

Business Partner Code of Conduct





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Preamble & Principles

The Munich Airport Group is committed to legal compliance, value-oriented corporate governance, sustainability, and social responsibility. The Munich Airport Group expects the same from its business partners [suppliers, service providers, cooperation partners, licensees, and consultants]. In this Business Partner Code of Conduct, the Munich Airport Group has established the requirements and principles governing its collaboration with its business partners.

Social Responsibility

Assuming social responsibility is an indispensable component of value-based corporate governance, a decisive factor for the sustainable success of a company, and an essential foundation for cooperative partnerships. We expect our business partners to adhere in particular to the following principles, to observe them throughout all their activities within their own business operations, and to take measures to ensure compliance. They are also expected to promote adherence to these principles among their own business partners and to eliminate or minimize risks within their supply chain.

Compliance with Human Rights

Our business partners are obligated to respect and protect internationally recognized human rights, in particular the Universal Declaration of Human Rights [UDHR], the UN International Covenant on Civil and Political Rights, the UN International Covenant on Economic, Social and Cultural Rights, the conventions and protocols of the International Labour Organization [ILO] on labor standards, as well as the OECD Guidelines for Multinational Enterprises. Where stricter national regulations exist, these take precedence. All forms of discrimination, mistreatment, or violation of human dignity are prohibited, specifically:

1. Prohibition of Child Labour

Child labour as defined by the conventions of the International Labour Organization [ILO] is strictly prohibited. The minimum age for employment must comply with applicable national laws and ILO Conventions 138 and 182.

2. Prohibition of Forced Labour

All forms of forced labour, debt bondage, or modern slavery are forbidden. Employees must perform their work voluntarily and have the right to terminate their employment with reasonable notice.



3. Equal Opportunity and Non-Discrimination

Any form of discrimination based on gender, age, ethnic origin, religion, disability, sexual orientation, political or ideological beliefs [provided these do not contradict the principles of the liberal democratic basic order], or any other legally protected characteristic is not tolerated. All employees must be treated fairly and with respect.

4. Occupational Health and Safety

Our business partners must ensure safe and healthy working conditions. They are required to minimize workplace hazards, implement necessary protective measures, comply with applicable occupational safety standards, and conduct regular safety training. They must ensure that potential health risks from accidents, injuries, and work-related illnesses of its employees are identified and prevented.

5. Fair Compensation and Working Hours

Compensation must meet at least the applicable legal or industry-specific minimum wage requirements. Overtime must comply with legal regulations, be compensated appropriately, and be voluntary. All applicable laws on working hours must be observed, particularly those governing daily and weekly working hours and rest breaks. The business partner may employ only subcontractors or other third parties who also commit to these requirements.

6. Combating Illegal Employment

Our business partners must ensure that all employees are legally employed and that all applicable labor and immigration regulations are complied with. Illegal employment, undeclared work, or the use of employees without valid work permits is strictly prohibited. This applies equally to all subcontractors and other third parties within the supply chain.

7. Freedom of Association and Collective Bargaining

The rights of employees to freedom of association and collective bargaining must be respected. They must be free to join trade unions or other employee representative bodies without fear of reprisals or discrimination.

8. Environmental and Climate Protection

Our business partners commit to complying with all applicable international standards and legal requirements regarding environmental and climate protection and acknowledge sustainable business practices and environmental stewardship as core corporate principles. They take effective measures that reflect their environmental responsibility and continuously strive to identify negative environmental impacts [e.g., avoiding harm to natural resources vital to life], minimize and actively



contribute to environmental and climate protection. The Munich Airport Group reserves the right to agree on specific environmental and climate protection requirements with its business partners and to regularly review their compliance.

Integrity in Business Conduct / Anti-Corruption

1. Prohibition of Corruption, Gifts & Hospitality

All forms of corruption are prohibited; transparency is paramount. Our business partners are required to take all necessary measures to prevent corruption and other criminal offenses and to avoid any appearance of being receptive to personal advantages during their business activities. The same applies to promising or granting personal benefits to our employees. Our business partners must refrain from any form of unlawful influence on public officials and political officeholders and ensure the highest level of transparency, integrity, and legal compliance when dealing with public authorities. Furthermore, our business partners undertake to disclose if their company employs individuals who are public officials and/or political officeholders and who are key decision-makers regarding the business relationship.

2. Avoidance of Conflicts of Interest

Conflicts of interest must be avoided by both parties. Our business partners are obligated to make decisions related to their business activities with the Munich Airport Group solely based on objective criteria. Conflicts of interest involving private matters or other business or personal activities—including those of relatives or other closely associated persons—must be excluded. The Munich Airport Group requests its business partners to disclose any existing conflicts of interest before entering a business relationship. If, in exceptional cases, conflicts of interest arise unexpectedly or could potentially arise, the Munich Airport Group must be notified in writing without delay.

3. Conduct in Competition

Our business partners commit to complying with all relevant competition laws. They do not engage in agreements or arrangements that influence prices, terms, strategies, or customer relationships, especially in relation to participation in tenders. The same applies to the exchange of competitively sensitive information as well as any other conduct that unlawfully restricts or could restrict competition.

4. Anti-Money Laundering and Counter-Terrorism Financing

All business partners are required to comply with all applicable laws and regulations to combat money laundering and the financing of terrorism. Our business partners ensure that their business practices do not support illegal or unethical financial transactions.



5. Export and Import Controls, Sanctions

Business partners undertake to comply with applicable export control and sanctions regulations. Cooperation with sanctioned business partners throughout the supply chain is prohibited.

6. Data Protection and Handling of Confidential Information

Business partners are required to comply with all applicable laws governing the handling of information and personal data and to implement appropriate technical and organizational measures. Before entering a business relationship, requirements for contractual obligations must be reviewed. The use of artificial intelligence [AI] for data processing must be transparent, non-discriminatory, and meet the highest security standards. Unlawful surveillance, automated decision-making without human oversight, or insecure AI applications are not permitted. Business partners must keep confidential any information obtained in connection with the business relationship. This obligation continues beyond the termination of the business relationship.

Duty to Cooperate

Business partners must accept and comply with the guidelines and principles set out in this Business Partner Code of Conduct and make every effort to ensure compliance throughout the entire business relationship and to appropriately address these requirements across their entire supply chain.

The Munich Airport Group reserves the right to verify compliance with the requirements of this Business Partner Code of Conduct, through audits conducted by the Munich airport Group or a third party. For this purpose, the submission of the necessary documentation may be requested.

The business partner is obligated to notify the Munich Airport Group in writing without delay of any identified violations of this Business Partner Code of Conduct and to take appropriate corrective measures.

In the event of non-compliance or violations of these obligations, the Munich Airport Group reserves the right to take sanctioning measures, which, in severe cases, may result in the termination of the business relationship.

Complaint Procedure

Our business partners can report potential violations of this Code through the Munich Airport Group's existing whistleblower system. They must inform their employees that they can report violations of this Code and how to do so. Neither the Munich Airport Group nor their business partners tolerate any form of discrimination against whistleblowers who, in good faith, submit a report to the Munich Airport Group.



Final Provisions

By entering a contractual relationship, the business partner confirms compliance with this Business Partner Code of Conduct. The current version of the Business Partner Code of Conduct is published on the Munich Airport Group's website.