



**Rules of procedure for the complaints pro-
cedure in accordance with § 8 para. 2 of the
act on corporate due diligence obligations in
the supply chain (LkSG)**

1. Key points of the rules of procedure 2

2. Objective 2

3. Local scope 2

4. Applicability of the complaint process 3

5. Confidentiality 3

6. Protection against negative consequences or punishment..... 3

7. Complaint channels..... 3

8. Steps in the complaint process..... 4

 8.1 Receipt of complaints or reports 4

 8.2 Checking the complaint or report 4

 8.3 Clarification of the issue 5

 8.4 Generating a solution with the whistle-blower 5

 8.5 Corrective measures..... 5

 8.6 Review and final reporting..... 5

9. Examination of effectiveness 5

10. Documentation..... 5

11. List of abbreviations..... 5



1. Key points of the rules of procedure

1. The complaints procedure applies to all types of complaints or reports regarding human rights or environmental risks or violations of duty which occur anywhere along the entire supply chain of the Munich Airport Group (FMG Group).
2. All persons involved with the process are obligated to maintain confidentiality and will only receive information that they absolutely need on a case-by-case basis. Personal data will be rendered anonymous to protect the affected persons unless otherwise required in order to render a proper judgment.
3. Whistle-blowers who submit reports and complaints in good faith are protected against negative consequences, punishments or disciplinary actions due to the filing of a report and as a result of making use of the complaints procedure

2. Objective

The purpose of this complaints procedure is to handle reports regarding human rights or environmental risks, or insufficient preventative and corrective actions in the entire supply chain of Flughafen München GmbH and FMG-allied companies (together referred to as the FMG Group). This is meant to prevent the occurrence of human rights violations or violations of environmental laws, along with their associated consequences.

Any report filed in good faith regarding imminent or actual breaches of duty helps to prevent, end or minimize any irregularities in the FMG Group by allowing us to implement corrective and preventative measures.

All internal and external personnel, as well as potentially affected persons, can and should be encouraged to report any violations that they observe to the FMG Group, with or without revealing their identities and in full confidentiality in keeping with this complaints procedure.

3. Local scope

This guideline applies to FMG and the dependent companies in accordance with § 18 AktG [Stock Corporation Act] [in particular i.c.w. § 17 AktG]. This includes in particular companies in which FMG or companies controlled by it hold the majority of the shares [the individual Group companies (including FMG); FMG Group companies; all FMG Group companies together: FMG Group].

Terminal 2 Gesellschaft mbH & Co. OHG also falls within the scope of this guideline.

However, the scope is restricted by the following regulation:

Munich Airport International GmbH and its subsidiaries are not covered by the scope of this guideline.



4. Applicability of the complaint process

The complaints procedure described below applies to all types of complaints or reports regarding human rights or environmental risks or violations of duty according to § 2, para. 2 and para. 3 of the LkSG which occur anywhere within the entire supply chain of the FMG Group.

Human rights risks according to § 2, para. 2 of the LkSG include, in particular, violations of prohibitions against child labor, forced labor and slavery, violations of the prohibition of disregard of work safety and work-related health risks, violations of the prohibition of disregard of freedom of association, violations of the prohibition against violations of unequal treatment and withholding of reasonable pay, and deterioration of a natural standard of life due to environmental contamination.

Environmental risks according to § 2, para. 3 of the LkSG include, in particular, violations of prohibitions with regard to mercury in accordance with the Minamata agreement, violations of the prohibition of the production and use of chemicals according to the Stockholm convention (in particular persistent organic pollutants, i.e. so-called POPs), and violations of the prohibition against the inflow and outflow of hazardous wastes.

5. Confidentiality

Confidentiality as to the identity of the whistle-blower and the contents of the report are of the highest priority. All persons involved with the process are obligated to maintain confidentiality and will only receive information that they absolutely need on a case-by-case basis. Personal data will be rendered anonymous to protect the whistle-blower unless otherwise required in order to render a proper judgment. Reports and complaints can also be filed anonymously.

6. Protection against negative consequences or punishment

Persons who submit reports and complaints in good faith are protected against negative consequences, punishments or disciplinary actions due to the filing of a report and as a result of making use of the complaint process. Such retaliations are not tolerated by the FMG Group and are strictly forbidden.

Whistle-blowers who intentionally or through gross negligence report false information concerning violations will not be protected.

7. Complaint channels

Internal and external persons can file reports and complaints both orally and in text form. The FMG Group has an Internet-based whistleblowing-system. Reports and complaints can be filed through this system in name and anonymously.



Independent of the selection of the reporting method, specially trained associates in the corporate compliance unit (RCC) are the central contact for receiving and processing reports and complaints:

Corporate compliance unit - internal reporting office	
Telephone	+49 89 975 403 40
E-Mail	hinweise@munich-airport.de
Address	Administration building Nordallee 25 85356 München-Flughafen
Whistleblower-System	https://hintbox.munich-airport.de

These representatives are independent contractors and not under any formal direction in handling cases.

8. Steps in the complaint process

Reports and complaints are handled objectively in a formalized procedure as described below. Specially trained associates in RCC are tasked with the responsibility for receiving and handling reports and complaints. Confidential treatment of reports is guaranteed throughout the entire procedure (see item 5).

8.1 Receipt of complaints or reports

RCC will confirm to the whistle-blower that his or her report or complaint has been received; this takes place, no later than seven days, via the complaint channels identified under item 7.

8.2 Checking the complaint or report

In a first step, RCC checks to see whether the report or complaint contains human rights or environmentally relevant risks, i.e. violations of duty according to item 4, and thus falls under the area of application of this complaints procedure. In addition, a plausibility check is carried out as part of the process, and responsibilities are assigned. In particular, a check is performed as to whether further information is required to clarify the issue and whether it is necessary to include internal departments and areas in the process, and if so which ones. The departments can include especially those for sustainability (V-EN), environment (RCU), purchasing (KLE), personnel (PC) and the legal department (RCJ). As part of the examination, other clarifying activities by RCC can be carried out and contact with the affected persons or organizational units may be required. All requirements and laws concerning confidentiality are observed.



8.3 Clarification of the issue

In a second step, the issue is clarified. To this end, RCC may ask the whistle-blower for further information and will discuss the issue and the expectations as to possible preventative and corrective measures with the person. If a report or complaint does not have merit, the whistle-blower will be notified as such. Otherwise, a solution will be worked out.

8.4 Generating a solution with the whistle-blower

After clarification of the issue, it is evaluated and corresponding solutions, in particular required preventative and corrective measures, are worked out together with the whistle-blower. If necessary, agreements are arranged concerning compensation. Pertinent confidentiality requirements and legal data security regulations are always observed.

8.5 Corrective measures

Concrete corrective actions agreed upon are implemented and tracked. The FMG Group or by persons contracted by it are responsible for the implementation.

8.6 Review and final reporting

The results implemented are mutually evaluated together with the whistle-blower. The whistle-blower will receive a reply within three months. This will include notification of planned actions and those already taken, as well as the reasons for them. The whistle-blower will only receive a reply provided that internal research or determinations are not affected as a result, and provided that the rights of persons who are a party to the report or who are named in the report are not substantially affected.

The above notwithstanding, the whistle-blower will be notified of the result of the investigations initiated by the report once the investigations have concluded, provided that this notification is in compliance with legal confidentiality obligations.

9. Examination of effectiveness

The effectiveness of the process is examined annually and as events require it. If necessary, adaptations to the process or to corrective measures taken can be made.

10. Documentation

The persons in a reporting capacity who are responsible for receiving reports will document all incoming reports, keeping in mind confidentiality and legal requirements. Only the persons in RCC responsible for handling reports have access to the corresponding documents.

11. List of abbreviations

FMG	Flughafen München GmbH
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KLE	Purchasing Unit
LkSG	Supply Chain Due Diligence Act
PC	Corporate Division People & Culture
RCC	Corporate Compliance Unit
RCJ	Corporate Legal Unit
RCU	Corporate Environment Unit
V-EN	Strategic Sustainability Management