



Code of Conduct

for Employees of Fraport AG



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1. Policy of Fraport AG

We are convinced that sustainable business activity is the key prerequisite for our company's ability to meet future challenges and for our claim to a position of leadership in the industry.

In its role as an international provider of high-quality airport services, Fraport AG continuously works to optimize processes, products, and services with an eye to our employees, customers, owners, the environment, and society while developing responses to future challenges at an early stage.

This enhances the company's value in the long term, which benefits our employees* and stakeholders and serves to express the increasingly sustainable alignment of our business activities.

Everything we do each and every day is based on the Fraport basic values of honesty, integrity, trustworthiness, responsibility, transparency, loyalty, and fairness.

We are also committed to upholding the principles of the UN Global Compact in the areas of human rights, labor standards, environmental protection, and fighting corruption.

We are also guided by the core labor standards of the International Labour Organization (ILO), the conventions of the United Nations, and the OECD Guidelines for Multinational Enterprises.

** Fraport defines "employees" as meaning all employees and temporary agency workers who work for Fraport, including executives, part-time employees, working students, those employed for brief periods, trainees, apprentices, and interns.*

2. Overview

Philosophy and Scope of Application

Preamble

Fraport AG (hereinafter "Fraport") is a provider of high-quality airport services.

Scope of application

The principles of the Code of Conduct are binding on the Group worldwide, within our sphere of influence. They apply to all Fraport employees.

Compliance

Compliance with laws, regulations, accepted standards, guidelines, and principles

We are committed to compliance with the applicable national laws and regulations and to upholding internationally accepted standards, guidelines, and principles.

Prevention of corruption

We and our employees comply with the relevant provisions of law and regulations on fighting corruption.

Antitrust and competition law

Fraport and its employees respect the principles of fair competition with other enterprises that operate on the market. The applicable national and international antitrust laws and regulations and the laws against unfair competition must be complied with.

Confidentiality, data protection and privacy

Business and trade secrets must be kept confidential. Confidential information must not be disclosed to third parties without authorization.

Working conditions

Occupational safety and health

We take care to ensure a safe, secure, healthful, and hygienic working environment for all employees and affirm that we take the necessary measures to prevent accidents and adverse health effects in these activities. At the same time, we expect our employees to conduct themselves with personal responsibility.

Dealing with alcohol and drugs

Consumption of alcohol and drugs is strictly prohibited during working hours and is not permitted anywhere on company premises.

Working hours

We agree to comply with the relevant provisions of law and occupational standards on working hours.

Compensation

Pay at Fraport is in accordance with the applicable legal and collective agreements and occupational standards/regulations.

Dealings with others

Fraport demands that all employees deal with one another in a spirit of fairness and respect.

Human Rights

Freedom of association and collective bargaining rights

We respect the fundamental right to freedom of association and the right to collective bargaining in order to settle general labor conditions within the Group. We offer the authorized bodies representing the employees an open and trustful collaboration and seek to ensure a fair exchange of interests within the Group.

Dealing with child labor and forced labor

Fraport rejects all forms of forced labor and child labor.

Diversity

Employee diversity offers a wealth of potential. All forms of discrimination are prohibited.

Final Provisions

Information and communications

We make sure that all employees are made aware of the provisions of this Code of Conduct.

Dealing with reports of violations

Fraport urges all employees to report cases in which there is good reason to believe this Code of Conduct has been violated.

Sanctions

In the event of violations, we reserve the right to take legal action depending on the severity of the violation.



3. Philosophy and Scope

3.1 Preamble

Fraport AG is a provider of high-quality airport services.

In line with our basic values of honesty, integrity, trustworthiness, responsibility, transparency, loyalty and fairness, we have high standards for doing business in a manner that is socially, economically, and ecologically sustainable for the future; we view sustainability as shaping the future responsibly.

Our reputation and good name as a company are key components of our success. All of us contribute, with all our work, each and every day to the positive image of Fraport.

The Code of Conduct set out in this document reflects the culture of values we uphold at Fraport and offers our employees a framework for dealing responsibly with the economic, legal, and ethical challenges of day-to-day business and taking action appropriately.

At all Group locations, Fraport is committed to conserving the natural basis for life and strives to engage in environmental management to protect and preserve natural resources.

3.2 Scope of application

The principles of the Code of Conduct are binding on the entire Group, worldwide. They apply to all Fraport employees.

The Fraport Code of Conduct cannot provide detailed instructions on how to act in all situations, nor is it intended to do so. Instead, it represents the general framework and the principles of action that guide Fraport. How those principles are to be observed in real-world practice is, therefore, specified where necessary by internal company rules, regulations, and instructions. Existing guidelines, collective labor agreements and internal company agreements apply without limitation alongside the Code of Conduct. Local adjustments may be made to take account of special circumstances, but must in all cases be based on the current Code of Conduct.

All executives are tasked with upholding and spreading the Code of Conduct within the company and with ensuring compliance herewith. In their function as role models, they bear special responsibility in this regard.





4. Compliance

4.1 Compliance with laws, regulations, accepted standards, guidelines, and principles

Sustainability stands for more than just stated assumption of responsibility in the areas of the economy, ecology, and social matters. It also stands for our company's actions in striving to fulfill its role as an accepted part of our society through uncompromising compliance with its laws, rules, and regulations.

As a result, we are committed to compliance with the applicable national laws and regulations and uphold internationally accepted standards, guidelines, and principles, especially the principles of the UN Global Compact, the Universal Declaration of Human Rights, the conventions of the United Nations, and the core labor standards of the International Labour Organization (ILO) as well as the OECD Guidelines for Multinational Enterprises.

The principles set out in the rest of this Code of Conduct must be observed by our employees and must not be circumvented through contractual agreements or comparable measures.

4.2 Prevention of corruption

The relevant legal provisions on fighting corruption must be observed. In our dealings with customers, suppliers, and service providers as well as with government institutions, the interests of Fraport and the personal interests of Fraport employees must be kept strictly separate by both sides. Actions and decisions, especially purchasing decisions, must always be free of non-objective considerations and personal interests. This means that money, or personal advantages or perquisites with monetary value, must never be either accepted or offered in return for preferential treatment during business dealings.

Furthermore, our employees agree not to offer, promise, request, grant, or accept any gifts, payments, invitations, or services during the course of business dealings where so doing could affect a business relationship in an impermissible manner. Our dealings with the above-mentioned advantages and perquisites are determined by the Fraport principles of legal compliance, responsibility, and appropriateness. For comprehensive explanation, please see the detailed rules accessible on www.fraport.com in the “Compliance” section.

Appreciation and respect for every human being are high priorities for us and among our core values. Cultivating and developing each and every individual’s potential for achievement lies at the heart of management’s responsibilities toward employees. We expect our employees to identify with the Company’s goals and demonstrate loyalty with regard to the Company’s interests. With that in mind, employees should avoid situations in which their personal, family, or financial interests could conflict with those of Fraport. If it becomes apparent that such a conflict of interest could arise, the person concerned should disclose it and request the approval of the appropriate manager or contact the “Corporate Compliance and Values Management” unit or the appropriate persons within the Group affiliates.

We encourage our employees to report corrupt and unlawful behavior. The first point of contact for this is the relevant manager.

If an employee does not wish to contact that manager, other appropriate communication channels are available (see 7.2 “Dealing with reports of violations”), “Dealing with reports of violations”).

4.3 Antitrust and competition law

We respect the principles of fair competition with other enterprises that operate on the market.

We expect our employees and service providers to comply with all applicable national and international antitrust laws as well as the laws against unfair competition wherever relevant to the scope of their specific responsibilities. Agreements, understandings, or activities that affect prices or conditions, allocate sales territories or customers, or impede free, open competition in an impermissible manner are prohibited. Agreements and understandings between customers and suppliers with the intent of restricting the freedom of contractual partners concerning prices and other conditions (setting of prices and conditions) are also prohibited.

Reports regarding anticompetitive behavior must be directed to the appropriate manager. For questions regarding whether certain actions are permitted under competition or antitrust law, please feel free to contact the appropriate manager (see 7.2 “Dealing with reports of violations”).

4.4 Confidentiality, data protection and privacy

We are committed to transparent communication within the limits of business confidentiality. Our employees agree to maintain confidentiality with regard to business and trade secrets and to comply with the laws on data protection and privacy.

5. Working Conditions

5.1 Occupational safety and health

Preventing accidents and illnesses in the workplace is a priority for Fraport. We are committed to protecting and promoting good health, and we take care to ensure a safe, secure, healthful, and hygienic work environment for our employees. We provide appropriate equipment and materials and take the necessary measures to prevent accidents and adverse health effects that could arise in connection with our activities. We are committed to continuous improvement and further development of the work environment.

We expect our employees to assume personal responsibility for maintaining their health, and we support them in maintaining or developing a healthful lifestyle.

All employees receive regular information - aligned to their job and duties - on applicable health and safety standards as well as safety measures and are required to comply with the protective measures that are in place.

5.2 Dealing with alcohol and drugs

Health and safety are of great value to individuals and are also important to our company's success and reputation. Being able to make decisions without limitations is also an essential prerequisite when it comes to operating responsibly and securing our position amid the competition. For these reasons, working under the influence of alcohol, drugs, and other intoxicants and consumption of these substances during working hours are strictly prohibited while maintaining the right of co-determination.

5.3 Working hours

We are committed to compliance with the relevant legal and collective provisions and occupational standards on working hours, paid vacation, and legal holidays as well as the relevant ILO conventions.

5.4 Compensation

Compensation at Fraport is aligned to the relevant labor market and is under no circumstances lower than the applicable legal minimum standards or the minimum standards set by collective agreements.

5.5 Dealings with others

The principle of respect is a key component of the Fraport culture of values. Fraport stands for fair, respectful dealings with one another in a spirit of partnership. We do not tolerate any form of bullying or verbal, physical, and/or sexual coercion, violence, and/or harassment.

6. Human Rights

6.1 Freedom of association and collective bargaining rights

We respect the fundamental right to freedom of association and hereof the right of collective bargaining in order to settle general labor conditions within the Group.

We offer the authorized bodies representing the employees an open and trustful collaboration and seek to ensure a fair exchange of interests within the Group.

6.2 Dealing with child labor and forced labor

Fraport rejects all forms of forced labor and child labor.

The age limit for permitted employment shall not lie below the age up to which children are required to attend schooling and shall not in any case lie below 15 years (or 14 years insofar as permitted by national law in compliance with ILO Convention 138). Adolescent employees must not be exposed to any dangerous or unsafe situations or to any situations that can adversely affect their health.

We are committed to ensuring that the rights of children and adolescents are respected. We do not tolerate any form of exploitation of children or adolescents. We ensure that the ILO conventions as well as international standards and regulations for the protection of children and adolescent employees are complied with.

6.3 Diversity

As an enterprise with an international alignment, Fraport fosters diversity in its staff, acting according to the principle of equality and rejecting all forms of discrimination.

We are committed to prohibiting all forms of differentiation, exclusion, or preferential treatment particularly based on:

- ethnic, national, and/or social origin
- race
- skin color
- sex
- age
- religion, creed, and/or worldview
- political activities
- membership in an employee organization
- disability
- sexual orientation.

Fraport fully complies with the applicable laws and regulations.



7. Final Provisions

7.1 Information and communications

All employees have access to the provisions of this Code of Conduct - including in their local language at our associated locations.

Questions regarding the understanding of this Code of Conduct can be addressed to an individual's manager, to the "Corporate Compliance and Values Management" unit or to the appropriate persons within the Group affiliates. For other issues concerning the understanding or interpretations regarding compliance, please contact Mrs. Elke Breuer (Vice President Corporate Compliance and Values Management, RAC-CW), Tel. +49 (0)69690-60121.

7.2 Dealing with reports of violations

We expect all employees to act responsibly and in line with the principles outlined in the Code of Conduct. We promote open, candid dealings with each other and foster a culture of mutual trust between employees and their individual managers. This applies both to the concrete meaning of the Code of Conduct in individual cases and to possible violations.

If an employee does not wish to contact his or her direct supervisor or the next higher manager, there are other ways available in Fraport Group, where cases of noncompliance with the Code of Conduct or economic offences can be reported. Whistle-blowers are guaranteed protection when they use any of these reporting channels.

Alongside the direct supervisor, the following contact person is available for employees at the Frankfurt site, especially in the event of suspected serious criminal offences:

The external ombudswoman, Annette Parsch, Attorney at Law, who can be reached toll-free (within Germany) under telephone number 0800 1230125 or fax number 0800 1230126, as well as by e-mail at parsch@ombudsfrau-parsch.de.

For more information, please visit the website of the Fraport ombudswoman: www.fraport.com/ombudswoman

The electronic reporting system of Fraport AG was established to accept reports of serious violations of the Code of Conduct and/or economic offences. You can access this system at the website www.fraport.com, under "Compliance".

Detailed information on all reporting channels is available on the intranet.

For Fraport's German and international Group companies, reports are accepted by the relevant local compliance officer or the electronic reporting system, in the relevant local language.

We point out that in individual cases, we are legally obligated to communicate information that is fundamentally to be treated as confidential to third parties (for example, in order to initiate investigative proceedings). It is possible that the person submitting the report might be called on to testify as a witness.

7.3 Sanctions

In the event of violations, we reserve the right to take disciplinary or legal action depending on the severity of the violation.

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Dr. Stefan Schulte
Chairman of the Executive Board



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