



2025

SUSTAINABILITY
REPORT



Towards a More Sustainable Future

Concern for the future of coming generations has guided the work carried out by the SATA Group. Building a more balanced relationship with nature and the community is a collective and ongoing effort that requires constant adaptation to new challenges. More than an isolated project, it represents a responsible way of acting in both life and business. Investing time and resources in initiatives that promote environmental and social sustainability is a priority for the Group.

Table of contents

1 General disclosures

- 4 KEY ESG FIGURES IN 2025
- 6 1.1. ABOUT THE REPORT
- 8 1.2. SUSTAINABILITY GOVERNANCE MODEL
- 9 1.3. APPROACH TO SUSTAINABILITY
- 14 1.4. STAKEHOLDER ENGAGEMENT
- 16 1.5. DOUBLE MATERIALITY ANALYSIS

2 Environmental

- 21 2.1. APPROACH TO CLIMATE CHANGE
- 29 2.2. AIR POLLUTION
- 30 2.3. BIODIVERSITY PROTECTION
- 32 2.4. EFFICIENT WASTE MANAGEMENT

3 Social

- 37 3.1. OUR PEOPLE
- 44 3.2. QUALITY AND SAFETY IN CUSTOMER SERVICE

4 Governance

- 47 4.1. BUSINESS ETHICS AND INTEGRITY
- 50 4.2. SUPPLIER RELATIONSHIP MANAGEMENT
- 52 4.3. CYBERSECURITY AND DATA PROTECTION

5 Annexes

- 56 ENVIRONMENTAL TAXONOMY
- 57 METHODOLOGICAL NOTES
- 60 ESRS TABLE

Key ESG
figures in
2025



Energy consumed (MWh)

1,134,362

Waste (t)

126



Environmental

Scope 1 Emissions (tCO₂e)

294,381

Scope 2 Emissions (tCO₂e)

822

Scope 3 Emissions (tCO₂e)

110,049

Emissions per passenger-kilometre (gCO₂/PKM)

79



Social

Employees

1,875  59% MEN
 41% WOMEN

Training hours per employee

56

100%

Employees covered by health and safety systems

96%

Employees with permanent contracts

Governance

14%

Women in top management positions

Incidents of non-compliance with the Code of Ethics and Conduct

0

Compromised credentials or cybersecurity incidents with material impact

0

1.1 About the report

[ESRS 2 BP-1, BP-2, GOV-3]



The SATA Group's Sustainability Report for fiscal year 2025 was prepared on a consolidated basis, in accordance with the financial statements for the period between January 1 and December 31, 2025.

The consolidation perimeter includes the following entities: SATA Air Açores - Sociedade Açoriana de Transportes Aéreos, SA (hereinafter referred to as SATA Air Açores), SATA Internacional - Azores Airlines, SA (hereinafter referred to as Azores Airlines), SATA Gestão de Aeródromos, SA (hereinafter referred to as SATA Gestão de Aeródromos), and SATA Holding, SA (hereinafter referred to as SATA Holding).

This Sustainability Report represents a first exercise in aligning with the requirements of the European Corporate Sustainability Reporting Directive (CSRD) and the revised version of the European Sustainability Reporting Standards (ESRS), proposed by EFRAG in November 2025. The report also highlights SATA Group's contribution to the Sustainable Development Goals (SDGs). With this approach, the SATA Group reinforces its commitment to transparent communication with stakeholders and to ensuring reporting in accordance with the key sustainability reporting standards.

The reported content covers

the material impacts, risks, and opportunities (IROs) associated with SATA Group's activities, both in terms of its own operations and its upstream and downstream value chain, whenever such information is relevant and required by applicable regulations. The management of these issues - including policies, measures, targets, and their respective performance - is presented throughout the report, reflecting the Group's integrated approach to sustainability.

In this first alignment cycle, only information considered relevant and available at the date of publication is disclosed, without incurring unreasonable efforts and using the phasing options foreseen in the ESRS, while maintaining the commitment to strengthen and deepen the quality of disclosures in future exercises.

The **Methodological notes** and the **ESRS Table** in the annexes indicate the applicable disclosure requirements reported by the SATA Group, in accordance with the **Double materiality analysis**.



Due diligence procedure

At SATA Group, due diligence is understood as a cross-cutting process, presenting from the planning of activities to the way risks are assessed and business relationships are conducted, reinforcing responsible and preventive management in all external interactions. In this context, in 2024, the implementation of an integrity due diligence procedure applicable to third parties with whom the Group interacts was initiated, with the

aim of establishing a structured process for assessing integrity risks in the financial, compliance and sustainability dimensions. This is an ongoing measure that is still in the implementation phase within the process of evaluating and engaging third parties (more information in [4.2. Supplier relationship management](#)).

Due diligence elements applied by SATA Group

Chapter

Integrate due diligence into governance, strategy, and business model

[4.2. Supplier relationship management](#)

Engage in dialogue with affected stakeholders at all essential stages of due diligence

[3.1. Our people](#)
[3.2. Quality and safety in customer service](#)
[4.1. Business ethics and integrity](#)
[4.2. Supplier relationship management](#)

Monitor the effectiveness of these efforts and communicate

[4.2. Supplier relationship management](#)

1.2 Sustainability governance model

[ESRS 2 GOV-1, GOV-2]



This framework allows for a structured response to environmental, social, and ethical priorities, reinforces the ability to anticipate risks and seize opportunities, leveraging the potential for responsible, long-term value creation.

Monitoring these issues at the highest level thus ensures consistency and transparency, guaranteeing that sustainability is treated as a central pillar of the strategy and not as an isolated domain.

Integrating sustainability into companies' strategic management is essential for strengthening stakeholder confidence and guiding informed and consistent decisions.

At SATA Group, the management of sustainability-related matters at the highest level is ensured by the Board of Directors (BoD), which assumes strategic oversight of these issues. The Chairman and the Executive Member of the BoD are responsible for overseeing the departments responsible for sustainability and other related and material matters for the Group, including environment, occupational health and safety, data protection, governance, and legal compliance. The BoD is also responsible for approving and monitoring the implementation of policies and codes of conduct, ensuring the transversal alignment of SATA Group's principles and values throughout the organization and its business relationships.

The Sustainability Directorate of the Group is responsible for operationalizing sustainability actions, promoting collaboration with various internal areas and integrating these principles into management, ensuring the definition, implementation, and monitoring of environmental and social initiatives

and goals, as well as reporting aligned with the main ESG frameworks. The approval of material sustainability topics resulting from the double materiality analysis, as well as the definition, review, and approval of the sustainability strategy for managing material impacts, risks, and opportunities, is the responsibility of the BoD, based on proposals presented by the Sustainability Directorate.

The Sustainability Directorate, which reports directly to the BoD through meetings, monitors developments and best practices in the sector with the relevant authorities and industry entities, through active participation in various events, from forums, workshops, working groups, webinars, insight sessions and capacity-building actions related to the various areas of sustainability.

In 2025, the Sustainability Department of the SATA Group participated in approximately 85 training actions



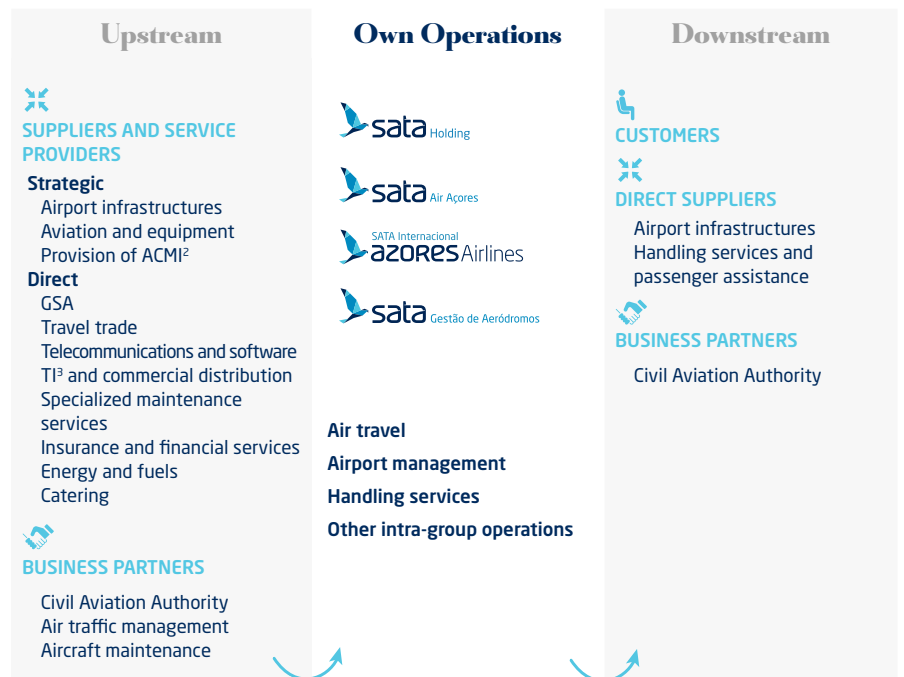
Approach to sustainability

[ESRS 2 SBM-1]

In a constantly transforming sector, SATA Group believes that sustainability is not just a commitment, but a path that guides it, as an airline operator, to take daily responsibility for contributing to a more responsible future, integrating sustainable practices at the heart of its strategy and the decision-making processes.

The SATA Group's business model is based on providing: passenger air transport services, as the main source of revenue and environmental and social impact; air cargo and mail transport services, contributing to the supply of regions and logistical efficiency; and related aeronautical services, such as third-party assistance and maintenance, which ensure mobility and connectivity and reinforce the safety of the operations. SATA Group operates in the regional, national, and international markets, influenced by the demand of its main clients, whether due to tourism seasonality, the mobility needs of residents and VFR¹, students, institutional and corporate clients, and cargo and mail shippers.

The Group operates within a broad and interdependent value chain, involving critical suppliers, operational partners, regulatory bodies, and other relevant stakeholders, which generates direct impacts on customers and passengers, communities and destinations, reflecting the inherent complexity of providing air transport services and associated aeronautical activities.



In this context, sustainability plays a central role in the Group's strategy, not only as a response to regulatory demands and the growing expectations of stakeholders, but also as an essential condition for ensuring business resilience, future competitiveness and the preservation of the ecosystems and communities that depend on its operations.

This premise guides the SATA Group's actions and underpins the construction of a long-term approach, materialized in the Strategic Plan 2022-2050. Throughout 2025, several initiatives were implemented within the ESG (environmental, social, and governance) pillars, detailed throughout this report, which reflect this commitment and the alignment between the Group's activity and the Sustainable Development Goals (SDGs).

¹ Visiting Friends and Relatives (VFR).

² Aircraft Crew Maintenance Insurance (ACMI).

³ Information Technology (TI).

Sustainable Development Goals

The SATA Group identifies seven priority SDGs - 2, 3, 5, 8, 12, 13, 15 -, to which it contributes by reducing the impacts associated with its activity and promoting the organization's sustainable progress. For SDG 16, the Group also has an indirect influence, notably through establishing partnerships with organizations that develop projects focused on social and environmental causes.



By 2030, end hunger and ensure access by all people, in particular the poor and people in vulnerable situations, including infants, to safe, nutritious and sufficient food all year round.

Indicator: Prevalence of moderate or severe food insecurity in the population, based on the Food Insecurity Experience Scale (FIES).



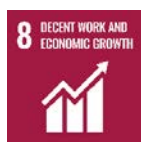
By 2030, reduce by one third premature mortality from non-communicable diseases through prevention and treatment and promote mental health and well-being.

Indicator: Suicide mortality rate.



Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.

Indicator: Proportion of women in managerial positions.



By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.

Indicator: Average hourly earnings of female and male employees, by occupation, age and persons with disabilities.



Achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment.

Indicator: Hazardous waste generated per capita and proportion of hazardous waste treated, by type of treatment.



Integrate climate change measures into national policies, strategies and planning.

Indicator: Total greenhouse gas emissions per year.



Take urgent action to end poaching and trafficking of protected species of flora and fauna and address both demand and supply of illegal wildlife products.

Indicator: Proportion of traded wildlife that was poached or illicitly trafficked.



Partnerships, commitments and certifications

for the sustainable transition of aviation



Manifesto of the Aviation Sustainability Alliance

SATA Group is a signatory to the Manifesto of the Aviation Sustainability Alliance (ASA), a government initiative created within the framework of the National Roadmap for the Decarbonization of Aviation (RONDA), which mobilizes the national aeronautical ecosystem around common sustainability objectives - from decarbonization, operational efficiency, innovation and promotion of sustainable fuels (SAF), to strengthening the social and economic dimensions that ensure a more responsible, competitive aviation sector aligned with national and European goals.

Carbon Management Program

SATA Group participates in the Carbon Management Program of ANA Aeroportos, within the scope of the Airport Carbon Accreditation (ACA) certification of João Paulo II Airport, for levels 4 and 5. This program aims to define joint strategies between ANA Aeroportos and the main stakeholders in airport operations to reduce associated carbon emissions. In this context, the SATA Group is part of three working groups: Aviation, focused on air operations; Handling, centered on ground operations; and Energy, which addresses energy consumption and the transition to renewable energy.

GRACE Azores Cluster

SATA Group is a founding member of the GRACE Azores Cluster, promoted by GRACE - Empresas Responsáveis, a global movement that brings together companies committed to integrating sustainability into business management. The Cluster promotes regional, sectoral and thematic working groups dedicated to sharing best practices, creating synergies and developing knowledge and collaborative initiatives. SATA Group's participation reinforces its commitment to contributing to the development of the communities where it operates and to promoting more responsible business environments.



APCER Certification



SATA Group is certified by APCER under the NP 4469:2019 standard - Social Responsibility Management, which recognizes the integration of responsible practices in organizational management through a Social Responsibility Management System supported by the implementation of policies and objectives. This certification confirms the Group's commitment to ethical principles, fair labor practices, continuous improvement, and stakeholder engagement, reinforcing its role as a socially responsible organization.

AZEA

SATA Group is part of the Alliance for Zero Emission Aviation (AZE), an European Commission initiative that brings together airlines, airports, manufacturers, regulators, and technology entities with the goal of accelerating the development and adoption of zero-emission aircraft, particularly electric and hydrogen-powered aircraft. By joining this alliance, the Group positions itself at the forefront of the sector's energy transition, closely following technological developments, contributing to solutions tailored to the specificities of island operations, and benefiting from specialized knowledge and international cooperation.



Sustainability Charter of the Azores

In addition to integrating sustainability as a strategic pillar in its activity, the SATA Group also assumes an active role in promoting the sustainable growth of the Autonomous Region of the Azores (ARA). Reinforcing this commitment, SATA Group is a signatory of the Sustainability Charter of the Azores, an initiative of the Regional Government of the Azores that supports organizations in integrating sustainability practices into their business model, through the provision of specialized technical support, capacity-building mechanisms, and support tools and resources.



Ecovadis

For the second consecutive year, the companies of the SATA Group responded to ECOVADIS, one of the leading international platforms for analyzing and classifying companies' performance in sustainability matters, which also contributes to the ESG risk management of suppliers. In 2025, SATA Gestão de Aeródromos submitted its performance to the ECOVADIS questionnaire for the second time, maintaining its Silver Medal.

Azores Airlines obtained the Bronze Medal after the evaluation carried out in 2025. Despite the setback in the ranking, it continues to work towards returning to the Silver medal in a future evaluation and advancing on its journey to achieve the Gold medal.

Following the evaluation carried out in 2025, SATA Air Açores had its classification suspended due to discrepancies in the analysis. Despite

IEnvA



IEnvA (IATA Environmental Assessment) is an environmental assessment system developed by IATA to support airlines in adopting sound environmental management processes aligned with the requirements of the aviation sector. This program certifies that organizations implement structured and effective practices, ensuring the monitoring and continuous improvement of their environmental performance. SATA Air Açores and Azores Airlines are certified according to IEnvA, being the first Portuguese airlines to achieve this milestone. The companies' certification covers the areas of flight operations, corporate activities, and MRO¹, the latter of which was audited in 2025 as part of the certification process.

this, it continues to work towards returning to the Silver medal in a future evaluation and advancing on its journey to achieve the Gold medal.

SATA Group thus reinforces its commitment to the continuous improvement of its environmental, social and governance practices, with the aim of consistently raising its performance in future assessments.



¹ Maintenance, Repair and Overhaul (MRO).

1.4 Stakeholder engagement

[ESRS 2 SBM-2]



The SATA Group operates within a complex ecosystem, where different stakeholders influence and are influenced by its activity.

Therefore, the Group promotes continuous engagement that allows it to understand their expectations, better interpret the context in which it operates, and adjust practices whenever necessary. Through this ongoing dialogue, emerging themes are identified, risks and opportunities are anticipated, and practices are adjusted to ensure evolution is aligned with stakeholders' priorities.



The SATA Group is an organization that values relationships based on trust, transparency and close collaboration.



To this end, it integrates the contributions of its employees, clients, strategic partners, agencies, operators and other stakeholders into the management processes, strengthening the efficiency, quality, and reliability of the services provided. In this context, the BoD is regularly informed about the perspectives of different stakeholders, namely through meetings and reports from the various departments, as well as through meetings held directly with social partners and employee representatives, and the distribution of newsletters.

<i>Stakeholder</i>	<i>Engagement mechanism</i>	<i>Objectives</i>
 CUSTOMERS	- Customer service counters at the airport; - On board the aircrafts; - Institutional Website; - Social media.	Guarantee an effective service, provide up-to-date information, and collect contributions for the continuous improvement of the service.
 AGENCIES, OTAS¹, CONSOLIDATORS, OPERATORS	Institutional meetings, when necessary.	Strengthen commercial cooperation and integrate relevant recommendations for operations and market offerings.
 PARTNERS GSA²	Monthly meetings.	Promote and publicize the services of Azores Airlines and SATA Air Açores to expand the area for attracting passenger flows, strengthen their presence in the markets and increase sales volume, through closer relationships with travel agents, tour operators and OTAs.
 EMPLOYEES	Organizational Climate assessment conducted periodically.	Identify opportunities for improvement in internal management to guide the definition of measures to be implemented and to update the Psychosocial Risk Assessment, monitoring critical factors and ensuring a safe and healthy work environment.
 TRADE UNIONS	Meetings are held whenever legally required or when negotiations are underway, usually monthly.	Promote dialogue on working conditions and relevant labor issues.
 WORKERS' COMMITTEE	Meetings are held whenever legally required or when the consideration of relevant matters is justified, usually monthly.	Ensure employee participation in matters related to labor management and relevant Group decisions.
 STRATEGIC SUPPLIERS	Regular meetings with varied frequency depending on the supplier and the topics to be discussed.	Continuous monitoring of fleet operation and maintenance, ensuring a rapid response to critical situations and guaranteeing business continuity, including technical performance, maintenance needs, material supply, warranty management, invoicing, intervention planning, and reliability analysis.

¹ Online Travel Agencies (OTAs).

² General Sales Agent (GSA).

1.5

Double materiality analysis

[ESRS 2 SBM-3, IRO-1]

In 2025, as part of its strategic sustainability plan, the SATA Group developed the double materiality analysis process, in accordance with CSRD and the requirements established by ESRS.

This exercise made it possible to identify the material impacts, risks, and opportunities (IROs) associated with the activities of the SATA Group, considering its interaction with the strategy, business model, and the various actors in the value chain, which integrates a comprehensive set of operational and support activities

essential to the provision of air transport services (more information in [1.3. Approach to sustainability](#)).

The results of this analysis form the basis for the SATA Group’s strategic alignment on sustainability issues, as well as for the preparation of the corresponding report.

The analysis was conducted according to the two dimensions that comprise the concept of double materiality:

Impact Materiality ("inside-out" view)	Financial Materiality ("outside-in" view)
Assesses the actual or potential impacts of the SATA Group’s activities on the environment and society.	This study analyses how environmental, social, and governance issues can influence the financial performance of the SATA Group, its strategic resilience, and its capacity for the value creation.
Impacts are classified as: - Positive or negative; - Real or potential; - For potencial impacts, the time horizon (short, medium or long term) in wich they may occur in the future is identified; - For negative impacts, it is identified whether they have an effect on human rights.	Risks and opportunities are classified according to their time horizon of occurrence in the future (short, medium, or long term).

As a result of the double materiality analysis carried out, 27 material IROs were identified (15 impacts and 12 risks and opportunities), corresponding to 8 material topics, of which 7 are aligned with topics established by the ESRS and one constitutes an entity-specific topic of the SATA Group (Cybersecurity).

ESRS Standard	Topic	Sub-topic	Impact Materiality	Financial Materiality	Chapter
Environmental					
ESRS E1	Climate change	Climate change adaptation		●	2.1. Approach to climate change
		Climate change mitigation	●	●	
		Energy	●	●	
ESRS E2	Pollution	Air pollution	●	●	2.2. Air pollution
ESRS E4	Biodiversity and ecosystems	Impacts on the state of species		●	2.3. Biodiversity protection
ESRS E5	Circular economy	Resource inflows	●	●	2.4. Efficient waste management
		Waste	●		
Social					
ESRS S1	Own workforce	Working conditions	●	●	3.1. Our people
		Equal treatment and opportunities for all	●		
ESRS S4	Consumers and end-users	Information-related impacts for consumers and/or end-users	●		3.2. Quality and safety in customer service
		Personal safety of consumers and/or end-users	●		
Governance					
ESRS G1	Business conduct	Corporate culture		●	4.1. Business ethics and integrity
		Political influence, including lobbying activities		●	
		Management of relationships with suppliers		●	4.2. Supplier relationship management
SATA Group's Entity-specific Topics					
-	Cybersecurity	-	●		4.3. Cybersecurity and data protection

Legend: ● Material from an impact and/or financial view.



Material IROs directly influence SATA Group’s strategy and business model, especially considering climate demands, regulatory costs, and operational efficiency needs. These factors have a cross-cutting impact on the value chain and condition decisions related to fleet, fuel, route planning, and reporting. In response, the Group has been reinforcing efficiency measures, promoting the gradual modernization of the fleet, optimizing operations, and integrating sustainability risks and opportunities into decision-making processes, strengthening resilience and the creation of sustainable value.

Impacts, risks and opportunities identification and evaluation process

The double materiality analysis was developed in four main stages:

1 Comprehension	2 Identification	3 Evaluation	4 Definition
Mapping the value chain (upstream, own operations and downstream). Identification of potentially material ESG issues for the passenger and cargo air transport sector. Stakeholder consultation.	Identification of IROs for potentially material ESG issues previously identified, based on the SATA Group’s risk management process and benchmark analysis of peers and industry references. IRO Classification.	Definition of the assessment criteria applicable to impact and financial materiality. Assessment of impact materiality and financial materiality by internal teams of the SATA Group.	Definition of applicable impact and financial materiality thresholds. Identification of IROs that are above the selected thresholds. Calibration of results. Validation of the final list of material IROs and their respective ESG topics.

The identification of IROs was based on a comprehensive analysis of SATA Group's activities throughout the value chain, considering its own operations, impacts on the environment and people, and interactions with employees, suppliers, business partners, customers, and other relevant stakeholders, along with an analysis of the context of the passenger and cargo air transport sector. In this way, it is ensured not only alignment with industry's best practices but also a complete approach to the dimensions that must be considered within the framework of dual materiality.

The impacts were assessed for severity, determined based on the criteria of scale (severity of the impact), scope (extent of the impact), and irremediability (ability to remedy the effects of the negative impacts), each rated from 1 (low) to 5 (high). For potential impacts, their probability of occurrence was also assessed, from 0.2 (low) to 1 (almost certain). In the case of negative impacts on human rights, the assessment was based exclusively on the severity of the impact, which prevails over probability, in accordance with ESRS requirements.

In the scale criteria, the perspectives of key stakeholders were also considered, obtained through a consultation process via an online questionnaire, which allowed for the assessment of their perception regarding the impact of SATA Group's activities on various sustainability issues. In this process, 20 stakeholders were consulted, representing employees, customers, suppliers, and strategic partners.

The risks and opportunities were assessed considering the magnitude of the financial impact on the Group, using a scale of 1 to 5 defined according to the relevant economic values, and the probability of occurrence.

Based on the assessment results, the IROs were prioritized by applying thresholds - 3.1 for impact

materiality and 1.3 for financial materiality - thus determining the material IROs for the SATA Group and their respective sustainability themes. The results of this exercise, subsequently presented to the BoD, also allowed for the determination of applicable disclosure requirements, in alignment with the ESRS. The material themes, as well as a detailed description of the respective IROs, are presented throughout this report in the Environmental, Social and Governance sections.

The same exercise also identified that the topics Water and marine resources (ESRS E3), Workers in the value chain (ESRS S2) and Affected communities (ESRS S3) are not material to the Group, so the respective disclosure requirements are not covered in this report.



Environmental

Commitment to SDGs:



2.1 Approach to climate change

[ESRS E1-4 a E1-8; ESRS 2 GDR]

Sub-topic	Description	Type	Value Chain	Real Potential
Climate change adaptation	Increased fuel consumption due to changing wind patterns can lead to higher operating costs	R	OP	
Climate change mitigation	The use of fossil fuels in air and land transport operations leads to the production of significant GHG ¹ emissions, resulting in a negative impact on the environment and contributing to the worsening of climate change.	I-	U, OP, D	
	Changes to various legal regulations in the environmental field can cause variations in the price of carbon licenses, waste recovery rates, the application of fines, and the need for progressive investment in ecological solutions and new technologies, significantly increasing operational costs.	R	OP	
Energy	The use of more energy-efficient/fuel-efficient equipment and technologies allows for reduced fuel consumption by aircraft, thereby reducing the environmental impact of activities associated with GHG emissions.	I-	OP	
	Investing in more energy/fuel-efficient fleets and technologies can meet the growing demand for more sustainable solutions, leading to increased market share, as well as long-term operational savings, reduced cost volatility, and reduced regulatory risks.	O	OP	

Material impacts, risks and opportunities related to climate change, as a result of the double materiality analysis process (more information in [1.5. Double Materiality Analysis](#)):

Legend:

I+ > Positive Impact
I- > Negative Impact
R > Risk
O > Opportunity
OP > Own operations
U > Upstream
D > Downstream

 > Real
 > Potential in short-term
 > Potential in medium-term
 > Potential in long-term

¹ Green House Gas (GHG).

The aviation sector is globally recognized to have a significant environmental footprint, despite contributing only about 2% to 3% of global anthropogenic CO₂ emissions.

This reality results mainly from the high energy intensity of its operations and the strong dependence on fossil fuels in the current air mobility model. At the same time, the worsening of climate change translates into more frequent and severe weather phenomena, impacting flight efficiency, connection regularity and operational resilience.

This scenario, coupled with the growing demand for air transport and the high complexity associated with decarbonizing the sector, has intensified regulatory pressure and stakeholder expectations, driving the sector towards a transformation focused on reducing its climate impacts. Internationally, IATA¹ has made the Fly Net Zero commitment, which sets the goal of achieving Net Zero by 2050, mobilizing the entire industry for an energy transition based on technological innovation, operational efficiency, and the expansion of sustainable fuels. ICAO² has similarly defined this objective for international civil aviation, presenting a decarbonization roadmap to guide countries in pursuing this global goal.

In parallel, the European Union has integrated aviation into the Fit for 55 legislative packages, aimed at reducing GHG emissions by 55% by 2030, notably the ReFuelEU Aviation regulation, which defines guidelines and progressive targets for the incorporation of sustainable aviation fuels (SAF) (more information in **Carbon Offsetting**). Complementarily, the European roadmap Destination 2050 presents an integrated vision for the decarbonization of the sector in Europe, aligned with the Paris Agreement and the objectives of the European Union, combining technological, operational and public policy measures to achieve carbon neutrality by 2050.

In this context, the SATA Group reinforces its commitment to reducing its emissions by implementing energy efficiency measures, optimizing consumption, and preparing for lower-carbon solutions, ensuring a more sustainable operation aligned with regulatory, sectoral and customer expectations. This commitment is clearly defined in its **Sustainability Policy**, which prioritizes controlling and mitigating the effects of climate change, promoting energy efficiency, reducing and offsetting carbon emissions through active collaboration with the industry for the decarbonization of the sector, and continuously improving environmental performance through its environmental management system.

¹International Air Transport Association (IATA).

²International Civil Aviation Organization (ICAO).



Fleet renewal

Initiated in 2018 and scheduled for completion in 2027, the Azores Airlines fleet renewal program is one of the main drivers of decarbonization for the SATA Group.

Throughout this period, the SATA Group has consistently invested in more modern, energy-efficient, and passenger-comfortable aircraft, while simultaneously meeting the operational demands of inter-island, domestic, and international connections.

The transition to new-generation aircraft - the Airbus NEO family - equipped with CFM LEAP engines and advanced aerodynamic technology, allows for reductions of up to 20% in fuel consumption and up to 5% in gas emissions and operational noise.

Currently, the Azores Airlines fleet includes two A321neo aircraft, two A320neo aircraft, and three A321neo LR aircraft, the latter capable of operating transatlantic routes with substantially greater energy efficiency than previous generation aircraft. The fleet also includes two A320 CEO aircraft.

By 2025, 78% of the fleet will consist of more efficient aircraft. With the expected arrival of two more A320neo aircraft, the SATA Group will achieve, by 2027, a fleet entirely composed of new, more efficient generation models.

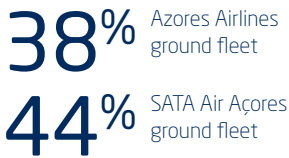


Ground operations

Ground operations represent another significant source of emissions, and the Group has been working to mitigate the associated climate impact. In this regard, a program was initiated in 2021 to electrify the GSE (Ground Support Equipment) fleet and the vehicles of the Group's two airlines, with completion scheduled for 2030.



By 2025, were electrified



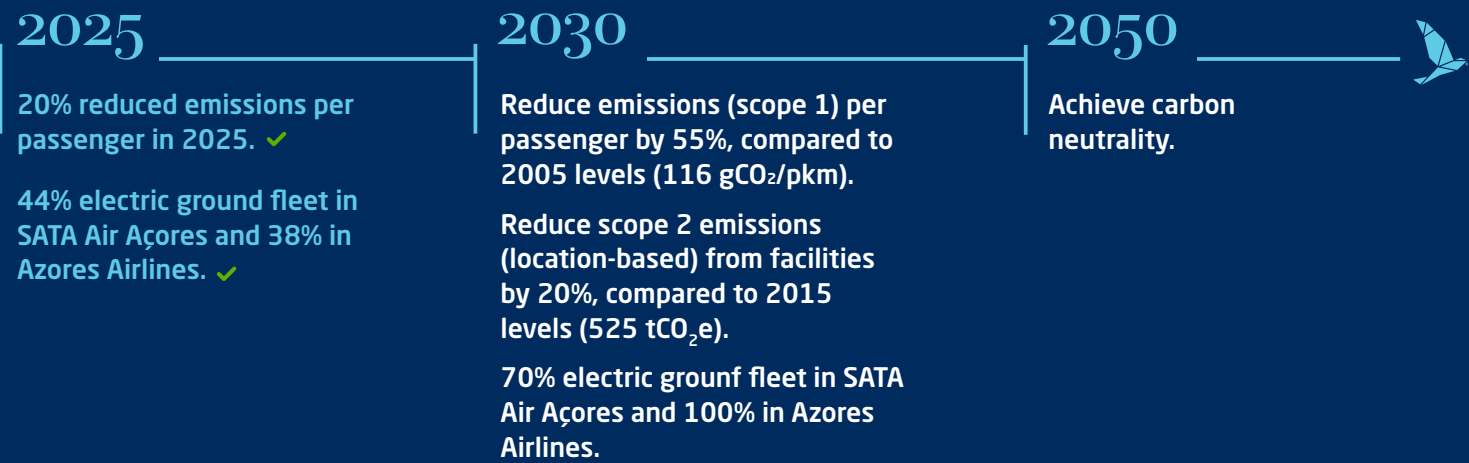
550 tons of SAF used in 2025 by Azores Airlines, within the scope of ReFuelEU

Aligned with European emission reduction targets and best practices, SATA Group has begun using SAF (Sustainable Aviation Fuel), an essential aviation fuel for the decarbonization of the sector. Produced from renewable raw materials – such as waste oils, urban and agricultural waste, or synthetic carbon capture processes – SAF can be mixed directly with traditional kerosene without altering aircraft

or airport infrastructure. However, despite its benefits, global SAF production remains limited and much more expensive compared to fossil fuels, although regulatory advances and increased investment are underway to expand its production and make it more accessible.

Targets ★

Reflecting its commitment to the progressive decarbonization of its operations, the SATA Group has established scope 1 and 2 GHG emission reduction targets, having already achieved a 20% reduction in scope 1 by 2025. (More information on the SATA Group's emissions reduction targets can be found in the [Methodological notes](#)).





Carbon offsetting

24,826 tCO₂

EU ETS

EU EMISSIONS TRADING SYSTEM

The EU ETS is the EU emissions trading system that regulates GHG emissions in various sectors, including aviation. In the aviation sector, it applies primarily to flights within the European Economic Area, obliging operators to implement monitoring, reporting and verification procedures and to submit emission allowances corresponding to verified CO₂ emissions.

The system has been strengthened as part of the Fit for 55 packages, which introduced the progressive phase-out of free permit allocation, a reduction in the emissions ceiling, and adjustments to route regulations, along with the inclusion of new instruments, including measures to support SAF.

These changes aim to contribute to the objectives of the European Green Deal, namely reducing emissions by 55% by 2030 and achieving carbon neutrality by 2050.

93,368 tCO₂

Flights subject to compensation requirements

CORSIA

CARBON OFFSETTING AND REDUCTION SCHEME FOR INTERNATIONAL AVIATION

CORSIA is a global mechanism developed by ICAO with the goal of ensuring carbon-neutral growth in international aviation. The scheme mandates the monitoring, reporting, and verification of CO₂ emissions from covered flights and provides, in a phased manner, for the offsetting of emissions above the reference level through the purchase of eligible offset units.

In 2025, the regulatory requirements associated with the initial phases of the mechanism will continue to apply, while the eligibility criteria for offset and SAF projects will continue to be developed and consolidated.



Over 90%

annual fuel supply at EU airports by 2025

REFUELEU AVIATION

ReFuelEU Aviation is an European regulation that forms part of the Fit for 55 legislative package and establishes a mandatory framework for progressively increasing the supply and use of SAF in the EU, aiming to reduce fuel lifecycle emissions.

The regulation imposes an obligation on fuel suppliers to provide fuel, monitoring, reporting and verification requirements, and operational rules for operators and airports, including measures to prevent tankering (the practice of refueling in excess to avoid refueling where it is more expensive), as well as mechanisms for traceability and verification of sustainability criteria and GHG reductions.

Within the framework of the regulation, operators were also required to guarantee the supply of 90% of the fuel needed for each flight at the departure airport itself.

In 2025, Azores Airlines submitted the applicable regulatory report, with the respective external verification, ensuring compliance with the requirements defined in this framework and contributing to the elimination of tankering practices and the reduction of unnecessary emissions.



2.1.1 Energy consumption

In 2025, the SATA Group’s total energy consumption reached 1,134,362 MWh, of which 6,569 MWh corresponded to renewable energy sources resulting from the use of SAF in its air fleet.

Fossil fuels accounted for approximately 99% of total consumption, with Jet Fuel being the main source, consuming 1,124,498 MWh in the air fleet. This is followed by diesel used in the ground fleet (1,457 MWh) and in backup generators (9 MWh).

The electricity acquired by the Group comes exclusively from fossil fuels, totaling 1,829 MWh, of which 96% was used for the operation of the facilities and the remainder for charging the electric fleet.

The SATA Group also monitors energy intensity indicators, namely specific fuel consumption per passenger kilometer (l/100pkm), as a relevant metric for evaluating operational efficiency.

Energy consumption (MWh)	2025
Energy consumption from fossil sources	1,127,793
Crude oil and petroleum products	1,125,964
Purchased electricity	1,829
Fuel consumption from renewable sources	6,569
Total energy consumption	1,134,362

Specific fuel consumption per passenger kilometer (l/100pkm)	2025
SATA Air Açores	5.66
Azores Airlines	2.96
SATA Group	3.12

2.1.2 Carbon footprint

In 2025, the SATA Group maintained its commitment to annual carbon footprint monitoring, a process that has been continuously improved to ensure a more accurate understanding of the organization’s climate impact and to ensure alignment with the established decarbonization targets and regulatory sustainability requirements.

In this context, SATA Air Açores and Azores Airlines maintain a partnership with IATA CO₂ Connect for the quantification of emissions associated with the Group’s airline operations. This collaboration allows access to a CO₂ calculation tool and harmonized and recognized methodologies, ensuring greater accuracy in emissions measurement and alignment with industry best practices.

Regarding SATA Group’s carbon footprint in 2025, scope 1 emissions reached 294,381 tCO₂e, resulting mainly from Jet Fuel consumption in air operations and, to a lesser extent, from diesel consumption in the ground fleet and generators.



Scope 2 emissions, associated with purchased electricity consumption, amounted to **822 tCO₂e** (market-based), reflecting the use of energy from fossil sources, especially in the Group's airport infrastructure.

Scope 3 emissions reached **110,049 tCO₂e**, with the most relevant categories for the Group being fuel and energy-related activities not included in scopes 1 and 2, which represent approximately 56% of the total, and the acquisition of goods and services, with an approximate weight of 31%.

GHG Emissions (tCO ₂ e)	2025
Scope 1 GHG Emissions	294,381¹
Fuel consumption from stationary sources	2
Fuel consumption from mobile sources	294,379
Fugitive emissions	0
Biogenic emissions	1,755
Scope 2 GHG Emissions (market-based)	822
Scope 2 GHG Emissions (location-based)	820
Scope 3 GHG Emissions	110,049
C1. Purchase of goods and services	34,425
C2. Capital goods	11,655
C3. Fuel and energy related activities (not included in scopes 1 or 2)	61,578
C4. Upstream transport and distribution	448
C5. Waste	8
C6. Business traveling	238
C7. Employee commuting	1,697

405,252 tCO₂e

SATA Group's carbon footprint in 2025 (market-based)

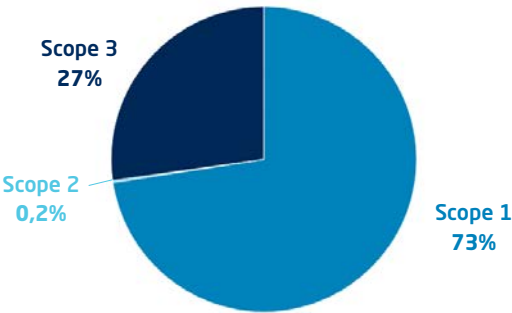
As an airline, and given the nature of its activity, scope 1 emissions represent the largest share of global emissions, as a result of high Jet Fuel consumption.

¹According to the methodology defined by the ESRS, total Scope 1 emissions do not include biogenic emissions.

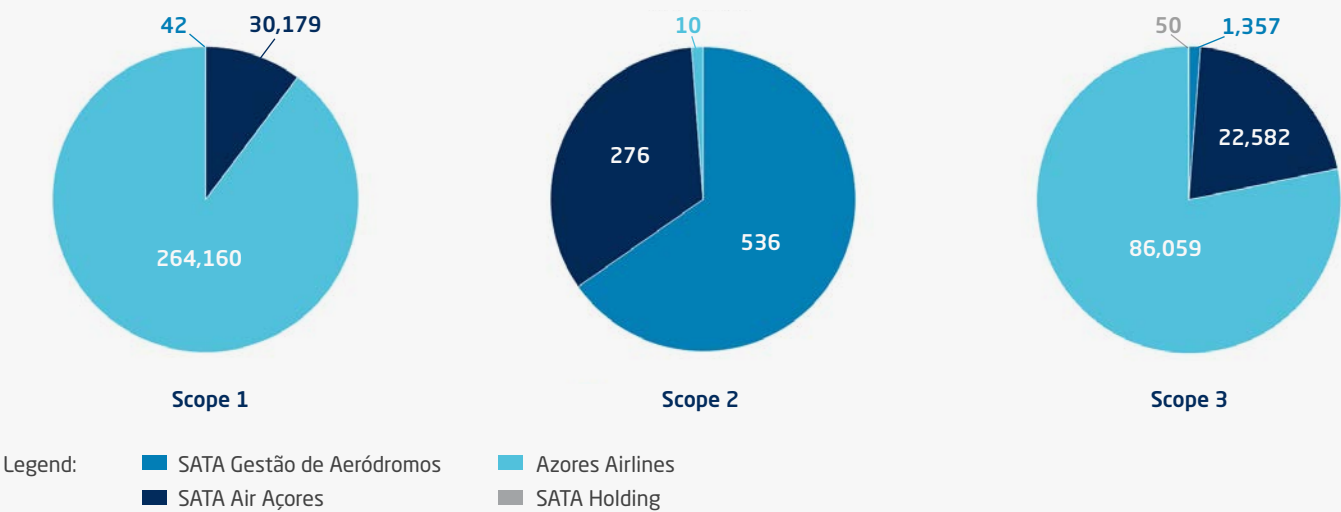
The analysis of the Group’s four companies shows that SATA Azores Airlines is responsible for approximately 86% of the total footprint, reflecting the volume and scope of its national and international operations. SATA Air Açores contributes approximately 13%, while SATA Gestão de Aeródromos and SATA Holding have residual values of 0.5% and less than 0.1%, respectively.

Considering only scopes 1 and 3, Azores Airlines is responsible for the majority of emissions of these types (90% and 78%, respectively). In scope 2, on the other hand, the largest share corresponds to SATA Gestão de Aeródromos, followed by SATA Air Açores (65% and 34%, respectively).¹

GHG Emissions in 2025, by scope



GHG Emissions by company (tCO₂e)



Carbon intensity		2025
Passenger-kilometre (gCO ₂ /pkm)		
SATA Air Açores		143.1
Azores Airlines		75.0
Passenger-kilometre revenue (gCO ₂ /rpk)		
SATA Air Açores		143.4
Azores Airlines		75.6

The SATA Group also monitors specific indicators of its activity, namely the carbon intensity per passenger, in order to better track the effectiveness of the decarbonization measures implemented.

¹More information on how SATA Group's carbon footprint is calculated can be found in the **Methodological notes**.

2.2 Air pollution

[ESRS E2-1, E2-2; ESRS 2 GDR]

Material impacts, risks and opportunities related to the topic of pollution, as a result of the double materiality analysis process (more information in [1.5. Double Materiality Analysis](#)):

Sub-topic	Description	Type	Value Chain	Real Potential
Air pollution	The combustion of fuels by air and road transport operations leads to the production of air pollutants, such as sulfur oxides, nitrogen oxides, and dust, resulting in reduced air quality and negatively impacting the environment and public health.	I-	OP	●
	Increased government regulations related to air quality may require additional investments in emissions control technologies or changes in operations, resulting in increased costs for the organization.	R	OP	◐

Legend:

I+ > Positive Impact
I- > Negative Impact
R > Risk
O > Opportunity
OP > Own operations
U > Upstream
D > Downstream

● > Real
 ◐ > Potential in short-term
 ◑ > Potential in medium-term
 ◒ > Potential in long-term

In addition to GHG emissions, aviation operations generate other local environmental impacts, resulting from the emission of air pollutants, such as NO_x and particulate matter, noise in communities near airports, and the use of hazardous substances such as fire extinguishers and refrigerant fluids.

Through its [Sustainability Policy](#), the SATA Group is committed to controlling and mitigating these impacts, adopting strategic measures and industry best practices to reduce pollution and improve air quality, while always ensuring regulatory compliance.

The measures implemented in 2025 focus primarily on pollution sources under the operational control of the SATA Group, with the aim of reducing emissions and their harmful effects on the environment.

Furthermore, the renewal of the SATA Group's fleet, with the integration of A321neo and A321neo LR aircraft, is also a measure that, in addition to reducing GHG emissions, allows for the reduction of atmospheric emissions associated with air operations, especially NO_x emissions during landing and take-off phases. In parallel, the progressive electrification of the fleet of ground support equipment and vehicles reduces emissions from ground handling, while also contributing to improved air quality in airport areas (more information in [2.1. Approach to climate change](#)).



FIRE EXTINGUISHER REPLACEMENT

This year the Group fully completed the process of replacing halon fire extinguishers with non-hazardous agents in its fleet, in accordance with current legal regulations. The replacement was carried out with the Q200, Q400, A320 CEO, A321 NEO and A321 NEO LR models. This measure led to an overall reduction of 11% in the number of halon fire extinguishers installed. A 6% reduction was achieved at Azores Airlines and a 26% reduction at SATA Air Açores.



REPLACEMENT OF AIR CONDITIONING SYSTEMS

The Group proceeded with the replacement of 5 HVAC systems in airport terminals to reduce emissions, resulting in a reduction of 24.58 tCO₂e.

In terms of both noise and non-CO₂ emissions, the new Airbus NEO fleet also offers more efficient performance compared to previous generations of aircraft.

2.3 Biodiversity protection

[ESRS E4-2, E4-3, E4-5; ESRS 2 GDR]

Material impacts, risks and opportunities related to biodiversity and ecosystems, as a result of the double materiality analysis process (more information in [1.5. Double Materiality Analysis](#)):

Sub-topic	Description	Type	Value Chain	Real Potential
Impacts on the state of species	Failure to comply with legal requirements and bird strike risk management systems can cause accidents and have financial, legal, and reputational repercussions for the organization.	R	OP	

Protecting biodiversity is a crucial element for the safety and sustainability of airport operations. The presence of animal life in the infrastructure operated by SATA Gestão de Aeródromos represents an operational risk, since failure to comply with legal requirements and bird strike risk management systems can lead to accidents, material damage and operational disruptions.

Within the scope of its **Sustainability Policy**, the SATA Group is committed to protecting the environment and reducing the impacts associated with its operations, promoting the continuous improvement of environmental performance. The policy also establishes zero tolerance for the illegal transport of wild animals, endangered species, and their by products, reinforcing the Group’s role in preserving biodiversity. This concern is also reflected in its purchasing processes and respective Internal Purchasing Regulations, which include environmental requirements for the acquisition of services and goods that impact biodiversity and ecosystems.

Legend:

I+

> Positive Impact

I-

> Negative Impact

R

> Risk

O

> Opportunity

OP

> Own operations

U

> Upstream

D

> Downstream



> Real



> Potential in short-term



> Potential in medium-term



> Potential in long-term

In this context, SATA Gestão de Aeródromos implements a structured program for the control, evaluation, and analysis of animal life, which includes continuous monitoring, systematic recording of sightings and occurrences, and semi-annual analysis of the results, allowing for the identification of trends, risk assessment, and the definition of appropriate mitigation measures.

In 2025, 29 bird strikes were reported, involving only small and medium-sized birds (notably pigeons and sparrows), which corresponds to a comparatively low risk level compared to collisions with larger birds. The higher number this year is due to a one-off occurrence that led to the implementation of mitigation measures, namely the presence of the Mobile Command Post in the touchdown zones and estimated takeoff areas, during aircraft operations, with sirens activated to scare away birds.

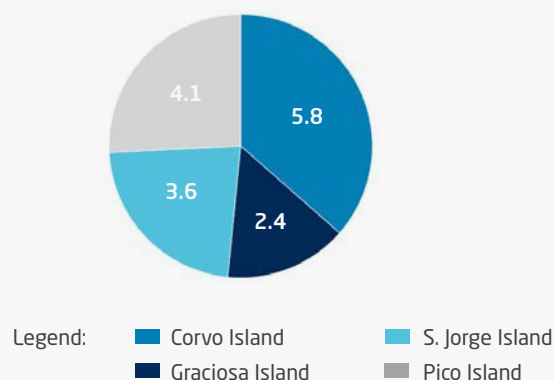
Considering the benchmark indicator – wildlife strikes per 1,000 movements – there was a higher incidence of bird strikes at the Corvo Island aerodrome compared to the other islands.



Considering these results, the wildlife management Scarecrow System was implemented at Corvo Aerodrome with the aim of reducing the risk of bird strikes, which has already demonstrated positive results. Its implementation is also planned for the remaining aerodromes, and the project has already been contracted to the supplier.

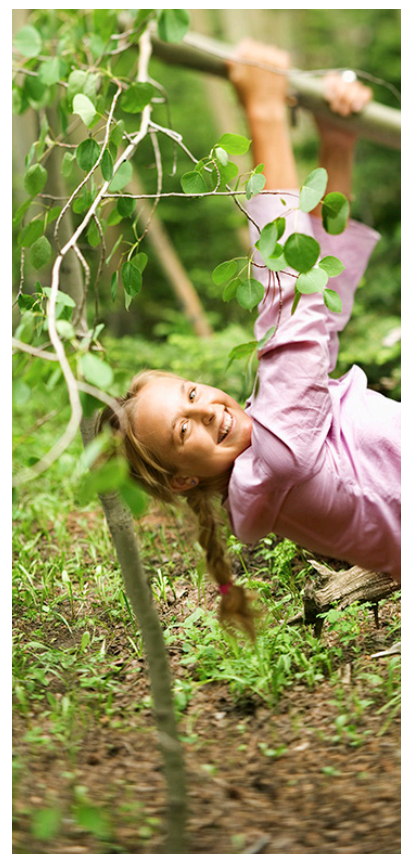
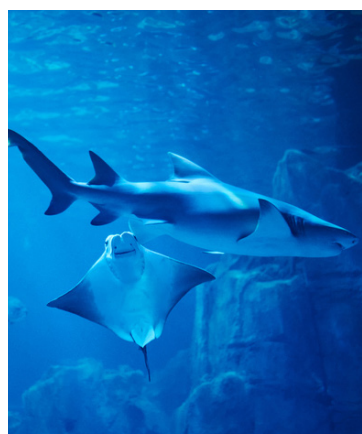
The analysis carried out in the second half of 2025 showed an increase in the number of days with wildlife sightings at all aerodromes, reinforcing the importance of continuous monitoring as a tool for tracking and supporting the management of associated risks.

Wildlife Strikes per 1,000 movements



To fulfill its commitment to combating the illegal trafficking of wild animals, the SATA Group implements the IEnvA certified program, which integrates the obligations of the Buckingham Palace Declaration and a module dedicated to the prevention of illegal wildlife trafficking, while simultaneously ensuring compliance with ISO 14001:2015. In this context, SATA Group is certified according to Illegal Wildlife Trade and provides training for its employees, covering the applicable legal framework, the identification of risk situations, and internal reporting procedures, guaranteeing compliance with legal requirements and best international practices.

The Group has also established a partnership with the Fly Without Fins initiative, which is particularly relevant in the context of the Azores as an island region. Through this collaboration, it contributes to raising awareness about the importance of preserving vulnerable marine species, namely sharks and rays, promoting restrictions on the transport of fins and more responsible practices in the aviation sector. With this initiative, reinforces its role as an active agent in protecting biodiversity and promoting sustainable development aligned with the environmental specificities of the ARA.



2.4 Efficient waste management

[ESRS E5-1, E5-2, E5-3, E5-5; ESRS 2 GDR]

Material impacts, risks and opportunities related to resource use and the circular economy, as a result of the double materiality analysis process (more information in [1.5. Double Materiality Analysis](#)):

Sub-topic	Description	Type	Value Chain	Real Potential
Resource inflows, including resource use	The Group's operations require a large amount of air transport equipment and components that depend on the supply of natural resources. Upstream suppliers may not implement efficient resource use practices, which can have negative effects on the environment (e.g., raw material shortages).	I-	U	
	The scarcity or increased cost of materials, components, and/or equipment for carrying out the organization's activities (e.g., aircraft maintenance) can lead to instability in services and, consequently, have financial repercussions.	R	U, OP	
	The current geopolitical context, including the outbreak of wars, can lead to delays/disruptions in the supply of raw materials and result in increased associated costs, negatively impacting operations, financial results and organizational stability.	R	U, OP	
Waste	Low recovery/recycling rates for waste generated during the organization's operations (e.g., aircraft maintenance, in-flight meals, etc.), or its improper disposal at treatment plants, have negative impacts on the environment and contribute to the exacerbation of climate change.	I-	OP, D	

- Legend:
- I+ > Positive Impact
 - I- > Negative Impact
 - R > Risk
 - O > Opportunity
 - OP > Own operations
 - U > Upstream
 - D > Downstream
 - > Real
 - > Potential in short-term
 - > Potential in medium-term
 - > Potential in long-term

Waste management is one of the environmental commitments undertaken in the [Sustainability Policy](#), which prioritizes promoting the circular economy, reducing waste production, and increasing the rate of waste recovery. This framework guides the Group's operational decisions, from the selection of materials used on board to the processes of separating, forwarding and recovering waste generated, both in flights and in ground operations.

To ensure structured management aligned with legal requirements and industry best practices, the Group has an Internal Waste Prevention and Management Plan that operationalizes the management hierarchy: prevent, reuse, recycle, recover and dispose of. At the same time, the Integrated Waste Management System ensures that all waste streams are directed to duly licensed entities, guaranteeing proper treatment and traceability of processes.

To leverage its commitment to the circular economy in its operations, the SATA Group has defined a structured action plan with measures and targets established for waste management and recovery, based around three operational areas: flight operations, corporate activities and aircraft maintenance.

As part of this plan, by 2025, the Group replaced flyers with digital campaigns, reduced the consumption of paper and cardboard packaging on board by 61%, and introduced the B.O.B (Buy on Board) service at Azores Airlines, through which meals are only available upon request made on board and paid for at the time, allowing a 40% reduction in the placement of primary packaging on board.

At SATA Air Açores, the replacement of disposable headrests with reusable versions was initiated, a measure that will eliminate approximately 150,000 disposable units per year.

Between 2026 and 2030, the Group also plans to implement an onboard waste separation procedure on domestic flights, aiming to achieve a recycling rate of 20% by 2030. As preparatory work for achieving this target, an initial assessment was conducted with key stakeholders to evaluate the advantages and challenges of reaching the defined goal.



Targets ★

The targets are regularly monitored by the teams responsible with the support of annual intermediate goals that ensure their fulfilment within the defined deadlines.



FLIGHTS

Achieve a recycling rate of 20% on domestic flights by 2030, compared to 2026 (0%)

10% > 15% > 18% > 20%

2027

2030

Replace 100% of disposable seatbelts with reusable ones on SATA Air Açores flights by 2026, considering one million units in 2025 as a reference value

2027 — 100%

CORPORATE ACTIVITIES

A 20% reduction in total waste compared to 2026 levels

5% > 10% > 15% > 20%

2027

2030

Achieve a recycling rate of 75%, relative to 2026 levels

40% > 50% > 60% > 75%

2027

2030

AIRCRAFT MAINTENANCE

100% reduction in waste mix, compared to 13.7 tons reported in 2024

20% > 40% > 50% > 75% > 100%

2026

2030

Achieve a recycling rate of 75%, compared to 2024 figures (28%)

35% > 45% > 55% > 65% > 75%

2026

2030



126 tons
of waste in 2025

78% were non-hazardous
86% were recycled

In this context, controlling and reducing waste produced by operations is a key indicator of the SATA Group’s environmental performance.

The main materials placed on the market are primary packaging from aircraft, with the management of the respective waste ensured by the managing entity, in accordance with current regulations.

Regarding domestic flights within the European Union, the SATA Group is developing procedures to assess the possibility and feasibility of initiating onboard waste separation and ensuring its proper disposal. Internationally, considering current regulations, particularly those concerning International Cabin Waste, it is not yet possible to recycle the packaging from these flights, and therefore it is sent to landfills by the catering operator.

The remaining material waste mainly results from maintenance and airport management activities.

	2025
Total weight of waste produced (ton)	126
Hazardous waste	28
Non-hazardous waste	98
Total weight of waste diverted from disposal (ton)	109
Hazardous waste	19
Non-hazardous waste	90
Total weight of waste directed to disposal (ton)	17
Hazardous waste	9
Non-hazardous waste	8
Percentage of waste diverted from disposal (%)	86
Percentage of waste directed to disposal (%)	14

The SATA Group is part of Working Group CAT 1, coordinated by IATA, a technical forum dedicated to the management of International Cabin Waste (Category 1), which brings together airlines, catering providers, airports and health authorities to harmonize procedures and promote safe and circular operational practices.

The working group addresses the harmonization of procedures, the development of operational guidelines and the promotion of solutions that allow for increased recycling and reduced onboard waste, in accordance with international requirements.





Social

Commitment to SDGs:



3.1

Our people

[ESRS S1-1 a S1-8, S1-10, S1-12 a S1-16; ESRS 2 GDR]

Material impacts, risks, and opportunities regarding the topic of own labor, as a result of the double materiality analysis process (more information in [1.5. Double Materiality Analysis](#)):

Sub-topic	Description	Type	Value Chain	Real Potential
Working conditions	The organization's activities are subject to social events, such as strikes due to worker dissatisfaction and insecurity regarding their working conditions, which, in addition to causing social disruption, can result in significant revenue losses and/or additional costs.	R	OP	
	The adoption of various internal communication measures based on an open and transparent dialogue between the Board of Directors and all company employees and their representatives, unions, and workers' committees contribute to the motivation and alignment of workers with the Group's objectives and values.	I+	OP	
	The sector faces the risk of conflicts with workers, which can result in long periods of strikes, increased absenteeism, difficulties in recruiting and retaining talent due to a negative reputation, reduced revenue, and decreased market share.	R	OP	
	Promotion of a respectful work environment and freedom of association improves working conditions, job satisfaction, safety, and the protection of workers' rights, contributing to a fairer environment.	I+	OP	
	The creation of mechanisms that allow for open dialogue between workers and the organization facilitates collective bargaining, potentially leading to better wages, benefits, working conditions, and safety, resulting in greater worker satisfaction and protection of their rights.	I+	OP	
	Failures in internal health and safety management systems for workers can lead to accidents and jeopardize their working conditions and trust in the organization.	I-	OP	
Equal treatment and opportunities for all	Applying fair compensation, in accordance with abilities, skills, professional experience and the role performed, promotes gender equality and gender neutrality in remuneration.	I+	OP	
	The lack of investment in continuous training and development of workers leads to a less qualified workforce, jeopardizing the quality and safety of service and worker satisfaction.	I-	OP	

Legend:

I+ > Positive Impact

I- > Negative Impact

R > Risk

O > Opportunity

OP > Own operations

U > Upstream

D > Downstream

 > Real

 > Potential in short-term

 > Potential in medium-term

 > Potential in long-term

People are an essential pillar in the SATA Group's activity and are crucial to fulfilling its mission as a regional air operator. Throughout 2025, the Group maintained its management commitment focused on the development and appreciation of human capital, recognizing that the performance of its teams is a critical factor in the quality of service provided. To this end, it invests in training, occupational health and safety, as well as continuous improvement initiatives, ensuring that employees have the skills, tools, and conditions necessary to meet operational demands and customer expectations.

Its actions are guided by policies and codes that promote a safe, inclusive work environment aligned with principles of ethics, integrity, and responsibility, integrating contributions from various areas and unions through consultation processes.

The Group has a **Diversity and Inclusion Policy** that establishes the Group's commitment to promoting a work environment based on equal opportunities, respect, prevention of discrimination, and the creation of conditions that favor the balance and well-being of teams, valuing the diversity of profiles and skills as a factor in creating value and reducing risks associated with unequal treatment and an adverse organizational climate. In 2025, no incidents of discrimination, including harassment, or violations of human rights were recorded, with only two complaints identified, which were addressed and resolved through internal labor investigation proceedings.

In addition to this policy, the SATA Group's operations are framed by other normative instruments - such as the Code of Ethics and Conduct, the Human Rights Policy, the Policy of good conduct for the prevention and combat of workplace harassment, and the Occupational health and safety prevention management policy - which, in an integrated manner, address issues of ethics, professional conduct, corporate responsibility, health and safety (more information in **3.1.2. Health and safety** e **4.1. Business ethics and integrity**). All policies and codes are communicated to internal stakeholders through the intranet, with the respective notification via email upon publication.

0
incidents of
discrimination
and human
rights
violations

17%
employees
who took
family care
leave

Through various internal channels - such as the Irregularities Report Channel and the General Ethics Channel - the Group reinforces a culture of open and continuous dialogue, encouraging the active participation of employees and promoting working relationships based on transparency and cooperation (more information in **4.1. Business ethics and integrity**). These channels are managed by the Legal Compliance and Governance Directorate, which ensures the receipt and follow-up of reported concerns and incidents. This process is complemented by regular interaction with employee representatives and union structures, through meetings and communications held at least monthly, in order to systematically integrate employee perspectives into decision-making.

In 2025, the SATA Group had a total of 1,875 employees, comprising 1,113 men and 762 women. The geographical distribution remained predominantly concentrated in Portugal, with 1,862 employees, complemented by teams in the United States (eight employees) and Canada (five employees). During the same period, the turnover rate was 3%, corresponding to the departure of 53 employees throughout the year.

1,862

in Portugal

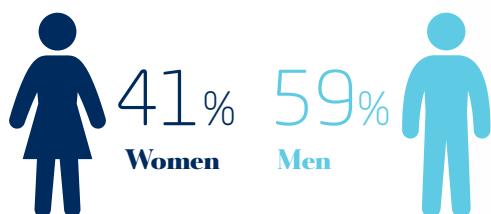
8

in the United States of America

5

in Canada





EMPLOYEES BY GENDER

Employees	Men	Women	Total
Total	1,113	762	1,875
Percentage	59%	41%	-



EMPLOYEES BY CONTRACT TYPE

Employees	Men	Women	Total
Permanent contract	1,068	725	1,793
Fixed-term contract	45	37	82



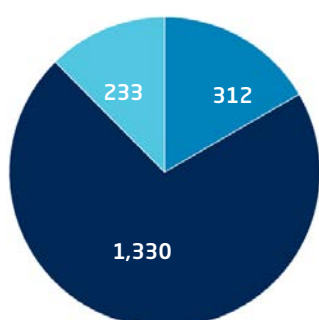
EMPLOYEES IN TOP MANAGEMENT POSITIONS

Employees	Men	Women	Total
Top management positions	156	25	181
Percentage	86%	14%	-



EMPLOYEES BY TYPE OF EMPLOYMENT

Employees	Men	Women	Total
Full-time	1,100	753	1,853
Part-time	13	9	22



Legend:

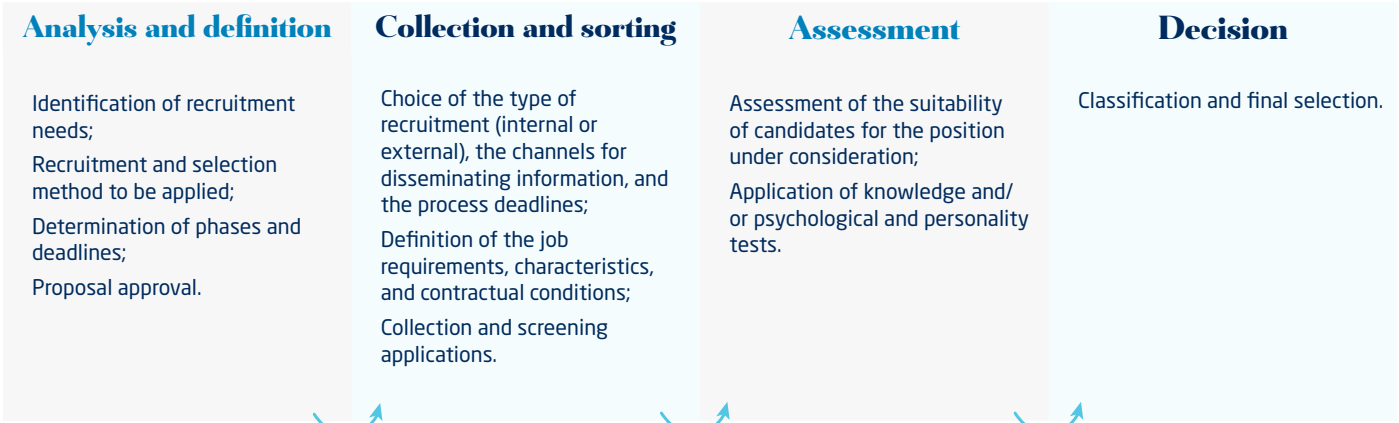
- <30 years old
- 30-50 years old
- > 50 years old

EMPLOYEES BY AGE GROUP

Age	Employees
<30 years old	312
30 - 50 years old	1,330
> 50 years old	233

The Recruitment and Selection Model was designed to ensure uniform, transparent processes aligned with the operational and cultural needs of the SATA Group. The goal is to guarantee that each hire is the result of a rigorous assessment of the candidates' suitability for the roles and the Group's values, promoting objective and consistent decisions.

This model integrates four main stages that ensure the quality of the process, from identifying needs to the final decision, conducting each phase in a structured way, with predefined criteria and evaluation methods tailored to each role.



In 2025, the Group continued to invest in its people, ensuring they have the resources, conditions, and opportunities necessary to develop their potential and meet the demands of the area in which they operate.

SATA Group ensures that all its employees, across various geographical locations, are covered by social protection mechanisms in situations of income loss due to illness, unemployment, workplace accidents, acquired disability, parental leave, retirement, or pension, both through public instruments and through additional benefits provided by the organization, namely health insurance.

The applicable systems differ outside the European Union, particularly in the United States and Canada, where social protection results from a combination of public systems and mandatory or optional private instruments.

The Group maintains nine Collective Bargaining Agreements with the representative trade unions of workers in Portugal, guaranteeing formal and structured mechanisms for social dialogue. Workers are represented at the highest level of the Group's governance, through the presence of a workers' representative on the Board of Directors of SATA Air Açores, as well as the existence of a Workers' Committee at SATA Air Açores and SATA Internacional. Within the SATA Group, the same working conditions are applied to employees covered by collective agreements and those not covered, ensuring fairness and consistency in work practices.

82%
employees covered by collective bargaining agreements in Portugal

3.1.1 Training and skills development

Training remains an essential development tool that the SATA Group provides to its employees. The Training Check-in program stands out for its scope and significant participation, involving employees from various areas of the Group. This year, this approach was reinforced, ensuring a diverse training offer aligned with the current and future needs of the business.



The Azores Aeronautical Training Centre (CFAA) is a center of excellence for the development of the SATA Group's human capital, serving as the privileged location for practical crew training. Through a dedicated environment aligned with operational realities, the CFAA contributes to the continuous development of skills, promoting a culture of safety, quality, and responsibility.

In 2025, each SATA Group employee received an average of 56 hours of training, with female employees registering an average of 45 hours of training and male employees an average of 64 hours.¹

56
training hours
per employee

Partnerships for development and qualification

As part of its skills development strategy, the SATA Group actively participates in entities that promote technical development and management qualification, contributing to the continuous improvement of internal practices. Among these organizations, the following stand out:



The Forum for Business Administrators and Managers (FAE), a non-profit association dedicated to the training and professional development of business managers and administrators, promoting skills development, knowledge sharing, and networking.



The Association for the Economic Valorization of the Azores (AVEA) promotes vocational education of excellence, supporting the development of young people and equipping them with skills that facilitate the continuation of their studies and integration into the labor market, enhancing their growth and qualifications.

¹The training hours only apply to employees in Portugal.

3.1.2 Health and safety

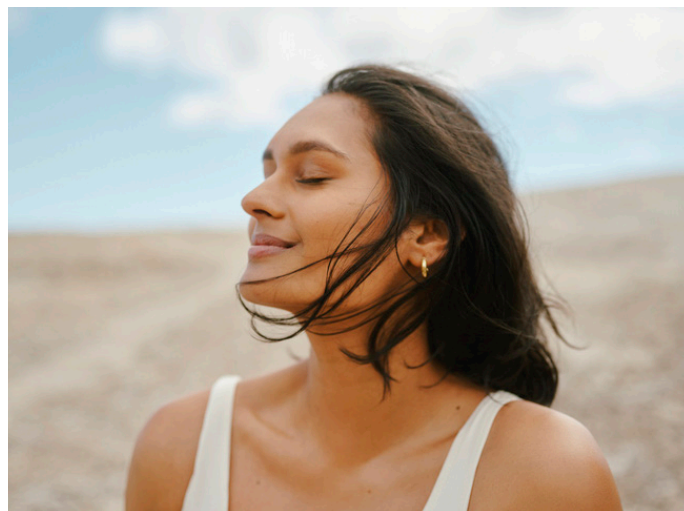
The SATA Group's strategic commitment to organizational sustainability, valuing people, and promoting a healthier, safer, and more participatory work environment is at the heart of its daily activities. The Group works to ensure that this commitment is present in all phases of its operations, aware of the specific risks of the aviation sector and the responsibility it assumes towards its people and all those who interact with its activity.

This priority translates into an ongoing approach to prevention, promoting adequate training and reinforcing practices that ensure a safe working environment, contributing to the physical integrity and well-being of the teams.

The Occupational health and safety prevention management policy, available to all employees on the intranet, clearly and operationally embodies this commitment, establishing that all employees have responsibilities in prevention and compliance with regulations, while leadership - through the Social Relations, Occupational Health and Safety Office (RSST) - ensures the identification of hazards, the assessment of risks, and the implementation of necessary measures to mitigate conditions likely to affect the physical, mental, and social safety of workers. The Group also implements an occupational health and safety management system that covers all its employees and ensures compliance with legal obligations on these matters.

The SATA Group promotes an open communication culture, based on regular communication with workers and their representatives. In addition to formal channels of dialogue, specific reporting mechanisms are provided, such as the Safety Report, which allow for the communication of relevant situations.

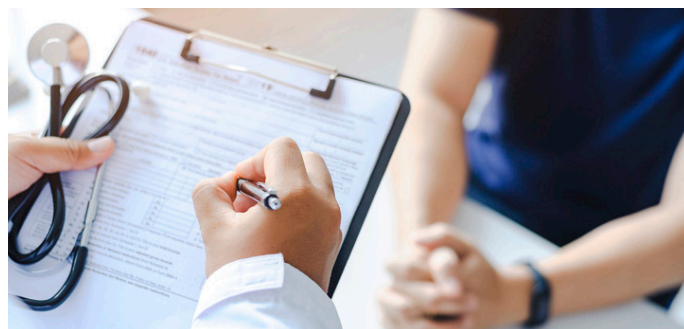
These instruments, combined with the process of assessing occupational and psychosocial risks, allow to identify potential risks and implement preventive



100%

of workers covered by the
SATA Group's health and safety
management system

and corrective measures. These measures include benefits such as health insurance, and a structured set of initiatives aimed at promoting worker well-being and work-life balance.



In 2025, no work-related deaths were recorded, with only 174 workplace accidents, corresponding to a rate of 48 accidents per million hours worked and a total of 4,643 associated lost workdays.

Targets ★

Reducing workplace accidents by 5% by 2026, compared to 2025 levels.

“SATA Saudável” Program

The “SATA Saudável” Program plays a central role, consolidating an integrated approach to the health and well-being of teams. Designed to address the psychosocial risks associated with the Group’s activity, it reinforces the importance of a safe, healthy, and people-centered work environment.

Based on three pillars - Promotion, Prevention and Intervention - the program ensures that all workers have the necessary resources to take care of their health and well-being, reinforcing the Group’s commitment to safety and quality of life at work.

As part of this program, mandatory consultations and regular health check-ups are complemented with the development of projects and partnerships that promote physical and mental well-being. The Group also provides health insurance (UNA Seguros) to all employees with employment contracts, covering various areas and whose package can be extended to immediate family members at an additional cost borne by the employee.

“Saúde mental em tempo de mudança” Project

This year, the Group dedicated itself in a more structured way to the promotion of mental health, reinforcing access to consultations, psychological support, and specific support actions in this area.

To that end, it implemented the “Saúde mental em tempo de mudança” Project, with the goal of increasing the overall well-being of its employees, preventing mental health-related illnesses, including burnout, and improving productivity, using specialized psychologists.

For 2026, an increase in the number of scheduled mental health consultations is planned, including in-person consultations at certain operational workplaces.

Workplace gymnastics project

In collaboration with a physical exercise coach, the aim is to reduce musculoskeletal injuries and absenteeism resulting from accidents and work-related illnesses.

“Envolve-te II” Project

The “Envolve-te II” project aims to assess the organizational climate of the SATA Group by consulting employees, promoting the identification of opportunities for improvement and the implementation of best practices.

Coordinated by the RSST Office, in close collaboration with the Human Resources area, the project is based on a rigorous, transparent process focused on continuous improvement.

Following the success of the first edition in 2024, the Board of Directors instructed the RSST Office to lead the second edition - Envolve-te II - scheduled for 2026. To prepare for this new phase, an evaluation of the progress recorded over the past two years was carried out in 2025, allowing for the identification of new opportunities for improvement aligned with the actual expectations of employees.

“Senta-te e Conversa” Project

Within the scope of the “Envolve-te” project, an informal and face-to-face consultation process is promoted among employees, with the aim of identifying and mitigating psychosocial risks.

This initiative strengthens the relationship with the teams and promotes a culture of active listening, allowing for the anticipation of needs, the reduction of risk factors, and the enhancement of well-being in the workplace.

Employee participation is crucial to the success of these projects, with cross-sectoral involvement being essential for building realistic diagnoses and implementing sustained improvements.

3.2 Quality and safety in customer service

[ESRS S4-1, S4-2, S4-3, S4-4; ESRS 2 GDR]

Material impacts, risks and opportunities concerning consumers and end users, as a result of the double materiality analysis process (more information in [1.5. Double Materiality Analysis](#)):

Sub-topic	Description	Type	Value Chain	Real Potential
Information-related impacts for consumers and/or end-users	A lack of clear, accurate, and timely information about the organization’s services (e.g., flight schedules, changes, passenger rights and responsibilities, etc.) can cause conflict and dissatisfaction and harm customer service.	I-	OP, D	
Health and safety	There is a possibility, albeit small, of a serious accident or incident involving aircraft. Failures to follow safety procedures may jeopardize the health and safety of passengers and the organization’s employees.	I-	OP, D	

Legend:

I+ > Positive Impact

I- > Negative Impact

R > Risk

O > Opportunity

OP > Own operations

U > Upstream

D > Downstream

 > Real

 > Potential in short-term

 > Potential in medium-term

 > Potential in long-term

Customers are a priority at SATA Group and the central focus of its operations. Within this framework, a continuous commitment is maintained to providing safe, reliable, and high-quality services, while ensuring that each passenger has accurate, transparent, and up-to-date information throughout their entire travel experience.

This commitment is underpinned by clear, continuously updated standards aligned with the regulatory requirements of the markets in which the Group operates, applied across the board to ensure consistency, rigor, and full respect for customers’ rights. In their development and ongoing review, guidelines from national and regional authorities are incorporated, guaranteeing compliance with industry’s best practices and reinforcing adherence to applicable obligations.

The standards are available through the institutional website and intranet, ensuring that both clients and employees have access to up-to-date and easily accessible content.

The SATA Group guarantees clear and up-to-date communication with its customers through multiple channels that facilitate both the provision of information and the collection of feedback.

Through social media and the periodic sending of newsletters, the Group regularly shares relevant information and updates, while airport service desks provide in-person support to passengers.

The institutional website brings together the main operational and commercial content, including legal frameworks, baggage rules, safety information, campaigns, and a travel catalogue, along with complaint channels and a chat for answering questions. Through these mechanisms, customers can communicate needs, concerns, or file complaints, which are analyzed and handled in accordance with the Passenger Handling Manual (PHM), ensuring continuous, effective interaction in compliance with applicable regulations.



General conditions for transporte

This framework defines the terms applicable to air transport, including declarations, notices, and information made available to passengers through the ticket, itinerary/receipt, and associated documents. It establishes the responsibilities of the carrier and passengers, regulating essential aspects such as travel procedures, baggage rules, safety standards, management of operational irregularities, and limits of liability, ensuring clear, consistent information in accordance with the legal and regulatory requirements governing air transport.

General conditions for transporting passengers and baggage to/and from Canada

It establishes specific rules applicable to passengers on routes or operations subject to Canadian regulation, guaranteeing protection, information, and assistance in situations such as flight disruptions, operational irregularities, or denied boarding. The regulation defines passenger rights and carrier obligations regarding communication, compensation, refunds, baggage, and customer support, ensuring that the service provided meets the requirements set forth in the Air Passenger Protection Regulation and other regulations issued by the Canadian Transportation Agency.

Customer service plan for USA

Prepared in accordance with the American Aviation Consumer Protection Regulation, the plan establishes the procedures that the carrier must guarantee in operations to and from the United States. It defines various requirements, including communication of delays, cancellations or diversions, processing of refunds and baggage management, ensuring compliance with consumer protection obligations under U.S. regulations.



To gather feedback, the SATA Group also offers NPS¹ questionnaires to assess customer satisfaction. Results are monitored weekly using specific indicators, which are reported to operational and support areas to allow for proactive management of deviations.

The collected comments are systematically analyzed, allowing for the identification of causes, guiding continuous improvement plans, disseminating best practices, and characterizing the geographic distribution of the sample.

Throughout this year, the SATA Group developed campaigns with travel trade partners and OTAs to push sales for the dates with the highest demand, with the goal of strengthening its visibility and improving interaction with its customers.

Within the scope of the campaigns, sales figures and demand trends are monitored daily for each route operated by SATA Air Açores and Azores Airlines, taking into account the purchase window for each market.

Targets ★

Annually, the Group aims to achieve an average satisfaction score between 50 and 74, considering a benchmark of 54 reached in 2021. This goal is revised whenever necessary.

At the same time, it also intends to reduce the response time for customer complaints to 15 days, in order to streamline the process and contribute to a relationship of trust with its customers.

¹Net Promoter Score (NPS).



Governance

Commitment to SDGs



4.1

Business ethics and integrity

[ESRS G1-1, G1-2, G1-3, G1-5; ESRS 2 GDR]

Material impacts, risks and opportunities related to the topic of business conduct, as a result of the double materiality analysis process (more information in [1.5. Double Materiality Analysis](#)):

Sub-topic	Description	Type	Value Chain	Real Potential
Corporate culture	A lack of sustainable policies and risk management can compromise the sustainability of the business in meeting legal requirements, as well as the organization's reputation.	R	OP, D	
Political influence, including lobbying activities	As a company that is 100% owned by public capital, the SATA Group's activity is conditioned by the major strategic guidelines defined by the Regional Government of the Azores. In this capacity, it is sensitive to political cycles and changes that may arise, whether regional or national in scope.	R	U	

Legend:

I+ > Positive Impact
I- > Negative Impact
R > Risk
O > Opportunity

OP > Own operations
U > Upstream
D > Downstream

 > Real
 > Potential in short-term
 > Potential in medium-term
 > Potential in long-term

The SATA Group's business conduct is based on principles of ethics, transparency, and responsibility, which guide its practices and its relationships with all stakeholders, promoting responsible business practices and contributing to the creation of sustainable value.

SATA Group's governance model prioritizes integrity, transparency, and the adoption of responsible practices in all dimensions of the business. This approach is supported by principles, policies, and tools in ethical, environmental, and social matters, applicable across the entire organization. These normative documents are made available to external stakeholders through the institutional website and to employees using the intranet and the internal communication channel Ibelong.

The Group has a robust regulatory framework that addresses the identification and handling of illegal behavior or behavior contrary to internal rules, including the Code of Ethics and Conduct and various complementary policies that reinforce compliance with

legal obligations and best practices, ensuring the respect and conformity with the principles and values that guide the operations and business relationships. Communication of concerns extends to internal and external stakeholders, reflected in the availability of rules applicable to the value chain, such as the Supplier Code of Conduct and the Sustainable Procurement Policy (more information in [4.2. Supplier relationship management](#)).

Preventing corruption and bribery is also a priority, evidenced by the existence of specific policies – such as the Anti-corruption policy, the Plan for preventing risks of corruption and related offenses, the Policy on accepting offers, benefits and advantages, and the Conflict of interest management policy – reinforced by risk management and internal control practices integrated into its culture and processes, enabling the identification of vulnerabilities, the mitigation of risks and the promotion of an ethical and responsible working environment. Ethics is, therefore, a fundamental pillar of the Group's corporate strategy. The values of professionalism,

integrity, transparency and independence guide the actions of the SATA Group and reinforce responsibility in relationships with employees, customers, suppliers and business partners, supporting the Group's ambition for growth and consolidating its reputation as a responsible and transparent operator.

<u>Code of Ethics and Conduct</u>	It establishes the principles and rules that guide the Group's actions, promoting integrity, responsibility and transparency in all professional interactions. The policy defines standards of conduct, guidelines on conflicts of interest, use of resources, and compliance with legal and regulatory obligations, in order to mitigate risks of misconduct, non-compliance and damage to reputation, applying across all Group operations and to all internal stakeholders.
<u>Policy of good conduct for the prevention and combat of workplace harassment</u>	It defines rules and guidelines to prevent and combat harassment situations, clarifying prohibited behaviors and establishing procedures for reporting, analysis and treatment. It contributes to strengthening the well-being of workers and an organizational culture based on respect, helping to mitigate legal, psychosocial and reputational risks associated with these behaviors.
<u>Anti-corruption policy</u>	It consolidates the Group's commitment to preventing and responding to corruption and related offenses, defining rules applicable to offers, hospitality, donations, sponsorships and relationships with public and private entities. It includes measures to prevent fraud and money laundering and registration obligations, thus strengthening internal control mechanisms and contributing to the mitigation of risks related to corruption and fraud.
<u>Plan for preventing risks of corruption and related offenses</u>	A complementary instrument to the Anti-corruption policy for identifying, analyzing, and mitigating corruption risks in the Group's activities. To this end, it maps critical processes, identifies areas of greatest exposure, and defines preventive measures, internal controls, functions and other procedures. It includes mechanisms for continuous monitoring and reporting, contributing to the systematic strengthening of the integrity and effectiveness of the prevention system.
<u>Policy on accepting offers, benefits and advantages</u>	It establishes limits and procedures for gifts, hospitality and other benefits, acting as a preventive control against conflicts of interest, undue advantages and risks of bribery or improper influence. The policy defines value limits, admissibility criteria, communication and registration procedures, as well as prohibited situations. In this way, it contributes to reducing legal and reputational risks and to ensuring transparent and consistent practices, both internally and in relations with stakeholders.
<u>Conflict of interest management policy</u>	It defines principles and procedures for identifying, communicating and managing potential or apparent conflicts of interest, ensuring high standards of integrity and compliance in the supply chain and contributing to the mitigation of associated risks.
<u>Human rights policy</u>	It ensures respect for human rights in operations and throughout the value chain, establishing commitments aligned with international standards, including: • United Nations Guiding Principles on Business and Human Rights; • OECD Guidelines for Multinational Enterprises; • International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. The policy covers various topics, such as decent work, equal opportunities, non-discrimination, freedom of association, prohibition of child and forced labor, health and safety and data protection, thus reinforcing alignment with responsible practices and helping to avoid adverse impacts on employees and the value chain.
<u>Risk management policy</u>	It frames risk management as an integral part of strategy and management processes, defining risk categories, guiding principles, and responsibilities of management bodies. It establishes methodologies for vulnerability identification, assessment, mitigation, monitoring, and reporting, reinforcing organizational resilience and the effectiveness of internal controls.

The SATA Group's Ethics and Compliance system includes several reporting channels, namely: the **Ethics Channel**, publicly available on the institutional website; the Irregularities Report Channel and the General Ethics Channel, both internal communication channels accessible via email, the latter being used primarily for issues related to the Code of Ethics and Conduct.

These channels allow for the reporting of potential violations of internal regulations in any SATA Group

company, always guaranteeing the confidentiality of complaints and protection against retaliation. The management of these issues is ensured by the Group's Head of Regulatory Compliance, in line with the institutional commitment to integrity, transparency, and good governance practices. To reinforce the independence and credibility of the process, the effectiveness of these mechanisms and compliance with policies is evaluated using external entities.

Political influence and lobbying activities

As an organization fully owned by public capital, the SATA Group conducts its business in alignment with the strategic guidelines defined by the Regional Government of the Azores, as the Group's sole shareholder. This institutional configuration implies permanent coordination with public priorities and with the evolution of the regional and national political and regulatory framework. To guarantee this alignment, the Board of Directors maintains a structured and regular relationship with the shareholder, ensuring strategic coherence and the defense of the interests of the parties involved.

Active participation in industry associations is also a central element of the Group's institutional work. Integration into regional, national and international bodies allows for the monitoring of trends and legislative developments, contributes to consultation processes, and ensures that the operational and regional specificities of the SATA Group are considered in the definition of policies and regulatory frameworks that influence aviation.

The Group currently collaborates with the following entities:



Association for the representation, promotion and defense of the economic interests of commerce, industry and services in the ARA.



An organization that represents the interests of regional European companies before the European Commission, the European Parliament, and European regulatory bodies, focusing on connectivity, competitiveness, sustainability and the development of policies tailored to the specific characteristics of regional operations.



An association dedicated to defending the interests of airlines operating in Portugal, working with the Government, regulators, and airport operators, addressing various issues such as aviation policy, airport infrastructure and the competitiveness of the sector in Portugal.



A non-governmental organization (NGO) that sets global standards for commercial aviation, operating in areas such as fares, safety, operations, payment methods, and international policy. It is also responsible for establishing and managing key international standards, including BSP¹, interline procedures, IATA codes, and operational safety benchmarks.

In 2025, the financial contributions associated with the SATA Group's membership in these associations and organizations exceeded 56,000 euros. These contributions reflect the importance of a policy of institutional engagement and participation in forums relevant to the sector, enabling transparent action and responsible representation of the Group's operational and strategic interests.

¹Billing and Settlement Plan (BSP).

4.2

Supplier relationship management

[ESRS G1-6; ESRS 2 GDR]

Material impacts, risks and opportunities regarding supplier relationship management, as a result of the double materiality analysis process (more information in [1.5. Double Materiality Analysis](#)):

Sub-topic	Description	Type	Value Chain	Real Potential
Management of relationships with suppliers, including payment practices	Factors such as the energy crises, lack of raw materials, staff shortages, or the insolvency of a key supplier can lead to disruptions in the supply of goods and services and financial damage to the organization, jeopardizing business continuity.	R	U	

Legend:

I+

 > Positive Impact

I-

 > Negative Impact

R

 > Risk

O

 > Opportunity

OP

 > Own operations

U

 > Upstream

D

 > Downstream



 > Real



 > Potential in short-term



 > Potential in medium-term



 > Potential in long-term

Managing supplier relationships is an essential element of the SATA Group’s operations and directly contributes to the robustness and reliability of its supply chain. The Group works with partners who share principles of ethics, integrity, and sustainability, integrating social, environmental and governance criteria into the selection, evaluation, and monitoring processes. This approach strengthens transparency, mitigates risks, and ensures that the supply chain remains aligned with the ethical and responsibility standards defined by the Group.

To ensure this alignment, the Group has a **Supplier Code of Conduct**, which establishes minimum requirements for suppliers, guaranteeing compliance with ethical principles and ESG criteria throughout the value chain, including responsible labor practices, respect for human rights, prevention of corruption, environmental protection, and health and safety. It also provides for the development of audits by the buyer and the monitoring of compliance with the requirements established by the respective code, contributing to mitigating conduct risks, reinforcing

compliance, and safeguarding the Group’s reputation.

Based on this framework, the implementation of a structured supplier and third-party risk assessment model was initiated, which integrates the Supplier Assessment provided by Moody’s - an international entity that analyzes the ESG performance of companies - as a criterion in procurement processes exceeding 25,000 euros. This assessment, by integrating environmental, social and governance criteria, will support the contracting decision-making processes, reinforcing transparency and risk management. With completion scheduled for the end

Target ★

By the end of 2026, the Group aims for the Supplier Code of Conduct to be signed by at least 50% of the supplier database.



of 2026, this measure aims to support more informed decisions, mitigate risks, and promote continuous improvement in supply chain performance in terms of sustainability, simultaneously encouraging suppliers to evolve their practices and strengthen their commitment to more responsible operations.

This procedure is formalized in the **Sustainable Procurement Policy**, which establishes principles and criteria for integrating environmental, social and governance considerations into procurement processes. To this end, it defines requirements applicable to suppliers, evaluation and monitoring criteria, and guidelines for responsible procurement practices, promoting greater ESG performance throughout the supply chain and managing associated risks and opportunities.

To ensure the consistent application of these practices, the SATA Group provides training for its teams on various ESG topics, including procurement teams. Training initiatives on corruption and risks in dealing with third parties are also promoted, specifically targeting procurement teams within the scope of their purchasing activities.

As part of its internal process for evaluating and contracting third parties, the Group also began implementing an integrity due diligence procedure in 2024 applicable to suppliers, business partners and other counterparties, with the goal of identifying and

assessing financial, compliance and sustainability risks. This process is based on specific questionnaires that enable the collection of documentation demonstrating compliance with legal, regulatory and ESG requirements, reinforcing practices aligned with standards of ethics, transparency and accountability throughout the value chain.

Regarding the supplier payment processes, the SATA Group seeks to guarantee clear and transparent conditions throughout the entire billing cycle. The payment term is generally set at 60 days for domestic suppliers and 30 days for international suppliers and may be adjusted in specific contractual clauses when applicable. On average, the payment term to suppliers after the applicable contractual term, considering a weighted value across various categories, is 39 days. Treasury planning is based on contractual due dates.



4.3

Cybersecurity and data protection

[ESRS 2 GDR]

Material impacts, risks and opportunities related to cybersecurity, as a result of the double materiality analysis process (more information in [1.5. Double Materiality Analysis](#)):

Sub-topic	Description	Type	Value Chain	Real Potential
Cybersecurity	Developing efficient and robust cybersecurity systems, along with recruiting human resources with high technical knowledge on these issues, allows for more effective prevention and response to potential cyberattacks	I+	OP	
Information-related impacts for consumers and/or end-users	Failures in protecting the personal data of consumers and end-users can result in privacy breaches and exposure to cyber risks, negatively impacting customer security.	I-	OP, D	

Legend:

I+ > Positive Impact

I- > Negative Impact

R > Risk

O > Opportunity

OP > Own operations

U > Upstream

D > Downstream

 > Real

 > Potential in short-term

 > Potential in medium-term

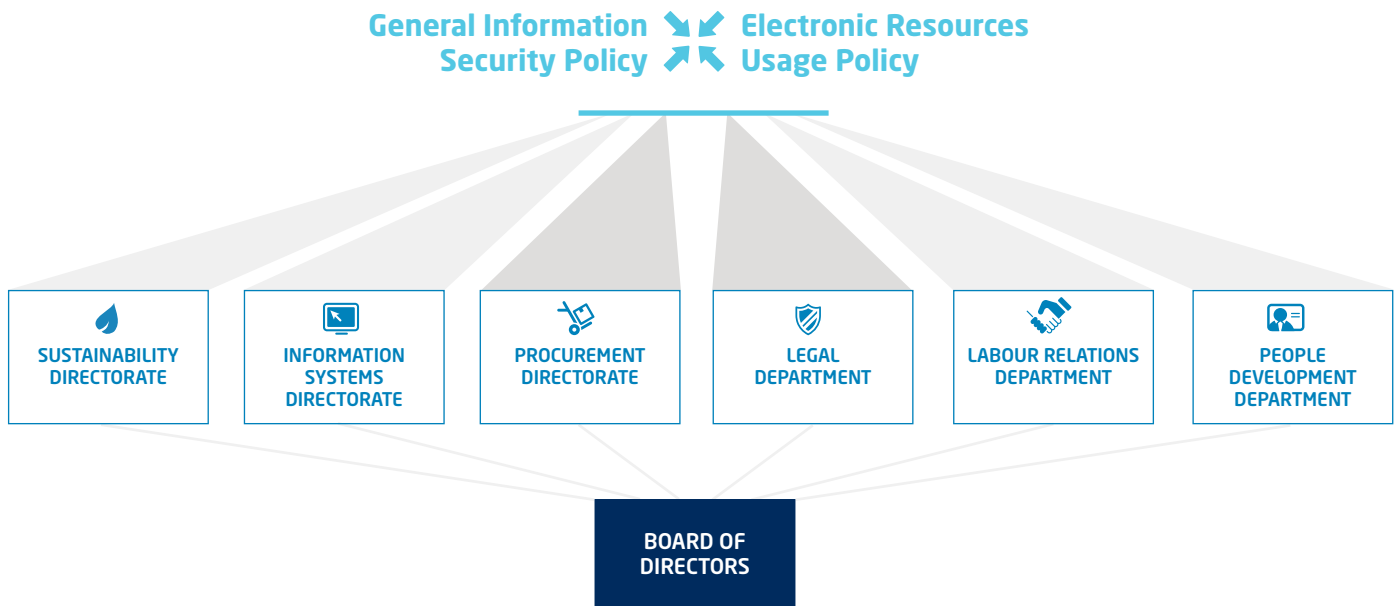
 > Potential in long-term

Cybersecurity plays a critical role in the context of high dependence on digital systems and increasing sophistication of cyber threats. Organizations are increasingly exposed to risks associated with social engineering attempts, fraudulent communications, phishing campaigns, and other forms of misuse of digital identities and channels, with potential impacts on business continuity, information protection, and the security and trust of stakeholders.

The SATA Group, as a provider of essential services supported by information systems, and given its ongoing interaction with customers and business partners, recognizes the importance of protecting its intellectual property and the data under its management, while promoting the secure use of digital media.

The definition and management of the cybersecurity framework therefore result from a collaborative process involving the main internal areas with relevant responsibilities in this field, allowing for a cross-cutting approach aligned with the Group’s operational and legal needs.

This process involves several directorates whose contributions are considered in the development and review of applicable policies and standards, which are subsequently approved by the Board of Directors and made available to the relevant internal parties through the Group’s intranet.



The SATA Group's approach to cybersecurity is primarily based on its General Information Security Policy, which constitutes the central regulatory framework for information protection.

This policy defines the Group's position regarding information security and establishes the guiding principles applicable to the protection of information assets, ensuring business continuity, stakeholder trust and compliance with applicable legal and regulatory requirements. Its scope extends to all information under

the responsibility of SATA Group companies, regardless of whether it is stored in physical or electronic format, as well as to all individuals and entities that interact with this information.

The policy is operationalized through a set of internal rules that translate its principles into guidelines and procedures applicable to the different domains of information security, ensuring its consistent application throughout the Group's operations.

INFORMATION SECURITY RISK MANAGEMENT STANDARD It defines guidelines for identifying, assessing, and addressing information security risks.	ACCESS MANAGEMENT STANDARD It defines guidelines for managing access to information assets, ensuring adequate levels of protection.	CLASSIFICATION AND INFORMATION PROCESSING STANDARD It establishes criteria for classifying information and applying appropriate levels of protection, regardless of its format.
TRAINING AND AWARENESS STANDARD It defines the guidelines for employee training and awareness regarding information security, promoting appropriate and conscious behaviours.	ACCIDENT PREVENTION AND RESPONSE STANDARD It establishes guidelines for preventing and responding to information security incidents.	STANDARD FOR ASSESSING THE EFFECTIVENESS OF RISK MANAGEMENT MEASURES It establishes guidelines for the regular evaluation of the effectiveness of risk treatment measures implemented within the scope of information security management.

Among these standards, the Information Security Risk Management Standard stands out, which, in addition to complementing the General Information Security Policy, is aligned with the SATA Group’s risk management model, allowing the integration of cybersecurity risks into the organization’s overall risk management approach.

Complementing the information security framework, the SATA Group has a Electronic Resources Usage Policy, which establishes guiding principles and rules for the acceptable, appropriate, and responsible use of electronic resources and information, in accordance with the provisions of paragraph 2 of Article 22 of the Labor Code, approved by Law No. 7/2009, of February 12. This policy applies to all people and entities that interact

with information under the responsibility of the Group’s companies.

The implementation of the SATA Group’s cybersecurity policies is supported by the implementation of structured measures, monitored through performance indicators, aimed at achieving the objectives defined in the General Information Security Policy, particularly regarding information protection and the mitigation of risks associated with information security.



Measures

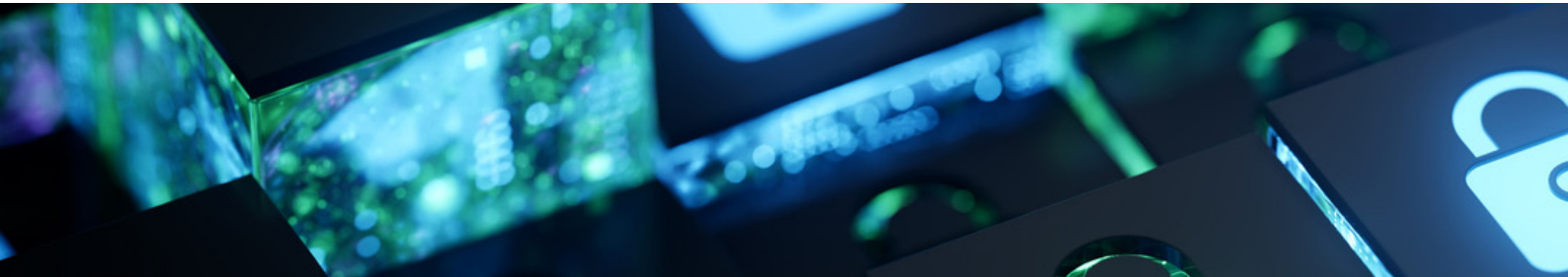
TEAM REINFORCEMENT
FOCUS: Strengthening the Information Security management team through internal training in information security.
SCOPE: SATA Group
STATUS: Implemented in 2025
RESOURCES:

THIRD-PARTY RISK MANAGEMENT
FOCUS: Assessment and mitigation of risks associated with suppliers and partners.
SCOPE: SATA Group
STATUS: Planned
RESOURCES:

INFORMATION PROTECTION
FOCUS: Prevention of data leaks and strengthening mechanisms to safeguard the Group’s information assets.
SCOPE: SATA Group
STATUS: Planned
RESOURCES:

RENEWAL OF THE *MANAGED SECURITY SERVICES PROVIDER (MSSP) CONTRACT*
FOCUS: Strengthening capabilities for continuous monitoring, detection, and response to incidents and vulnerabilities.
SCOPE: SATA Group
STATUS: Planned
RESOURCES:

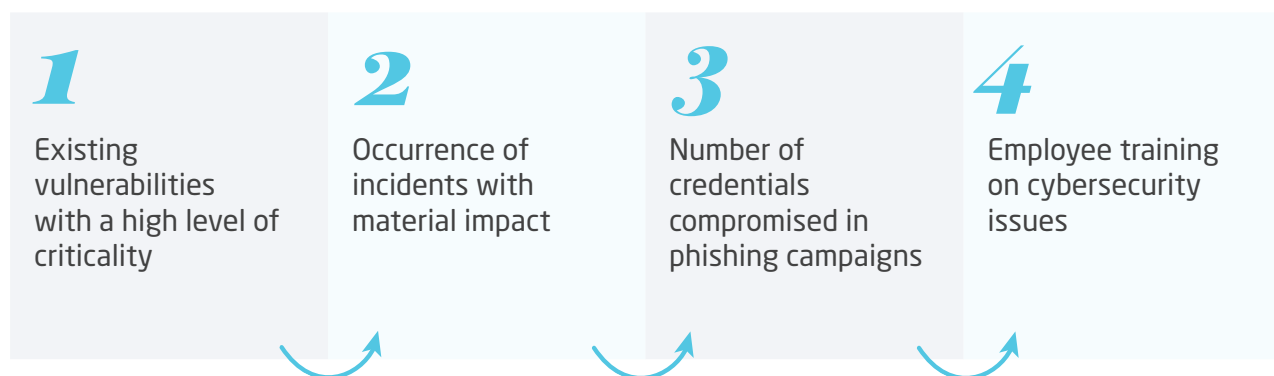
Legend: Human resources Financial resources Technological resources



The implementation of these measures implies the allocation of various resources, including human, financial and technological resources. In particular, the third-party risk management procedure and the renewal of the MSSP contract foresee a mobilization of significant financial resources in 2025, with allocations of approximately between 50,000 and 25,000 euros, respectively.

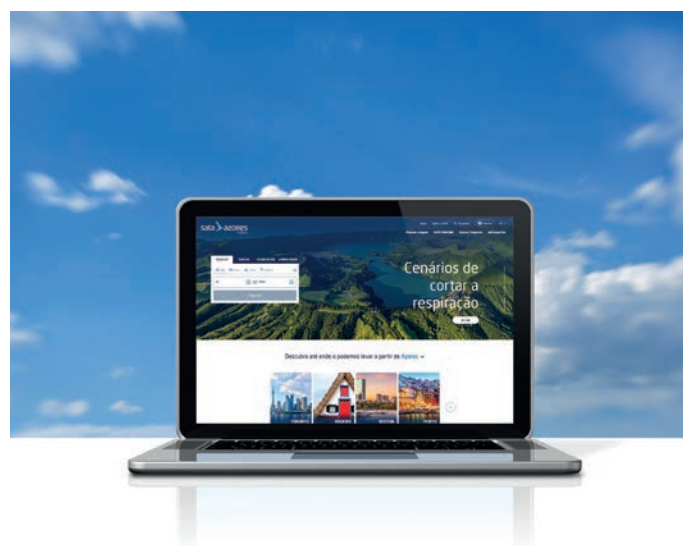
From the consumer's perspective, the Group provides information through its **institutional website** aimed at raising awareness and alerting them to cybersecurity risks, including examples of fraudulent communications, guidelines for identifying legitimate contacts and specific channels for reporting suspicious situations

The effectiveness of implemented cybersecurity measures and the level of risk exposure are monitored using four parameters:



Regarding capacity building, initiatives aligned with national awareness programs are included, such as the "Cidadão Ciberseguro" program, promoted by the National Cybersecurity Center (CNCS). The metrics related to compromised credentials and incidents with material impact are validated by an external body and monitored regularly over time.

In 2025, there were no compromised credentials or incidents with material impact.



Legitimate e-mails from the SATA Group

All legitimate e-mails from the SATA Group companies are sent from the following domains:

@sata.pt

azoresairlinesmail.com

Target ★

By 2026, the SATA Group plans to establish cybersecurity targets, aligned with its strategic vision in terms of sustainability, for the management of material impacts, risks and opportunities.



5 Annexes

Environmental Taxonomy

Context

The European Commission published the EU Environmental Taxonomy Regulation (2020/852) in June 2020, aiming to increase investment in projects with a positive environmental impact. The EU Environmental Taxonomy is a classification system for economic activities, identifying those that can be considered sustainable or “green” according to technical, environmental and social criteria. According to this regulation, an economic activity is aligned with the Taxonomy, and therefore sustainable, if:

- It’s eligible for the Taxonomy,
- Contributes substantially to at least one of the six environmental objectives defined by the European Commission (Climate change mitigation, Climate change adaptation, Sustainable use and protection of water and marine resources, Transition to a circular economy, Pollution prevention and control, and Protection and restoration of biodiversity and ecosystems),
- Not significantly compromises any of the other environmental objectives,
- And complies with the Minimum Social Safeguards.

Taking these criteria into account, companies must report the proportion of their Revenue, Capex and Opex associated with their eligible economic activities and/or aligned with Taxonomy.

In 2024, the SATA Group conducted, for the first time, a taxonomic analysis of its economic activities. In 2025, it adopted this approach again, voluntarily reporting the results obtained from this analysis. Given that this reporting is voluntary, the SATA Group adopted a simplified approach, reporting only on the eligibility of its main activity and on the Revenue and Capex indicators.

Eligibility analysis

Considering the Climate Delegated Act, the Complementary Climate Delegated Act, and the Taxonomy Environmental Delegated Act, SATA identified activity 6.19. Passenger and freight air transport, as eligible, being associated with the objective of mitigating climate change and corresponding to the main activity that the company carries out.

The values associated with the company’s eligibility are represented in the table below:

	Total KPI Value (€)	Proportion of economic activities eligible for the taxonomy (%)	Proportion of economic activities not eligible for the taxonomy (%)
Revenue	58,206,402€	80%	20%
Capex	16,337,021€	81%	19%

Revenue and Capex were calculated in accordance with International Financial Reporting Standards (IFRS) in line with the consolidated financial statements for the year ended December 31, 2025.

In 2025, the denominator of the total revenue ratio amounted to 58,206,402€, which corresponds to the total sales and services provided presented in the consolidated income statement. The revenue considered eligible corresponds to

the value associated with “air operations – scheduled flights”. Details of sales and services can be found in notes 3.20 and 27 of the annex to the consolidated financial statements.

In 2025, the denominator of the Capex ratio amounted to 16,337,021€, corresponding to the altered increases in tangible fixed assets, intangible assets, and assets under right of use. The Capex considered eligible corresponds to the value associated with publications made in the context of

air transport. Details of industrial investments can be found in notes 3.3, 3.4, 6 and 7 of the annex to the consolidated financial statements.

Next steps in the application of the Taxonomy

The SATA Group intends to continue monitoring updates introduced within the framework of the EU Environmental Taxonomy and update its reporting accordingly. In particular, it will consider the changes resulting from Commission Delegated Regulation (EU) 2026/73 of 4 July 2025, which introduced measures to simplify the Taxonomy analysis and reporting process, initially proposed under the Omnibus package. Over the next few years, the SATA Group will deepen and strengthen its Taxonomy analysis and reporting, including identifying other eligible activities, as well as analyzing technical, environmental and social criteria. This process will progressively allow it to report the eligibility and alignment of its activities with the EU Environmental Taxonomy.



Methodological notes

ESRS E1-6 - Targets related to climate change adaptation and mitigation

For the calculation of the scope 2 emissions reduction target, a location-based approach was applied, using the electricity emission factors for 2015 (the target's base year) for mainland Portugal, ARM, and ARA, provided by APA. Total electricity consumption recorded in 2015 and the proportion of SATA Group's consumption in each region were used, based on an estimate using 2025 values.

ESRS E1-7 - Energy consumption and mix

The SATA Group has operations in sectors with a high climate impact, in accordance with Article 2 of Decree-Law No. 9/2025, Section H.

ESRS E1-8 - Gross scope 1, 2 and 3 GHG emissions

The GHG inventory was calculated according to the GHG Protocol (Greenhouse Gas Protocol) methodology, and the operational control approach was applied.

The carbon footprint was calculated for the scope 1, 2, and 3 GHG emission applicable to the four companies of the SATA Group, which comprise the reporting perimeter of this report. For the calculation of GHG emissions of scope 3, a screening of emissions and a materiality analysis of the 15 categories was carried out to identify the most significant ones.

SATA Holding does not report Scope 1 and 2 GHG emissions, as it has no operational activity.



Category	Inclusion in the GHG emissions inventory	Obs	Data typology	Sources of emission factors
SCOPE 1				
Mobile combustion fuel consumption	Yes	-	Data derived from monthly monitoring carried out by those responsible for the aerodromes.	EF ¹ : National Inventory Document 2025 (APA). GWP ² : IPCC Fifth Assessment Report (AR5).
Stationary combustion fuel consumption	Yes	-	Ground fleet: Data from annual collection by the airport authority and monthly collection by those responsible for aerodromes, scheduling, and maintenance. Air fleet: Aircraft fuel consumption provided by the Control and Management Department.	EF: National Inventory Document 2025 (APA) e DEFRA. GWP: IPCC Fifth Assessment Report (AR5).
Fugitive emissions	N/A	According to the intervention reports, no leaks of F-GHG were identified.	-	-
Process emissions	N/A	The SATA Group's activities do not involve industrial processes.	-	-
SCOPE 2				
Electricity consumption - Market-based	Yes	-	Data sourced from: monthly "Billed Energy and Water" report; airport authority.	Emission factors of the SATA Group's energy suppliers.
Electricity consumption - Location-based	Yes	-	Data regarding electric vehicles used for the maintenance of the Lisbon line are not included, as the airport authority has not yet authorized the installation of the boxes.	ARA e ARM ³ : Emission factor considered in the market-based methodology. Continental Portugal: Average intensity of emissions from electricity production in Portugal in 2025 (APREN).
Steam, heat and cooling consumption	N/A	The SATA Group does not purchase steam, heat or cooling services.	-	-
SCOPE 3				
C1. Purchased goods and services	Yes	-	Financial data for the acquisition of products and services.	EF: Open CEDA database.
C2. Capital Goods	Yes	-	Financial data for the acquisition of capital goods.	EF: Open CEDA database.
C3. Fuel and energy-related activities	Yes	-	Activity data were obtained in areas 1 and 2. Physical data were considered for both fuel consumption and electricity acquisition.	EF for fuels and for the extraction, refining and transport of fuels for electricity production: DEFRA database. EF for electricity production: APREN.
C4. Upstream transportation and distribution	Yes	-	Financial data for product transportation. For the purposes of this report, it was not possible to obtain physical data relating to the upstream transportation of the purchased products. Therefore, transportation costs, especially for materials and goods, identified in the "Purchase of goods and services" category were allocated to that category.	EF: ADEME database.
C5. Waste	Yes	-	Physical data for the waste generated. Only waste for which e-GARs (electronic waste management documents) have been issued is included. Waste produced in administrative areas, airports (public zones), and onboard waste is not included.	EF: ADEME, DEFRA and MfE databases.
C6. Business travel	Yes	-	Physical and financial data for employee stays. Physical data for air travel. Financial data for travel expenses.	EF for physical data: DE-FRA database and Green-view; National Inventory Document 2025 (APA). EF for financial data: ADEME, EPA and EXI-OBASE databases. GWP: IPCC Fifth Assessment Report (AR5)

¹ Emission factor (EF).² Global Warming Potential (GWP).³ Autonomous Region of Madeira (ARM).

C7. Employee commuting	Yes	-	Physical data for calculating emissions from employee travel without a company car and employee travel with access to a company car. For the calculation of emissions associated with commuting in 2025, the emission values resulting from the 2024 calculation methodology were used.	EF: National Inventory Document 2025 (APA) GWP: IPCC Fifth Assessment Report (AR5)
C8. Upstream leased assets	N/A	These emissions are accounted for in scopes 1 and 2 of the SATA Group.	-	-
C9. Downstream transportation and distribution	N/A	The SATA Group does not sell products that require transportation or distribution to the end consumer.	-	-
C10. Processing of sold products	N/A	The services provided by the SATA Group do not result in the sale of products that require further transformation by the clients.	-	-
C11. Use of sold products	N/A	The SATA Group does not sell products that generate emissions during use.	-	-
C12. End-of-life treatment of sold products	N/A	The SATA Group does not sell physical products that generate waste at the end of their useful life.	-	-
C13. Downstream leased assets	N/A	These emissions are accounted for in scopes 1 and 2 of the organization.	-	-
C14. Franchises	N/A	The SATA Group does not operate or grant franchising agreements.	-	-
C15. Investments	N/A	The SATA Group does not hold any financial stakes.	-	-

ESRS E5-5 - Resource outflows

For the purposes of this report, it was not possible to disaggregate the recovered waste by type of treatment, since most of it is stored only by the waste management operators of the ARA before being sent to the mainland, where it goes to different recovery destinations, including recycling. The recovered waste is classified in categories R1, R9, R12 and R13 of the Waste Framework Directive.

ESRS S1-5 - Characteristics of the undertaking's employees

The total number of employees in the company corresponds to all workers performing their duties until December 31, 2025.

The turnover rate is reported as a percentage and results from the quotient between the number of workers who left the company during the reporting period and the number of workers at the end of the reporting period.

ESRS S1-7 - Collective bargaining coverage and social dialogue

The percentage of salaried workers covered by collective agreements only considers employees in Portugal.

ESRS S1-15 - Remuneration metrics

The gender pay gap results from the ratio between the difference in average pay between men and women and the average pay for men.

The annual pay ratio is calculated by dividing the total annual pay of the highest-paid person in the organization by the median total annual pay of all salaried employees (excluding the highest-paid person).

Average and median salaries were calculated based on the total number of employees in Portugal.

ESRS Table

Disclosure requirement		Location in the report
ESRS 2	GENERAL DISCLOSURE	
BP-1	Basis for preparation of the sustainability statements.	1.1 About the report
BP-2	Specific information if the undertaking uses phasing-in options.	1.1 About the report
GOV-1	The role of the administrative, management and supervisory bodies in relation to sustainability.	1.2 Sustainability governance model A one-tier BoD composed of five independent members, namely three executive members and two non-executive members. More information on the governance structure can be found in Governance Model .
GOV-2	Integration of sustainability-related performance in incentive schemes.	The SATA Group does not yet integrate sustainability performance into its incentive schemes.
GOV-3	Statement on due diligence.	1.1 About the report
GOV-4	Risk management and internal controls over sustainability reporting.	The SATA Group does not yet have an implemented process for managing risks and internal controls associated with sustainability reporting.
SBM-1	Strategy, business model and value chain.	1.3 Approach to sustainability More information on the governance structure can be found in SATA Group .
SBM-2	Interests and views of stakeholders.	1.4 Stakeholder engagement
SBM-3	Interaction of material impacts risks and opportunities with strategy and business model, and financial effects.	1.5 Double materiality analysis The SATA Group does not provide products or services that are subject to prohibitions in specific markets.
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported.	1.5 Double materiality analysis
IRO-2	Material impacts, risks and opportunities and disclosure requirements included in the sustainability statement.	1.5 Double materiality analysis
ESRS E1	CLIMATE CHANGE	
E1-1	Transition plan for climate change mitigation.	2.1 Approach to climate change
E1-2	Identification of climate-related risks and scenario analysis.	2.1 Approach to climate change
E1-3	Resilience in relation to climate change.	2.1 Approach to climate change
E1-4	Policies related to climate change mitigation and adaptation.	2.1 Approach to climate change
E1-5	Actions and resources in relation to climate change mitigation and adaptation.	2.1 Approach to climate change
E1-6	Targets related to climate change adaptation and mitigation.	2.1 Approach to climate change Methodological notes
E1-7	Energy consumption and mix.	2.1 Approach to climate change Methodological notes
E1-8	Gross scope 1, 2, 3 GHG emissions.	2.1 Approach to climate change Methodological notes
E1-9	GHG removals and GHG mitigation projects financed through carbon credits.	The SATA Group did not acquire carbon credits in 2025.
E1-10	Internal carbon pricing.	The SATA Group did not set an internal carbon price for 2025.

E1-11	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities.	The SATA Group has not yet quantified the financial effects associated with climate risks and opportunities.
ESRS E2	POLLUTION	
E2-1	Policies related to pollution.	2.2 Air pollution
E2-2	Actions and resources related to pollution.	2.2 Air pollution
E2-3	Targets related to pollution.	In 2025, it was not possible to report on the requirement.
E2-4	Pollution of air, water and soil.	In 2025, it was not possible to report on the requirement.
ESRS E3	WATER	The materiality analysis conducted in 2025 concluded that this ESRS standard is not material to the SATA Group.
ESRS E4	BIODIVERSITY & ECOSYSTEMS	
E4-1	Biodiversity and ecosystems transition plan.	The SATA Group did not develop a transition plan for biodiversity and ecosystems.
E4-2	Policies related to biodiversity and ecosystems.	2.3 Biodiversity protection
E4-3	Actions and resources related to biodiversity and ecosystems.	2.3 Biodiversity protection
E4-4	Targets related to biodiversity and ecosystems.	2.3 Biodiversity protection
E4-5	Metrics related to biodiversity and ecosystems change.	2.3 Biodiversity protection
ESRS E5	RESOURCE USE AND CIRCULAR ECONOMY	
E5-1	Policies related to resource use and circular economy.	2.4 Efficient waste management
E5-2	Actions and resources related to resource use and circular economy.	2.4 Efficient waste management
E5-3	Targets related to resource use and circular economy.	2.4 Efficient waste management
E5-4	Resource inflows.	The SATA Group is preparing internal mechanisms to report this indicator in its reports for the coming years.
E5-5	Resource outflows.	2.4 Efficient waste management Methodological notes
ESRS S1	OWN WORKFORCE	
S1-1	Policies related to own workforce.	3.1 Our people
S1-2	Engagement with own workforce and workers' representatives, existence of channels for own workforce to raise concerns or needs and approaches to remedy.	3.1 Our people
S1-3	Actions and resources related to own workforce.	3.1 Our people
S1-4	Targets related to own workforce.	3.1 Our people
S1-5	Characteristics of the undertaking's employees.	3.1 Our people Methodological notes
S1-6	Characteristics of non-employees in the undertaking's own workforce.	In 2025, it was not possible to report on the requirement.
S1-7	Collective bargaining coverage and social dialogue.	3.1 Our people Methodological notes

S1-8	Diversity metrics.	3.1 Our people
S1-10	Social protection.	3.1 Our people
S1-12	Training and skills development metrics.	3.1 Our people
S1-13	Health and safety metrics.	3.1 Our people
S1-14	Work-life balance metrics.	3.1 Our people
S1-15	Remuneration metrics.	Wage disparity between men and women in 2025: 34%. This high figure is due to the larger number of men in the organization and the fact that the majority of Commanders, Pilot Officers, and Aircraft Maintenance Technicians (AMTs) are men. Ratio of total annual compensation between the highest-paid individual and the median compensation of all workers in 2025: 7.2. Methodological notes
S1-16	Incidents of discrimination and other human rights incidents	3.1 Our people
ESRS S4 CONSUMERS AND END-USERS		
S4-1	Policies related to consumers and end-users.	3.2 Quality and safety in customer service
S4-2	Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy.	3.2 Quality and safety in customer service
S4-3	Actions and resources related to consumers and end-users.	3.2 Quality and safety in customer service
S4-4	Targets related to consumers and end-users.	3.2 Quality and safety in customer service
ESRS G1 BUSINESS CONDUCT		
G1-1	Policies related to business conduct	4.1 Business ethics and integrity
G1-2	Actions related to business conduct	4.1 Business ethics and integrity
G1-3	Targets related to business conduct	4.1 Business ethics and integrity
G1-5	Metrics related to political influence, including lobbying activities	4.1 Business ethics and integrity
G1-6	Metrics related to payment practices	4.2 Supplier relationship management
SATA GROUP'S ENTITY-SPECIFIC TOPIC CYBERSECURITY		
GDR-P	General disclosure requirement for policies	4.3 Cybersecurity and data protection
GDR-A	General disclosure requirement for actions and resources	4.3 Cybersecurity and data protection
GDR-T	General disclosure requirement for targets	4.3 Cybersecurity and data protection
GDR-M	General disclosure requirement for metrics	4.3 Cybersecurity and data protection