supporting Biodiversity: Encourage suppliers to take steps to identify risks and impacts on biodiversity and habitats, and maintain a zero tolerance towards illegal trade of wildlife and wildlife products.
- Higher risk suppliers: For suppliers and categories presenting higher environmental risk, Emirates Group expects the identification, management and disclosure of material environmental impacts and will progressively require appropriate controls and improvements.
- Circular economy: Procurement supports circular economy principles through waste reduction, material efficiency and collaboration with suppliers to optimise product and service lifecycles.

4.3 Social Responsibility

Social considerations form part of Emirates Group's supplier selection, evaluation and ongoing monitoring processes, with the objective of protecting and respecting human rights and fair labour standards across the supply chain.

- Fair labour practices: Suppliers are expected to provide safe working conditions, lawful employment and respect for labour rights.
- Human rights: Emirates Group has zero tolerance for child labour, forced labour and all forms of modern slavery and will not engage with suppliers involved in such practices within their operations or value chains.
- Community Impact: Support local suppliers and small and medium-sized enterprises where feasible and commercially appropriate.

4.4 Governance Led Application of Principles

To operationalise these principles, Emirates Group applies a governance led approach to sustainable procurement, including:

- ESG based sourcing and evaluation criteria where relevant.
- Balanced decision making across cost, risk, sustainability impact and operational requirements.
- Integrate sustainability and due-diligence obligations into procurement contracts where applicable.
- Escalation and management of material ESG non compliance.
- Supplier engagement and development to support continuous improvement.
- Proportionate monitoring and assurance for higher risk suppliers.

5 Policy Ownership & Maintenance

Group Procurement and Logistics owns this Policy and is responsible for maintaining and reviewing it on an annual basis, or more frequently where required, in consultation with relevant stakeholders and in alignment with regulatory developments and best practice.

Material changes to this Policy require approval from the Chief Procurement Officer, with input from relevant functions such as Sustainability, Legal and Human Resources, as appropriate.

Business units may develop supplementary procedures provided they are consistent with and support this Policy.

6 Continuous Improvement, Monitoring and Review

This Policy will be reviewed every 12 months to ensure its ongoing effectiveness, relevance and alignment with Emirates Group's sustainability objectives and external requirements. Emirates Group will set measurable objectives to drive continuous improvement in sustainable procurement and will monitor progress against these objectives.

7 Communication

This Policy will be communicated to employees and existing, prospective and potential suppliers. It will be made publicly available through Emirates Group's website and supplier registration platforms

8 Related documents

- Emirates Group Procurement Policy – Internal Document
- Emirates Group Procurement Procedures Manual – Internal Document
- Emirates Group Procurement Sustainability Guideline – Internal Document
- Emirates Group Supplier Code of Conduct – Publicly available
- Emirates Group Anti-Slavery Statement – Publicly available
- Emirates Group Environmental Policy – Publicly available
- Anti-Bribery and Corruption Policy – Publicly available
- Anti-Slavery and Human Trafficking Policy – Publicly available
- Antitrust and Competition Law compliance – Publicly available
- Data protection – Publicly available
- Cybersecurity Technology Policy – Publicly available

All Internal and Publicly Available documents are found on <https://www.theemiratesgroup.com>

9 Whistleblower Protection and Anonymous Complaints

Emirates Group is committed to ethical business practices and encourages the reporting of legitimate concerns regarding potential or actual non compliance.

Concerns can be raised via email at: procurementconcerns@emirates.com. Additionally, concerns may also be reported via email to speakup@emirates.com, which is the Emirates Group Confidential Disclosure programme, managed by Group Internal Audit.

Emirates Group will take all reasonable steps to ensure that you are not victimized or subject to any form of retaliation or discrimination because of a confidential disclosure.

Suppliers are expected to inform their employees and subcontractors of available reporting channels and to maintain equivalent grievance mechanisms that protect whistleblowers from retaliation.

10 Conclusion

By adhering to this Sustainable Procurement Policy, Emirates Group aims to lead by example in promoting responsible and sustainable procurement practices across its value chain. The Group is committed to continuous improvement and welcomes feedback from stakeholders to strengthen its sustainability performance.

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