

Policy statement of the FBB Group

A. Foreword from the Executive Board

We bear a special responsibility as the operator of Berlin Brandenburg Airport Willy Brandt (BER) and the third largest airport location in Germany. Not only towards our 2,085 employees – but also towards our passengers, our neighbours, the environment and the society in which we live.

The entry into force of the German Act on Corporate Due Diligence Obligations in Supply Chains (*Lieferkettensorgfaltspflichtengesetz, LkSG*) is an important signal from the German legislator in favour of a uniform standard for the protection of human rights and the environment. This sets out a clear path for responsible and sustainable corporate governance, which Flughafen Berlin Brandenburg GmbH (FBB) expressly associates itself with.

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. To this effect, we are determined not only to fulfil the requirements of the law, but also to commit ourselves to human rights and environmental protection. We will 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 high standards. We will tread this path together through transparent communication and open dialogue with our stakeholders. In addition to flight operations, we also have our sights firmly set on sustainability and climate protection. We have the clear target of making operations at BER carbon neutral by no later than 2045.

This policy statement reports our strategy in a transparent and publicly accessible way. Therefore, this statement serves as a compass for our employees and business partners. The fundamental values of human rights and environmental protection should not only be established in our policy statement, it should also be embodied in every action of our day-to-day work.

Thank you for your cooperation and support on this path.

Kind regards,

Executive Board

B. Policy statement

1. Human rights and environmental strategy

The FBB Group is aware of its responsibility towards people and the environment. For this reason, respecting and safeguarding human rights and environmental issues are an integral part of corporate management and decision-making.

The company is committed to internationally recognised human rights and environmental standards. These particularly include sustainable development goals, the Universal Declaration of Human Rights and the United Nations Conventions, the core labour standards of the International Labour Organisation and the OECD Guidelines for Multinational Enterprises.

In particular, we attach great importance to the following human rights and environmental aspects:

- We reject
 - any form of child labour as well as
 - any form of forced labour, slavery or slavery-like practices, servitude or other forms of exertion of control or oppression in the working environment.
- We respect the fundamental right to freedom of association and the consequent right to collective bargaining to regulate general working conditions in the company within the framework of national laws.
- We oppose the unequal treatment of people on the basis of their national or ethnic origins, social background, state of health, gender attributes, disability, sexual orientation, restricted access to education, political opinions, religions or beliefs.
- We expressly oppose the use of torture, humiliating treatment and the use of physical and psychological violence.
- We undertake to comply with the relevant statutory regulations
 - on occupational health and safety, working hours and breaks, holidays and public holidays,
 - on the handling of hazardous or environmentally harmful waste and products,
 - with regard to the reducing energy and resource consumption and negative effects on the environment.
- We guarantee an appropriate wage – pay in the FBB Group exceeds the applicable statutory minimum standards.

In this context, we define a binding framework of action for our employees, business partners and suppliers based on the aforementioned principles and standards. Our employees must comply with internal regulations and guidelines in which our social responsibility in the areas of social and environmental matters is formulated. Further information on these topics can be found on our corporate website.

We expect our suppliers and service providers as well as their subcontractors to fulfil their social and environmental responsibilities and to avoid violations of human rights, internationally recognised labour standards and environmental obligations in their area of responsibility. Our human rights and environmental expectations and policies for cooperation are defined in FBB's respective contractual terms and conditions for our business partners.

2. Risk management, risk analysis and other measures

Respecting our human rights and environmental due diligence obligations is one of our top priorities and is implemented and managed through an internal system of measures that covers all relevant business

processes. A corresponding risk management system has been set up in the company in accordance with the requirements of the LkSG.

The respective organisational unit is assigned operational responsibility for identifying, assessing, monitoring, managing and documenting risks and deriving preventive and corrective measures as part of a decentralised risk management system. Risk management is monitored by the legal and compliance organisational unit. The Executive Board bears overall responsibility.

The analysis of existing risks and hazardous situations in the company's own area of business and within the direct supply chains is based on the recommendations of the Federal Office for Economic Affairs and Export Control and comprises an abstract risk assessment that is checked for plausibility as part of a subsequent specific risk assessment. The risk analysis is carried out both annually or as needed. Findings from evidence processed as part of the complaints procedure are taken into account accordingly.

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

Findings from the risk analyses are incorporated into the development of specific measures to ensure compliance with our human rights and environmental due diligence obligations. The effectiveness of the measures taken is continuously assessed. Appropriate measures are adapted or further developed as necessary.

FBB checks compliance with the human rights and environmental strategy in its own area of business and monitors the human rights and environmental situation with our direct suppliers. If there are any irregularities, we will take suitable and appropriate measures to prevent or end the violation of human rights or environmental obligations or to minimise the extent of the violation.

Furthermore, we have set up a complaints procedure [1] and provide a corresponding reporting channel [2] via which all persons can report human rights and environmental risks and violations of any corresponding obligations that have arisen as a result of the business activities of our company or one of our direct or indirect suppliers.

The implementation of our human rights and environmental due diligence obligations is documented internally and reviewed regularly. The key information on the fulfilment of due diligence obligations in the past financial year is summarised in the annual report and published on the company's website. This policy statement is updated as necessary and reviewed annually for changes.

3. Risk analysis results

An initial LkSG risk analysis carried out in 2023 in the company's own area of business identified a number of abstract risks in topics relating to unequal treatment in the context of employment. The probability of occurrence is assumed to be very low due to the existing prevention and control measures.

As part of the risk analysis of our direct suppliers, we determined that the majority of our business partners are based in Germany and, therefore, have low abstract country risks. No higher country risks

were identified. Some of our direct suppliers come from high-risk industries, such as wholesale or mineral oil processing. These increased industry risks are put into perspective in combination with the low country risk identified for the registered office of the respective companies.

4. Further information

Topic	Link
[1] Complaints procedure	https://corporate.berlin-airport.de/content/dam/corporate/en/geschaeftspartner/einkauf/verfahrensordnung-8-lksg-en.pdf
[2] Whistleblowing system	www.bkms-system.net/fbb