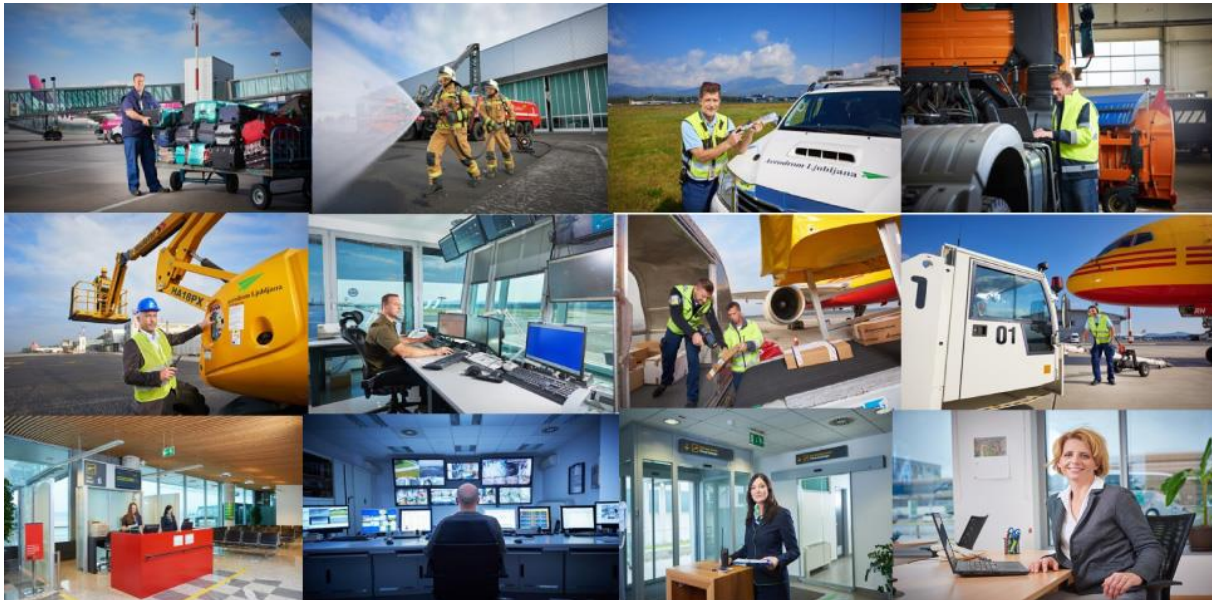


**ETIČNI KODEKS IN STANDARDI RAVNANJA ZA ZAPOSLENE /
CODE OF CONDUCT AND STANDARDS OF BEHAVIOUR FOR
EMPLOYEES**



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Etični kodeks in standardi ravnanja za zaposlene¹ je izdan s strani posloводства družbe in vodje integriranih sistemov upravljanja Fraport Slovenija.

This Code of conduct and standards of Behaviour for employees² is released by the Top Management and the Head of Integrated Governance System of Fraport Slovenija.

Etični kodeks in standardi ravnanja vsebuje zahteve smernic za Etični kodeks skupine Fraport AG.

Code of Conduct and standards of Behaviour for employees is following the requirements of Group Code of Conduct

Zg. Brnik, 01.10.2021

Taja Skobir, MBA, I.r.
Vodja integriranih sistemov upravljanja /
Head of Integrated Governance System

Dr. Babett Stapel, I.r.
Poslovodna direktorica /
Managing Director

Oliver Weiss, I.r.
Direktor Operative /
Chief Operating Officer

¹ Fraport Slovenija z besedo " zaposlene "opredeljuje vse redno zaposlene, študente in pripravnike.

² Fraport Slovenija defines "employees" as meaning all employees, students and trainees.

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»Spoštovana sodelavka, sodelavec!

Naše službe predstavljajo pomemben del naših življenj. Jasna ločnica, kje se poslovno konča in zasebno začne, skoraj ne obstaja več, zato so naše vrednote in ravnanje na obeh področjih neločljivo povezani. Z njimi posamezniki gradimo svoj ugled in ugled širših celot. V tem smislu nepogrešljiv delček prispevamo tudi v družbi Fraport Slovenija, saj pomembno pripomoremo k uresničevanju njenega poslanstva in delujemo v smeri vizije družbe. S svojim delom in vedenjem izražamo odgovornost do podjetja in njegovih deležnikov pri čemer nas vodijo etična in moralna načela.

Namen dokumenta, ki je pred vami, je spominjati, usmerjati in potrjevati ustrezna ravnanja, ki oblikujejo našo organizacijsko kulturo, uresničujejo pričakovanja in ustvarjajo zadovoljne deležnike ter s tem zagotavljajo dolgoročno poslovanje družbe. Odlikujejo nas motiviranost, osebno zadovoljstvo, spoštljivost, odprtost in poštenost. Pri delu zagotavljamo varnost in kakovost storitev, izpolnjujemo strateške cilje podjetja in skrbimo za ranljivo okolje. Smo tudi družbeno odgovorni, povezujemo in strokovno razvijamo sodelavce ter zagotavljamo varno in zdravo delovno okolje.

Prepričani smo, da omenjeni standardi spremljajo vaš vsakdan. S hitrim razvojem poslovnega sveta in vedno bolj zahtevnim gospodarskim okoljem pa nenehno nastajajo nova področja, na katerih moramo upoštevati priporočila tega dokumenta. Prizadevajte si jih uresničevati in postati še boljši, ozrite se naokoli in k temu spodbujajte tudi druge. Nadaljnji uspeh in ugled naše družbe je odvisen od vsakega posameznika in hkrati od vseh nas.«

S spoštovanjem!

Dr. Babett Stapel
Poslovodna direktorica

“Dear colleague!

Work is an important part of our life. A clear line between our business and personal life almost doesn't exist anymore, that is why our values and behavior are inextricably linked in both areas. According to this we build our reputation and the reputation of the broader whole. In this sense, we contribute an indispensable piece to Fraport Slovenija company. This is an important contribution to help achieve its goals and act towards the vision of the company. Work and behavior express our responsibility to the company and its stakeholders whereby we are guided by ethical and moral principles.

The purpose of document is to remember, to guide and to validate appropriate actions that shape our organizational culture, realize our expectations and satisfy the stakeholders in order to ensure the long-term business conduct of the company. We are recognized for motivation, personal satisfaction, respectfulness, openness and honesty. Our work ensures the security and quality of services, fulfillment of company's strategic objectives and we manage to take care of the fragile environment. We are also socially responsible; we connect, professionally take care for the development of our employees and provide a safe and healthy working environment.

We believe that the above-mentioned standards accompany your daily life. With the rapid development of the business world and an increasingly challenging economic environment, we are constantly emerging new areas in which we need to follow the recommendations of this document. Strive towards exercise it and become even better and encourage others to do the same. Continued success and reputation of our company depends on each individual and at the same time from all of us.”

With respect!

Dr. Babett Stapel
Managing Director

1. PREDSTAVITEV

Glavne dejavnosti Fraport Slovenija, d.o.o. (v nadaljevanju "Fraport Slovenija") so letališke storitve in zemeljska oskrba, komercialne dejavnosti in nepremičnine, letalski tovorni promet in letalska akademija.

Etični kodeks in standardi ravnanja za zaposlene Fraport Slovenija odražajo naše temeljne vrednote in vzpostavljajo zavezujoča pravila za etično, ekonomsko in zakonsko pravilno ravnanje pri vsakodnevnih poslovnih dejavnostih.

Od vseh zaposlenih Fraport Slovenija se zahteva, da delujejo v skladu z zakonskimi zahtevami in internimi dokumenti. V resničnem življenju kršitev zakonov ali internih dokumentov ne moremo popolnoma izključiti. Zato pričakujemo, da naši zaposleni poročajo o kakršnihkoli zaznanih kršitvah ali neskladnostih. Sumljive primere je treba pojasniti in nepravilnosti odpraviti.

V skladu z našimi temeljnimi vrednotami, kot so iskrenost, integriteta, zanesljivost, odgovornost, transparentnost, lojalnost in poštenost, imamo visoke standarde za naše delovanje na način, ki je socialno, ekonomsko in ekološko trajnosten za prihodnost; saj trajnostni razvoj za nas pomeni odgovorno prihodnost.

Naš ugled in dobro ime družbe so ključne sestavine uspeha. Vsak od nas, s svojim delom, vsak dan prispeva k pozitivni podobi Fraport Slovenija.

1. INTRODUCTION

The main activities of Fraport Slovenija, d.o.o. (hereinafter "Fraport Slovenija") are Airport Services and Ground Handling, Commercial and Real Estate, Cargo Services and Aviation Academy.

Fraport Slovenija, Code of Conduct and Standards of Behavior for Employees reflect our core values and establish binding rules for dealing with ethical, economical and legal challenges of everyday business activities.

All Fraport Slovenija employees are required to comply with relevant laws and our internal guidelines. In real life, however, violations of these laws or guidelines cannot be completely excluded. Therefore, we expect our employees to report any kind of violation or non-compliance. Suspicious cases should be clarified and irregularities must be remedied.

In line with our basic values of honesty, integrity, trustworthiness, responsibility, transparency, loyalty and fairness, we have high standards for doing business in a manner that is socially, economically, and ecologically sustainable for the future; we view sustainability as shaping the future responsibly.

Our reputation and good name as a company are key components of our success. All of us contribute, with all our work, each and every day to the positive image of Fraport Slovenija.

2. PODROČJE UPORABE

Načela etičnega kodeksa in standardov ravnanja za zaposlene so zavezujoča za celotno Fraport skupino, zato veljajo tudi za vse zaposlene Fraport Slovenija.

Etični kodeks in standardi ravnanja za zaposlene Fraport Slovenija ne morejo zagotoviti podrobnih navodil kako ravnati v vseh situacijah, niti ni namenjen temu.

Dokument predstavlja splošni okvir in načela ravnanja, ki vodijo Fraport Slovenija. Kako se ta načela upoštevajo v praksi, je predpisano v raznih internih pravilnikih družbe, predpisih in delovnih navodilih.

Obstoječi pravilniki, kolektivna pogodba in interne pogodbe brez omejitev uporabljajo določila etičnega kodeksa in standardov ravnanja. V primeru posebnih okoliščin se lahko uporabljajo prilagoditve, a morajo temeljiti na veljavnem etičnem kodeksu.

Vodje na vseh nivojih so zadolženi za ohranjanje in širjenje tega dokumenta znotraj družbe ter zagotavljanje delovanja skladnosti z njim. Njihova funkcija predstavlja vzor, zato nosijo posebno odgovornost v zvezi s tem področjem.

2. SCOPE OF APPLICATION

The principles of the Code of Conduct and Standards of Behavior for Employees are binding on the entire Group. They apply to all Fraport Slovenia employees.

The Fraport Slovenia Code of Conduct and Standards of Behavior cannot provide detailed instructions on how to act in all situations, nor is it intended to do so.

Instead, it represents the general framework and the principles of action that guide Fraport Slovenia. How those principles are to be observed in real-world practice is, therefore, specified where necessary by internal company rules, regulations, and instructions.

Existing guidelines, collective labor agreements and internal company agreements apply without limitation alongside the Code of Conduct Standards of Behavior. Local adjustments may be made to take account of special circumstances, but must in all cases be based on the current Code of Conduct.

Leaders on all levels are tasked with upholding and spreading this document within the company and with ensuring compliance herewith. In their function as role models, they bear special responsibility in this regard.

3. SKLADNOST POSLOVANJA

3.1 Skladnost z zakoni in drugimi predpisi, sprejetimi standardi, smernicami in načeli

Trajnostni razvoj pomeni več kot le prevzem odgovornosti na področju gospodarstva, ekologije in socialnih zadev. Pomeni tudi izvajanje ukrepov v prizadevanju za izpolnitev svoje vloge kot del družbene odgovornosti, skozi brezkompromisno delovanje v skladu s zakoni, pravili in predpisi.

Zavezani smo k poslovanju, skladnemu z veljavnimi zakoni in drugimi predpisi ter podpiranju mednarodno sprejetih standardov, smernic in načel, zlasti načel UN Global Compact, Splošne deklaracije o človekovih pravicah, konvencij Združenih narodov, in temeljnih standardov dela Mednarodne organizacije dela (ILO), kot tudi smernic OECD za multinacionalne družbe.

Načela, določena v nadaljevanju tega etičnega kodeksa, morajo upoštevati naši zaposleni in se jim ne smejo izogniti na podlagi pogodbe ali česa drugega.

3.2 Preprečevanje korupcije

Upoštevati je treba ustrezne pravne določbe v boju proti korupciji. V odnosih s kupci, dobavitelji in ponudniki storitev (v nadaljnjem besedilu "poslovni partnerji"), kot tudi z vladnimi institucijami, morajo biti interesi Fraport Slovenija in osebni interesi zaposlenih strogo ločeni. Dejanja in

3. COMPLIANCE

3.1 Compliance with laws, regulations, accepted standards, guidelines and principles

Sustainability stands for more than just stated assumption of responsibility in the areas of the economy, ecology, and social matters. It also stands for our company's actions in striving to fulfill its role as an accepted part of our society through uncompromising compliance with its laws, rules, and regulations.

As a result, we are committed to compliance with the applicable national laws and regulations and uphold internationally accepted standards, guidelines, and principles, especially the principles of the UN Global Compact, the Universal Declaration of Human Rights, the conventions of the United Nations, and the core labor standards of the International Labour Organisation (ILO) as well as the OECD Guidelines for Multinational Enterprises.

The principles set out in the rest of this Code of Conduct must be observed by our employees and must not be circumvented through contractual agreements or comparable measures.

3.2 Prevention of corruption

The relevant legal provisions on fighting corruption must be observed. In our dealings with customers, suppliers, and service providers (hereinafter "Business Partners") as well as with government institutions, the interests of Fraport Slovenija and the personal interests of its

odločitve, zlasti odločitve o nabavi, morajo biti vedno sprejete brez subjektivnih razlogov in osebnih interesov. To pomeni, da se denar ali karkoli drugega za osebno korist z monetarno vrednostjo nikoli ne sme sprejeti ali ponuditi v zameno za poslovanje ali prednost pri poslovanju.

Ceniti in spoštovati vsakega človeka je naša prioriteta in ena izmed naših temeljnih vrednot. Razvoj potenciala vsakega posameznika je ena bistvenih odgovornosti posloводства družbe v odnosu do zaposlenih. Pričakujemo, da se naši zaposleni identificirajo s cilji družbe in s svojim ravnanjem izkazujejo pripadnost interesom družbe. Zaposleni se morajo izogibati situacijam, v katerih bi bili njihovi osebni, družinski ali finančni interesi v nasprotju z interesi Fraport Slovenija. Če se izkaže, da bi morebiti lahko prišlo do navzkrižja interesov, mora zaposleni to razkriti in pridobiti odobritev posloводства družbe oziroma se obrniti na Pooblaščenko za skladnost poslovanja.

3.3 Konkurenčno pravo

Spoštujemo načela poštene konkurence z drugimi podjetji, ki delujejo na trgu. Pričakujemo, da bodo naši zaposleni in ostali ponudniki storitev delovali v skladu z vso veljavno nacionalno in mednarodno zakonodajo na področju konkurenčnega prava in upoštevali načela nelojalne konkurence, kadar je to v njihovi odgovornosti. Sporazumi, dogovori, ali dejavnosti, ki vplivajo na cene ali pogoje poslovanja ali na določitev trga poslovanja ter ovirajo prosto in odprto konkurenco na nedopusten način, so prepovedani. Sporazumi in dogovori med strankami in dobavitelji z namenom omejevanja svobode pogodbenih partnerjev glede cen in drugih pogojev (določanje cen in pogojev), so prav tako prepovedani.

employees must be kept strictly separate by both sides. Actions and decisions, especially purchasing decisions, must always be free of non-objective considerations and personal interests. This means that money, or personal advantages or perquisites with monetary value, must never be either accepted or offered in return for preferential treatment during business dealings.

Appreciation and respect for every human being are high priorities for us and among our core values. Cultivating and developing each and every individual's potential for achievement lies at the heart of management's responsibilities toward employees. We expect our employees to identify with the Company's goals and demonstrate loyalty with regard to the Company's interests. With that in mind, employees should avoid situations in which their personal, family, or financial interests could conflict with those of Fraport Slovenija. If it becomes apparent that such a conflict of interest could arise, the person concerned should disclose it and request the approval of the management or contact Compliance Officer.

3.3 Antitrust and competition law

We respect the principles of fair competition with other enterprises that operate on the market. We expect our employees and service providers to comply with all applicable national and international antitrust laws as well as the laws against unfair competition wherever relevant to the scope of their specific responsibilities. Agreements, understandings, or activities that affect prices or conditions, allocate sales territories or customers, or impede free, open competition in an impermissible manner are prohibited. Agreements and understandings between customers and suppliers with the intent of restricting the freedom of contractual partners concerning prices and other conditions (setting of prices and conditions) are also prohibited.

Poročila o nekonkurenčnem obnašanju morajo biti posredovana nadrejenim. Za vprašanja glede tega, ali so določena ravnanja v skladu s konkurenčnim pravom, vas prosimo, da se obrnete na Pravnika ali Pooblaščenko za skladnost poslovanja

Reports regarding anticompetitive behavior must be directed to the appropriate manager. For questions regarding whether certain actions are permitted under competition or antitrust law, please feel free to contact Legal Counselor or Compliance Officer.

3.4 Poslovna skrivnost, varstvo podatkov in zasebnost

Zavzemamo se za transparentno komunikacijo v okviru spoštovanja poslovne skrivnosti. Naši zaposleni se zavedajo, da je potrebno ohraniti zaupnost podatkov v zvezi s poslovanjem in poslovnimi skrivnostmi ter delovati v skladu z zakonom o varstvu osebnih podatkov.

V primeru potovanja znane oziroma pomembne osebe (VIP, CIP, PIP) je v skladu z načeli Politike o varstvu osebnih podatkov vsakršno snemanje ali slikanje ter javno objavljanje na družabnih omrežjih ali drugih medijih brez izrecnega dovoljenja dotične osebe prepovedano.

3.4 Confidentiality, data protection and privacy

We are committed to transparent communication within the limits of business confidentiality. Our employees agree to maintain confidentiality with regard to business and trade secrets and to comply with the laws on data protection and privacy.

In accordance with the principles of the Privacy Policy when important person is travelling (VIP, CIP, PIP) any recording or photographing and public posting on social networks or other media without the express permission of the person concerned is prohibited.

4. OBVEZNOSTI ZAPOSLENIH PO SPOŠTOVANJU ZAKONODAJE

Pri izvajanju poslovanja pričakujemo, da se področna zakonodaja in predpisi spoštujejo in izpolnjujejo. Naše dejavnosti se v vseh primerih izvajajo v skladu z veljavnimi zakonskimi zahtevami. Ne moremo in ne bomo sprejeli nikakršnega ravnanja, ki bi lahko bilo vprašljivo ali bi ogrozilo našo integriteto.

Pridobivanje naročil

Filozofija naše družbe je, da je potrebno naročila pridobiti na podlagi poštene konkurence. Zanašamo se na inovativne, kakovostne in cenovne prednosti ter zavračamo neprimerne sporazume o cenah in količinah. Naše dejavnosti temeljijo na usmeritvah nacionalne in mednarodne protimonopolne zakonodaje.

Ta odnos tudi pomeni, da ne smemo poskušati pridobiti posla, ki v zameno ponuja neposredne ali posredne, neupravičene ali nezakonite koristi.

Javnim uslužbencem in drugim funkcionarjem ne ponujamo daril ali drugih koristi v zvezi z njihovim delovanjem ali izvajanjem uradnih dolžnosti. Zavračamo vse oblike korupcije. Zakonodajo dosledno upoštevamo.

Finančno računovodstvo

Strogo se držimo splošnih zakonskih predpisov za ustrezno izvajanje računovodskega in finančnega poročanja.

Prepoved posredovanja notranjih informacij

Zakonski predpisi prepovedujejo uporabo in posredovanje notranjih informacij. Pod izraz "notranja informacija" se šteje tudi

4. OBLIGATIONS OF EMPLOYEES TO ABIDE BY LAW

In all our business concerns, we expect that relevant laws and regulations are respected and complied with. Our activities conform to the legal requirements applicable in each case. We cannot and will not accept any conduct that could call into question or jeopardize our integrity.

Acquisition of orders

It is the philosophy of our company that orders should be won through fair competition. We rely on innovative quality and price advantages and we reject price and quantity-fixing agreements. Our activities are governed by the guidelines of national and international antitrust legislation.

This basic attitude also means that we refrain from attempting to win orders by granting or offering direct or indirect, unjustified or illegal advantages to others.

We do not offer public servants or other officials' gifts or other benefits in connection with the placing of orders or the fulfillment of their official duties. We reject all forms of corruption. The relevant laws must strictly be observed.

Financial accounting

We strictly adhere to general statutory rules for proper accounting and financial reporting.

Prohibition of insider trading

Legal regulations prohibit the use and transmission of inside information. The term "insider information" is understood to

naslednje: napovedi dobička, tveganje izgube ali poslovnih informacij, ki niso javno znane.

include the following: profit forecasts, risk of losses or business information that are not public knowledge.

Varstvo osebnih podatkov

Dovoljeno je zbiranje, obdelovanje in uporaba osebnih podatkov, kot so informacije o zaposlenih, strankah in dobaviteljih, v kolikor je to dopustno v skladu z zakonom o varstvu osebnih podatkov, drugimi zakonskimi predpisi in obstoječimi internimi pravili.

V primeru dvoma se je treba posvetovati s **Pooblaščenko za varstvo osebnih podatkov** (taja.skobir@fraport-slovenija.si; 04 2061 440).

Personal data protection

It is allowed to collect process and use personal data such as information about employees, customers and suppliers to the extent that this is admissible in accordance with the Data Protection Act, other legal regulations and the existing company agreement.

In case of doubt, the **Data Protection Officer** (taja.skobir@fraport-slovenija.si; 04 2061 440).

5. DELOVNI POGOJI

5.1 Varnost in zdravje pri delu

Preprečevanje nezgod in bolezni na delovnem mestu je prioriteta Fraport Slovenija. Zavezani smo k varovanju in spodbujanju dobrega zdravja in skrbimo, da je zagotovljeno varno, zdravo in higiensko delovno okolje za zaposlene. Nudimo ustrezno opremo in sprejemamo vse potrebne ukrepe za preprečevanje nesreč in škodljive učinke na zdravje, ki se lahko pojavijo v zvezi z našim delovanjem. Zavzemamo se za stalno izboljševanje in nadaljnji razvoj delovnega okolja.

Pričakujemo, da bodo naši zaposleni prevzemali osebno odgovornost za ohranjanje lastnega zdravja, družba pa jih bo podpirala pri ohranjanju in razvoju zdravega načina življenja.

Vsi zaposleni so redno informirani – glede na njihovo delo in delovne naloge - o veljavnih zdravstvenih in varnostnih standardih, kot tudi varnostnih ukrepih, ki jih morajo pri svojem delu upoštevati.

5.2 Obnavljanje alkohola in drog

Varnost in zdravje pri delu predstavljata pomembno vrednoto zaposlenim in sta pomembna za uspeh in ugled našega podjetja. Biti sposoben sprejemati odločitve brez omejitev je tudi osnovni pogoj za odgovorno ravnanje. Iz tega razloga je strogo prepovedano delo pod vplivom alkohola, mamil in drugih opojnih substanc ter uživanje prej navedenih substanc med delovnim časom.

5. WORKING CONDITIONS

5.1 Occupational safety and health

Preventing accidents and illnesses in the workplace is a priority for Fraport Slovenia. We are committed to protecting and promoting good health, and we take care to ensure a safe, secure, healthful, and hygienic work environment for our employees. We provide appropriate equipment and materials and take the necessary measures to prevent accidents and adverse health effects that could arise in connection with our activities. We are committed to continuous improvement and further development of the work environment.

We expect our employees to assume personal responsibility for maintaining their health, and we support them in maintaining or developing a healthful lifestyle.

All employees receive regular information – aligned to their job and duties – on applicable health and safety standards as well as safety measures and are required to comply with the protective measures that are in place.

5.2 Dealing with alcohol and drugs

Health and safety are of great value to individuals and are also important to our company's success and reputation. Being able to make decisions without limitations is also an essential prerequisite when it comes to operating responsibly and securing our position amid the competition. For these reasons, working under the influence of alcohol, drugs, and other intoxicants and consumption of these substances during

working hours are strictly prohibited while maintaining the right of co-determination.

5.3 Delovni čas

Zavezani smo k upoštevanju ustreznih delovnih predpisov in poklicnih standardov na področju delovnega časa, plačanega dopusta in opredeljenih prostih dni, kot tudi upoštevanje ustreznih konvencij ILO (Mednarodne organizacije dela).

5.3 Working hours

We are committed to compliance with the relevant legal and collective provisions and occupational standards on working hours, paid vacation, and legal holidays as well as the relevant ILO (International Labor Organization) conventions.

5.4 Povračila

Povračila v Fraport Slovenija so usklajena s trgom dela in v nobenem primeru niso nižja od veljavnih zakonskih minimalnih standardov ali minimalnih standardov, določenih s kolektivno pogodbo.

5.4 Compensation

Compensation at Fraport Slovenija is aligned to the relevant labor market and is under no circumstances lower than the applicable legal minimum standards or the minimum standards set by collective agreements.

5.5 Ravnanje z drugimi

Načelo spoštovanja je ključni sestavni del kulture vrednot Fraport Slovenija. Zavzemamo se za pošteno, spoštljivo medsebojno ravnanje v duhu partnerstva. Ne dopuščamo nobene oblike ustrahovanja in verbalnega, fizičnega in/ali spolne prisile, nasilja in/ali nadlegovanja.

5.5 Dealing with others

The principle of respect is a key component of the Fraport Slovenija culture of values. Fraport Slovenija stands for fair, respectful dealings with one another in a spirit of partnership. We do not tolerate any form of bullying or verbal, physical, and/or sexual coercion, violence, and/or harassment.

6. ČLOVEKOVE PRAVICE

6.1 Svoboda združevanja in pravica do kolektivnega pogajanja

Spoštujemo temeljno pravico do svobode združevanja in pravico do kolektivnega pogajanja, da bi rešili splošne pogoje za delo v skupini.

Pooblaščenim organom, ki predstavljajo zaposlene ponujamo odprto in zaupanja vredno sodelovanje in si prizadevamo zagotoviti pravično izmenjavo interesov znotraj skupine.

6.2 Delo otrok in prisilno delo

Fraport Slovenija zavrača vse oblike prisilnega dela in dela otrok.

Starostna meja dovoljene zaposlitve, ne sme biti pod starostjo, do katere so otroci zavezani obiskovati šolo in v nobenem primeru ne sme biti nižja od 15 let. Mladostniki ne smejo biti izpostavljeni nikakršnim nevarnim situacijam ali kakršnikoli situaciji, ki bi lahko negativno vplivala na njihovo zdravje.

Zavezani smo k spoštovanju pravic otrok in mladostnikov. Ne dopuščamo nobene oblike izkoriščanja otrok in mladostnikov. Skrbimo, da so konvencije Mednarodne organizacije dela, kot tudi mednarodni standardi in predpisi za zaščito otrok in mladostnikov izpolnjeni.

6.3 Raznolikost

Kot družba, ki deluje v mednarodnem okolju, spodbujamo raznolikost zaposlenih, delujemo po načelu enakosti ter zavračamo vse oblike diskriminacije.

6. HUMAN RIGHTS

6.1 Freedom of association and collective bargaining rights

We respect the fundamental right to freedom of association and hereof the right of collective bargaining in order to settle general labor conditions within the group.

We offer the authorized bodies representing the employees an open and trustful collaboration and seek to ensure a fair exchange of interests within the group.

6.2 Dealing with child labour and forced labour

Fraport Slovenija rejects all forms of forced labor and child labor.

The age limit for permitted employment shall not lie below the age up to which children are required to attend schooling and shall not in any case lie below 15 years. Adolescent employees must not be exposed to any dangerous or unsafe situations or to any situations that can adversely affect their health.

We are committed to ensuring that the rights of children and adolescents are respected. We do not tolerate any form of exploitation of children or adolescents. We ensure that the ILO conventions as well as international standards and regulations for the protection of children and adolescent employees are complied with.

6.3 Diversity

As an enterprise with an international alignment, Fraport Slovenija fosters diversity in its staff, acting according to the

principle of equality and rejecting all forms of discrimination.

Zavezani smo k prepovedi vseh oblik razlikovanja, izključitve ali prednostne obravnave, zlasti glede na :

- etnično, nacionalno in / ali socialno poreklo
- raso
- barvo kože
- spol
- starost
- vero, veroizpoved, in / ali svetovni nazor
- politične aktivnosti
- članstvo v delavskih organizacijah
- invalidnosti
- spolno usmerjenost.

Fraport Slovenija v celoti deluje v skladu z veljavnimi zakoni in predpisi.

We are committed to prohibiting all forms of differentiation, exclusion, or preferential treatment particularly based on:

- ethnic, national, and/or social origin
- race
- skin color
- sex
- age
- religion, creed, and/or worldview
- political activities
- membership in an employee organization
- disability
- sexual orientation.

Fraport Slovenija fully complies with the applicable laws and regulations.

7. RAVNANJE Z DARILI, UGODNOSTMI IN VABILI

Naš pristop do daril, vabil in drugih ugodnosti temelji na relevantni zakonodaji, odgovornemu ravnanju in analizi primernosti. Kot splošno pravilo za presojo primernosti darila ali druge ugodnosti, ne vpliva niti ali je bil njihov sprejem prikrit, niti posledično nalaganje kakršnih koli obveznosti v zameno. Pričakujemo, da bodo tudi naši dobavitelji sprejeli aktivne ukrepe za upoštevanje Kodeksa ravnanja dobaviteljev.

Za zagotovitev ustrezne transparentnosti, morajo biti vse izjeme in odstopanja od teh pravil primerno dokumentirane in predhodno odobrene s strani nadrejenih. To velja na vseh ravneh hierarhije družbe. Darila in ugodnosti definiramo, kot vse, kar je prejemnik prejel v povezavi s poslovnim razmerjem brez, da bi za to plačal razumno tržno ceno.

7.1 Sprejemanje daril, ugodnosti in vabil

7.1.1 Sprejemanje daril, ugodnosti in vabil na podlagi sklenjenih pogodb

V Fraport Slovenija je na splošno prepovedano sprejemanje naslednjih vrst daril, ugodnosti ali vabil, bodisi neposredno ali posredno v povezavi s sklepanjem ali vodenjem pogodb ali v fazi pogodbenega pogajanja s poslovnimi partnerji:

- **Denar:** npr gotovina, nakazila ali prenosi s strani tretjih oseb na račune zaposlenih Fraport Slovenija ali njihovih družinskih članov, provizije ter brezobrestna posojila ali posojila po obrestni meri nižji od tržne.

7. DEALING WITH GIFTS, BENEFITS AND INVITATIONS

Our approach to gifts, invitations, and other benefits is characterized by legality, responsibility, and appropriateness. As a general rule for judging the appropriateness of a gift or benefit, it must neither be necessary for the recipient to conceal acceptance of it, nor should it impose any kind of obligation. We expect our suppliers to take active measures to comply with the Code of Conduct for suppliers.

To ensure adequate transparency, all exceptions and derogations from these rules must be documented and approved by the responsible superior. This applies at all levels of the company's hierarchy. We define gifts and benefits as everything that the recipient is given in connection with a business relationship without him or her paying a reasonable market price.

7.1 Acceptance of gifts, benefits and invitations

7.1.1 Acceptance of gifts, benefits and invitations in connection with awarding contracts

Within Fraport Slovenija it is generally strictly forbidden to accept the following types of gifts, benefits or invitations in connection, either directly or indirectly, with awarding and handling contracts or a contractual negotiation with business partners:

- **Money:** e.g. cash, remittances, transfers or provisions by third parties to accounts of Fraport Slovenija employees or members of their families, interest-free or low-interest loans.

- **Ugodnosti v obliki proizvoda, storitve ali druge ugodnosti v naravi, ki so zagotovljene zaposlenim ali njihovim družinskim članom**, kot na primer: brezplačne letalske vozovnice, brezplačna uporaba objektov ali vozil oziroma uporaba le-teh po znižanih cenah, počitniška potovanja, nakupi po znižanih cenah, alkoholne pijače, oblačila, nakit, vstopnice in boni brez poslovnega konteksta.
- **Benefits in form of a product, services or benefits, which are provided to employees or their family members:** e.g. air travel tickets, use of objects or vehicles free of charge or at reduced rates, holiday trips, purchases at discount prices, alcoholic beverages, clothing, jewelry, admission tickets and vouchers without any kind of business context.

Za ugodnosti, ki veljajo za vse zaposlene Fraport Slovenija, in so pogodbeno urejene, določila tega internega akta ne veljajo.

The provisions of these internal file do not apply to benefits, which apply to all Fraport Slovenija employees and which are contractually settled.

7.1.2 Sprejem vljudnostnih daril in vabil

7.1.2 Acceptance of courtesy gifts, events and invitations

Ne glede na določila točke 7.1.1 pa lahko zaposleni v družbi Fraport Slovenija, sprejmejo običajna vljudnostna darila, pri čemer se kot običajno vljudnostno darilo šteje darilo, katerega tržna vrednost ne presega **42 EUR** oziroma skupna vrednost vseh daril prejetih s strani istega darovalca, v davčnem letu ne presega **84 EUR**.

Notwithstanding the provisions of paragraph 7.1.1, employees of the Fraport Slovenija, can take the usual courtesy gifts, while as usual courtesy gift is considered a gift, the whose market value does not exceed **42 EUR** or the total value of all gifts received by the same donor does not exceed **84 EUR** in the tax year.

V primeru sprejema vljudnostnega darila, katerega vrednost presega 42 EUR, je prejemnik darila dolžan o tem takoj poročati svojemu nadrejenemu ali Pooblaščenim osebi za skladnost poslovanja, ki presodi primernost sprejema takega darila. **Enako velja za področje vabil.**

In case of accepting a courtesy gift, of which the value exceeds 42 EUR, the recipient must inform this to his or hers superior or to Compliance Officer, who assesses the acceptability of the gift. **The same applies for invitations.**

Presoja primernosti sprejetega darila se zahteva na vseh hierarhičnih ravneh in jo je potrebno ustrezno uporabiti v vsakem primeru. Usmeritev družbe Fraport Slovenija je, da prejemnik darila ne potrebuje skrivati, niti ga prejem darila ničesar ne obvezuje. Fraport Slovenija želi gojiti kulturo zaupanja.

The aspect of appropriateness applies to all hierarchical levels and must be appropriately applied in each case. A good rule of thumb is that the recipient should not need to keep the acceptance of a gift secret and should not be obligated in any way by it. Fraport Slovenija wishes to cultivate a culture of trust.

Dovoljeno je sprejeti povabilo na **predstavitve izdelkov in storitev** (npr. sejmi ali razstave), vendar samo v primeru, če Fraport Slovenija nosi vse s tem povezane potne stroške v okviru odobrenega službenega potovanja in če predstavitev predstavlja pretežni del programa.

Ravno tako se je dovoljeno udeležiti dogodkov, kot so proslave, otvoritve, festivali, prodajni dogodki in podobno, vendar je potrebno upoštevati zgornjo omejitev vrednosti.

Vabila na dogodke, pri katerih **zaposleni** Fraport Slovenija sodelujejo kot **predavatelji**, so predmet dovoljenja nadrejenega v okviru odobritve službenega potovanja. V tem primeru bo organizator običajno kril stroške službene poti. Zaposlenemu je v tem primeru strogo prepovedano sprejemati kakršno koli plačilo ali nadomestilo, če je na dogodku prisoten v rednem delovnem času. Lahko pa Fraport Slovenija zaračuna organizatorju dogodka za storitev izvedbe predavanja zaposlenega.

Vabila na **športne ali kulturne dogodke**, ne glede na vrednost, je potrebno predhodno odobriti s strani nadrejenega ali Pooblaščenih oseb za skladnost poslovanja. Vabila za člane družine ali prijatelje so dovoljena le izjemoma, in sicer z predhodno odobritvijo nadrejenega ali Pooblaščenih oseb za skladnost poslovanja.

V splošnem je nedovoljeno sprejeti več kot **dve vabili na osebo na letni ravni**. Ravno tako je prepovedano sprejemati darila ali vabila vedno od istega partnerja.

It is permitted to accept **invitations to product information and service events** (e.g., trade shows and exhibitions) only if Fraport Slovenija bears all of the associated travel expenses within the scope of official business trips and if the professional program clearly predominates.

It is also allowed to attend events such as celebrations, inaugurations, festivals, sales events, etc., but the above value limit must be observed.

Invitations to events where Fraport Slovenija **employees** are to act as **lecturers** are subject to the superior's permission within the framework of a business trip authorization. In this case, the organizer will usually cover the costs of the business trip. The employee is strictly prohibited to accept any kind of compensation when on duty for Fraport Slovenija during working hours. It may, however, be possible that Fraport Slovenija invoices the organizer for lecturer services provided by the employee.

Invitations to **sporting or cultural events**, regardless of value, must be approved in advance by the Supervisor or the Compliance Officer. Invitations for family members or friends are allowed only exceptionally, with the prior approval of the Supervisor or the Compliance Officer.

In general, is inadmissible to except more than **two invitations per person per year**. Promptly repeated benefits from the same partner are prohibited.

7.2 Dajanje daril, ugodnosti in vabil

Za dajanje vljudnostnih daril, ugodnosti in vabil našim poslovnim partnerjem, kot so kupci in dobavitelji, veljajo enaki predpisi kot za sprejem le-teh. So znotraj razumnega in dopustnega okvirja splošne skrbi za stranke in promocije naše družbe.

Dajanje daril, ugodnosti in vabil, ni sprejemljivo, če je to mogoče razumeti kot poskus, da se nezakonito ali nepravilno vpliva na objektivne odločitve strank in posledično ustvarja obveznosti oziroma odvisnosti. Poslovnim strankam je med drugim nesprejemljivo podeliti sledeča darila oz. ugodnosti:

- **Denar:** npr. gotovina, nakazila ali prenosi tretjih oseb na račune kupcev, plačila dejavnosti, katerih zneski so neprimerni in nesorazmerni z uspešnostjo.
- **Denarna nadomestila:** npr. brezplačne letalske vozovnice, počitniška potovanja in razni prevozi, brezobrestna posojila ali posojila z neustrezno nizkimi obrestmi, prekomerno plačilo za storitve.
- **Blago in druga sredstva:** npr. alkoholne pijače, oblačila, nakit, vstopnice in boni brez kakršne koli povezave z našim poslovanjem, neprimerna poslovna kosila

Vrednost darila ali ugodnosti ne sme presegati **42 EUR** oziroma skupna vrednost vseh daril danih istemu prejemniku v davčnem letu ne presega **84 EUR**.

Pogostitve poslovnih partnerjev (kot so kosila, večerje ipd) ne zahteva posebne odobritve po tem kodeksu, velja pa vrednosti limit, in sicer **100 EUR** na osebo.

7.2 Giving of gifts, benefits and invitations

The giving of courtesy gifts, benefits and invitations to our business partners such as customers and suppliers is subject to the same regulations as for the acceptance from suppliers. They are reasonable and permissible as part of a general customer care and promotion of our company.

The giving of gifts, benefits and invitations, however, is not acceptable if they can be construed as attempts to illegally or unfairly influence objective decisions by customers and create obligations or dependencies. To illustrate this, it is not acceptable to provide any of the following gifts and benefits to a business partner:

- **Money:** e.g. cash, remittances, transfers by third parties to accounts of customers, payments for activities whose amounts are uncommon and incommensurate with performance.
- **Monetary equivalents:** e.g. free air travel tickets, holiday trips, cars or any other item for usage, interest-free loans or loans with inappropriately low interest, excessive remuneration for services.
- **Material and other assets:** e.g. alcoholic beverages, clothing, jewelry, admission tickets and vouchers without any relationship to our business, inappropriate business meals,

The value of a gift or benefit may not exceed **42 EUR** or the total value of all gifts given to the same recipient in a tax year does not exceed **84 EUR**.

Catering for business partners (such as lunches, dinners, etc.) does not require special approval under this code, but the limit value is **100 EUR** per person. In the

V primeru, da je ta limit presežen, mora biti odobreno s strani posloводства.

event that this limit is exceeded, it must be approved by the management.

V primeru nejasnosti, predvsem glede presoje primernosti, se obrnite na svojega neposredno nadrejenega ali na Pooblaščenko za skladnost poslovanja.

In case of queries regarding the appropriateness, please consult your immediate superior or to Compliance Officer.

8. POROČANJE O KRŠITVAH

Podpiramo odprte, iskrene medsebojne odnose ter razvijamo kulturo medsebojnega zaupanja med zaposlenimi in njihovimi nadrejenimi. To velja tako za upoštevanje standardov ravnanja kot tudi za obravnavo morebitnih kršitev.

Načeloma se zaposleni v Fraport Slovenija, ki želijo prijaviti kršitev, najprej obrnejo na svojega neposredno nadrejenega ali na Pooblaščenko za skladnost poslovanja.

Če ta način poročanja ne pride v poštev, lahko zaposleni svojo prijavo posredujejo preko internih sistemov poročanja (internet, skrinjice, Galiot SMS) ali **Etičnega odbora**, ki ga imenuje poslovodstvo. Etični odbor je sestavljen iz treh članov. Namen odbora je zbiranje, obvladovanje in analiziranje prijav kršitev etičnega ravnanja in drugih, s tem povezanih, nepravilnosti v družbi. S prijavi in poročili glede neskladnega ravnanja Etični odbor seznanja Pooblaščenko za skladnost poslovanja. Člani etičnega odbora so predstavljeni na intranetu družbe.

Vsi zaposleni lahko poleg zgoraj omenjenih kanalov poročanja lahko uporabijo tudi **elektronski sistem za prijavo kršitev** (BKMS©) družbe Fraport AG, ki deluje 24/7 in omogoča prijaviteljem, da prijave posredujejo anonimno na elektronski sistem za prijavo nepravilnosti.

Ravno tako obstaja tudi možnost, da se prijave resnih zakonskih kršitev posredujejo **zunanjemu varuhu človekovih pravic** družbe Fraport AG. Anonimnost prijaviteljev je zagotovljena ves čas, ravno tako je posvetovanje z varuhinjo brezplačno.

8. VIOLANCE REPORTING

We promote open, candid dealings with each other and foster a culture of mutual trust between employees and their individual managers. This applies both to the concrete meaning of the Standards of Behavior in individual cases and to possible violations.

In principle, employees of Fraport Slovenija wanting to give a notification should first contact their immediate superior or the Compliance Officer.

If this way does not come into consideration, the employees can also give their notification via an internal reporting system (internet, boxes, Galiot SMS) or **Ethical Committee**, appointed by the Top management. Ethics Committee consists of three members. The purpose of the committee is collecting, processing and analyzing reports of violations of ethical conduct and other related irregularities in the company. The applications and reports regarding non-compliance, Ethical Committee shall inform the Compliance officer. Members of the ethics committee are presented on the company intranet.

In addition to the aforementioned reporting channels, all employees can use the **Fraport AG electronic reporting system** (BKMS ©), which operates 24/7, allowing applicants to submit their reports anonymously to the electronic irregularity reporting system.

There is also the possibility of reporting serious legal violations to the **external ombudsman of Fraport AG**. Applicants' anonymity is guaranteed at all times and consultation with the guardian is free of charge.

Naslov spletne strani Fraport AG za prijavo kršitev:

<https://www.fraport.com/en/our-group/goals-and-values/compliance.html>

Opozarjamo, da smo v posameznih primerih zakonsko dolžni posredovati informacije, ki se obravnavajo kot zaupne, tretjim osebam (npr. v primeru, ko je potrebno sprožiti uradne preiskovalne postopke). Možno je, da bi se od prijavitelja zahtevalo, da nastopi v vlogi prič.

Vprašanja o tem kako interpretirati standarde ravnanja ali vprašanja glede prejetanja daril ali povabil se lahko naslovijo na neposredno nadrejene ali **Poblaščenko za skladnost poslovanja** (taja.skobir@fraport-slovenija.si; 04 2061 440).

8.1 Sankcije

V primeru kršitve, si pridržujemo pravico, da glede na resnost kršitve, uvedemo disciplinske ali druge pravne postopke.

Website address of Fraport AG for reporting infringements:

<https://www.fraport.com/en/our-group/goals-and-values/compliance.html>

We point out that in individual cases; we are legally obligated to communicate information that is fundamentally to be treated as confidential to third parties (for example, in order to initiate investigative proceedings). It is possible that the person submitting the report might be called on to testify as a witness.

Questions on how to interpret the Standards of Behavior in a specific situation or in case of any questions about accepting gifts and invitations should be addressed to your immediate superior or **Compliance Officer** (taja.skobir@fraport-slovenija.si; 04 2061 440).

8.1 Sanctions

In the event of violations, we reserve the right to take disciplinary or legal action depending on the severity of the violation.