F6.0 Corporate Guideline on Occupational Health and Safety (Extract)

OH&S (Occupational Health and Safety) Management System in the Fraport Group

Holistic, integrated occupational health and safety is a key element of our overall corporate responsibility within the Group and within the individual companies at the various locations.

Ensuring the requisite structural and process organization and putting in place the joint essential conditions for occupational health and safety help to create efficient work processes while also boosting motivation, job satisfaction and the identification of our employees with the Group companies.

For the Fraport Group, the formulated occupational health and safety policy and its principles form the joint platform on which holistic occupational health and safety is built. They are defined in greater detail by the “Ten principles of occupational health and safety for safe and healthy working” and provide the foundations for trust-based collaboration in the company.

This corporate guideline contains these common rules and regulations and the principles of cooperation in occupational health and safety formulated for the companies in the Fraport Group. This guideline applies directly to the Group companies in accordance with the criteria defined within it (see section 2). It is serves as a reference framework for the companies to introduce their own OH&S management systems. Adequate scope for action based on local circumstances is maintained. The Group companies formulate this scope for action independently, while building on the premises described in this regulation. To improve readability, the following document uses the masculine gender generically instead of using female and male forms simultaneously. All personal designations apply equally to all genders.

signed for Fraport – Group Executive Board

M. Müller
## Version

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1. **Occupational Health and Safety Management System in the Fraport Group**

1.1 **Principles**

The OH&S (occupational health and safety) management system describes the organization, the tasks, and the responsibilities of occupational health and safety and occupational medicine within the Fraport Group. It supports the goal of securing equal protection for all employees and legal certainty for the management. Local statutory regulations relating to occupational health and safety and occupational medicine must always be implemented by the responsible managers on site.

1.2 **Fundamental Assignment of Responsibilities to the Chief Occupational Health and Safety Expert of the Fraport Group and the Chief Company Doctor of the Fraport Group**

As a matter of principle, the Chief Occupational Health and Safety Expert of the Fraport Group and the Chief Company Doctor of the Fraport Group are jointly responsible for the occupational health and safety tasks described in the following sections and assigned to them and the associated management system, unless explicitly stated otherwise. To improve readability, this guideline uses the term “OH&S MS Management” as a synonym for these responsibilities.

Responsibility for the functionality of the system and its organization within the Fraport Group is assigned to the Chief Occupational Health and Safety Expert.

1.3 **Integration of the OH&S MS in the Management System Structure of the Fraport Group**

The management system summarized in this guideline references the principles of the management systems in the Group, which are described in the Corporate Guideline F8.0 “Regulations Governing Management Systems”, and focuses on the systemic specifics of an occupational health and safety management system based on DIN ISO 45001. However, the fact that it is based on DIN ISO 45001 does not necessarily mean the system needs to be certified.

The responsibility for deciding whether certification under DIN ISO 45001 should be applied for lies with the individual Group companies. In such an event, this corporate guideline also serves as a higher-level framework for a management system for health and safety at work and necessitates a supplementary corporate handbook in which the standard specifications of occupational health and safety are required to be taken into account at the local level.

2. **Scope of the OH&S MS**

2.1 **Fraport AG and Controlled Companies in Germany**

This corporate guideline has to be implemented by Fraport AG and all companies (with their own personnel) in Germany that are directly or indirectly controlled by Fraport AG, irrespective of their individual legal form.

For the purposes of this corporate guideline, companies are deemed to be controlled if Fraport AG by virtue of its shareholder rights or other (e.g. contractual) rights is able to issue legally effective instructions to the management on specific
implementation measures as they are regulated in this corporate guideline. Second and third-tier subsidiaries, etc., are to be regarded (also) as controlled by Fraport AG if Fraport AG can also exercise indirect legally effective control over the sub-subsidiary through its influence on the company or companies in which it directly owns shares.

2.2 Fraport-controlled Companies at Frankfurt Airport

The requirements of central occupational health and safety and occupational medicine listed in sections 3, 5 and 9.2 et seq. apply directly to the companies at Frankfurt Airport that have entered into a control and profit and loss transfer agreement with Fraport AG (see list of companies in MSU 6.0.5.2).

2.3 Non-controlled Companies in Germany

These companies (with their own personnel) participate in the OH&S management system voluntarily in accordance with an individually agreed declaration of consent made by the responsible management. The guideline provides the binding framework in this case.

2.4 Companies of the Fraport Group in Other Countries

For (controlled and non-controlled) companies in other countries, this corporate guideline serves as guidance and can serve as a binding framework on the basis of corresponding resolutions (by shareholders/management). The relevant local legislation has to be complied with by the management.

Group Occupational Health and Safety FRA / D / International

Figure 1: Group Occupational Health and Safety Strategy
3. **Occupational Health and Safety Policy, Principles, and Objectives in the Group**

3.1 **Principles of Occupational Health and Safety**

The in-house occupational health and safety goals and principles listed below are based on the policy statement on occupational health and safety (see annex) and are mandatory regulations in all Group companies covered by this corporate guideline (see section 2), unless they contravene the local statutory regulations. They must be reflected at the companies in their own documented occupational health and safety goals and activities.

- Every work-related injury or illness is preventable.
- We do not accept any action that puts safety or health at risk.
- The management provides sufficient resources.
- All managers are aware of their position as role models.
- All employees are individually responsible for preserving their health and jointly responsible for the health of their colleagues.
- Active involvement and training of employees is crucial.
- Rules and regulations are adhered to.
- Any defects identified must be rectified immediately.
- All incidents are investigated in order to prevent future injury, adverse health impacts and property damage.
- We undergo regular inspection via audits at all levels.

3.2 **Objectives and Preventive Activities in Occupational Health and Safety**

The overriding goals of occupational health and safety stem from the following principle:

“Group employees must be protected against accidents, work-related health risks and occupational diseases by preventive measures.”

This principle requires a highly developed culture of prevention within the Group and its Group companies. In order to implement the concepts of prevention in operations, objectives and defined processes have to be defined in the individual Group companies.

3.2.1 **Priority for in-house specialists in the support provided in occupational health and safety**

In order to guarantee the direct implementation of the objectives and the further development of occupational health and safety, each company of the Fraport Group should consult on occupational safety and occupational medicine measures first and foremost with internal (Group) occupational safety experts and company doctors or, when the Group company is not covered by the scope of the local implementation of the EU directives on occupational safety, with the designated officers for occupational health and safety (hereinafter referred to as “designated officers”) who are based in-house in the company (for further information, please see section 9.2).

For Fraport AG and the controlled Fraport Group companies at Frankfurt Airport, central support is provided by the Occupational Health and Safety Unit and the
3.2.2 Prevention activities

Activities related to prevention in the field of occupational health and safety are to be regularly defined and conducted within the OH&S objectives set by the companies. Reports on these prevention activities should be submitted as best practice presentations to the OH&S MS Board so that benefits can be drawn from the positive aspects.

3.3 Roles, Tasks, and Responsibilities

This chapter describes the roles, tasks, and responsibilities of the relevant persons in the management system.

3.3.1 Responsibility of the management for occupational health and safety at the Group level

As part of its overall responsibility, the Group Executive Board defines the Group-wide occupational health and safety policy and higher-level objectives for this corporate guideline. It ensures that it is updated and continues to be developed, and it verifies the effectiveness of the system by means of reviews and audits. It appoints the Chief Occupational Health and Safety Expert of the Fraport Group and the Chief Company Doctor of the Fraport Group to implement this responsibility operationally and regulates their powers (see also section 1.2).

3.3.2 Responsibility of the management for occupational health and safety at the company level

The top management and the subordinate managers in each Group company and in each country in which Fraport operates are responsible for the organization of occupational health and safety, compliance with local laws and regulations governing occupational health and safety, the implementation of occupational health and safety measures, and, in accordance with the decisions taken, for compliance with the requirements of this guideline.

Implementation of the specifications contained in this corporate guideline does not absolve the local management teams of their duty to take all the necessary and, where applicable, supplementary measures for the respective company in order to guarantee occupational health and safety.

The management must review compliance with the occupational health and safety requirements using internal company control mechanisms and make the results transparent. The management is obliged to cooperate with the Chief Occupational Health and Safety Expert and the Chief Company Doctor of the Fraport Group.

The management of all Group companies in Germany and abroad must appoint a responsible contact person for local occupational health and safety (= “designated officer”, see Glossary).

For the purposes of Group reporting and the pursuit of occupational health and safety goals, each responsible officer must fulfill the reporting requirements defined by OH&S MS Management in accordance with section 9.4.9. This section is binding for all companies globally.
3.3.3 Other roles and responsibilities in the OH&S MS

**Group level**
For the companies specified under 2.1 / 2.3, the Chief Occupational Health and Safety Expert of the Fraport Group, acting in a management capacity, is responsible for the controlling, coordination and further development of the OH&S MS. To ensure the functionality of the system as a whole, the Chief Occupational Health and Safety Expert and the Chief Company Doctor of the Fraport Group coordinate the exercise of the governance tasks assigned to them by mutual agreement. The Chief Occupational Health and Safety Expert of the Fraport Group and the Chief Company Doctor of the Fraport Group are the central contacts for occupational health and safety issues in the Group. Their tasks, rights, and duties are specified in section 9.3.

**Company level, Group companies worldwide**
The officers designated by management (see 9.2) advise the management teams and managers on all questions relating to occupational health and safety. They are the technical contacts for the OH&S MS Management of the Fraport Group.

**Company level, national**
The responsible occupational health and safety expert and the responsible company doctor of the respective company are the contacts (see 9.2) for occupational health and safety. They advise the management teams and managers on all matters relating to occupational health and safety (in accordance with the German Act on Works Physicians, Safety Engineers and Other Occupational Safety Specialists). They are the technical contacts for OH&S MS Management at the Fraport Group.

**Company level, national, controlled companies at Frankfurt Airport**
In accordance with the Group structure of Fraport AG (see 9.2), the OH&S MS Management of the Fraport Group is responsible for occupational health and safety at the controlled and/or procedurally integrated Group companies of Fraport AG at Frankfurt Airport in a direct advisory capacity. It advises the Group Executive Board, the management teams and managers on all questions relating to occupational health and safety (in accordance with the German Act on Works Physicians, Safety Engineers and Other Occupational Safety Specialists) (see list of companies in MSU 6.0.5.2).

3.3.4 Committees in the OH&S MS
A distinction is made between the following committees in the OH&S management system of the Fraport Group:

**3.3.4.1 Occupational Health & Safety Board (OH&S Board)**
The Occupational Health & Safety Board (OH&S Board) [Konzern-Arbeitsschutzausschuss (K-ASA)] represents the concerns of Group management relating to the effective and efficient organization of preventive and sustainable occupational health and safety for the Fraport Group worldwide. Experiences and findings are discussed.

In this case the cooperation of the foreign Group companies and holdings is to be ensured by a mandate of the Group companies assigned to a representative of the department in the Fraport Group that is responsible for global investments (BET).
The specific organization of the tasks, rights, and duties of the OH&S Board are regulated in rules of procedure. These are approved and updated by the member of the Group Executive Board who heads the OH&S Board.

### 3.3.4.2 OH&S MS Board

The cooperation and the exchange of experience are organized in the OH&S MS Board, which comprises the OH&S MS Management, the specialist OH&S MS team in the Fraport Group and the officers designated in writing at the Group level (see also Fehler! Verweisquelle konnte nicht gefunden werden.). Details are regulated in the rules of procedure.

### 3.3.4.3 Communication for controlled/procedurally integrated companies at Frankfurt Airport

OH&S MS informs the supported companies about the occupational health and safety situation at Frankfurt Airport at least once every calendar year (in the first quarter) and passes on the decisions of the OH&S Board/Executive Board (see Fehler! Verweisquelle konnte nicht gefunden werden.).

The diagram in Figure 2 below presents the Group occupational health and safety organization:

*OH&S = Occupational health and safety
** = including Frankfurt Airport

**Figure 2: Organizational Chart of the OH&S MS in the Fraport Group**
4. Planning

4.1 Internationally Recognized Occupational Health and Safety Measures

In order to meet the holistic requirement for a functioning OH&S MS that has been adopted, the internationally recognized general occupational health and safety measures should be acted on and developed in all Group companies in relation to the topics below.

- Preparation of risk assessments
- Procurement and use of operating materials and provision of infrastructure
- Documentation of occupational accidents and occupational diseases
- Training courses and instruction on occupational health and safety
- Cycle and scope of occupational health and safety inspections
- Performance of audits
- Occupational health and safety targets
- Reporting requirements in occupational health and safety

The specific contents are described in the annex under 9.4.

4.2 Planning of Changes

In principle, the effects of developments of new, improved or modified products or production processes or the procurement of hazardous materials/substances and other operating materials have to be taken into consideration in advance. This also applies to new services or planned workplaces. It is good practice to involve the responsible occupational health and safety experts, company doctors and designated officers within the Group from the outset in order to avoid negative impacts on occupational health and safety.

Everyone who is involved in developing new workplaces and products is called on to use innovative technologies and materials in order to improve the health and protection of the employees.

4.3 Documentation in the OH&S MS

The documentation in the OH&S MS is drawn up in accordance with the national local specifications and the requirements applying to documented information, which are defined in Corporate Guideline F8.0 for the Group companies involved.

The implementation of and compliance with the measures listed in 4.1 and 9.4 must be documented and archived.

5. Support

5.1 Resources

The resources required to achieve the objectives and measures, in particular to perform risk assessments, accident analyses, instruction in safety, inspections, audits, and training for the management and the workforce, have to be planned and provided.
5.2 Knowledge in the Organization

Each Group company must be aware of its processes and their relevance for occupational health and safety. Risk assessments form the basis of the defined preventive measures. They are a key component of the company documentation and must be available and taken into consideration whenever any change, whether procedural or organizational, is made.

Compliance risks in occupational health and safety are minimized thanks to a documented system for identifying relevant legal or other requirements and technical standards and their availability in the Group company.

5.3 Competence in Occupational Health and Safety

In accordance with the requirements derived from international occupational health and safety standards, all employees of a Group company must receive training in the occupational health and safety issues that are relevant to them. When selecting employees, attention must be paid to ensure that they possess the necessary expertise. When legal requirements call for special qualifications, these must be verified when selecting employees or it must be ensured that these qualifications are acquired before the employees start work.

5.4 Awareness

The OH&S MS, the policy and the objectives, which are summarized in this corporate guideline, and the rules derived from them form an integral part of the internal and external communications.

These must be communicated forcefully and conveyed positively in the daily work by everyone from the top company management down to the operational managers by actively performing their function as role models.

5.5 Communications

The defined policy and the occupational health and safety objectives must be communicated to the employees in the Group companies in a suitable form. They form an integral part of employee appraisals, instruction in safety, and training courses of the managers.

5.6 Management of Resources at the Group Level

The Chief Occupational Health and Safety Expert of the Fraport Group (see also 9.3) is responsible for the design of the OH&S MS at Group level and for the further development of the OH&S MS structures in coordination with the Chief Company Doctor. In accordance with section 1.2, OH&S MS Management is responsible for the functional design, overarching policy and objectives of the OH&S MS and exercises a governance function.

To allow it to fulfill the duties assigned to it, OH&S MS Management of the Fraport Group reports directly to the Executive Board member responsible for occupational health and safety and is thus outside the line organization. It reports directly to this Executive Board member on all occupational health and safety issues within the Group and organizes the management review in accordance with section 7.3.

The Chief Occupational Health and Safety Expert manages the OH&S Board and the board of the occupational health and safety experts/company doctors/designs.
nated officers (OH&S MS Board). OH&S MS Management ensures that recommendations and best practice methods are developed within the framework of the exchange of experience.

6. Operations

6.1 Operational Management in View of Aspects related to Occupational Health and Safety

In the area of operations, it must be ensured by the responsible officers, but also by each employee, that the occupational health and safety requirements are known and complied with. Safety takes priority over operational needs.

Any deviations that arise during operations must be immediately communicated and analyzed and measures to guarantee safety must be instituted.

6.2 Products and Services Provided by Third Parties

In the process chain, the interfaces both with internal departments and with external companies must be examined to see whether they contain any risks related to occupational health and safety, and they must be taken into consideration in the risk assessments; if necessary, measures must be defined in order to ensure a sufficient level of safety within the framework of the OH&S MS requirements.

When agreements are drafted either with service providers or customers, occupational health and safety aspects must be taken into consideration and, if necessary, agreed with the occupational health and safety experts/company doctors/designated officers.

6.3 Development of Services and Products

It is good practice to involve the occupational health and safety organizational structure, the occupational health and safety experts, the company doctors or the designated officers of the Group in the development of new services and products (see 4.2).

7. Performance Evaluation

7.1 Performance Indicators in Occupational Health and Safety

The relevant processes must be monitored by reference to the agreed occupational health and safety goals. Performance indicators must be defined on a process-specific basis by the respective departmental management (by the Chief Occupational Health and Safety Expert and the Chief Company Doctor) and the degree of their attainment measured.

The results of the measurements are to be monitored by the Group company in question; the measures that may need to be instituted in the event of any deviations have to be defined and documented as part of the reporting requirements pursuant to 9.4.9.
7.2 **Key Performance Indicators in Occupational Health and Safety**

Key performance indicators must be collected throughout the Fraport Group worldwide within the framework of the OH&S MS and communicated promptly via the SAP-BPC-AS system.

7.3 **Management Review in Occupational Health and Safety**

It is good practice to record and evaluate the following key points in the management review in accordance with DIN ISO 45001:

- The status of measures from previous management reviews
- Changes in external and internal issues that affect the OH&S management system (risks, opportunities, and legal obligations)
- The extent to which the OH&S policy and the OH&S objectives have been realized
- Information on the OH&S performance (incidents, results, measurements)
- Appropriateness of the resources deployed to maintain an effective OH&S management system
- The relevant communications with stakeholders
- Possibilities for continuous improvement

8. **Improvements**

As a matter of principle, the measures derived from the risk assessments and accident analysis meetings must be evaluated on an annual basis in the Group companies and institutionalized via a continuous improvement process (see also section 4.2).

Furthermore, the requirements relating to continuous improvement of Corporate Guideline F8.0 apply to the Group companies involved.

9. **Appendix**

9.1 **Glossary**

| ASiG | Gesetz über Betriebsärzte, Sicherheitsingenieure und andere Fachkräfte für Arbeitssicherheit – German Act on Works Physicians, Safety Engineers and Other Occupational Safety Specialists |
| BET | Global Investments and Management business unit of Fraport AG |
| OHSO | Designated officer for occupational health and safety and occupational medicine (“designated officer” for short) |
| DGUV | Deutsche Gesetzliche Unfallversicherung – Umbrella organization of the German accident insurance institutions |
| KASA | Konzernarbeitsschutzausschuss (Occupational Health and Safety Board) |

/-/-/-

OH&S MS
9.2 **Occupational Health and Safety Support from In-house (Group) Experts**

...

9.3 **Tasks, Rights, and Duties of the OH&S MS Management of the Fraport Group**

9.3.1 **Tasks of the Chief Occupational Health and Safety Expert**

The Chief Occupational Health and Safety Expert of the Fraport Group performs a governance function for occupational health and safety issues within the framework of this corporate guideline and in accordance with the specifications of and assignment by the Executive Board.

...

He has the authority to issue guidelines relating to occupational health and safety as part of the requirements defined in this corporate guideline ...

...

He is the point of contact for boards, government agencies and accident insurance institutions in matters relating to occupational health and safety.

...

9.3.2 **Tasks of the Chief Company Doctor**

The Chief Company Doctor of the Fraport Group performs a governance function for occupational medicine topics within the framework of this corporate guideline and in accordance with the specifications of and assignment by the Executive Board.

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He has the authority to issue guidelines relating to occupational medicine topics as part of the requirements defined in this corporate guideline, ...

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He is the point of contact for boards, government agencies and accident insurance institutions in matters relating to occupational medicine.
9.4 Measures in Accordance with International Requirements

The following measures should be implemented in the Group companies as follows:

9.4.1 Preparation of Risk Assessments

Risk assessments must be carried out and kept up to date for all relevant activities in due consideration of psychological stresses, the machinery and equipment used, products, and the infrastructure provided. The “(S)TOP” hierarchy of measures forms the basis for any prioritization to be applied in defining the measures derived from the risk assessments.

The aim is to further develop the activities in the company in accordance with the (S)TOP principle in such a way that problems and adverse health impacts can be excluded to the greatest possible extent. All factors, such as the design and organization of the work processes as well as further technical developments and findings from ergonomics and occupational medicine, must be taken into consideration.

9.4.2 Procurement and Use of Operating Materials and Provision of Infrastructure

The work equipment that is used, such as plant, machinery, devices, tools, as well as the design of the workplaces, etc., are produced and procured in accordance with the legal requirements relating to occupational health and safety and occupational medicine and are checked regularly to ensure they are being used safely.

Workplaces must be operated and maintained safely in respect of their permitted use.

9.4.3 Documentation of Work Accidents

Work accidents are recorded and analyzed systematically. The accident analysis also includes accident analysis meetings with the people affected or involved. The causes of accidents are to be identified in the course of these accident analyses, and (if applicable) measures are to be defined to prevent future accidents. The implementation and effectiveness of the measures are to be supervised.

All work accidents and the activities to be derived from them must be documented and archived.

9.4.4 Documentation of Occupational Diseases

Occupational diseases are recorded and analyzed systematically when they become known. These analyses may also include meetings with the people affected or involved. The causes are to be identified in the course of these analyses, and (if applicable) measures are to be defined to prevent future disease events.

9.4.5 Training Courses and Instruction on Occupational Health and Safety

All employees (executives and non-executive employees) must be regularly trained or instructed on their responsibilities and the hazards/risks identified for their activities in accordance with the defined measures.

Managers must be trained in their responsibilities for preventing work accidents as well as with regard to their obligation to supervise compliance with requirements that promote occupational health and safety.
9.4.6 Frequency and Scope of Occupational Health and Safety Inspections

The condition of the workplaces and the equipment used must be examined in the course of regular inspections by the responsible management and the occupational health and safety expert as well as the company doctor responsible for occupational medical support or the officers designated by the company. The results of these inspections and any identified need for action/measures must be documented and their implementation arranged. Occupational health and safety inspections are to be conducted in accordance with regulatory and defined Group and company-specific requirements, and in any case at least once a year.

9.4.7 Performing Audits

Internal audits must be organized and carried out on a regular basis by each company in order to review the effectiveness of the OH&S MS.

Independently of this, occupational health and safety audits must be carried out as part of the management auditing program of the Fraport Group. It will be ensured that each Group company is audited within a three to five-year period.

The process instructions and requirements in the quality management system of the Fraport Group, which are defined in Corporate Guideline F8.0 for Group companies involved, apply for the performance of audits.

9.4.8 Occupational Health and Safety Targets

The occupational health and safety targets are defined in the corporate targets and the personal targets of the responsible officers. The achievement of these targets is monitored. Adequate key performance indicators should be applied in accordance with the Group’s requirements.

9.4.9 Reporting Requirements in Occupational Health and Safety

In order to ensure the flow of information within the framework of the OH&S MS, it is necessary to communicate key developments at specific intervals.

Direct reporting requirements / ad hoc reports
While taking data privacy into due consideration, there is a requirement to report directly by e-mail to the Chief Occupational Health and Safety Expert of the Fraport Group in the event of fatal work accidents or accidents resulting in severe injuries (imminent danger to the victim’s life). A detailed description of the accident has to be included in the form to be used for this (filed in the GalaxyNet of the Fraport Group).

Regular reports
Accident statistics and key occupational health and safety performance indicators must be collected and documented by the Group companies in accordance with the relevant updated requirements and reported and made available to the OH&S MS Management of the Fraport Group within defined time periods. The Fraport Group makes the necessary data acquisition platform (currently SAP-BPC-AS) available to all occupational health and safety experts and company doctors for inspection.

Management review
A management review including statements on the effectiveness of the OH&S MS, the degrees to which targets have been achieved, and the results of audits must be prepared once a year and a copy sent to the OH&S MS Management of the Fraport Group (see also section 7.3). This review is prepared by mutual agreement or formulated by the respective expert depending on the specialization.
Occupational health and safety report
In accordance with international standards, an occupational health and safety report is drawn up by the OH&S MS Management and approved by the Group Executive Board.

Link to the Policy Statement on Occupational Health and Safety of the Fraport Group
Policy Statement on Occupational Health and Safety of the Fraport Group