

fairport Code

Acting responsibly
at STR





corporate goals



value creation
We do business successfully and sustainably.



service
We delight our customers.



transportation
We connect people, Baden-Württemberg and the world.



environment
We responsibly shape the airport of the future.



airport city
We develop new business areas.



employees
We are an attractive employer.



Our strategic corporate goals show how the vision of the fairport can be realized.

Our guiding principle: We strive to become one of the best-performing and most sustainable airports in Europe – the fairport.



corporate values



team spirit
We achieve our goals together and value the achievements of the individual.



respect
We value diversity and treat each other with care.



credibility
We live our word, take a stand and are authentic.



flexibility
We are open to change.



fairness
We behave unbiased and stick to rules and agreements.



Our corporate values set out how we want to treat each other.

The corporate goals, values and leadership principles of Stuttgart Airport are the result of a process that was open for participation for all employees. The jointly defined values shape our corporate culture and create a sense of unity.

The six strategic corporate goals are used to derive specific goals for the top management, divisional management and department heads.



leadership principles



role model
I am a role model and ambassador for the company's values and goals. I set an example of what I expect from my employees. Through my attitude and approach, I create a motivating working environment.



communication
I communicate transparently, clarify expectations and goals, explain decisions and create an active feedback and learning culture.



appreciation
I take time for the team. I treat my colleagues with interest and respect and listen attentively. I appreciate performance and dedication.



working together
I think and act in the interest of the airport as a whole. I address conflicts openly and we resolve them together.



trust
I give trust. I gain trust by being authentic and reliable. I trust the decisions made by employees.



learning culture
I deal openly with mistakes, encourage learning from them and support the improvement process.



performance
I create equal opportunities. I create an environment in which employees can perform at their best. I strengthen personal responsibility through conscious delegation of tasks and decision-making skills. I am in contact with employees, recognize potential and support them individually.



Our leadership principles define how good leaders at STR behave.

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Preamble

Value-based corporate governance and compliance are non-negotiable for us at Stuttgart Airport. This goes beyond strict adherence to rules. It places integrity and fairness at the heart of our corporate culture and our business processes.

In addition to our guiding principle, strategic corporate goals, values and leadership principles this fairport code forms a strong

foundation. It lays down the guidelines for our behaviour towards each other, in business partnerships and in competition, towards customers, authorities, politicians and other interest groups. The fairport code is a central part of our DNA.

the fairport, that's all of us.

The management of Flughafen Stuttgart GmbH



Ulrich Heppe
CEO



Carsten Poralla
Managing Director

The management of our majority-owned subsidiaries at Stuttgart Airport



Andreas Schweizer
Managing Director
Cost Aviation GmbH



Dirk Spengler
Managing Director
Flughafen Stuttgart Energie GmbH



Nicole Ferrari
Managing Director
HSG Flughafen Stuttgart Handels-
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SAG Stuttgart Airport Ground Handling GmbH

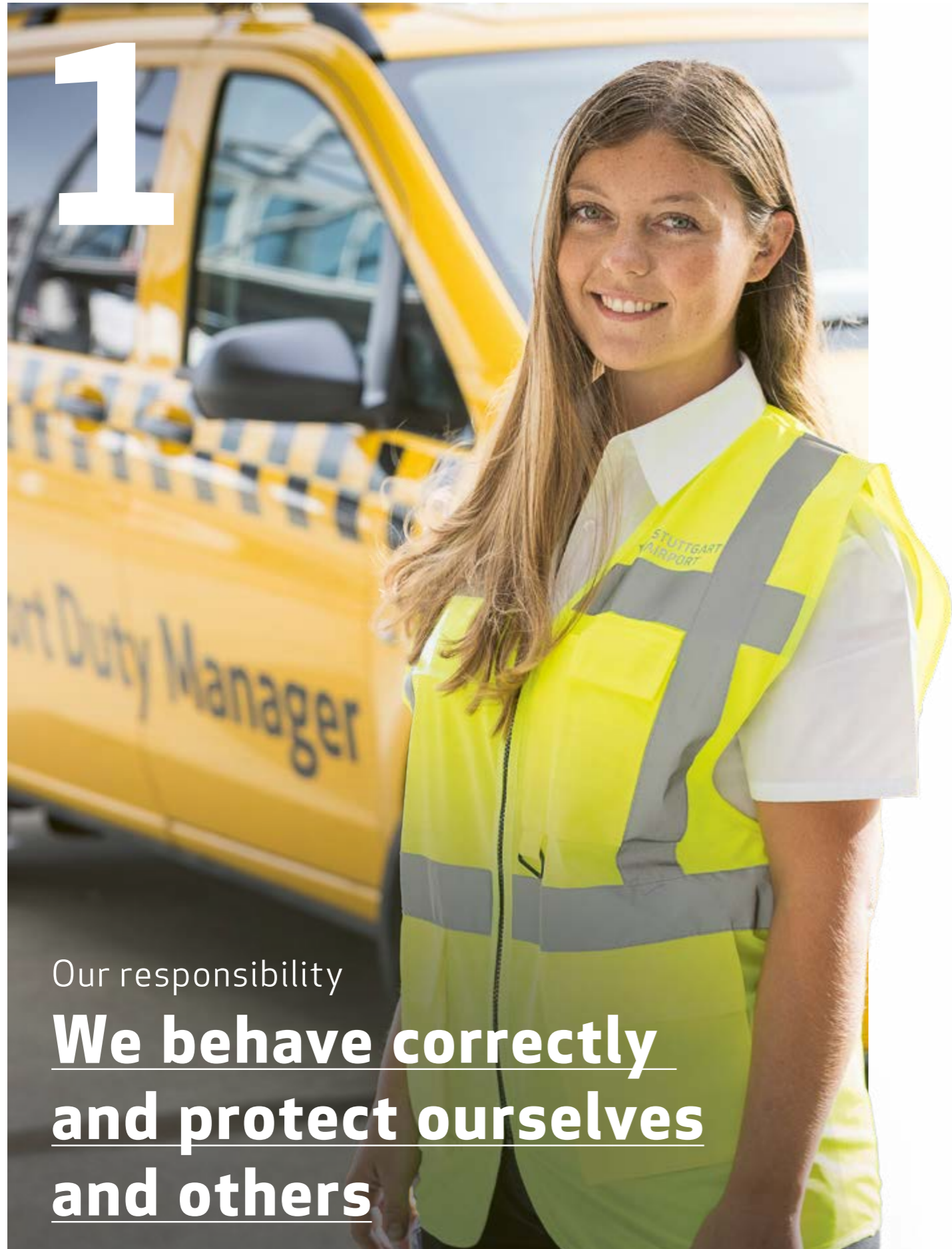


Oliver Wenzel
Managing Director
SAG Stuttgart Airport Ground Handling GmbH



Claudia Brodbeck
Managing Director
S. Stuttgart Ground Services GmbH

1



Our responsibility

**We behave correctly
and protect ourselves
and others**



Integrity and compliance

Integrity and compliance are part of our airport DNA and are non-negotiable for us.

At STR, we are united by the common goal to always act responsibly and in a fair manner. The basis for this is that we comply with the applicable law, observe our internal company rules and regulations and ensure compliance with processes and their reliable monitoring. Knowing which rules are relevant to our activities in and for our company not only prevents violations, but also indirectly contributes to value creation.

The consequences of non-compliance could affect both the airport group and us personally. Examples of this are:

- damage to our reputation as a public corporation,
- high sanctions and claims for damages against our company,
- personal consequences under labour law,
- personal fines, penalties and claims for damages or
- in the worst case even personal imprisonment.

We are alert and ask ourselves the following key questions:

- 01 Is my behaviour in line with our **values**?
- 02 Have I **carefully weighed up** all relevant factors in my decision?
- 03 Is my behaviour **lawful** and am I acting within the frame of legal and internal rules?
- 04 Would I accept my decision if I were **affected myself**?
- 05 Would I **stand by my decision** if it came to light?
- 06 Would I be able to **defend** my behaviour **in public**?
- 07 What would **my family or friends** think about my behaviour?
- 08 Would I be ready to always **take responsibility** for my behaviour?



Safety and security

A lively safety culture is essential at an international airport like Stuttgart Airport. It is the basis of our actions and decisions. Safety serves to protect human life, health and values and to sustainably safeguard our success and reputation as a company. At STR, this primarily includes air and corporate security, operational safety & security, flight operational safety & security as well as preventive and defensive fire protection, including modern crisis management.

We are aware that our efforts for safety and security often do not pay off directly and immediately in measurable terms, but usually only have an effect in the longer term. We see legal and regulatory requirements as a minimum standard and an incentive to establish a high level of safety and security beyond this. We integrate safety and security into our daily work to achieve effective protection and the most efficient solutions possible.

We live our safety and security culture every day and pursue a proactive approach in which each and every one of us supports the departments

responsible for safety and security in their work. We want a goal-oriented and constructive cooperation with all authorities, all specialist departments and all companies based at the airport.

We actively and attentively ensure that safety and security regulations are always observed by everyone. If we notice any deficits or shortcomings, we get in touch with the relevant contact persons at Stuttgart Airport and work on possible solutions. We do not tolerate any regulatory offenses or criminal acts directed against the airport, its employees or aviation. We support the law enforcement authorities in an appropriate manner.

In case of an incident or critical situation, we naturally do everything in our power to help deal with the consequences to prevent further damage. We work hand in hand as an airport family with the common goal of protecting human life, preventing or minimizing damage and ensuring safe aviation.

We pay attention

01

to **comply with legal and regulatory safety requirements** in our decisions and actions. This also includes airport-specific regulations such as the Security Policy, the requirements of the European Aviation Safety Agency (EASA), the fire safety regulation, internal instructions and company guidelines.

02

to behave **responsibly** in terms of safety and security and **adhere to guidelines and agreements**.

03

to **sustainably maintain** the level of security at the airport or **further increase** it through practicable and cost-conscious solutions.

04

to contribute to the **prevention** of incidents by taking appropriate measures during the construction and operation of buildings and events.

05

to **support** in case an incident or damage occurs.



2



Our responsibility

We take responsibility for our society and our environment



Environmental protection

We commit to continuously improve the environmental sustainability of airport operations and reduce our consumption of resources. We avoid, minimize or neutralize negative external effects as far as this is possible within our sphere of influence and in the interests of sustainable development. We keep the negative environmental impact as low as possible. We set a good example, even if this requires more effort.

We want to reduce the consumption of raw materials and energy as well as emissions. We therefore exploit all possibilities for process optimization and give preference to environmentally friendlier technologies and work equipment whenever their use is operationally and economically justifiable. We believe that this creates opportunities for new solutions and innovations.

At STR, we engage in three key fields of action and stick to our principles in these areas:

Environment and resources:

We are making great efforts to keep the impact on biodiversity at the airport as low as possible while at the same time ensuring safe and smooth airport operations. We for instance rely on a green space management system that reconciles the maintenance and management of green spaces with the interests of nature and flight safety. We protect the soil and surrounding waters from direct and indirect damage caused by airport operations and associated activities. Wherever possible, we avoid using environmentally hazardous substances in our work. During construction work, we reduce land

sealing to a minimum and carry out extensive soil remediation measures.

Climate action and energy:

By using electric vehicles, we keep the environmental impact of our vehicle fleet as low as possible. We are working on turning the airport into a well networked and sustainable mobility hub. With suitable offers, we want to create incentives for travellers and employees to make climate-conscious transport choices. We also use targeted preventive and defensive fire protection measures to prevent or minimize harmful emissions and negative effects on our environment.

Aircraft noise:

At eight stationary and one mobile aircraft noise measurement facilities in the immediate vicinity of the airport, we continuously measure the aircraft noise emissions of take-off and landing and make these transparent on our website in a monthly publication. We guarantee structural noise protection measures within the noise protection area.

Within the scope of our environmental management system, we identify ecological requirements and potential environmental risks at an early stage through constant monitoring and investigations. We document the environmental impact of the airport on an ongoing basis and regularly monitor its development. We also expect our business partners to actively contribute to achieving our environmental goals.

We take responsibility for our environment.

- 01 We strive to **continuously improve** the environmental sustainability of airport operations.
- 02 We **avoid, minimize or offset external negative effects** as far as this is possible within our sphere of influence and in the interests of sustainable development.
- 03 We **reduce consumption** of raw materials and energy, we **cut emissions** and we **prefer environmentally friendlier solutions**, technologies and work equipment.
- 04 We pay attention to **environmental requirements and risks**.



Human rights

We respect human rights. To us, this is a core element of responsible, value-based business conduct and we are committed to it throughout our entire value and supply chain. It goes without saying that we comply with the applicable laws

and regulations. We are also a member of the United Nations Global Compact. Its guiding principles provide us with important additional orientation.

We are careful to

- 01 **review** our business decisions **for adverse effects on human rights** as early as possible.
- 02 **avoid negative impacts** of our business activities on human rights.



Donations and sponsorship, political commitment

As an airport, we are part of society, and we are happy to get involved in our neighborhood and in good relations. Sponsoring, donations and charitable contributions as well as memberships are therefore important contributions to our social commitment and support the interests of STR.

As the largest airport in Baden-Württemberg with central importance for mobility, dialog with

political stakeholders is important for the success and development of our company. As a matter of principle, we are politically neutral as well as non-denominational and we observe the legal framework. Exercising unfair influence on politics and legislation is prohibited. We examine our involvement very conscientiously and carefully in each individual case.

We make sure

- 01 that all sponsoring, donations and charitable contributions **serve our corporate interests**.
- 02 that these are only made if **no dishonest business advantages** are gained and no other unfair purposes are pursued.
- 03 that our **corporate citizenship** is thereby made visible and strengthened.
- 04 that we are **politically neutral** and **non-denominational**.



Basic principles of our communication

We engage in an open dialog with each other as well as with our neighbours, customers, business partners, representatives of authorities and politics, the media and other interest groups. We provide regular and transparent information about our actions. We encourage the exchange of information on current topics as well as long-term developments. We follow up on positive and negative feedback and other information from our stakeholders. We incorporate the concerns and needs of our stakeholders into our day-to-day business and our decisions.

Everyone ensures that their own appearance and opinions in public or on social networks do not damage the reputation of our company. Private statements of opinion must not give the impression that they represent the official position of the airport. We speak to each other respectfully. Our language is both non-discriminatory and inclusive.

We ensure

- 01 that we communicate **openly and transparently** with each other.
- 02 that our language **neither offends nor excludes** others.
- 03 to **involve our stakeholders** and make decisions in our and their interests.
- 04 that we **take feedback seriously** and use it to improve.
- 05 that we **take responsibility** for our statements.
- 06 to act in accordance with the applicable **social media guidelines**.



3



Our responsibility

**We take
responsibility as a
business partner**



Corruption and bribery

Corruption is a major problem in business environments. It takes various forms and could occur in any company at any level. In addition to bribery, corruption also includes other criminal law issues such as embezzlement, fraud, favouritism – also known as nepotism – and the like. The most common form is bribery during the initiation and execution of business transactions or contracts or with the aim of obtaining certain benefits in return. This is worldwide a punishable act.

We are particularly careful when dealing with public officials and persons who belong to the public sector, are employed by a government

agency or have been commissioned by the same. In this context, it is prohibited and can be prosecuted to even “encourage” someone with a small payment or other benefit with the aim of carrying out or speeding up an official act that is in principle lawful.

We remain straightforward. We only achieve business success through our performance and reliability based on our values. Our business relationships and contracts may only be established based on objective criteria – not by giving or accepting improper advantages. We reject all forms of corruption and bribery.

We do not allow bribery, for example in form of:

- 01 excessive gifts and invitations
- 02 payments of inappropriate travel expenses
- 03 misuse of donations, sponsorship and memberships
- 04 unjustified payments or other benefits
- 05 “encouraging” official acts - not even through small donations

We are alert, especially in the case of:

- 01 inconsistencies in records or payments
- 02 suspicious personal relationships or unusual business arrangements
- 03 unusually high remuneration, fees, commissions, gifts, hospitality or invitations
- 04 demands for advance payments without comprehensible business reasons and without appropriate legal and financial security



Gifts and invitations

Gifts and invitations can have a certain relevance for the development and maintenance of business relationships. If such courtesies are kept within reasonable limits and our internal company guidelines and legal regulations are observed, they are generally acceptable.

We pay close attention to those who are involved. Particular caution is required with public officials. If gifts and invitations exceed the appropriate and permissible value and scope and are intended to influence the recipient's decision, this may be punishable by law. At least, it can make the unpleasant impression that something is not quite as it ought to be.

Gifts and invitations must

- 01 be **permitted** by applicable laws and regulations.
- 02 comply with our **internal rules and value limits** and those of the recipient.
- 03 be **transparent** and **correctly accounted**. There must never be any appearance of dishonesty.
- 04 be (socially) **appropriate** in type, value and frequency to the occasion and the position of the recipient.
- 05 be **free from** the expectation of receiving or being able to demand an **inappropriate advantage** in return.
- 06 Furthermore, we note that particularly strict rules apply to public officials.



Careful selection of suppliers and business partners

We care for a sustainable supply chain. We therefore want to enter and sustain business relationships with reputable partners only. In doing so, we consider any environmental, human rights, financial and other risks. We protect the

interests of our customers by carefully selecting suppliers and other business partnerships, as well as by applying the same high standards that we set for our own actions.

We pay attention to the following:

- 01 We **select** suppliers and our business partnerships **carefully**.
- 02 **Sustainability is a key criterion** for the selection and continuance of partnerships.



Money laundering and terrorist financing

There is a risk that business activities are indirectly misused for money laundering or terrorist financing. Money laundering means disguising the origin of money or other assets from criminal activities and introducing them into the "normal", i.e. legal, economic and financial cycle. In addition to financial support, terrorism can also be financed through other assets such as goods and merchandise. Even unintentional involvement in money laundering can result in very severe penalties for everyone involved.

third parties with whom we wish to do business. We only want to enter and sustain business relationships with reliable partners whose business activities comply with legal regulations and whose operating resources are of decent origin.

We immediately allocate incoming payments to the corresponding services and book them correctly. We ensure transparent and open payment flows.

At STR, we take great care to check the identity of customers, business partners and other

We always check:

- 01 Do we **know who** we are doing business with?
- 02 Have we depending on the risk **verified the identity** of customers, business partnerships and other third parties?
- 03 Do we know their **economic background** and the **origin of payments**, and can we ensure that they come from decent, legitimate sources?
- 04 Did we **report** any ambiguities, doubts or suspicions?



Accounting and taxes

We fulfil our legal obligation to keep proper accounts and comply with binding tax regulations with the utmost care in our business activities. As a public company, we bear a special responsibility. Irregularities could have serious consequences

for our company and for the people responsible, and they indirectly affect our employees.

We place great importance on

- 01 keeping our books, records and systems **complete, accurate and truthful**.
- 02 ensuring **tax compliance** in all our business transactions and maintain secure processes and the corresponding documentation.



Data protection and information security, confidential information

In times of digitalization and increasing data networking, the protection of personal data has become an important issue. Special legal regulations exist for the handling of personal data to protect privacy and personal rights. At Stuttgart Airport, we only process personal data in accordance with the legal requirements. We protect the personal data of employees, applicants, customers, suppliers, service providers and other business contacts.

Confidential information is information that should not be made public. This can be non-

public information from our company as well as information from or about our stakeholders that is protected in accordance with legal and contractual requirements. We are obligated to treat confidential information that has been transmitted to us or otherwise becomes known to us responsibly and to protect it against unauthorized access by third parties. Company information may only be passed on to third parties or even published to the extent that is absolutely necessary and only after legal clearance.

We are attentive and respect these rules:

- 01 We comply with the **applicable** data protection **regulations**.
- 02 We collect, process or use personal data only to the extent necessary for **specified, explicit and legitimate purposes**.
- 03 We are **aware** of what information is considered confidential or even strictly confidential.
- 04 We ensure an **appropriate level of security** for information and data processing.
- 05 We secure our **IT infrastructure, networks and processes** to ensure the confidentiality, integrity and availability of sensitive information and to prevent unauthorized internal and external access.



Fair and free competition

At Stuttgart Airport, we are fully committed to the principles of fair competition. Our business activities are based exclusively on objective and comprehensible criteria and respect the applicable competition rules. Free, undistorted and effective competition is protected in particular by antitrust law. Violations of this can

have serious consequences for our company and the employees involved. These include, for example, high fines, claims for damages, reputational damage and even personal imprisonment.

We are careful and follow these rules:

- 01 We **avoid** even the **mere appearance** of behaviour that violates antitrust law.
- 02 We do not enter into **any market-relevant agreements** with competitors, in particular regarding prices, offers, terms and conditions or market shares.
- 03 We are aware that it does not matter whether it is a **formal agreement** or "only" an **informal conversation**.
- 04 We **avoid** any kind of intentional **coordination of behaviour** if this could lead to a restriction of competition.
- 05 We think twice about what information we can share at **association events** and other **industry meetings**.



Conflicts of interest

A conflict of interest may exist if the personal interests of an employee conflict with those of the airport. This can arise for example from secondary employment or when privately ordering goods or services from companies that we deal with in our business activities at the airport. It can be a

disadvantage for the airport when employees place their personal interests above those of the company. To protect ourselves and our group, we responsibly watch out for potential conflicts of interest and communicate these openly.

We critically question our own actions:

- 01 Am I making business decisions **in the best interests of STR** and not based on personal motives, family interests or ties?
- 02 Do I **favour** a supplier, service provider or business contact **for no objective reason**?
- 03 If in doubt, do I **speak openly** about a potential conflict of interest?
- 04 Could I make my decision public and **take responsibility** for it?

4

Our responsibility
**We take
responsibility as
an employer**



Equal opportunities and anti-discrimination

We create a working environment that offers personal and career prospects, ensures equal opportunities, offers recognition and values special achievements and results. Everybody contributes by being open, friendly and treating others fair.

We respect the dignity, privacy and personal rights of every individual. We see diversity as an enrichment and we work together regardless of ethnic, national or social origin, culture, religion, age, disability, skin colour, gender, sexual

identity and orientation as well as ideology. We do not tolerate discrimination, sexual harassment or any other personal attacks on individuals or groups. This applies to both our colleagues and third parties, such as customers, applicants, service providers or business contacts. We strive to create conditions that enable a balance between work and private life and between working hours and free time.

We are considerate and do not accept any

- 01 racist or sexual hostility,
- 02 insinuations or remarks hostile to people with disabilities,
- 03 gender-specific harassment or physical, verbal and psychological violence. This includes unwanted approaches or assaults as well as suggestive jokes or remarks.



Protection of company assets

We treat the airport's property and assets conscientiously and carefully. We respect the tangible and intangible capital of the company. Every employee is responsible for the protection and proper use of company property and other company assets. Work equipment and other airport property – such as vehicles, tools, spare

parts, office materials, documents, technical equipment and IT devices or data carriers – may only be used for operational purposes. We ensure that we use them responsibly and protect them from loss, theft, damage or misuse.

We watch out for the following:

- 01 We handle company property and assets **conscientiously and appropriately**.
- 02 We take responsibility and help to ensure that our company assets are **reliably protected**.



Working conditions, occupational health and safety

Stuttgart Airport takes its duty of care as an employer very seriously and protects its employees from work-related hazards such as accidents. We strive to continuously improve the health and safety of our employees at work.

For us, occupational health and safety is more than just complying with legal regulations. We see occupational health and safety as an inseparable part of our daily activities. We also take preventative measures into account when planning future activities, for example in construction projects, procurement and organization of

work. We create opportunities for our airport employees to preserve and support their health.

The good health of our colleagues is very important to us. Everyone actively contributes to their own health and well-being. We all take care of the people around us, no matter what our organizational position is. In terms of occupational health and safety, we act responsibly, participate actively and accept suggestions.

We care about:

- 01 continuously **improving** occupational health and safety.
- 02 taking occupational health and safety into account in **all our activities and changes**.
- 03 **actively contributing** to occupational health and safety.
- 04 **promoting** health and well-being.



Freedom of collective bargaining and association

It is beyond question to us, that all employees have the right to form trade unions and employee representative bodies, such as works councils, and to become involved in these associations. We work openly and trustfully with the elected representatives and appreciate their important perspective. We strive for a fair balance of all interests through constructive dialog.

Collective agreements and works agreements protect our employees from discrimination, guarantee fair working conditions and ensure that they benefit from economic success.

Even in challenging times, trade unions and works councils are our reliable partners. Together, we find balanced solutions that take the interests of employees and the company into account.

We are careful

- 01 to **involve** our employee representatives **in all decisions relevant** to our employees.
- 02 **not to hinder** anyone in his or her activities as a works council or trade union representative.
- 03 **not to disadvantage or favour** the members of our employee representative bodies because of their activities.

5



Our responsibility

We support each other and report issues



Everybody needs to help – please report issues!

Together we protect our company. We speak up when something is wrong.

As an airport, we depend on the trust of our stakeholders – our employees, customers, business contacts, politicians, our neighbours and the public. We are committed to consistent compliance with external requirements and have set ourselves internal rules to follow. We reject any behaviour that harms the airport group or third parties with whom we do business. As a public company, we have a special obligation.

Everyone can help to identify risks as early as possible by reporting them. This may even

prevent damage before it occurs. In doing so, we make an important contribution to protecting our company and our colleagues.

Do you believe that individual aspects of the fairport code have been disregarded? Are there indications of company-related criminal offenses, administrative offenses or serious breaches of regulations affecting Stuttgart Airport or one of its subsidiaries?

Then please support us!

Everyone can help to identify risks as early as possible by reporting them. This may even



Contact persons and reporting channels

The following contact persons and reporting channels are available for questions, uncertainties or suspected violations of internal or legal rules and regulations:

- your own manager or supervisor
- the employees of the legal department (Legal & Compliance)
- the compliance officers
- the members of the central Compliance Board
- Members of the works council

Upon request, you can also submit your report **completely anonymously**.

Our digital whistleblowing system under <https://www.bkms-system.com/fairport> is available for this purpose. The safest way is to copy or enter the link in your browser.

Any information received will be treated in strict confidence and anonymously. Your anonymity is automatically protected by a certified technical solution as long as you do not enter any data that could be used to identify you. To fully protect your anonymity, please do not use a business notebook, smartphone or other end device.

This is important to us:

The protection of the informant is the overriding principle. We do not tolerate any form of retaliation against complainants or whistleblowers. All incoming information on possible violations is handled in a compulsory company-wide procedure. Third parties may also report possible violations. We treat such complaints and reports from third parties according to the same principles as those from internal sources, insofar as it is legally possible and permitted.



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The fairport code contains our environmental
policy in accordance with the EMAS regulation.

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