



Rules of procedure for filing complaints
according to Section 8 Paragraph 2 of the
Law on Corporate
Due Diligence in Supply Chains (LkSG)
of the
Munich Airport Group

June 29, 2023

Table of contents

1. Goal of the complaint process.....	2
2. Applicability of the complaint process.....	2
3. Confidentiality	3
4. Protection against negative consequences or punishment.....	3
5. Complaint channels	3
6. Steps in the complaint process.....	4
6.1 Receipt of complaints or reports.....	4
6.2 Checking the complaints or reports.....	4
6.3 Clarification of the issue.....	4
6.4 Working out a solution with the reporting person.....	5
6.5 Corrective actions	5
6.6 Overview and final reporting.....	5
7. Examination of effectiveness	5
8. Documentation.....	5



1. Goal of the complaint process

The purpose of this complaint process is to handle reports regarding human rights or environmental risks, or insufficient preventative and corrective actions in the entire supply chain of Flughafen München GmbH and FMG-allied companies [together referred to as the Munich Airport Group]. This is meant to prevent the occurrence of human rights violations or violations of environmental laws, along with their associated consequences.

Any report filed in good faith regarding imminent or actual breaches of duty helps to prevent, end or minimize any irregularities in the Munich Airport Group by allowing us to implement corrective and preventative measures.

All internal and external personnel, as well as potentially affected persons, can and should be encouraged to report any violations that they observe to the Munich Airport Group, with or without revealing their identities and in full confidentiality in keeping with this complaint process.

2. Applicability of the complaint process

The complaint process described below applies to all types of complaints or reports regarding human rights or environmental risks or violations of duty according to Section 2, Paragraphs 2 and 3 of the LkSG which occur anywhere along the entire supply chain of the Munich Airport Group.

Human rights risks according to Section 2, Paragraph 2 of the LkSG include, in particular, violations of prohibitions against child labor, forced labor and slavery, disregard of work safety and work-related health risks, disregard of freedom of association, violations of the prohibition against violations of unequal treatment and withholding of reasonable pay, and deterioration of a natural standard of life due to environmental contamination.

Environmental risks according to Section 2, Paragraph 3 of the LkSG include, in particular, violations of prohibitions with regard to mercury resulting from the Minamata Agreement, violations of the prohibition of the production and use of chemicals according to the Stockholm convention [in particular persistent organic pollutants, i.e. so-called POPs], and the prohibition against the inflow and outflow of hazardous wastes.



3. Confidentiality

Confidentiality as to the identity of the reporting person and the contents of the report are of the highest priority. All persons involved with the process are obligated to maintain confidentiality and will only receive information that they absolutely require on a case-by-case basis. Personal data will be rendered anonymous to protect the affected persons unless otherwise required in order to render a proper judgment. Reports and complaints can also be filed anonymously.

4. Protection against negative consequences or punishment

Persons who submit reports and complaints in good faith are protected against negative consequences, punishments or disciplinary actions due to the filing of a report and as a result of making use of the complaint process. Such retaliations are not tolerated by the Munich Airport Group and are strictly forbidden.

Reporting persons who intentionally or through gross negligence report false information concerning violations will not be protected.

5. Complaint channels

Internal and external persons can file reports and complaints both orally and in text form. The Munich Airport Group has an Internet-based reporting system - the so-called Business Keeper Monitoring System [BKMS® System]. Reports and complaints can be filed through this system in name and anonymously.

Independent of the selection of the reporting method, specially trained associates in the Compliance department are the central contact for receiving and processing reports and complaints.

Compliance Department – internal reporting office	
Telephone	+49 89 975 403 40
E-Mail	hinweise@munich-airport.de
Address	Administration building Nordallee 25 85356 München-Flughafen
BKMS® System	Introduction [bkms-system.net]



These representatives are independent contractors and not under any formal direction in handling cases.

6. Steps in the complaint process

Reports and complaints are handled objectively in a formalized procedure as described below. Specially trained associates of the Compliance department of the Group are tasked with the responsibility for receiving and handling reports and complaints. Confidential treatment of reports is guaranteed throughout the entire process [see Section 2].

6.1 Receipt of complaints or reports

The Compliance department will confirm to the reporting person that his or her report or complaint has been received; this is done via the reporting methodology identified under Section 5, and no later than seven days.

6.2 Checking the complaints or reports

In a first step, the compliance department checks to see whether the report or complaint contains human rights or environmentally relevant risks, i.e. violations of duty according to Section 2, and thus falls under the area of application of this complaint process. In addition, a plausibility check is carried out as part of the process, and responsibilities are assigned. In particular, a check is performed as to whether further information is required to clarify the issue and whether it is necessary to include internal departments and areas in the process, and if so which ones. These departments can be those for sustainability, environment, purchasing, personnel and the legal departments, for example. As part of the examination, other clarifying activities by the compliance department can be carried out and contact with the affected persons or organizational units may be required. All requirements and laws concerning confidentiality are observed.

6.3 Clarification of the issue

In a second step, the issue is clarified. To this end, the compliance department may ask the reporting person for further information and will discuss the issue and the expectations as to possible preventative and corrective measures with that person. If a report or complaint does not have merit, the reporting person will be notified as such. Otherwise, a solution will be worked out.



6.4 Working out a solution with the reporting person

After clarification of the issue, it is evaluated and corresponding solutions, in particular required preventative and corrective measures, are worked out together with the reporting person. If necessary, agreements are arranged concerning compensation. Pertinent confidentiality requirements and legal data security regulations are always observed.

6.5 Corrective actions

Concrete corrective actions agreed upon are implemented and tracked. The implementation is done by the Munich Airport Group or by persons contracted by it.

6.6 Overview and final reporting

The results implemented are mutually evaluated together with the reporting person. The reporting person will receive a reply within no later than three months. This will include notification of planned actions and those already taken, as well as the reasons for them. The reporting person will only receive a reply provided that internal research or determinations are not affected as a result, and provided that the rights of persons who are a party to the report or who are named in the report are not substantially affected.

The above notwithstanding, the reporting person will be notified of the result of the investigations initiated by the report once the investigations have concluded, provided that this notification is in compliance with legal confidentiality obligations.

7. Examination of effectiveness

The effectiveness of the process is examined annually and as events require it. If necessary, adjustments to the process or to corrective measures taken can be made.

8. Documentation

The persons in a reporting capacity who are responsible for receiving reports will document all incoming reports, keeping in mind confidentiality and legal requirements. The only persons having access to the corresponding documents are those in the compliance department responsible for handling reports.