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Abra Group Limited

www.abragroup.net

Modern Slavery & Human Trafficking Statement

14 July 2026

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Revision history

Revision number	Date	Section	Changes made
00	14 July 2026	Entire document	Document creation

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INDEX

Modern Slavery & Human Trafficking Statement..... 4
Organisational structure and supply chain 5
Abra's supply chain 5
Policies in relation to modern slavery..... 7
Due diligence processes in relation to modern slavery 8
Risk assessments and management..... 9
Effectiveness 11
Training and awareness on modern slavery..... 12
Board Approval and Sign-off..... 14

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Modern Slavery & Human Trafficking Statement

(UK Modern Slavery Act 2015 – Section 54)

Organisation	Abra Group Limited ("Abra")
Registered address (UK)	1 Ashley Road, 3rd Floor, Altrincham, Cheshire, UK, WA14 2DT.
Financial year covered	*1 January 2025 to 31 December 2025*
Signed by	Rick Schifter Director, Vice-Chair of Abra Board of Directors Chair of the Abra Nominating and Governance Committee
Date of Board approval	14 July 2026
Date of publication	21 July 2026

This statement is published in accordance with section 54 of the Modern Slavery Act 2015 ("the Act"). It summarises the actions taken during the financial year from 1 January 2025 to 31 December 2025 ("FY25") to identify, assess and address modern slavery and human trafficking risks in our operations and supply chains. Modern slavery includes slavery, servitude, forced and compulsory labour, and human trafficking. This statement relates to companies within the Abra Group Limited group.

Following approval, this statement will be published on Abra's corporate website and submitted to the UK Government's Modern Slavery Statement Registry.

Abra recognises that modern slavery and human trafficking are significant issues presenting a challenge for businesses worldwide and we continue to build on the work carried out in previous years to identify modern slavery and human trafficking risks and strengthen preventative measures.

This statement is structured around the areas commonly recommended for disclosure under section 54 of the Act:

1. Organisational structure and supply chain
2. Policies in relation to modern slavery
3. Due diligence processes in relation to modern slavery
4. Risk assessments and management
5. Effectiveness
6. Training and awareness on modern slavery

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Organisational structure and supply chain

Abra Group Limited ("Abra", or together with its subsidiaries, the "Group"), is a leading air transportation group operating across Latin America and is the holding company of Avianca International Group Limited ("Avianca"), New Gol Parent S.A. ("GOL") and Wamos Air ("Wamos").

Abra's involvement in Wamos is governed by shareholder arrangements consistent with EU ownership regulations. Wamos operates independently of Abra from a corporate and regulatory standpoint, and therefore the steps taken by Wamos to address modern slavery and human trafficking risks may not always be fully visible to Abra, and as a result may not be detailed in this statement.

Abra represents one of the largest air transport platforms in the region. Amongst other locations, Abra operates in Colombia, Ecuador, Brazil, Chile, and El Salvador, as well as Spain, the United Kingdom, the United States, the Cayman Islands; Abra brings together the iconic GOL and Avianca brands under a single leadership team, alongside Wamos Air. This structure enables collaboration across areas such as procurement, governance, compliance, risk management, loyalty programmes (Lifemiles and Smiles), digital capabilities and operational expertise, supporting the sharing of good practices and the progressive development of Group-wide standards, while each airline brand retains responsibility for its own operations and regulatory obligations. The Group employs more than 30,000 aviation professionals and operates a fleet of over 325 aircraft, serving more than 145 destinations across 28 countries.

In FY25 Abra continued to focus on synergy realisation to drive value creation, with increased coordination across fleet, procurement, network, commercial, sustainability and loyalty. FY25 also saw strengthened governance and leadership with Board enhancements and the appointment of a Chief Procurement Officer, Chief Loyalty Officer, Chief Commercial Officer and Chief Corporate Responsibility Officer.

Abra carried over 71 million passengers in 2025, up 5.2% year over year, while capacity increased 11.6%. Load factor remained healthy at 81.3%, reflecting continued development of longer-haul and international flying across the platform. In 2025, Abra continued to strengthen its network by increasing frequencies at core hubs and selectively launching new routes in key international markets, supporting improved connectivity and utilisation across the platform. The Group closed 2025 with 325 total aircraft in the fleet and over 145 destinations served.

Abra's supply chain

Abra's services are delivered through airline networks connecting destinations across the Americas and Europe, supported by cargo operations, logistics solutions and commercial partnerships. Service delivery includes the transport of passengers and goods via aircraft operations and integrated logistics services, including the use of partner networks and third parties where relevant to enable service delivery and extend connectivity. Supplier categories include aviation services, repair and overhaul (MRO), aviation IT systems, logistics, fuel, recruitment, training, textiles and operational support reflecting a diversified and regionally embedded supply chain.

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The Group does not manufacture physical goods. Its business model is based on the provision of air transportation and related services delivered through its airline brands and associated platforms. Service delivery is carried out at airline level (including passenger, cargo and logistics operations), with group-level coordination, governance and oversight supporting alignment, efficiency and risk management.

Supplier data is gathered at airline brand level. In 2025, the Group had relationships with more than 18,000 suppliers, of which approximately 10,500 provided goods or services for which the Group incurred expenditure during the reporting period. The remaining suppliers were retained in supplier records due to existing contractual, administrative or historical business relationships but did not record spend during the year. This supplier base reflects the scale and operational complexity of the Group's airline activities across multiple jurisdictions. The Group sources goods and services regionally and globally through a diversified supplier base supporting core aviation activities. Suppliers are primarily located in Colombia, Brazil and the Americas and support functions including maintenance, logistics, flight operations, digital systems, ground handling, catering and professional services.

Abra operates as a coordinated group of airline brands across multiple countries, supported by centralised strategic functions and local execution. Its supply chain combines centralised sourcing strategy and joint negotiations with decentralised procurement activities managed by each airline brand, including supplier onboarding, contracting, and contract management.

Responsibility for supply chain management is shared between centralised and local functions. At the Group level, Abra leads sourcing strategy and aligns principles and control frameworks in coordination with legal, compliance, and finance teams. Oversight of responsible supply chain practices is coordinated at Group level through the alignment of principles and control frameworks and periodic monitoring of airline brand governance frameworks and disclosures. Supplier management and data are largely handled at the airline brand level. Each airline brand maintains its own supplier codes of conduct and compliance requirements, covering integrity, labour conditions, human rights, environmental management, and anti-corruption policies.

While Abra aligns high-level ESG principles and oversight across the Group, a fully standardised and centralised supplier assessment approach is still evolving. As a result, the Group's visibility is currently focused primarily on its direct (Tier 1) suppliers through procurement, contracting and supplier management processes. Visibility beyond direct suppliers remains limited, including in certain areas relating to sourcing practices, subcontracting arrangements and labour conditions within lower-tier suppliers. The complexity of the aviation and logistics supply chain, including the use of specialised suppliers, third-party service providers and global partner networks, may limit the Group's ability to comprehensively map and monitor all upstream activities. Consequently, visibility of potential human rights and modern slavery risks beyond the Group’s direct supplier base remains particularly challenging. The aviation industry also relies on a number of specialised suppliers and, in certain categories, a limited number of qualified providers, which may increase concentration and dependency risks and reduce visibility over some parts of the broader supply chain.

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Abra engages with a range of stakeholders across its operations and supply chain, including suppliers and contractors, supplier workers, airline brands, procurement and compliance functions, trade unions and employee representatives, government and regulatory authorities, local communities, civil society organisations and other stakeholders involved in responsible sourcing and labour rights. Engagement with these groups helps inform the Group's understanding of potential human rights and modern slavery risks within its operations and supply chain.

Our understanding of our operations and supply chains continues to evolve. Abra continues to strengthen its approach through enhanced coordination, increased alignment of processes across the Group, and the development of a more structured and risk-based approach to supplier management.

During the reporting period, Abra has further consolidated its view of its supplier base across airline brands, including improved visibility of key categories and geographies. In the next reporting period, Abra plans to prioritise strengthening the consistency of supplier data and enhancing its understanding of Tier 1 suppliers through more structured categorisation by geography, sector and risk profile. Abra also plans to explore opportunities to deepen its understanding of selected higher-risk areas of the supply chain where feasible. While visibility beyond direct suppliers remains limited, Abra intends to continue to take steps to improve transparency over time by taking a risk-based approach.

Policies in relation to modern slavery

Abra maintains Codes of Conduct and an Anti-Corruption Policy, and its Responsible Business Conduct frameworks are aligned with the principles of the UN Global Compact. The policies explicitly prohibit forced labour, abusive practices, discrimination, and harassment, and promote dignity, inclusion and respect for human rights across both our business and our supply chain.

The Code of Conduct is publicly available on our website. Employees and suppliers are expected to follow the expectations set out in the Code.

Employees across Abra Group are employed under arrangements governed by applicable local labour laws. These frameworks provide employment protections including non-discrimination, freedom of association, collective bargaining rights and the ability to voluntarily terminate employment in accordance with applicable legal and contractual requirements.

Abra expects its suppliers, business partners and, where applicable, their own supply chains to operate in a manner consistent with applicable laws, respect human rights, and uphold the principles set out in Abra's policies and standards. We reinforce our expectations of suppliers through a range of measures which can include contractual commitments and due diligence.

This group-level framework of policies is supported by airline brand-level codes and standards. Avianca has its own Code of Conduct, GOL has a Code of Ethics and Compliance Policy and Wamos maintains an internal Code of Ethics and Conduct.

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Relevant links:

- Abra code of conduct
- Avianca code of conduct
- GOL Code of Ethics

As our approach to managing human rights and modern slavery risks matures, we will continue to review and strengthen our policy framework to support greater consistency across the Group. In the next reporting period, Abra intends to further align internal expectations with internationally recognised standards and enhance clarity around supplier-related expectations embedded in contractual arrangements and codes of conduct. Abra also plans to continue to improve the accessibility and communication of relevant policies across the organisation and to suppliers where applicable.

Due diligence processes in relation to modern slavery

Due diligence is conducted through business partner due diligence processes covering suppliers, contractors and other third parties. A risk-based approach considers factors such as country, sector and ESG-related risks. Enhanced due diligence is applied to higher-risk relationships.

Supplier onboarding includes contractual requirements aligned with Abra's Code of Conduct and risk-based due diligence prior to engagement. This includes screening third parties against sanctions and restricted lists, verification of ownership and business activities, and completion of due diligence forms. Ongoing monitoring is performed through periodic re-screening and event-driven reviews to ensure continued compliance with regulatory and ESG requirements.

In addition, concerns relating to ethics, compliance, human rights, or potential modern slavery risks may be raised through established reporting mechanisms. We offer confidential and independent Whistleblowing Hotlines, operated by independent third parties, through which colleagues can raise concerns confidentially and, where permitted by law, anonymously. Reports are reviewed in accordance with established procedures and individuals raising concerns in good faith are protected from retaliation.

Abra recognises that its due diligence approach continues to evolve alongside the maturity of its governance and risk management frameworks. During the reporting period, due diligence processes were applied through supplier onboarding and ongoing monitoring activities. In the next reporting period, Abra intends to strengthen consistency across its airline brands by defining minimum Group-level expectations for due diligence activities and enhancing screening processes where feasible. This includes supporting the identification of higher-risk relationships and more structured periodic reassessment, where appropriate.

Avianca

As part of its commitment to human rights, Avianca has worked to embed due diligence processes across its operations and supply chain. Avianca has identified and prioritised key risks to support prevention and mitigation efforts affecting employees, customers, suppliers and communities. This

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approach is integrated into its management model and helps to support the management of risks that may affect people throughout its operations and supply chain.

Avianca's analysis integrated international standards such as the Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB), best practices identified through the Corporate Sustainability Assessment (CSA) of Standard & Poor's (S&P), sectoral frameworks such as IATA and the OECD, industry benchmarks, and internal strategic documentation. Through this process, Avianca identified and prioritised relevant risks considering their severity, likelihood, and remediation capacity, to support the prioritisation of measures for sensitive and critical processes.

In 2025, Avianca strengthened due diligence by updating risk mapping across direct operations and the supply chain, aligned with the United Nations Guiding Principles on Business and Human Rights (UNGPs), and supported by qualitative and quantitative analysis. Risk mapping is dynamic and may be updated periodically in response to significant changes in business model or operational contexts. Avianca has a secure and formal process for the onboarding of suppliers and third parties. As part of this process, due diligence is conducted to collect relevant information, including financial, legal, tax, and banking documentation, as well as any other information required based on the nature of the business relationship.

GOL

GOL has developed a structured due diligence process applicable to the assessment of third parties, including suppliers, as part of its Compliance programme. As established in the Compliance Policy, the Group conducts third-party due diligence as part of its compliance controls prior to contracting, with the objective of identifying, preventing and mitigating risks associated with third parties, including reputational and compliance risks. The Compliance function is responsible for carrying out this due diligence on third parties, where appropriate screening out those that may pose unacceptable risks to GOL, and monitoring higher-risk third parties and the related contracts.

Wamos

Wamos Air maintains an Ethics Channel through which employees and other relevant stakeholders may report potential breaches of its Code of Ethics and Conduct or applicable legislation. Reports are reviewed confidentially under the oversight of the Ethics Committee and Compliance function. The Code provides protection against retaliation for individuals who raise concerns in good faith.

Relevant links:

- Abra Ethics Channel
- Avianca Ethics Channel
- GOL Ethics Channel
- Wamos Ethics Channel

Risk assessments and management

Abra has begun implementing an Enterprise Risk Management framework designed to identify, assess, monitor and manage risks that may affect the achievement of its strategic and operational

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objectives. Supply chain and human rights considerations have been identified as material ESG topics and are being incorporated into risk assessment activities that form part of the framework. Modern slavery and human trafficking-related risks may arise within operations, business relationships and supply chains, and are considered as part of this.

Risk management responsibilities follow the Three Lines Model. Business management is responsible for identifying and managing risks within their areas, while the Corporate Risk function coordinates the risk assessment process, maintains the Corporate Risk Map and reports the Group's principal risks to senior management and the Audit Committee. Internal Audit provides independent assurance over elements of the risk management framework within the scope of its assurance activities.

The airline brands maintain risk management processes and controls tailored to their respective operational contexts and risk profiles.

Avianca

As part of its corporate risk management and human rights due diligence processes, Avianca has identified and prioritised several human rights risks, including:

- Right to privacy
- Freedom of opinion and expression
- Right to equality and non-discrimination
- Child labour
- Fair and safe working conditions/Right to rest and leisure time
- Human trafficking
- Forced labour
- Access to information

Action plans are being implemented to address these risks.

In relation to human trafficking, Avianca has carried out the following actions:

- Designed and formally issued a Human Trafficking Operational Protocol for flight crews, with a particular focus on cabin crew. The protocol provides guidance on identifying potential indicators of human trafficking and establishes reporting and escalation procedures for situations identified during flight operations
- Human trafficking awareness cards are available on all aircraft to support customer awareness. Additional passenger awareness activities were undertaken during the reporting period, including communications aimed at increasing awareness of human trafficking risks and encouraging the reporting of suspected concerns where appropriate.
- Training for both new and current cabin crew on human trafficking and the appropriate response protocols.
- Onboard announcements on selected routes to support awareness and prevention efforts.

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- Partnerships with Fundación Renacer (a civil society organisation that supports victims) and Colombia's Office of the Attorney General (the authority responsible for prosecuting these crimes) to strengthen Avianca's internal processes and deliver external awareness campaigns.

GOL

The use of suppliers potentially associated with forced labour has been identified as a key risk. GOL monitors key suppliers that have completed due diligence assessments. This monitoring includes verification against Brazil's Transparency List on Slave Labour ("*Lista Suja*"), an official public register maintained by the Brazilian Ministry of Labour and Employment that identifies employers found to have subjected workers to conditions analogous to slavery, supporting ongoing oversight and risk management efforts.

Continuous improvement

The Group intends to continue strengthening its approach to risk management through ongoing enhancements to governance, risk assessment, monitoring and reporting practices. In addition, key initiatives implemented across the airline brands are being evaluated to identify and standardise best practices, supporting their consistent adoption across the Group.

Effectiveness

Abra maintains policies, procedures and reporting mechanisms designed to support ethical conduct and the identification, escalation and management of potential concerns or breaches.

The Abra Management Committee oversees the establishment of goals and key performance indicators. ESG Committees within each airline brand support the development, monitoring and operational delivery of these indicators.

Abra's current effectiveness monitoring focuses on selected training, due diligence, risk management and reporting indicators. The use of ethics and whistleblowing channels, together with operational escalation pathways, forms part of the Group's approach to monitoring whether potential human rights, modern slavery or human trafficking concerns are identified, reviewed and addressed. Where concerns are raised, they are handled in accordance with applicable procedures, confidentiality requirements and non-retaliation commitments.

During the reporting period, one suspected human trafficking case was identified through airline-level operational processes and escalated in accordance with established protocols. The matter was addressed through the relevant internal reporting and response pathways, with appropriate consideration of confidentiality, safeguarding and cooperation with competent authorities where applicable.

Avianca

Avianca monitors and tracks the following KPIs:

- KPI 1: Percentage of employees represented by an independent trade union or covered by collective bargaining agreements.

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  - In 2025, 37% of employees in Colombia, 28% in Argentina and 100% in Mexico were represented by an independent trade union or covered by collective bargaining agreements.
- KPI 2: Number of new and active employees who completed human trafficking awareness training.
  - In 2025, 1,470 new and active employees completed human trafficking awareness training.
- KPI 3: Number of code of conduct-related breaches regarding discrimination and harassment.
  - In 2025, 0 breaches were identified regarding discrimination and harassment.

GOL

GOL monitors and tracks the following KPI:

- KPI 1: Percentage of employees who completed human trafficking training.
  - In 2025, 63% of employees eligible for human trafficking training completed the programme.

Continuous improvement

Abra recognises that its current indicators do not yet provide a fully comparable Group-wide view of modern slavery risk management. As its approach continues to mature, Abra intends to develop a core set of Group-level indicators to support more consistent monitoring of modern slavery-related activities across the airline brands (including indicators relating to supplier due diligence, training coverage for higher-risk roles, and the operation of reporting and escalation mechanisms) and, where appropriate, establish targets to support future implementation and performance monitoring. Abra also intends to strengthen the consistency of data collection and improve alignment between identified risks and monitoring metrics to support continuous improvement.

Training and awareness on modern slavery

To support colleagues in understanding the risks of modern slavery and human trafficking in our operations and supply chains, we provide relevant training. Training may include topics such as human trafficking awareness, identification of potential warning signs, ethical conduct, reporting mechanisms and escalation procedures for raising concerns related to human rights, ethics, compliance or potential modern slavery risks. In addition, over 5,500 employees participated in inclusion-related programmes during the reporting period, contributing to broader awareness of workplace conduct and human rights-related topics.

Abra recognises the importance of training and awareness in supporting the identification and mitigation of modern slavery risks. During the reporting period, training was delivered across relevant functions, including operational and compliance-related roles. In the next reporting period, Abra will seek to further strengthen its training approach by expanding coverage to functions with higher exposure to supply chain risks, including procurement, supplier engagement and operational teams. Abra will also continue to enhance the consistency of training content across airline brands while maintaining flexibility for local adaptation. Training programmes currently reflect the different

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operational contexts and maturity levels of the airline brands. The Group continues to evaluate opportunities to improve consistency in training content, coverage and reporting.

Training complements the Group's broader due diligence and risk management activities by supporting awareness and the identification of potential concerns.

Avianca

Avianca carries out training for both new and current cabin crew on human trafficking and the appropriate response protocols. Training content and awareness activities have been informed through collaboration with specialist organisations, including *Fundación Renacer* and relevant public authorities, supporting the development of awareness materials and response protocols. In 2025, 1,470 employees in operational roles completed human trafficking awareness training. In-person awareness sessions are based on human trafficking and the appropriate response protocols.

GOL

GOL offers a range of training programmes covering for example ethics and compliance, security and emergency training, which include human trafficking modules. These are made available to its operational teams which include airport employees, mechanics, pilots and cabin crew, as well as employees working in GOLLOG stores and cargo terminals. These programmes are delivered through a mix of e-learning, live instructor-led online training and in-person training. The training curriculum is developed internally through the GOL Academy and is informed by guidance from IATA and the Brazilian Civil Aviation Authority (ANAC). The training was introduced through a phased roll-out, the completion rate relates to eligible employees in the operation teams rather than the total workforce indicated on the previous section.

Continuous improvement

Abra recognises that its modern slavery risk management approach is continuing to mature. In the next reporting period, Abra plans to focus on strengthening supply chain transparency through a phased and risk-based approach, improving alignment of supplier expectations across airline brands, enhancing the consistency of relevant indicators, and considering further training and awareness activities where appropriate. These actions will build on existing governance, procurement, compliance and risk management processes and will be monitored through relevant management and ESG governance forums.

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Board Approval and Sign-off

This statement was approved by the Board of Directors of Abra on 14 July 2026.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes Abra's slavery and human trafficking statement for the financial year ended 31 December 2025. It has been approved by the Board of Directors of Abra Group Limited and signed on their behalf by:

DocuSigned by:
Rick Schifter
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Rick Schifter

Director, Vice-Chair of the Abra Board of Directors

Chair of the Abra Nominating and Governance Committee

14 July 2026

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