

# /Code of Conduct

Code of Conduct for the Munich Airport Group

Living ideas – Connecting lives



# /One code for all

The Munich Airport Group is a Five-Star airport, a role in which it embraces integrity, compliance, and sustainability in everything it does.

The Code of Conduct of the Munich Airport Group is based on this corporate culture. It contains the guidelines and principles for conduct that is in keeping with the company's values and with applicable law.

The executive management of the Munich Airport Group ensures that the Code of Conduct is observed, leads by example, and communicates the code to others within the company. All managers are tasked with sharing the Code of Conduct with employees, acting as role models, and ensuring that these rules and principles are followed. All employees are required to comply with the Code of Conduct in their actions.

## Code of Conduct

We take an entrepreneurial approach in everything we do.	We focus on responsible interpersonal dealings.	We value our work together as a team.	We emphasize transparency.
We trust in ourselves and our abilities.	<b>Our brand values</b> Partnership    Responsibility »Living ideas – Connecting lives« Expertise        Innovation		We have confidence in each other.
We emphasize professionalism and lifelong learning.	We always have the good of the group in mind.	We support sustainable progress and change.	We engage as a community and treat everyone equally.

**SCOPE**

The Code of Conduct is the standard by which everyone's conduct is measured. It applies both within the Munich Airport Group and toward third parties, in a national and international context. Where local law permits conduct that is not compatible with this Code of Conduct, the provisions of the Code of Conduct take precedence. The Code of Conduct supersedes all previous compliance principles as soon as it takes effect.

### Internal relations

The Code of Conduct is binding with regard to the conduct of the executive management, managers, and all employees. It applies to Flughafen München GmbH and to all subsidiaries and affiliates. Everyone within the Munich Airport Group is required to abide by it. All employees of the Munich Airport Group must receive annual information from their supervisors regarding the content of the Code of Conduct; employees and supervisors document acknowledgment of the Code of Conduct.

Beyond that, all employees are familiar with the airport-specific rules and guidelines that are relevant to their activities. Managers are required to ensure that they and their employees receive up-to-date information and training on these topics on an ongoing basis.

### External relationships - expectations and adherence

The Munich Airport Concern expects its suppliers/service providers and subcontractors, but also other companies and persons within the supply chain to avoid violations of human rights, internationally-recognized work standards and environmental obligations.

The Code of Conduct of the Munich Airport Group also applies to dealings with supplier companies/service providers, subcontractors, customers, and visitors as well as relations with the local community, government agencies, and the general public. Our communications are always open and transparent. The Code of Conduct must be brought to the attention of third parties.

Business partners must accept and abide by the established policies and principles set down in this Code of Conduct and must make every effort to ensure compliance with this Code of Conduct at all times throughout the business relationship and these policies and principles must be appropriately addressed throughout their entire supply chain.

The Munich Airport Concern reserves the right to check that the requirements from this Code of Conduct are adhered to, in particular through self-assessments and audits by the Munich Airport Concern or by a third party. To this end, presentation of all required documents may be requested for purposes of examination.

# **REGULATIONS AND STANDARDS OF CONDUCT**

The Munich Airport Group pledges to comply with German and international laws and government regulations and with the stipulations of government agencies and the company's own internal rules. The laws of the Federal Republic of Germany and the EU apply directly and without exception – including within international relationships. This includes the prohibition of anti-competitive behavior, formation of cartels and monopolies, illegal labor, child and forced labor, and violence. Compliance with human rights and human rights procedures must be ensured, in particular those according to the United Nations' Universal Declaration of Human Rights [UN].

**Sustainable actions with regard to the environment, the economy, social matters, and safety and security are part of the guiding principles of the Munich Airport Group. Business partners are expected to follow the same policy.**





### Responsible interpersonal dealings and individual protections

The behaviors set down in the Code of Conduct represent a measure of value that protects both the company's economic interests and its reputation. Everyone's actions are geared exclusively toward the interest and goals of the Munich Airport Group. Promises made with regard to quality and time must be honored. Company property must be used only for business purposes and treated with care in principle.

All managers and employees contribute their expertise, motivation, and personal responsibility in service of the group's overall success. **Team spirit, respect, loyalty, drive to succeed, efficiency, and responsible conduct are emblematic of the Munich Airport Group.**

All employees complete their assigned tasks with commitment, dedication, and loyalty. Cultural, ethnic, and religious differences are accepted. The Munich Airport Group is committed to the principle of equality, regardless of individual origin, age, disability status, skin color, religion, sexual identity, sex or gender, or belief system. We have zero tolerance for discrimination of any kind and instead actively promote inclusion and diversity.

Compliance with occupational safety and health standards, minimum wage, freedom of association, and provisions of collective agreements as well as social standards is ensured.

The rights of participation and co-determination of bodies representing specific interest groups must be upheld.

### Conflicts of interest and side jobs

The managers and employees of the Munich Airport Group expect loyalty toward the company's interests. Any blurring of the lines between personal and company interests must be avoided. Conflicts of loyalty should not be given any chance to arise. Personal business relationships between employees and third parties that maintain business relations with the Munich Airport Group should be avoided; the same is true of business relationships with employees' personal contacts. Potential conflicts of interest should be communicated to an employee's supervisor right away and reported in writing. Paid side jobs must be reported to the employer in writing beforehand.

### Gifts and invitations

Every effort must be made to avoid giving any impression of being receptive to personal benefits or perquisites as part of an employee's business activities. The same applies to promising or granting personal benefits or perquisites to business partners. Unfair conduct must be nipped in the bud. Managers and employees are required to conduct themselves in such a way that they do not find themselves in situations where they could be coerced into accepting benefits or perquisites.

### Any and all forms of corruption are prohibited, and transparency is the top priority.

The guidelines on gifts and invitations set out the only exceptions to the prohibition on accepting and offering benefits and/or perquisites.

### Procurement and awarding of contracts

The scale of the procurement volume within the Munich Airport Group and the strict stipulations surrounding awarding of public contracts require compliance with detailed rules on the implementation and review of any process involving procurement and awarding of contracts. Competitive bidding and contracting processes must always be conducted fairly.





### Confidentiality, data protection, and information security

The Munich Airport Group is committed to transparent communication within the bounds of business confidentiality. Business and trade secrets must be safeguarded, and the stipulations of data protection laws and the German Act on the Protection of Trade Secrets must be observed at all times. The personal data of employees, customers, supplier companies, and other stakeholders are processed only in accordance with the law.

In all areas of the Munich Airport Group, information is key to ensuring the lasting success of business processes. Information, the IT systems/applications used, and communication technologies are all valuable types of company property that deserve to be protected, and all managers and employees deal responsibly with these items in compliance with the relevant guidelines and policies.

### Principles of safety and security

Our top priority is to create a safety and security structure that is fully embraced by the managers and employees of the Munich Airport Group and its partners. Safety and security are fundamental when it comes to operating an airport. Everyone's actions are geared toward preventing operational risks and unlawful interference with air traffic and toward supporting the government agencies responsible for safety and security.

### Environment and climate

Air traffic is a sign of increased need for mobility, and it has a not insignificant environmental impact.

**With this in mind, the goal of responsible corporate governance is to strike a balance between the economic importance and ecological responsibilities of the Munich Airport Group.**

As a result, climate action is an important and central concern for the Munich Airport Group. Everyone involved is careful to use resources sparingly and efficiently and for specific purposes and to keep the environment in mind when going about their duties.

Violations of applicable environmental law will not be tolerated and adherence to international agreements in effect in Germany must be maintained, in particular adherence to the International Agreement of Minamata concerning mercury, the Stockholm Agreement on persistent organic pollutants and the Basel Agreement on the control of cross-border transportation of hazardous waste and disposal thereof as currently amended.

### Responsibility toward the local community

The Munich Airport Group is aware of its social responsibilities in the area surrounding the airport. The group's regional sponsoring activities are geared toward the common good of the local community, with the goal of ensuring lasting and stable relationships with neighbors. Transparent documentation is kept regarding these efforts.

# **VIOLATIONS**



Violations of laws, guidelines, and other regulations can result in massive economic disadvantages and loss of reputation within and without the Munich Airport Concern, and will not be tolerated. There are serious consequences to these kinds of violations under civil, labor, and/or criminal law.

**We comply with applicable laws and embrace the principles of our corporate culture in everything we do.**

# COMPLIANCE WITHIN THE GROUP

Prevention, verification, and sanctions where needed are all integral elements of corporate governance.

The group compliance unit and the compliance officers act as points of contact for all issues and matters relating to the topic of compliance. The executive management, managers, and employees can all seek advice according to the compliance rules. Transparent rules, advising, and ongoing training and activities to raise awareness all help to prevent incidents.

Regular reports are issued to the executive management, along with standardized reports to the Supervisory Board, regarding any incidents and the approaches taken to resolve violations, measures to minimize risk, and the standard of compliance achieved.

**In case of general questions on Compliance you may contact via email**

compliance@munich-airport.de  
or the compliance officers.

**For reporting violations (also on supply chains), please contact in confidence our internal reporting office:**

email: hinweise@munich-airport.de  
hotline: + 49 89 975 40340  
electronic reporting system [BKMS® system]  
including the option of anonymous reports:  
Introduction [bkms-system.net]

**The internal reporting office is available for all employees, business partners, and other third parties.**

Further information, also on the area of competence for group companies can be found under:  
<https://www.munich-airport.com/compliance>



**Publishing details**

**Publisher**  
Flughafen München GmbH  
Compliance RCC

**Editing and design**  
Flughafen München GmbH  
Corporate Media CPM

July 2023