

Policy statement about the human rights strategy for the Munich Airport Group

The Flughafen München GmbH including its corporate companies is committed to the highest sustainability standards, the ecological and social responsibility as well as to a good corporate governance. This also includes the respect of the human rights as a central value. The entire Munich Airport Group is committed to the internationally recognized standards, guidelines and principles. This includes especially the sustainable development goals [SDGs], the general declaration of the human rights, the conventions of the United Nations and the core working standards of the international Labor Organization as well as the OECD guidelines for multi-national companies.

1. Principles and scope

The major principles and rules for acting as well as the measures that the Munich Airport Group establishes for the interactions with business partners and stakeholders are summarized on the [Code of Conduct of the Munich Airport Group](#). It is the highest orientation basis for the management as well as for all executives and employees at the Munich Airport Group. The Code of Conduct of the Munich Airport Group includes all basic principles and rules for a responsible and ethical behavior against persons within and outside the corporation. The Munich Airport Group bases its interactions on the Code of Conduct.

The Munich Airport Group obligates itself to adhere to the national and international laws, the government regulations and public authority guidelines as well the internal company regulations. The law and the legislation of the Federal Republic of Germany and the EU are directly and without exception applicable - also in the international relationships. This includes the prohibition of anticompetitive behavior, of establishing a cartel or a monopole, of moonlighting, child and forced labor as well as the use of force. The adherence to human rights and human rights processes is guaranteed especially based on the principles of the United Nation's [UN] Universal Declaration of Human Rights.

As the basis, the [Code of Conduct](#) is the behavior measure for everybody. It is applicable within the Munich Airport Group as well as against third parties in a national and international context. The [Code of Conduct](#) is applicable for the Flughafen München GmbH as well as the subsidiaries and joint ventures and must be adhered to by everybody within the Munich Airport Group. However, the Munich Airport Group expects that its supplier companies/service providers and subcontractors, but also additional companies and persons assigned within the chain of delivery do not commit human rights violations, the violation of internationally recognized labor standards and violations of environmental obligations.

The business partners must accept and adhere to the guidelines and principles determined in this Code of Conduct and must make every effort to guarantee the adherence to this Code of Conduct during the entire business relationship and they must adequately address it for their entire chain of delivery.

Violations of the valid environmental laws will not be tolerated and the adherence to international agreements that are valid in Germany is required, especially the adherence to the international Minamata agreements for mercury, the Stockholm agreement about persistent organic harmful substances as well as the Basel agreements about the control of the cross-border transfer of hazardous waste and its disposal in their respectively valid versions.

Human rights in the Munich Airport Group are addressed in the following policies, guidelines and standards:

- [Guiding principle & Code of Conduct](#),
- Environment and energy policy
- [Occupational safety and health](#)

2. The understanding of human rights at the Munich Airport Group

The Munich Airport Group, as an internationally acting company, is aware of its responsibility and advocates the adherence to the internationally recognized human rights and environmental protection standards such as:

- Human rights and employment rights
- Prohibition of child labor
- Prohibition of discrimination
- Prohibition of forced labor
- Compensation and working hours
- Protection of the freedom of expression, the personal rights and the privacy
- Occupational safety and health protection
- Freedom of association
- Environment protection as a human right
- Responsible creation of value
- Human rights protection when using security forces
- The international Minamata agreement about mercury
- The Stockholm agreement about persistent organic harmful substances
- The Basel agreement about the control of the cross-border transfer of hazardous waste and its disposal in their respectively valid versions.

Sustainable acting with respect to the environment, economy, social items and security are included in the guiding principle of the Munich Airport Group and this is expected from all employees as well as the business partners.

3. Incorporation of a risk management in the corporation

The responsible handling of risks is of principle importance for the Munich Airport Group, and it is guaranteed as part of a systematic and continuous management of the entrepreneurial risks and opportunities.

The Munich Airport Group reviews the adherence to the requirements of the delivery chain due diligence law based on a risk analysis. For this purpose, the direct suppliers are re-assessed and re-prioritized - based on risk stages - with respect to their risk potential by using additional external risk indexes as well as already existing additional information [a.o. specific findings, already implemented preventive measures].

The prioritizing by the Munich Airport Group is the basis for a focused risk and action management. For this purpose, the Munich Airport Group performs risk analyses in the context of its business activity.

The risk analyses findings become part of the development of specific actions to prevent or reduce unfavorable impacts on the business activities. For this purpose, the Munich Airport Group relies of an interaction of different measures, and it integrates the finding from the activities in the business processes. The Munich Airport Group has established corporate principles and guidelines for the adequate protection of the human rights of the employees. In addition, the employees have unrestricted access to transparent complaints procedures.

The risk analysis is performed frequently - at least once annually - and it is documented in a reportable manner. An event related risk analyses can also be performed if the risk assessment requires it or if actual clues for obligation violations - also at direct suppliers - exist.

4. Organization and execution

The Munich Airport Group pursues the objective to establish a culture of sensitivity when handling human rights and to ensure its consistent adherence in the daily business through an efficient organizational structure. A series of implemented processes and measures is intended to guarantee the adherence to human rights, to show the need for action and permit a possibly required corrective intervention:

- Establishment of an interdisciplinary risk board with clearly defined structures and responsibilities, which must guarantee the adherence to the due diligence as well as its implementation in the corporation.
The risk board meets quarterly, or event related; representatives of the sustainability, purchasing, compliance, human resources and legal departments participate. As part of the meetings, events are debated, risks are discussed, and the required actions are determined.
- Adaptation of the purchasing practices or acquisition processes with respect to human rights and environment related issues.
- Adaptation of the existing whistle blower system on human rights issues.
- Execution of frequent trainings for the adherence to the requirements of the delivery chain due diligence law.
- Execution of frequent risk analyses and introduction of a risk and action management.
- Continuous documentation.
- Annual reporting to the BAFA and report to the management.