



Munich Airport International GmbH

Business Partner Code of Conduct

Version 2
1 August 2022

This Business Partner Code of Conduct defines principles and requirements of Munich Airport International GmbH and its subsidiaries [“MAI”] for any transaction provided by its business partners such as suppliers, service providers, contractors and third party intermediaries etc. [all of them hereinafter referred to as “Business Partners”]. MAI will not accept any deviations from this standard by its Business Partners. Munich Airport International GmbH and its subsidiaries are entities of Munich Airport Group and as such fully dedicated to the values and company culture of Munich Airport. As Five-Star Airport, Munich Airport Group is committed to act with integrity in a compliant and sustainable manner. Insofar the Code of Conduct of Munich Airport Group applies to the Business Partners of Munich Airport International GmbH and its subsidiaries without any restrictions or limitations. The Code of Conduct of Munich Airport Group can be accessed under the following link: <https://www.munich-airport.com/compliance-264015>. The Code of Conducts of Munich Airport Group and MAI are harmonized and do not contradict each other. If a matter is solely regulated in the Code of Conduct of MAI, this regulation takes precedence over the Code of Conduct of Munich Airport Group. In the event of inconsistencies between the Code of Conducts, the Code of Conduct of Munich Airport Group shall prevail. This Business Partner Code of Conduct together with the Code of Conduct of Munich Airport Group are hereinafter referred to as the “Code”.

MAI is fully committed to act with integrity and professionalism and therefore requires services and products to be provided with high business and ethical standards from all its Business Partners. MAI expects its Business Partners and their entire value chain to adhere fully to all applicable national laws as well as international recognized standards for social, environmental and corporate governance principles as stipulated herein.

Beyond the below listed specific standards MAI requests from its Business Partners to comply and act especially in accordance with the UN Guiding Principles on Business and Human Rights [UNGPs] and the UN Supplier Code of Conduct, the conventions of the International Labour Organisation [ILO] and other applicable principles of multinational intergovernmental organizations such as OECD, etc.

1. Social standards

a) Human rights

Business Partners undertake to support the protection of internationally proclaimed human rights and to fight forced labor, child labor as well as modern slavery and human trafficking. Any form of forced or involuntary labor as well as any acceptance of this, is excluded by Business Partners. This shall also be applicable for any form of work exploitation of children under the age of fourteen years or any other vulnerable minority group, which both are not tolerated and prohibited. This includes – among

others – Business Partners’ obligation to respect the human rights of their employees as stipulated by the UN Human Rights Convention. Business Partners of MAI shall have policies in place to promote diversity and create equal opportunity for their employees and their contract partners.

b) Labor law

Workplaces of Business Partners’ employees are healthy and safe in accordance with all applicable laws and regulations. Business Partners’ employees are treated with respect and have access to a work environment free of harassment or abuse and any form of harsh and inhumane treatment. Business Partners must not exercise any form of discrimination and shall only follow lawful practices. Business Partners preserve the freedom of association and right to collective bargaining. All applicable laws regarding minimum wages, working hours, working conditions are followed by Business Partners across all their entities and along the supply chain.

2. Environmental standard

Business Partners undertake to avoid emissions and waste and take all necessary steps to minimize energy and resource consumption. Therefore, Business Partners shall comply with environmental and climate standards and laws and shall permanently keep environmental pollution to a minimum and monitor their measures and follow all necessary steps to mitigate environmental risks.

3. Ethical & governance standards:

a) Business & ethical integrity

No form of corruption or any other form of unfair business practices (e.g. anti-competitive practices, illegal price fixing, bribery, money laundering, fraud, etc.) is tolerated in any form by Business Partners. Any conflict of interests with private interests or private economic interests of Business Partners’ employees (including their family members) must be avoided. Business Partners shall refrain from any form of offering, promising or granting advantages to any other party, either directly or through intermediaries. Especially, Business Partners undertake to forbid handing over gifts to private or public officials that are intended to influence a business decision or might motivate them to violate their obligations. Business Partners shall avoid and take all necessary steps to prevent any criminal act, fraud, non-compliance and especially corruption. This includes Business Partners’ obligation to respect private and confidential information as well as their obligation to respect all applicable data protection regulations and intellectual property of any third party.

b) Cooperation

Business Partners' employees as well as their other representatives are encouraged to report concerns or potentially unlawful practices at the workplace. In case of any suspicion, Business Partners undertake to cooperate with MAI to avoid any misconduct or to clarify such suspicious incidents. In any such case Business Partners shall inform MAI of such suspicion and update MAI in writing about any actions and measures they have taken.

MAI expects all its Business Partners to implement an appropriate Compliance Management System which is in accordance with all relevant applicable laws, regulations and standards. MAI reserves the right to discontinue any relationship in case of non-adherence with the Code.

4. Compliance monitoring by MAI

MAI may verify the compliance with the requirements according to the Code by itself or will have them examined by a third party. Therefore, Business Partners shall be able to provide MAI with evidence for the Business Partner's compliance with this Code. Additionally, MAI may confirm the Supplier's compliance through on-site monitoring and audit activities. In case MAI plans to undertake such activities, it will notify the Business Partner ten (10) working days prior to the planned commencement of the on-site audit or monitoring. The cost for such an on-site visit will be covered by MAI. Should the results of such an audit or monitoring indicate that the Business Partner does not comply with the Code, the Business Partner shall take necessary corrective actions in a timely manner.

In case of any concerns regarding illegal or improper procedures, please contact us under the following addresses:

FMG (RCC): compliance@munich-airport.de

MAI Group (MIL): MAI-compliance@munich-airport.de

Or you can report over a central, web-based whistleblower system, which can be used anonymously and non-anonymously. It can be accessed at <https://www.bkms-system.net/hinweisfmg>.