

Policy Statement of Flughafen Hamburg GmbH



Scope

Flughafen Hamburg GmbH including its majority holdings (hereinafter "Hamburg Airport Group") is committed to the highest standards of sustainability, encompassing ecological and social responsibility along with good corporate governance. This also includes respect for human rights as a core value as well as the observation of environmental standards. The respective executive boards and managers are responsible for the fulfilment of this Policy Statement.

The Hamburg Airport Group is committed to internationally recognised norms, guidelines and principles. This includes, in particular:

- the Universal Declaration of Human Rights
- the Declaration on Fundamental Principles and Rights at Work (International Labour Organisation)
- the Ten Principles of the UN Global Compact.

In addition to these aforementioned framework documents, we are committed to all authoritative regulations and codes related to environmental law and to the national implementation of the Paris Climate Accords. We are playing our part in achieving the Sustainable Development Goals (SDGs) identified in the United Nations 2030 Agenda for Sustainable Development.

Principles and Scope

The essential principles and rules of action, along with the standards imposed by the Hamburg Airport Group in its dealings with business partners and stakeholders, are encapsulated in the Hamburg Airport Code of Conduct, which is binding on all directors, managers and employees of the Hamburg Airport Group.

Internal Relationships

The Code of Conduct represents the chief reference framework for the Executive Board and for all managers and employees of the Hamburg Airport Group. It contains all fundamental principles and rules for responsible and ethical conduct towards persons both inside and outside the group.

The respective executive boards, managers and employees of the Hamburg Airport Group are duty

bound to comply with the applicable national and international laws, ordinances and regulations along with internal directives. This also includes, for example, the ban on anti-competitive behaviour, cartelisation, monopolisation, undeclared employment, child labour, forced labour and violence.

The special importance of environmental protection for Hamburg Airport is not just something of past and present, but also continues into the future.

Employees are therefore required to be sparing in their use of ecological resources within the context of their daily work. Work processes are to be designed in such a way that the consumption of energy and other natural resources is minimised whilst having regard to recycling and waste separation. FHG Group employees comply with all applicable environmental laws and regulations within their work setting.

External Relationships

As the Hamburg Airport Group, we set a high standard with our Code of Conduct not only internally but also for our external relationships.

Our suppliers and service providers are required to consistently circulate and comply with these standards, for themselves and also for all other companies and businesses (e.g. subcontracts) involved in the provision of services. In the event of a breach, suppliers are required to demonstrably resolve and remedy such. Should this not take place, the business relationship may be terminated as a result.

The Hamburg Airport Group expects of its suppliers, service providers, subcontractors and all other companies and individuals in the supply chain that there will be no breach of human rights, of internationally recognised labour standards or of environmental obligations.

Environmental protection is of the utmost importance to the Hamburg Airport Group. For this reason, breaches of applicable environmental law by our suppliers/service providers and their subcontractors will not be tolerated. Compliance must be ensured with international treaties valid in Germany, in particular with the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal.

Policy Declaration of the Hamburg Airport Group on Respect for Human Rights and Environmental Law

As a responsible corporation, the Hamburg Airport Group is committed to maintaining human rights and protecting 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.

The Hamburg Airport Group advocates especially for recognised standards of human rights and environmental protection, such as:

- compliance with human rights and employment law
- prohibition of child labour, all forms of forced labour and slavery
- prohibition of all forms of discrimination, with the precept of equal opportunity
- requiring pay and working hours to be in line with wage accords and agreements
- freedom of association
- protection of freedom of speech, personal rights and privacy
- occupational health and safety
- protecting human rights in the deployment of security personnel
- environmental protection as a human right
- the Stockholm Convention on Persistent Organic Pollutants
- the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal
- the international Minamata Convention on Mercury

Declaration on the Determination and Entrenchment of Risk Management in the Hamburg Airport Group

The Hamburg Airport Group is committed to dealing responsibly with risks. This is ensured by means of the systematic and continuous management of corporate risks and opportunities.

To this end, the Hamburg Airport Group has established risk management for all major business processes with the goal of preventing or minimising all risks, including those relating to human rights and to the environment. This risk management system is monitored and integrated within our overall Risk Management System (RMS).

Compliance with the requirements of the Supply Chain Act is verified by way of risk analysis. Part of the

analysis for compliance of our duty of care, conducted annually and where appropriate to incidents or events, involves a catalogue of risks relating to human rights and environmental issues. Risk management and the centralised organisational embedding of risk assessment guarantee the appropriate analysis of risk within the company in the framework of a bottom-up and top-down process. Risk analysis is conducted regularly – at least once a year – and verifiably documented.

The results of risk analysis feed into the development of specific measures to avoid or minimise adverse impact of business operations. In this process, the Hamburg Airport Group employs a combination of various measures incorporating findings from activities within the business processes.

Organisation and Implementation

The Hamburg Airport Group aims to create a culture of sensitivity in dealing with human rights and applicable environmental standards, and to ensure the consistent compliance with these in daily business operations by means of an efficient organisational structure.

A range of internal processes and measures are aimed at ensuring compliance with human rights, indicating areas where action is needed and, where necessary, facilitating corrective intervention. Examples include:

- The establishment of an interdisciplinary risk board with clearly defined structures and responsibilities to ensure compliance with duty of care and its implementation within the Group.
- Establishment of a risk board for specific incidents. As required, responsible persons from the various business units of the Hamburg Airport Group take part. Meetings investigate incidents, discuss risks and determine the necessary measures.
- Adjusting purchasing practices and procurement processes to take into account human rights and environmental issues.
- Human rights and environmental criteria are taken into account in the selection of suppliers within all Hamburg Airport Group procurement projects. Compliance with the provisions of the Supply Chain Act is actively required of all direct and indirect suppliers. Furthermore, suppliers are regularly checked for human rights and environmental anomalies using risk assessment software.

Where anomalies are detected, measures are taken which may extend to the termination of contractual agreements with a supplier.

- The establishment of an appropriate Grievance Handling System where employees, suppliers, customers and injured parties may lodge reports or complaints relating to compliance with duty of care pursuant to the Supply Chain Act.
- The carrying out of regular software-based risk analysis and the introduction of a risk and response management system.

- The implementation of human rights and environmental duty of care as an ongoing process subject to regular internal audits and updated appropriately.

Reporting pursuant to statutory requirements takes place annually.

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