



# **CODE OF CONDUCT FOR SUPPLIERS OF HANNOVER AIRPORT**



in effect as of 1/1/2024

## 1. PRINCIPLES

The Code of Conduct for Suppliers of Hannover Airport applies to Flughafen Hannover-Langenhagen GmbH (hereinafter referred to as "FHG"), Hannover Aviation Ground Services GmbH (hereinafter referred to as "AGS"), and Aircargo Services Hannover GmbH (hereinafter referred to as "ASH").

FHG, AGS, and ASH are committed to social, ecological, ethical, and sustainably responsible corporate governance. This responsibility extends not only to our own area of business, but also to responsible cooperation with business partners.

The Supplier Code of Conduct describes the requirements and principles for the cooperation of FHG, AGS, and ASH with suppliers and service providers (hereinafter referred to as "business partners").

The business partners of FHG, AGS, and ASH are obliged to comply with the applicable national laws and respect the relevant internationally recognized standards and directives. Particular attention is paid to the principles of the UN Global Compact in the areas of human rights, labor standards, environmental protection, and anti-corruption. Furthermore, the core labor standards of the International Labor Organization (ILO), the conventions of the United Nations Organization (UN), and the OECD Guidelines for Multinational Enterprises. In addition, there is an obligation to apply and comply with the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG).

The business partners assure that they will also work towards the consistent dissemination and observance of these standards by all other companies involved in the provision of services along the entire supply chain (e.g., subcontractors, suppliers, producers, etc.).

The "Declaration of Principles on Respect for Human Rights" by FHG, AGS, and ASH, which is based on the Act on Corporate Due Diligence Obligations in Supply Chains, summarizes the guiding principles relating to human rights and the environment.

## 2. TREATMENT OF EMPLOYEES

### OCCUPATIONAL HEALTH AND SAFETY

Our business partners ensure a safe, healthy, and hygienic work environment and take the necessary measures to prevent accidents and harm to health that may arise in connection with their work. Business partners are therefore obliged to ensure that the applicable occupational safety standards are complied with in relation to their employees and business partners. Business partners will take appropriate measures to identify and avoid potential health risks from accidents, injuries, and work-related illnesses among their employees.

### COMPENSATION AND WORKING HOURS

Working hours must comply with the applicable national laws and regulations and the relevant core labor standards of the International Labor Organization (ILO). Business partners are obliged to grant their employees involved in the execution of the contract the statutory benefits applicable to them by law or by collective agreements established by law and to employ only subcontractors or other third parties who also undertake to do so.

### COMBATING ILLEGAL EMPLOYMENT

Business partners must comply with the relevant statutory regulations on the employment of staff and are obliged to take effective action against illegal employment and undeclared work.

### FORCED LABOR

Business partners shall refrain from any form of forced labor. All forms of forced and compulsory labor as well as involuntary prison labor must also be prevented. This includes any work or service that is demanded of a person under threat of punishment and for which that person has not volunteered.

## **CHILD LABOR**

The exploitation of children and juveniles is not tolerated. Child labor as defined by ILO conventions and national regulations is prohibited. Juveniles must not be exposed to any situations that are dangerous, unsafe, or harmful to their health.

Child labor must not be utilized or supported in any way. Business partners must not employ children under the legal minimum employment age in the relevant country or under the applicable legal system. If no minimum age for employment is specified there, business partners must not employ children under the age of 15. Employees under the age of 18 may only perform work in accordance with legal requirements, e.g., with regard to nationally applicable working hours and conditions.

## **FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING**

Business partners must respect the fundamental right to freedom of association and the right to collective bargaining within the framework of national laws. In the event that national standards restrict the right of association and the right to collective bargaining, business partners must endeavor to ensure that the free and independent association of employees for the purpose of bargaining is made possible and permitted.

## **DISCRIMINATION**

Business partners must refrain from any form of discrimination. Employees may not be discriminated against on the basis of ethnic, national, and social origin, skin color, gender, age, religion and ideology, political activity, membership in an employee organization, disability, and/or sexual identity.

Equal opportunities must be maintained in recruitment, employment, compensation, and the granting of other benefits as well as promotion, termination, and retirement. Any form of psychological, physical, sexual or verbal abuse, intimidation, threats, or harassment must not be practiced or tolerated. The privacy of employees must be respected.

Bullying as systematic and repeated hostility, harassment, and exclusion of a person with the aim or consequence of unsettling, degrading, or excluding the bullied person from the work environment is not tolerated by FHG, AGS, and ASH. We firmly oppose any unacceptable treatment of employees, in particular sexual and/or verbal harassment.

## **DISCIPLINARY MEASURES**

All employees shall be treated with dignity and respect. Sanctions, fines, other penalties, or disciplinary measures may only be imposed in accordance with applicable national and international standards and internationally recognized human rights. Business partners must take appropriate measures to ensure that employees are not subjected to verbal, psychological, sexual, or physical violence, coercion, or harassment.

# **3. ENVIRONMENT**

## **ENVIRONMENTAL PROTECTION**

Business partners are obliged to comply with international standards and legal requirements for environmental and climate protection and to take measures to minimize environmental impacts and continuously improve environmental and climate protection. This includes the avoidance of emissions and the environmentally friendly handling, collection, storage, and disposal of waste as well as steps to increase resource efficiency.

## **REDUCTION OF ENVIRONMENTAL IMPACT**

Business partners must lower their emissions as much as possible in accordance with the state of the art. Waste is to be avoided or recycled wherever possible. The materials used should be reusable. When developing products and services, business partners must ensure that they are efficient in their use of energy and natural resources. Business partners should find economical solutions to improve energy efficiency and minimize energy consumption. The use of renewable resources is to be given preference.

## **HANDLING OF HAZARDOUS SUBSTANCES**

Business partners must label, monitor, and control hazardous materials, chemicals, and substances and ensure their safe handling, movement, storage, recycling, and disposal. This relates in particular to compliance with the provisions of the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants (POPs), and the Basel Convention on the export of hazardous waste.

## **PRESERVATION OF THE NATURAL FOUNDATION OF LIFE**

Business partners must not deprive people of land, forests, or water whose use secures their livelihoods in violation of legitimate rights. It is strictly forbidden to cause harmful changes to the soil, contaminate water and air, use excessive amounts of water, or emit harmful noise that significantly impairs natural resources for obtaining and producing food, denies a person access to clean drinking water and sanitary facilities, or even harms the health of people.

# **4. INTEGRITY IN BUSINESS TRANSACTIONS**

## **PREVENTION OF CORRUPTION**

FHG, AGS, and ASH do not tolerate any form of corruption or other unfair business practices. No participation in any form of bribery, extortion, embezzlement, fraud, or corruption is permitted, either directly or indirectly via third parties. Business partners must assure FHG, AGS, and ASH that they will not offer, promise, or grant employees of FHG, AGS, or ASH any improper benefits in order to influence their decision-making. The mere attempt to do so constitutes a violation. Business partners must take all necessary measures to prevent corruption and other criminal acts.

## **ANTITRUST AND COMPETITION LAW**

Business partners must comply with all applicable national and international antitrust laws and laws against unfair competition. Agreements regarding prices and conditions with competitors are therefore to be abstained from, as are other agreements restricting competition, which include in particular agreements with competitors for the purpose of dividing up the market or customers.

## **AVOIDANCE OF CONFLICTS OF INTEREST**

Business partners are obliged to make decisions relating to their business activities with FHG, AGS, and ASH exclusively on the basis of objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of family members or other related parties, must be excluded.

## **MONEY LAUNDERING**

Business partners undertake to comply with the relevant statutory provisions on the prevention of money laundering and to properly meet their reporting obligations. They must refrain from any form of money laundering.

## **DATA PROTECTION AND DATA SECURITY/INFORMATION SECURITY**

Business partners must collect, store, process, transmit, and disclose personal information only in accordance with the applicable laws and regulations on data protection and data security as well as official regulations. Business partners undertake to protect and safeguard confidential information, business and trade secrets, and the intellectual property of FHG, AGS, and ASH.

## **EXPORT AND CUSTOMS REGULATIONS**

FHG, AGS, and ASH expect their business partners to carefully review and comply with the applicable foreign trade regulations. In particular, business partners will not violate any embargo imposed by the European Union, the United Nations, or the United States of America.

## **DUE DILIGENCE OBLIGATIONS ALONG THE SUPPLY CHAIN**

Human rights and environmental due diligence obligations must be observed by business partners and communicated as necessary along their entire supply chain.

## **REMEDIAL MEASURES**

If risks for or violations of the basic principles of the Supplier Code of Conduct are identified, business partners must inform either FHG, AGS, or ASH immediately in writing, according to their respective responsibilities, and immediately take appropriate countermeasures to prevent, end, or mitigate a violation. There is also an obligation to inform FHG, AGS, or ASH immediately in writing about the progress and outcome of the investigation and any measures taken.

Individual agreements on compliance with the principles of the Code are concluded with each business partner

## **5. COMPLAINTS PROCEDURE**

Business partners must ensure that not only their employees, but also all business partners involved (subcontractors, suppliers, producers) are informed about the content of this Supplier Code of Conduct and all legal regulations affecting them in a manner suitable for them.

Business partners must inform their employees and business partners involved about access to and anonymous use of the complaints procedure. In addition, they must request all parties involved to disseminate information on this whistleblower system along the entire supply chain.

The electronic whistleblower system is available at [www.hannover-airport.de/hinweisgebersystem](http://www.hannover-airport.de/hinweisgebersystem).

Compliance with the German Whistleblower Protection Act (HinSchG) is guaranteed.

## **6. COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT**

We are entitled to check compliance with the above requirements either ourselves or through third parties bound to confidentiality.