

**Rules of Procedure for Grievance Handling
pursuant to Supply Chain Act
("Lieferkettensorgfaltspflichtengesetz" or "LkSG") Article 8**



I. Introduction

Hamburg Airport and its majority holdings* hereby undertake to observe human rights and to protect the environment. It is the declared goal of the company leadership to respect, protect and promote human rights and the environment throughout the entire value creation chain. Breaches of internationally established human rights and of national or international environmental protection regulations shall not be tolerated. Hamburg Airport adopts appropriate and effective measures to identify and verify risks related to human rights and the environment within the company's own areas of business and throughout the entire supply chain, and to prevent the materialisation of such risks. Obligations within the duty of care for human rights and the environment include the establishment of an effective Grievance Handling Procedure whereby persons may report breaches, risks and other circumstances.

These Rules of Procedure explain the process for submitting and processing of reports. They set out how to reach the Grievance Handling Procedure, who is responsible for Grievance Handling, the exact process once a report (grievance) is received and what measures are undertaken to protect the person lodging the report. The Grievance Handling Procedure is aimed at providing whistleblowers with a simple and safe means of making contact so that risks relating to human rights and the environment, along with breaches within the supply chain, can be recognised at an early stage, minimising and eliminating any resultant damage.

II. Recipients and Scope of Grievance Handling Procedure

The Grievance Handling Procedure is publicly accessible and available to all persons, whether within Germany or abroad. The Grievance Handling Procedure enables persons to provide information on risks to, and breaches of, human rights or environmental obligations resulting from business activities of Hamburg Airport or its majority holdings or at any point within the supply chain.

III. Process

Regardless of the means of reporting used, the process followed is the same from the point at which information is received.

1. Responsibility for Grievance Handling Procedure

The receipt and processing of information is the exclusive responsibility of employees who act impartially, are bound to maintain confidentiality and are not subject to any instruction or order within the context of the Grievance Handling Procedure.

2. Making a Report

Various means of reporting are available to whistleblowers:

- A web-based, multilingual reporting portal is available at the following link:
<https://prod.osapiens.cloud/portal/portal/webbundle/supplier-os-hub/supplieros-hub/public-access-app/complaint.html#/public/hub/flughafen-hamburg/DEFAULT/complaint/new>
- Postal reports may be sent to the following address:
Hamburg Airport, Flughafenstrasse 1-3,
22,335 Hamburg
- Reports may be lodged confidentially or anonymously. The web-based reporting portal may be used to follow the status of processing a report lodged via the portal.

3. Receipt of Report

After a report has been received, the person making the report receives confirmation. As a rule, the confirmation of receipt is sent immediately, but in individual cases the confirmation may be delayed by up to two weeks.

4. Processing of Report

Once a report is received, it is centrally verified and then assigned to a processing officer. Reports relating to majority holdings of Hamburg Airport may, where appropriate, be passed on to processing officers at the company in question. The responsible processing officer shall manage the relationship with the reporting person, investigate the facts of the case and, where appropriate, discuss them with the reporting person. Should it be determined that there has been a breach of duty related to human rights or the environment, the responsible processing officer shall promptly

initiate remedial measures. Should it be determined on the basis of a report that there is a risk to human rights or the environment, without an actual breach, the responsible processing officer shall initiate preventive measures. Reports are taken into account in risk analysis. The findings from investigating the facts of the case shall be communicated with the person who made the report, and where appropriate, further steps shall be discussed with this person.

As a rule, reports are fully processed within three months of receipt.

5. Making an Anonymous Report

Reports may, as a matter of principle, be lodged anonymously. When a report is lodged anonymously, no data are recorded which could enable the identity of the whistleblower to be determined. Should a person lodging an anonymous report provide information that may enable the determination of their identity, this information shall be treated in confidence.

6. Protection of the Reporting Person

Furthermore, when a report is lodged, confidentiality shall be ensured for personal data and any other information which may allow the identity of the person lodging the report to be determined. A report may only be viewed by the responsible processing officer for the report and by the person responsible for assigning reports. All responsible processing officers have been specially selected and trained. Hamburg Airport takes appropriate measures to ensure that the reporting person is protected from being disadvantaged or punished for the report lodged.

7. Documentation of Reports

Reports shall be stored for seven years pursuant to LkSG Art. 10 Para. 1 No. 2.

* Mehrheitsbeteiligungen des Hamburg Airport sind folgende Gesellschaften:

- HAM Ground Handling GmbH & Co. KG;
HAM Ground Handling Verwaltungs GmbH;
- CATS Cleaning and Aircraft Technical Services GmbH & Co. KG; C.A.T.S. Verwaltungs-GmbH
- Aerotronic-Aviation Electronic Service GmbH;
- GroundSTARS GmbH & Co. KG;
GroundSTARS Verwaltungs GmbH;
- RMH Real Estate Maintenance Hamburg GmbH;
- SAEMS Special Airport Equipment and Maintenance Services GmbH;
- SecuServe Aviation Security and Services Hamburg GmbH;
- SES Sustainable Energy Solutions GmbH & Co. KG;
SES Sustainable Energy Solutions Verwaltungs-GmbH;
- STARS Special Transport and Ramp Services GmbH & Co. KG; S.T.A.R.S. Verwaltungs-GmbH;
- AIRSYS – Airport Business Information Systems GmbH

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Christian Kunsch
Vorsitzender der Geschäftsführung
Hamburg Airport



Berit Schmitz
Geschäftsführung
Hamburg Airport



Impressum:
Flughafen Hamburg GmbH
Flughafenstraße 1-3
22335 Hamburg

info@ham.airport.de
www.hamburg-airport.de
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