

Policy Statement of the FBB Group

A. Foreword by the Management Board

We are in a position of considerable responsibility as the operator of Berlin Brandenburg Airport Willy Brandt (BER) and Germany's third largest airport location. Not only towards our 2,085 employees - but also our passengers, neighbourhood, the environment and the society in which we live.

With the coming into force of the German Supply Chain Due Diligence Act, the German legislator is sending out an important signal in favour of a uniform standard for the protection of human rights and the environment. This sketches out a clear path for responsible and sustainable corporate governance, which Flughafen Berlin Brandenburg GmbH (FBB) expressly supports.

We see the challenges associated with the law as an opportunity to further optimise our corporate processes and make our contribution to a sustainable future. In light of this, we are determined not only to meet the requirements of the law, but also extend our commitment to human rights and environmental protection beyond this. We shall systematically identify, prevent and minimise risks relating to human rights violations and environmental damage. At the same time, we want to ensure that our business partners also comply with these exacting standards. We shall travel this path together by way of transparent communication and open dialogue with our stakeholders. In addition to flight operations, we have set our sights firmly on sustainability and climate protection. Our clear objective is to render BER operations CO₂-neutral by 2045 at the latest.

By way of this policy statement, we are reporting on our strategy transparently and to the general public. This policy statement, therefore, serves as a compass for our employees and business partners. The basic values of human rights and environmental protection are not only to be anchored in our policy statement, they should also find expression in all aspects of our daily work.

Thank you for your cooperation and support on this journey.

Yours sincerely,

Management

B. Policy statement

1. Human rights strategy and human rights and environmental expectations of employees and suppliers

As the operator of a major airport, the FBB Group is aware of its special responsibility for people and the environment. Respecting and safeguarding human rights and environmental concerns are, therefore, an integral part of corporate management and decision-making.

The company is committed to internationally recognised human rights and environmental standards. These include, in particular, the Sustainable Development Goals, the Universal Declaration of Human Rights and the United Nations Conventions, the core labour standards of the International Labour Organization and the OECD Guidelines for Multinational Enterprises.

We attach great importance, in particular, to the following human rights and environmental aspects:

- We strictly reject
 - Any form of child labour as well as
 - Any form of forced labour, slavery or slavery-like practices, servitude or other forms of domination or oppression in the working environment.
- We respect the fundamental right to freedom of association and the resulting right to collective bargaining to provide for general working conditions at the company as part of national laws.
- We oppose the unequal treatment of people based on their national or ethnic origin, social background, health status, gender characteristics, disability, sexual orientation, restricted access to education, political opinions, religions or beliefs.
- We expressly oppose the use of torture, degrading treatment and physical and psychological violence.
- We undertake to comply with the relevant statutory regulations in respect of
 - Health and safety at work, working hours and rest breaks, holidays and public holidays,
 - Handling hazardous or environmentally harmful waste and products,
 - Reducing energy and resource consumption and negative effects on the environment.
- We guarantee an appropriate wage - remuneration in the FBB Group exceeds the applicable statutory minimum standards.

The FBB Group has described its own human rights strategy in this policy statement with consideration given to its own risk situation. In this context, we define a binding framework of action for our employees, business partners and suppliers based on the stated principles and standards. Our employees must adhere to internal regulations and guidelines in which our social responsibility in relation to social and environmental matters is formulated. The FBB Group expects all employees to comply with the human rights strategy set out in this policy statement and observe the human rights and environmental standards.

We also expect our suppliers and service providers to respect human rights and comply with environmental standards and take into account the human rights strategy described here. We expect, in particular, suppliers and service providers to avoid violations of human rights, internationally recognised labour standards and environmental obligations in their area of responsibility and minimise corresponding risks ["Human rights and environmental expectations of our suppliers"].

2. Risk management, risk analysis and other measures

We place a high priority on respecting our human rights and environmental due diligence obligations. It is implemented and controlled by way of an internal system of measures spanning all relevant business processes. A corresponding risk management system has been put in place at the company in accordance with the requirements of the German Supply Chain Due Diligence Act (LkSG).

As part of a decentralised risk management system, operational responsibility for identifying, assessing, monitoring, controlling and documenting risks and deriving preventive and corrective measures are allocated to the respective organisational unit. Risk management is monitored by the Head of Legal and Compliance as FBB's Human Rights Officer. The Human Rights Officer reports to the Management Board at least once a year and on an ad hoc basis in respect of risk analyses performed and pending and honouring human rights and environmental due diligence obligations. The Management Board holds overall responsibility for risk management.

The analysis of existing risks and hazardous situations in the company's own business area and within the direct supply chains is based on the recommendations of the German Federal Office of Economics and Export Control (BAFA) and comprises an abstract risk assessment that is reviewed in respect of plausibility as part of a subsequent specific risk assessment. The risk analysis is performed both annually and on an ad hoc basis. Findings from the processing of information from the complaints procedure are taken into account accordingly.

Risks identified are appropriately weighted in terms of their impact, probability of occurrence and significance, prioritised while taking into account the company's ability to influence their causes and then addressed.

The findings of the risk analyses are incorporated in the development of specific measures to guarantee compliance with our human rights and environmental due diligence obligations. The effectiveness of the adopted preventive and remedial measures and the complaints procedure are continually reviewed. Appropriate measures and processes are adapted or further developed as required.

2.1. Priority risks

The initial LkSG risk analysis in its own business area identified several abstract risks in unequal treatment in employment. The probability of occurrence is assumed to be largely very low thanks to the prevention and control measures in place.

As part of the risk analysis of our direct suppliers, we established that the majority of our business partners are based in Germany and, therefore, have low abstract country risks. Higher country risks were not identified. Some of our direct suppliers come from high-risk sectors such as wholesale, cleaning, construction and security and mineral oil processing. These increased sector risks are relative when combined with the low country risk identified for the registered office of the respective companies and could not be confirmed in the specific assessment of the individual companies.

2.2. Preventive measures

To minimise the human rights and environmental risks in the supply chain, FBB has implemented various preventive measures in its own business area and in dealings with its suppliers. These include, in particular, the following regulations and measures

- Policy statement in respect of the human rights strategy
- Training for employees in relevant business areas

- Own procurement strategies and purchasing practices to prevent or minimise the identified risks
- General and special contractual conditions

FBB takes human rights and environmental expectations into account when selecting direct suppliers. Furthermore, FBB places direct suppliers under obligation to comply with FBB's human rights and environmental expectations and address them appropriately along their own supply chain. FBB grants itself the right to information and control to enforce the contractually agreed standards. We expect our business partners, in particular, to regularly draw their employees' attention to the relevant issues.

In the event of substantiated knowledge of violations of human rights and environmental obligations by an indirect supplier, FBB adopts appropriate preventive measures against the perpetrator, such as the implementation of risk-based control measures, support in the prevention and avoidance of a risk or the implementation of industry-specific or cross-industry initiatives.

FBB monitors the implementation of the human rights and environmental strategy in its own business area. It simultaneously monitors the human rights and environmental situation on the part of our direct suppliers.

2.3. Remedial measures

Insofar as FBB becomes aware of an existing or imminent violation of human rights or environmental obligations in its own business area or at a direct supplier, appropriate remedial measures shall be adopted without delay to prevent or end the identified violation or to minimise the extent of the violation. If that is not possible, FBB shall draw up a concept to end or reduce the violation and implement it while setting a specific timetable. The concept is implemented following consultation with the company's own departments and the relevant suppliers. FBB reserves the right to terminate the business relationship if the concept has no effect within the specified period.

2.4. Complaints procedure

We have put in place a complaints procedure and provide a corresponding secure Reporting Channel[1] by way of which all persons can report human rights and environmental risks as well as violations of corresponding obligations that have arisen as a result of the business activities of our company or one of our direct or indirect suppliers. The Reporting Channel can be accessed at any time and enables whistleblowers to report risks and violations anonymously, confidentially and without fear of being penalised. The reports are processed independently and openly in accordance with a transparent process. We have published a description of the complaints procedure in the rules of procedure on our website [2].

2.5 Reporting and documentation

The key information about honouring due diligence obligations in the past financial year is summarised in the annual report and made available to the public free of charge.

Implementation of our human rights and environmental due diligence obligations is documented internally and regularly reviewed. Documentation is kept for at least seven years from the date of creation.

The policy statement can be viewed on our website [3] at any time. This policy statement is updated as required and reviewed annually in respect of changes.

C. Further information

No.	Hyperlink	Link/plain text
1	Reporting Channel	http://www.bkms-system.net/fbb
2	Rules of Procedure	https://corporate.berlin-airport.de/content/dam/corporate/de/geschaeftpartner/einkauf/verfahrensordnung-8-lksg.pdf
3	Website	https://corporate.berlin-airport.de/de/geschaeftpartner/einkauf-beschaffung/lieferkettensorgfaltspflichtengesetz.html