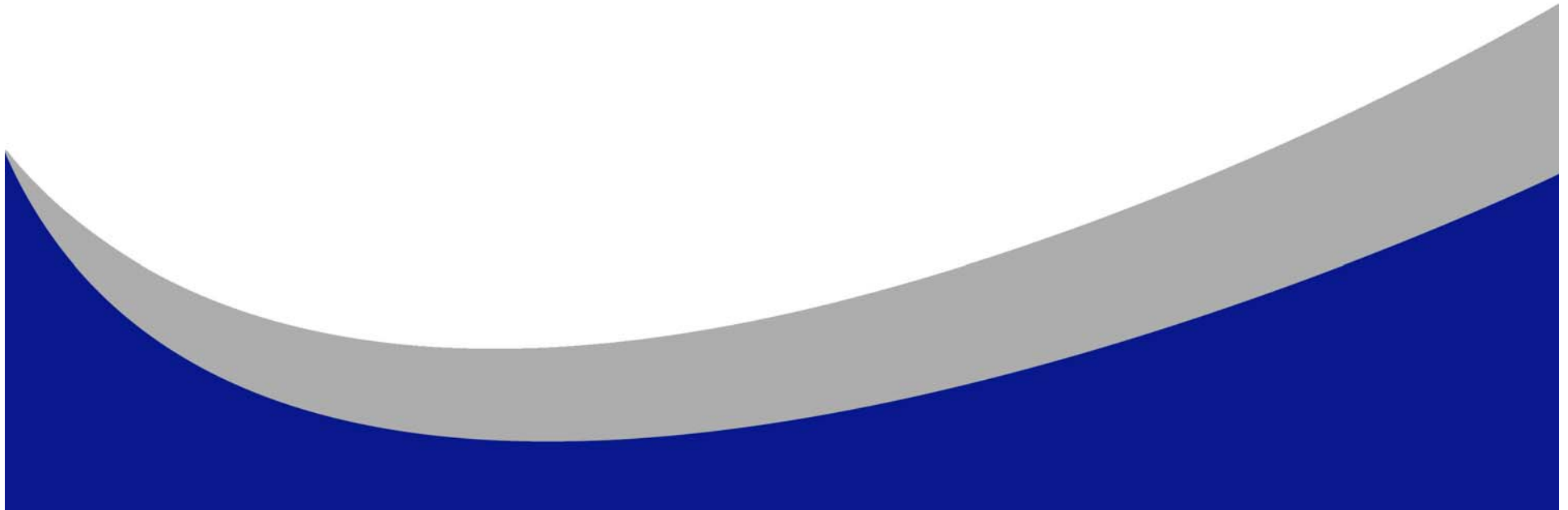




Fraport AG
Values Management System



Important Information at a Glance

- **Start:** Following a resolution from the executive board of Fraport AG, the Values Management System was introduced in January 2003.
- **Reason:** Capacity expansion plans increase the danger of corruption.
- **Goal:** Ensuring continuous business ethics throughout all Fraport divisions.
- **Focus:** Abidance by the law, dealing with gifts, handling of company property and company information
- **Function:** Safeguarding the organization and its employees against economic damage from unethical behavior.
- **Form:** Code of conduct and associated implementation process.

Values Management Concept

Definition:

- **Values Management encompasses all corporate statements, measures, methods and tools which ensure the **practical implementation** of **ethics-oriented** and **responsible** management.**
- **Values Management is aimed at creating a **living culture of moral values** and at **enhancing the primary responsibility** of the members of the organization which goes beyond formal compliance with laws and regulations.**

Values Management Concept

Principal questions

- *“Which values do we want to use as a basis for conducting our business and designing our internal and external processes and contacts?”*
- *“By which standards do we want to be measured?”*
- *“How can we operationally anchor these value?”*

Goals of Fraport's Values Management

- **Protecting the company**
 - preventing financially damaging practices
 - ensuring transparent and clean business transactions
- **Protecting the management**
from becoming personally liable within the scope of management responsibilities
- **Protecting the employees**
from consequences resulting from ignorance or lack of information
- **Protecting the investors** against loss of capital
- **Assuming social responsibility**
as one of the state's biggest awarders of construction contracts

What is Fraport AG' s Values Management?

- **The main element is the code of ethics**
 - “Fraport AG Standards of Behavior/ Rules for Dealing with Gifts and Courtesies“
- **Implementation process to anchor the system operationally in business practice**
 - Integration in business and management processes
 - Implementation at subsidiaries and associated companies
 - Communications concept (training, information events, etc.)
 - Dialog with stakeholders (suppliers, general public, etc.)

The Fraport Code of Ethics

Contents:

- I. Abiding by the law: Compliance with all laws and legal provisions**
- II. Respect and loyalty toward the company interest;**
this also applies with regard to company property and information
as well as any conflicts of interests
- III. Rules for dealing with gifts**

Message:

Conduct which jeopardizes the company's integrity will not be tolerated on any account!

Implementation Measures Taken

- **Management and business processes**
 - Codification of the Fraport Standards of Behavior/ /Rules on Gifts
 - Integration in the Fraport AG guidelines
 - Integration in the development of management personnel
 - Integration in the function of the internal ombudsperson

- **Initiation of a dialog with our business partners**

- **Fraport AG expects its business partners**
 - to take note of the Values Management
 - to ensure ethical business practices and business integrity

Communication Measures Already Implemented

- **A large number of training and communication measures for different areas and target groups**
 - From top management to operational staff
- **Preparation and supply of area- specific information and communication tools**
- **Two online surveys from which recommended practices are derived and which are used to investigate changes.**
- **Intensive external and internal reporting**

Integrity Clause on Construction Work (applies to architects and engineers by analogy)

The Client sets the highest standards of business ethics regarding the awarding and implementation of construction work. The Contractor represents and warrants that it has taken note of the Client's values management policy and has instructed its employees and subcontractors to comply with the same. For the purpose of ensuring the required business ethics, the Contractor hereby agrees to take all necessary measures to prevent the commission of any unlawful acts to the detriment of the Client. To this end, the Contractor must take all organizational precautions within its enterprise to enable it to supervise its employees' compliance with values-oriented codes of conduct. In order to guarantee the proper implementation of the construction contract in this respect, the Contractor itself must establish an integrity program for its enterprise and ensure its employees' and subcontractors' compliance with the same at all times.

Anti-corruption Clause in Consulting Contracts

The Contractor hereby affirms that neither it nor any enterprise or employee associated with it has received or given any unlawful payment, bribe money, kickback, or other illegal payment or promise, either directly or indirectly, in connection with the consulting services and will not do so in the future.

The Consultant also affirms that it has informed itself of the relevant statutory provisions of the countries affected by the order or the implementation of the same. Furthermore, the Consultant represents and warrants that it has likewise observed said statutory provisions and will do so in the future.

Instructions on an Embargo on Orders for Construction, Delivery, and Service Contractors

The trustworthiness of enterprises, applicants, and bidders is an essential requirement for the awarding of public contracts. These parties may be excluded from participating in competitive biddings if there is evidence that their management or employees have engaged in any serious misconduct that casts doubt on their trustworthiness. Serious misconduct includes, regardless of the form of involvement in the perpetration, instigation, or aiding and abetting of the same, fraud, breach of trust, collusive tendering, offering or granting benefits to employees of Fraport AG, or providing assistance with planning or bidding in order to undermine competition. In the event of such serious misconduct, a party may be excluded from participating in competitive bids for a period of six months to three years or, in particularly serious cases, up to five years. Any party who is excluded from participation is also prohibited from being used as a subcontractor or in joint ventures.