

Human Rights Policy

POLICY STATEMENT ON THE HUMAN RIGHTS
STRATEGY OF THE MUNICH AIRPORT GROUP

LIVING IDEAS – CONNECTING LIVES



Policy Statement

Flughafen München GmbH, including its subsidiaries, is committed to the highest sustainability standards, encompassing environmental and social responsibility as well as good corporate governance. Respect for human rights is a core value of this commitment.

The Munich Airport Group is committed to internationally recognized standards, guidelines, and principles. These include, in particular, the Sustainable Development Goals (SDGs), the Universal Declaration of Human Rights, United Nations conventions, the core labor standards of the International Labour Organization (ILO), and the OECD Guidelines for Multinational Enterprises.



PRINCIPLES AND SCOPE

Internal Relationships

The Code of Conduct serves as the highest guiding framework for management, executives, and employees of the Munich Airport Group. It contains the fundamental principles and rules for responsible and ethical behavior toward people both within and outside the Group.

The Munich Airport Group is committed to complying with national and international laws, governmental regulations, official requirements, and internal company rules. The laws and regulations of the Federal Republic of Germany and the European Union apply directly and without exception, including in international business relationships. This includes prohibitions against anti-competitive conduct, cartel and monopoly formation, undeclared work, child labor, forced labor, and violence. Compliance with human rights and human rights procedures is ensured, particularly in accordance with the principles of the United Nations Universal Declaration of Human Rights.

External Relationships

The Munich Airport Group expects its suppliers, service providers, subcontractors, and all other companies and individuals involved in its supply chain to refrain from violating human rights, internationally recognized labor standards, and environmental obligations.

Business partners are required to accept and comply with the guidelines and principles set out in the Business Partner Code of Conduct. They must make every effort to ensure compliance throughout the business relationship and appropriately address compliance along the entire supply chain.

Violations of applicable environmental laws are not tolerated. Compliance with international agreements applicable in Germany is required, particularly, the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal in their respective valid versions.

Human rights are addressed within the Munich Airport Group through the following policies, guidelines, and standards:

- **Mission Statement, Code of Conduct and Business Partner Code of Conduct**
- **Environmental and Energy Policy**
- **Occupational Safety and Health Policy**

UNDERSTANDING HUMAN RIGHTS AT THE MUNICH AIRPORT GROUP

As an internationally active company, the Munich Airport Group is aware of its responsibilities and is committed to upholding internationally recognized human rights and environmental protection standards, including:

- Human and labor rights
- Prohibition of child labor
- Prohibition of discrimination
- Prohibition of forced labor
- Fair remuneration and working hours
- Protection of freedom of expression, personal rights, and privacy
- Occupational health and safety
- Freedom of association
- Environmental protection as a human right
- Responsible value creation
- Human rights protection in the use of security personnel
- Compliance with the Minamata Convention on Mercury
- Compliance with the Stockholm Convention on Persistent Organic Pollutants
- Compliance with the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal

Sustainable action with respect to the environment, the economy, society, and safety is an integral part of the Munich Airport Group's mission statement and is expected of all employees as well as business partners.

INTEGRATION OF RISK MANAGEMENT INTO THE COMPANY



Responsible risk management is of fundamental importance to the Munich Airport Group and is ensured through a systematic and continuous process for managing business risks and opportunities.

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The Munich Airport Group reviews compliance with the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG) through risk analyses. Direct suppliers are evaluated according to their risk potential using external risk indices and additional available information, including specific findings and preventive measures already implemented. Suppliers are then prioritized according to risk levels.

This prioritization forms the basis for focused risk and action management. The Munich Airport Group conducts risk analyses within the context of its business activities.

Findings from these analyses are incorporated into the development of specific measures to prevent or mitigate adverse effects of business activities. The Munich Airport Group relies on a combination of measures and integrates insights gained into its business processes. To ensure adequate protection of employee human rights, the Munich Airport Group has established corporate principles and policies and provides employees with unrestricted access to transparent grievance mechanisms.

Risk analyses are conducted regularly, at least once a year, and documented in a manner suitable for reporting purposes. Additional event-driven risk analyses may be carried out if required by the risk assessment or if there are actual indications of violations, including by indirect suppliers.

ORGANIZATION AND IMPLEMENTATION

The Munich Airport Group aims to foster a culture of awareness regarding human rights and to ensure their consistent observance in daily business through an effective organizational structure.

A number of dedicated processes and measures have been implemented to ensure compliance with human rights, identify the need for action and enable corrective intervention where necessary:

- Establishment of an interdisciplinary Risk Board with clearly defined structures and responsibilities to ensure compliance with due diligence obligations and their implementation throughout the Group.
- The Risk Board meets quarterly and on an ad hoc basis. Representatives from Sustainability, Procurement, Compliance, Human Resources and Legal departments participate. Incidents, risks and necessary measures are discussed during these meetings.
- Adaptation of procurement practices and purchasing processes with regard to human rights and environmental considerations.
- Provision of a grievance mechanism in accordance with Section 8 of the German Supply Chain Due Diligence Act [LkSG].
- Regular training on compliance with the requirements of the Supply Chain Due Diligence Act.
- Regular risk analyses and implementation of risk and action management.
- Continuous documentation.



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