

# Policy Statement on Human Rights and Environmental Risks

## Foreword by the Fraport Executive Board and the Works Council

The Fraport Group is one of the world's leading companies in the airport business. We are active at 30 airports on four continents with nearly 18,000 employees from 88 countries. In 2021, Fraport's Group airports worldwide served over 136 million passengers and handled almost 3 million tonnes of freight – underscoring the contribution that our company makes to global connectivity.

The coronavirus pandemic and the war in Ukraine – as well as exacerbating social conflicts and the climate crisis – show how quickly our environment and the framework conditions in which we operate are changing. That makes it all the more important for us as a company to rely on clear and non-negotiable values. These values are the foundation on which we work at Fraport. They provide support, give us strength in the work that we carry out every day for our passengers and business partners, and form the basis for the cooperation between all our employees. Moreover, they serve us as guidelines for our human rights and environmental due diligence obligations.

German legislation has taken an important step towards a uniform standard for protecting people and the environment by introducing the German Act on Due Diligence in Supply Chains (LkSG Lieferkettensorgfaltspflichtengesetz) effective January 1, 2023. Fraport expressly welcomes the political commitment of expanding the protection of human rights and the environment to the global supply chains of German companies. The social impact of the act should not be underestimated, as companies will have to follow up on irregularities and prevent breaches. Anyone who wishes to do business with us and other German companies with a workforce of at least 1,000 employees will have to fulfill the requirements of the Supply Chain Act. The politicians are thus sending the right signal: every company should consider human rights and the environment when taking business decisions.

The new Supply Chain Act (LkSG) encourages us to follow the road toward sustainable and responsible management that we embarked on many years ago. We set high standards for our business partners back in 2013 with our Supplier Code of Conduct. The Code is accessible to the public on our website. We have also undertaken to comply with international regulations on the protection of human rights. Our Group-wide environmental policy – which includes the goal to reduce carbon emissions from our business activities to zero by 2045 – also reflects our long-term commitment to improving people's lives and the environment.

With this policy statement we fulfill our duty to make our human rights strategy transparent and accessible to the public, in line with the new Supply Chain Act. As part of this statement, we also report on the measures that we take to ensure compliance with our due diligence obligations regarding human rights and the environment. The policy statement serves us, our employees and our business partners as a compass for all our business activities.



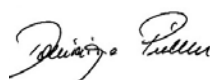
Stefan Schulte



Anke Giesen



Julia Kranenberg



Pierre Dominique Prümm



Matthias Zieschang



Hakan Bölükmeşe



Karin Knappe

## Scope

This policy statement on our human rights and environmental due diligence obligations applies to Fraport AG and all the companies that it directly or indirectly controls (hereinafter “Fraport”). The Executive Board, the respective managing directors, and all executives bear the responsibility for implementing this policy statement.

## International regulations and voluntary commitments

We are committed to the principles of the following internationally recognized human rights frameworks and the standards that they contain:

- Universal Declaration of Human Rights
- Core Labour Standards of the International Labour Organization (ILO)
- OECD Guidelines for Multinational Enterprises
- Ten Principles of the UN Global Compact

In addition to the stated frameworks, we are committed to the Paris Climate Agreement. We play our part in achieving the Sustainable Development Goals (SDGs) that are set out in the United Nations 2030 Agenda for Sustainable Development.

As a values-oriented Group, we set our employees, business partners, and suppliers a binding framework for action on the basis of the principles and standards that are defined in the above-mentioned frameworks. Our employees are also bound by the Fraport Code of Conduct, in which our social responsibility in the areas of economics, ecology, and social affairs is formulated. For our suppliers, the requirements and principles for working with us are described in the Fraport Supplier Code of Conduct. Our suppliers are required to ensure that these standards are consistently complied with and distributed among all other companies that are involved in performing services for us (e.g. subcontractors). The suppliers are requested to remedy any breach. If a supplier cannot prove that the breach has been remedied, this can result in the immediate termination of the business relationship.

## Policy statement on respect for human rights at Fraport

For us, responsible management forms the basis for our action. As a globally active Group, we are aware of the special due diligence obligation we have regarding both our own business activities and our supply and value chains. We respect human rights, take our responsibility to comply with legal requirements seriously, and avoid human rights violations in the course of our business activities.

In particular, we place great emphasis on the following human rights and environmental aspects:

- We reject all forms of child labor.
- We also strictly reject any form of forced labor, slavery or slave-like practices, servitude or other forms of domination or oppression in the work environment. We respect the fundamental right to the freedom of association and the right resulting from this to collective bargaining to regulate general labor conditions in the Group within the framework of national laws.
- We ensure appropriate wages. Compensation at Fraport is under no circumstances lower than the applicable legal minimum standards.
- We undertake to comply with the relevant legal provisions and applicable occupational standards on working hours, paid vacation, and legal holidays.
- We oppose discrimination against people on the basis of their national or ethnic origin, social background, health status, gender characteristics, disability, sexual orientation, limited access to education, political opinion, religion, or belief<sup>1</sup>. In this context, we particularly oppose unequal pay for equal work.
- We expressly oppose the use of torture and degrading treatment as well as physical and mental abuse.

<sup>1</sup> Religion and belief: unless not contradictory to the requirements of the job.

- We have a vision of an accident-free company and a healthy workforce. To this end, we promote integrated occupational health and safety as part of our overall corporate responsibility in the Group and at the various locations.
- We have approved a Group-wide environmental policy and have undertaken to adopt a sustainable, considerate, and careful approach to natural resources and the environment. In the course of our business operations, we avoid activities that cause soil degradation, water pollution, air pollution, biodiversity loss, harmful noise emissions, or excessive water consumption. Furthermore, we are striving to completely eliminate greenhouse gas emissions produced by our business activities by 2045. Similarly, we are reducing the volume of waste caused by our business activities as effectively as possible and deliver unavoidable waste to the circular economy. Specifically, we comply with the duties arising from the Minamata Convention on Mercury<sup>2</sup>, the Stockholm Convention on Persistent Organic Pollutants<sup>3</sup>, and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal<sup>4</sup>. We are committed to ensuring that people do not suffer any harm to their health as a result of our business activities and have access to fresh drinking water and clean restroom facilities and that the natural foundations for sustaining and producing food are not significantly impacted.
- We encourage our employees to use natural resources responsibly.
- We work towards the development and dissemination of environmentally friendly technologies by incorporating ecological criteria in the selection of products and services.

### **Risk management, risk analysis regarding human rights due diligence obligations, and prevention measures at Fraport**

Respecting our human rights due diligence obligations is of the highest priority for us as a values-oriented company. Using our integrated risk management system, we endeavor to anticipate any hazards. The aim of our risk management is to deal with process risks and ad hoc risks in a controlled and deliberate way by identifying, assessing, continually monitoring, managing, and systematically reporting them. Compliance with our due diligence obligations is integrated in our risk management system (RMS) and our internal control system. An analysis of compliance with our due diligence obligations is conducted annually and in an ad hoc manner based on, among other things, a catalog that includes human rights and environmental risks. The risk management and the central organizational integration of the risk assessment conducted by an independent body commissioned by the Executive Board guarantee that the risk analysis is performed within the company as part of a bottom-up and top-down process.

The consideration of human rights and environmental criteria in the selection of suppliers is a key part of Fraport's procurement strategy. We implement suitable measures to ensure that the regulations of the Supply Chain Act are complied with by our direct and indirect suppliers. Furthermore, the suppliers are regularly audited to check for any human rights and environmental irregularities. If irregularities are found, measures are taken that can extend to the termination of a contractual relationship with the supplier.

### **Compliance management system**

At Fraport, we go beyond mere compliance with minimum statutory requirements, but adopt high ethical principles for our actions. Our responsibility to ensure values-based compliance is reflected in our Code of Conduct, which is applicable to the Executive Board, managing directors, executives, and all employees. To harmonize minimum compliance standards and the structure of the compliance management system throughout the Group, Fraport developed a corporate guideline in 2014 that is applicable to all companies that it directly or indirectly controls. A compliance risk analysis has been conducted on a regular basis in the Fraport Group since 2015. This serves as an instrument for identifying, analyzing, and assessing compliance risks. The risks that are recorded and assessed during this analysis form the basis for adequate compliance measures.

<sup>2</sup><https://www.mercuryconvention.org/en/about>, as of August 18, 2022

<sup>3</sup><http://chm.pops.int/>, as of August 18, 2022

<sup>4</sup><http://www.basel.int/>, as of August 18, 2022

### **Electronic whistleblower system**

A certified electronic whistleblower system has been introduced to record and prevent conduct that may be damaging to the company. The system allows employees, suppliers, customers, and injured parties to report irregularities online. It can be accessed from around the world and at any time of the day or night, so that whistleblowers can report information, including about breaches of this policy statement, anonymously, confidentially and directly. Each report undergoes an intensive review of the facts presented in it, human rights and environmental risks are assessed, and corrective measures are initiated if necessary.

For more information on Fraport's compliance management and the whistleblower system, please see our Code of Conduct, our Supplier Code of Conduct and the [Compliance](#) section on our website.

### **Documentation and reporting**

Implementing our human rights and environmental due diligence obligations is a continual process that is subject to regular internal audits. This policy statement will be updated accordingly as necessary. For up-to-date information on human rights and environmental issues, please see our non-financial declaration and other publications on sustainable and responsible corporate management in the [Commitments](#) section of our website.

You will find our ESG Factbook, our combined non-financial declaration, and our EMAS-validated environmental statement under [Publications](#).