

CODE OF CONDUCT FOR EMPLOYEES OF FRAPORT GREECE

Fraport Greece

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Abbreviations

UNO	United Nations Organization
ILO	International Labor Organization
EU	European Union
FG	Fraport Greece
HRT	Human Resources & Training
LEG	Legal Department
LEG-CM	Compliance Management Section under the Legal Department

1. Introduction

Foreword by the Executive Board

Dear Employees,

We professionally operate airports around the world and provide the associated services. In this way in Fraport, we lay the foundations for international connectivity, economic growth, and prosperity. Our customers depend on the faithful observance of our procedures and on our services to continually evolve and improve.

The vision expressed in Fraport AG's mission statement to become Europe's best airport operator and set worldwide standards is based on the values of reliability, trust, commitment, competence, openness and courage.

At the same time, we at Fraport Greece have committed ourselves to dealing with each other and our partners and neighbors in a fair and appreciative manner, as is evident from our new value charter for: Integrity – Skills – Creativity – Joy – Cooperation - Respect. In addition to our commitment to comply with relevant laws and regulations, which goes without saying, all of the above are benchmarks that guide our actions.

With this Code of Conduct, we clarify our responsibility as a company and as a business partner, as well as each employee's responsibility in the workplace, and show how we meet this responsibility. Please read the Code of Conduct carefully and observe the rules in your daily work. Integrity is the basis for our actions!

We all are Fraport, regardless of where and in which Group company we operate. Together, we achieve our goals.

The Management of Fraport Greece

Alexander Zinell / CEO

Vangelis Baltas / CFO

Panagiotis Spyratos / COO

Andreas Karvelas / CTO

Code of Conduct for Employees of Fraport Greece

1.1. Objective, purpose and expected results

The Code of Conduct represents the universal basis and the principles of action that guide Fraport Greece. Its observation is specified by further internal company regulations and instructions.

1.2. Scope

The Code of Conduct applies to all employees¹ and all chief officers of Fraport Greece.

All executives are tasked with upholding and spreading the Code of Conduct within the company and with ensuring compliance with it, and as part of their role as role models, they have a particular responsibility in this regard.

¹ Employees: all employees and temporary workers working at Fraport Greece, including managers, student assistants, short-term employees, apprentices, trainees, and interns.

2. Our Corporate Social Responsibility

2.1. Compliance with Laws, Accepted Standards, and Principles

As a globally active company, Fraport Greece is committed to its social responsibility for sustainable development. This means taking responsibility in the areas of economy, ecology, and social matters and adopting a course of action that complies with laws and regulations.

We are committed to internationally recognized standards, regulations and principles, such as the principles of the UN Global Compact, the UN Agenda 2030 and its Sustainable Development Goals, the UN Universal Declaration of Human Rights and the core labor standards of the International Labour Organization (ILO). We are committed to compliance with the applicable national laws.

2.2. Compliance with Human Rights

Companies are important social stakeholders and have an original responsibility to promote human rights. Fraport Greece respects internationally recognized human rights, takes its responsibility to comply with legal requirements seriously, and avoids human rights violations in the course of its business activities.

Complying with human rights includes, in particular, the following **rights and obligations**:

- We reject all forms of child labor.
- We strictly reject any form of forced labor as well as all forms of slavery or slave-like practices, servitude or other forms of domination or oppression in the work environment.
- We respect the fundamental right to the freedom of association and the right resulting from this to collective bargaining to regulate general labor conditions in the Group within the framework of national laws.
- We ensure appropriate wages – compensation at Fraport Greece is under no circumstances lower than the applicable legal minimum standards.
- We undertake to comply with the relevant legal provisions and applicable occupational standards on working hours, paid vacation, and legal holidays.

Diversity

As an open-minded company, we value the diversity and variety of our workforce. This allows different perspectives and experiences to flow into our work. With this diversity lived in everyday life, we can develop solutions with our customers that are innovative for them. The appreciation and recognition of the diversity of our employees makes a major contribution to Fraport Greece's economic success.

Equal Opportunities and Equal Treatment

Fraport Greece encourages diversity in its workforce and pursues the objective of rejecting any form of discrimination. The principle of mutual appreciation and respect is an essential part of the Fraport Greece values culture: Fraport Greece stands for fair, respectful, and cooperative relationships.

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These **principles** form the basis of our actions:

- We are committed to not distinguishing, excluding, or favoring people on the basis of their ethnic, national or social origin, race, color, gender, age, religion, or belief.
- We prohibit any discrimination based on constitutional political activity, membership in an employee's organization, disability, or sexual orientation.

2.3. Environmental Protection

Fraport has adopted a Group-wide environmental policy and is committed to a sustainable and careful approach to natural resources and the environment. It is our goal to minimize the negative impacts of our activities on people and the environment. Noise abatement and climate protection play a special role in this.

Our environmental policy is based among others on the following principles:

- We are committed to conducting our business activities in an environmentally friendly manner. We strive to protect the environment and to ensure safe and healthy working conditions for our employees.
- We encourage our employees to use natural resources responsibly.
- We work towards the development and dissemination of environmentally friendly technologies by applying ecological criteria in the selection of products and services.
- As part of our responsibility, we strive to limit emissions of climate-relevant gases and air pollutants to an unavoidable minimum.

3. Our Responsibility as a Business Partner

3.1. Prevention of Corruption

Corruption is generally defined as the abuse of entrusted power for personal or private gain. Corruption not only causes material damage but also obstructs the economic, political, and social development of a country and thus ultimately undermines the foundations of a society.

Integrity in business dealings and the prevention of corruption are important principles for Fraport Greece. We do not bribe and do not allow ourselves to be bribed. We do not tolerate any form of corruption and avoid even the mere appearance of undue influence.

Gifts and Invitations

Benefits in the form of gifts and invitations are part of the usual forms of social contact in business life. Nevertheless, some benefits can be understood as inadmissible forms of influence, thus, they may also be punishable by law.

All employees undertake not to offer or accept any gifts or invitations in business dealings that could influence a business relationship in an inadmissible manner.

We observe the following **principles** regarding gifts and invitations:

- **Appropriateness:** Gifts or invitations must be in accordance with local customs and socially acceptable behavior. They may be made as a gesture of courtesy and appreciation but must not be of an unreasonably high value.
- **Connection with business activity:** A benefit may never be accepted or granted in order to influence a specific business decision. Even the appearance of such influence must be avoided.
- **Frequency:** The giving or acceptance of gifts and invitations must be limited to sporadic occasions.
- Invitations or gifts to public **officials** entail a higher risk and are generally prohibited. Exceptions should be arranged in coordination with the Compliance Department (Compliance Management Section (LEG-CM)).
- **Documentation:** The internal rules, approval and documentation processes must be observed.

Conflicts of Interest

Our success is based on business decisions being made solely in the interests of Fraport Greece. Employees must not pursue personal interests that conflict with Fraport Greece's interests or take personal advantage of business opportunities to which Fraport Greece is entitled.

Conflicts of interest can arise in many ways, e.g. through financial interests in suppliers, customers or business partners, in the context of secondary employment or through personal relationships between employees at work and with business partners.

If a conflict of interest exists or could exist, we implement the following **measures**:

- The affected employee shall notify his or her superior in writing.
- The superior shall take appropriate measures to adequately reduce the risks to the company arising from the conflict of interest.
- We document the conflict of interest, the decision whether and which measures are necessary, and the measures finally taken.

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Donations and Sponsoring

We assume social responsibility. As a trusted partner for our community, we promote culture, education, sports, and ecological and social matters.

In doing so, we take the following **principles** into account:

- We use donations and sponsoring only for purposes compliant with integrity requirements and avoid even the appearance of undue influence.
- Donations and sponsoring are awarded on the basis of transparent and clear criteria.

3.2. Fair and Free Competition

The protection of free competition is an essential requirement for wealth, growth and employment. Fraport Greece is committed to unrestricted and fair competition. We deal fairly with our business partners. Our aim is to prevail in competition by means of our values and expertise, when participating on the market. Fraport Greece does not tolerate any behaviour that is contrary to the rules of fair and free competition.

The following **principles** apply in particular:

- We do not enter into any unlawful agreements with competitors, in particular on prices, market, and/or customers.
- We do not exchange sensitive/strategic information such as prices, price components, costs or investments with competitors.
- We do not agree on unlawful restrictions with customers or suppliers, and we do not unlawfully exclude anyone.
- We deal fairly and responsibly with strong market positions.
- We do not manipulate tender procedures or submit sham bids.

If you are uncertain whether a planned approach is compatible with legal requirements or internal rules, always contact the responsible Legal Department in a timely manner (LEG).

3.3. Prohibition of Insider Trading

A condition for the efficient functioning of the capital markets is that all persons trading on the capital market have the same information. No person should gain an advantage at the expense of others because he or she has an information advantage (insider information) over the general public that allows him or her to make predictions about the price trend of shares and other securities.

As a listed company, the prohibitions and obligations of the EU Market Abuse Regulation apply to Fraport AG, its executive bodies and employees. Bodies and employees of Group companies and even external third parties may also be subject to obligations and restrictions when trading shares and other securities due to their relationship with Fraport AG.

Insider information is information that

- is not publicly known,
- is precise,
- relates directly or indirectly to an issuer (e.g. Fraport AG) or a financial instrument (e.g. the Fraport AG share), and
- if it were made public, would be likely to have a significant effect on the price of the financial instrument.

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It is prohibited to use insider information to acquire or sell, directly or indirectly, for one's own account or for the account of a third party, shares and other securities to which the insider information relates.

As a matter of principle, insider information must also be treated confidentially within the company. It may be disclosed only if there is a specific, verifiable reason, i.e. if disclosure is necessary in the regular course of employment and performance of the employee's respective task.

3.4. Prohibition of Money Laundering and Terrorist Financing

Money laundering (covert introduction of illegally acquired assets into the legal economic cycle) and terrorist financing (providing assets to carry out terrorist activities) are a serious threat and are therefore prohibited in many countries around the world.

Fraport Greece supports the fight of states against money laundering and terrorist financing and observes national and international economic sanctions.

The following **measures** are to be implemented in this connection:

- We conduct risk-based checks on the identity of business partners. It is our goal to maintain business relationships only with reputable partners who act with integrity and whose operating resources originate from legitimate business transactions.
- If there are any suspicions of money laundering or terrorist financing, we inform the Compliance Department (LEG-CM) immediately. Fraport Greece reports suspicious cases to the relevant authorities.
- To reduce money laundering and other compliance risks, cash transactions must be kept to a minimum.
- We observe legally binding sanctions.

4. Our Responsibility at the Workplace

4.1. Cooperation between Employees

The principle of respect is a key component of Fraport Greece's culture of values. Fraport Greece stands for fair, respectful dealings with one another in a spirit of partnership. We do not tolerate any form of bullying or verbal, physical or sexual coercion, violence or harassment. Racist, anti-Semitic, anti-religious and sexist attacks will not be tolerated.

The **demands made on our employees** are as follows:

- We all are Fraport, regardless of where and in which Group company we operate. Together, we achieve our goals.
- We identify with our work and are ambassadors for our company.
- We are service providers and know who our customers are. Every day, we all make our contribution to the motto "CONNECTING THE WORLD WITH TOMORROW" and thus to the success of the company. The company supports us in this and sets the framework for our development and qualification.
- We value and use the diversity of our colleagues and look for mutual exchange. We treat each other openly and respectfully and value each other's work.

4.2. Occupational Health and Safety

Holistic, integrated occupational health and safety is a key element of our overall corporate responsibility. Fraport Greece takes preventive measures to protect employees from accidents, work-related health risks, and occupational diseases.

The guiding principles for occupational health and safety are binding for all employees:

- Operational processes must be designed in such a way as to ensure safe and healthy operations. Safety and health are integral components in the planning and implementation of activities.
- Superiors are obligated to act responsibly and in an exemplary manner in terms of occupational health and safety.
- By taking appropriate measures and assuming suitable behavior, managers and employees are obliged to create safe working conditions that do not impair health.

4.3. Secure Handling of Data and Business Secrets

Fraport Greece considers the security and integrity of data and confidential information in business dealings as one of the basic principles of business activity.

Personal Data

The collection and processing of personal data is only permitted for a specific purpose and requires the consent of the affected person (data subject) or another legal basis.

Fraport Greece complies with legal requirements and protects the personal data of employees, customers, suppliers, and other affected persons.

"Personal data" means any information relating to an identified or identifiable natural person.

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Every employee must:

- treat personal data confidentially and only disclose such data to colleagues to the extent necessary for the performance of his or her duties.
- refrain from collecting or further processing personal data without authorization and, in case of doubt, seek data protection advice.
- delete personal data within the scope of responsibility and on the basis of departmental deletion concepts if the purpose of processing no longer applies.
- inform his or her superior and the data protection management/data protection officer immediately in the event of a data security breach.

Information and Business Secrets

Information determines our success and the success of our customers. For this reason, the protection of data integrity, data availability and the confidentiality of information are vital objectives.

Fraport Greece provides for legitimate and protectable confidentiality in business dealings and ensures the protection of business secrets against unauthorized acquisition, use and disclosure.

Employees shall maintain confidentiality about matters whose secrecy is provided for by legal regulations or ordered by the employer; this shall also apply beyond the termination of the employment relationship.

4.4. Social Media

In communicating with our customers, employees and the general public, we use social media such as Facebook, LinkedIn, Instagram, Twitter and internal communication platforms.

We also treat each other fairly and positively in digital space. In doing so, we bear in mind that anything published on the Internet cannot simply be taken back.

It is prohibited to make posts that:

- discriminate against or insult other persons,
- reproduce unconstitutional or inflammatory content,
- harm our reputation and that of our employees,
- endanger the climate of peace within the Group.

Furthermore, no contributions are permitted that misuse the intellectual property of others or publish confidential or internal data or information.

4.5. Protection of Assets

Fraport Greece operates efficiently and cost-consciously – thus, the protection of corporate assets is an integral part of our responsibility at work.

The protection of assets, in particular property, also relates to valuables that have been entrusted to Fraport Greece by customers, business partners, or passengers.

The following **principles** apply to the protection of assets:

- Employees are obliged to protect Fraport Greece property and assets from loss, damage and misuse.
- Organizational measures for the control of invoices and the release of payments must be observed.
- Objects and other assets provided by Fraport Greece are only to be used for operational purposes, unless otherwise regulated; they shall be treated with care and consideration.
- Employees shall treat third-party assets and objects entrusted to them with consideration and care.

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5. Our Support for You

5.1. Contacts for Your Questions

The Code of Conduct does not contain detailed instructions on how to act in all situations that arise in everyday working life but offers a basis for dealing responsibly with the challenges of day-to-day business.

Questions on the interpretation and application of these rules in working practice or on more extensive guidelines can be answered by executives, the Compliance Department of Fraport AG or the Compliance Officers of the Group's companies.

If you have any questions about compliance or the application of Fraport Greece's guidelines, you may also contact the Compliance Officer of the Compliance Department (LEG-CM) at P.stroumpos@fraport-greece.com.

5.2. Dealing with Mistakes and Rule Violations

Fraport Greece's corporate culture is governed by the values of Integrity, Skills, Creativity, Joy, Cooperation, and Respect of our employees. The value of integrity is to make decisions, take responsibility, honesty and transparency.

Mistakes can occur doing so. It is crucial that these mistakes are recognized and corrected. Fraport Greece promotes an open approach to mistakes. This is the only way we can learn from our mistakes and continue to develop.

A key requirement for our success is ensuring integrity in all business processes. Employees are obliged to comply with the applicable laws, this Code of Conduct and the internal rules. In the event of violations, they must expect consequences under labor law in addition to the possible consequences under criminal and liability law.

5.3. Reporting Channels for Suspected Compliance Violations

In the case of violations of laws or internal rules, Fraport Greece is interested in receiving information on such misconduct. We are grateful for any information that helps to identify and remedy irregularities. This is essential to prevent economic disadvantages and damage to our reputation.

We expect all employees to act responsibly and promote open interaction in the sense of a culture of trust between employees and the respective executives who are available as the first point of contact.

If employees do not wish to contact the responsible executive, various reporting channels are available where violations of the Code of Conduct or economic offences can be reported either by name or anonymously.

Comprehensive information on further reporting channels can be found on Fraport AG's corporate website at www.Fraport.com/en under "Compliance" or on Fraport Greece's online reporting system <https://www.Fraport-greece.com/ell/viosimotita/etairiki-symmorfosi--akeraiotita>, selecting Greek.

For Fraport Greece you can also contact Mr. Periklis Stroumpos (Head of Legal and Compliance Officer), tel. 214 4000 430 / 6982 978 723; e-mail P.Stroumpos@Fraport-greece.com) and Mrs Rania Tyrli (Head of Human Resources & Training), tel. 214 4000 513 / 6985 053 844; e-mail R.Tyrli@Fraport-greece.com.