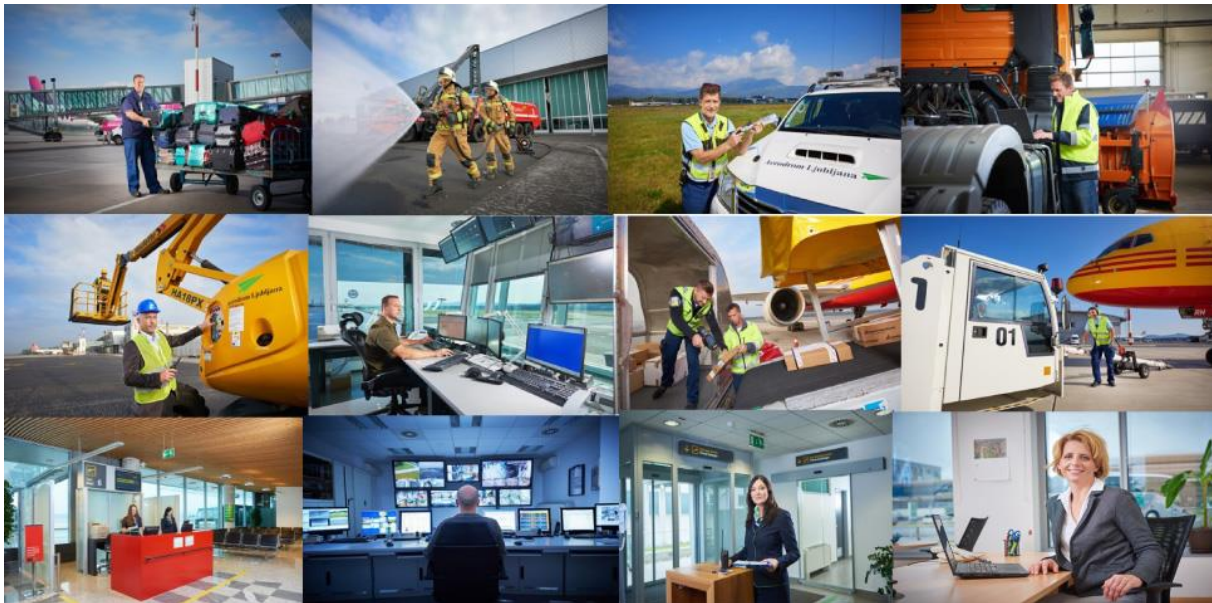


ETIČNI KODEKS ZA ZAPOSLENE / CODE OF CONDUCT FOR EMPLOYEES



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Etični kodeks je zavezujoč za vse zaposlene¹, direktorje, prokuriste in poslovodno direktorico zaposlene Fraporta Slovenija.

Etični kodeks predstavlja osnovo in načela delovanja, ki vodijo Fraport. Njegovo izvajanje je podrobneje določeno z internimi predpisi in navodili družbe.

Vsi vodstveni delavci so zadolženi za spoštovanje in širjenje Etičnega kodeksa v družbi ter zagotavljanje skladnosti s tem. V svoji funkciji vzornika nosijo pri tem prav posebno odgovornost.

The Code of Conduct applies to all employees², directors, procurators and managing director of Fraport Slovenia.

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

All executives are tasked with upholding and spreading the Code of Conduct within the company and with ensuring compliance herewith. In their function as role models, they bear special responsibility in this regard.

Zg. Brnik, 01.01.2024

Taja Skobir, MBA, I.r.

Vodja integriranih sistemov upravljanja /

Head of Integrated Governance System

Pooblaščenca oseba za skladnost poslovanja /

Local Compliance Office

Dr. Babett Stapel, I.r.

Poslovodna direktorica /

Managing Director

Oliver Weiss, I.r.

Direktor Operative /

Chief Operating Officer

¹ Zaposleni: vsi zaposleni in agencijski delavci, ki delajo v Fraportu Slovenija, vključno z vodji, študenti, zaposleni za krajši delovni čas, vajenci in pripravniki.

² Employees: all employees and temporary workers working in the Fraport Slovenia, including managers, student assistants, short-term employees, apprentices, trainees, and interns.

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1. Uvod

Nagovor poslovodstva

“Spoštovani zaposleni!

Profesionalno upravljamo letališče in zagotavljamo povezane storitve. Na ta način postavljamo temelje za mednarodno povezljivost, gospodarsko rast in blaginjo. Naše stranke so odvisne od naših brezhibnih postopkov in naših storitev, ki se nenehno razvijajo in izboljšujejo.

Vizija, izražena v naši izjavi o poslanstvu, postati najboljši upravljavec letališč v Evropi in postaviti svetovne standarde, ki temeljijo na vrednotah usposobljenosti, zaupanja, predanosti, odprtosti, poguma in zanesljivosti. Hkrati smo se v izjavi o poslanstvu zavezali, da bomo drug do drugega ter do naših partnerjev in sosedov ravnali pošteno in hvaležno. Poleg naše zavezanosti spoštovanju ustreznih zakonov in predpisov je to jasen pokazatelj vrednot, ki vodijo naša dejanja.

S tem Etičnim kodeksom pojasnjujemo svojo družbeno odgovornost, odgovornost kot poslovni partner in odgovornost na delovnem mestu ter dokazujemo kako izpolnjujemo to odgovornost.

Pozorno preberite Etični kodeks in upoštevajte pravila pri svojem vsakodnevnem delu. Integriteta je osnova našega delovanja!

Vsi smo Fraport, ne glede na to, kje in v kateri družbi skupine delujemo. Skupaj dosegamo naše cilje. “

S spoštovanjem!

Dr. Babett Stapel
Poslovodna direktorica

1. Introduction

Foreword by the Management

“Dear Employees,

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

The vision expressed in our mission statement to become Europe’s best airport operator and set worldwide standards is based on the values of competence, trust, commitment, openness, courage and reliability. At the same time, we have committed ourselves in the mission statement to dealing with each other and our partners and neighbors in a fair and appreciative manner. In addition to our commitment to complying with the relevant laws and regulations, this is a clear indication of the values 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. “

With respect!

Dr. Babett Stapel
Managing Director

2. Naša družbena odgovornost

2.1 Skladnost z zakoni, sprejetimi standardi in načeli

Fraport Slovenija je kot globalno aktivno podjetje zavezano k družbeni odgovornosti in trajnostnem razvoju. To pomeni prevzemanje odgovornosti na področjih gospodarstva, ekologije in družbenih zadev ter ukrepanja, ki je v skladu z zakoni in predpisi.

Zavezani smo mednarodno priznanim standardom, predpisom in načelom, kot so načela Global Compact ZN, Agenda ZN 2030 in njeni cilji trajnostnega razvoja, Splošna deklaracija ZN o človekovih pravicah in temeljni delovni standardi Mednarodne organizacije dela (ILO). Zavezani smo k spoštovanju veljavne nacionalne zakonodaje.

2.2 Spoštovanje človekovih pravic

Gospodarske družbe so pomembne družbene zainteresirane strani in imajo odgovornost za spodbujanje človekovih pravic. Fraport Slovenija spoštuje mednarodno priznane človekove pravice, svojo odgovornost za izpolnjevanje zakonskih zahtev jemlje resno in se pri svojem poslovanju izogiba kršitvam človekovih pravic.

Spoštovanje človekovih pravic vključuje zlasti naslednje **pravice in obveznosti**:

- Zavračamo vse oblike otroškega dela.
- Strogo zavračamo kakršno koli obliko prisilnega dela, pa tudi vse oblike suženjstva ali suženjskih praks, druge

2. Our Corporate Social Responsibility

2.1 Compliance with Laws, Accepted Standards, and Principles

As a globally active company, Fraport Slovenia 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 Slovenia 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

oblike prevlade ali zatiranja v delovnem okolju.

- Spoštujemo temeljno pravico do svobode združevanja in iz tega izhajajočo pravico do kolektivnega pogajanja za urejanje splošnih delovnih pogojev v Skupini v okviru nacionalne zakonodaje.
- Zagotavljamo ustrezne plače – nadomestila v Fraport Slovenija v nobenem primeru niso nižja od veljavnih zakonskih minimalnih standardov.
- Zavezuje se, da bomo spoštovali ustrezne zakonske določbe in veljavne poklicne standarde glede delovnega časa, plačanega dopusta in zakonitih praznikov.

Raznolikost

Kot podjetje odprtega duha cenimo raznolikost in raznovrstnost naših zaposlenih. To nam omogoča, da se v naše delo stekajo različni pogledi in izkušnje. S to raznolikostjo, ki jo živimo v vsakdanjem življenju, lahko z našimi strankami razvijemo rešitve, ki so zanje inovativne. Cenjenje in priznanje raznolikosti naših zaposlenih pomembno prispevata k gospodarskemu uspehu Fraport Slovenija.

Enake možnosti in enako obravnavanje

Fraport Slovenija spodbuja raznolikost zaposlenih in zasleduje cilj zavračanja vsakršne oblike diskriminacije. Načelo medsebojnega spoštovanja je bistveni del kulture vrednot Fraport Slovenija: zavzemamo se za poštene, spoštljive in kooperativne odnose.

Ta **načela** so osnova našega delovanja:

- Zavezani smo k temu, da ne bomo razlikovali, izključevali ali dajali prednost ljudem na podlagi njihove etnične, nacionalne ali družbene pripadnosti, rase, barve kože, spola, starosti, vere ali prepričanja.

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 Slovenija 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 Slovenija's economic success.

Equal Opportunities and Equal Treatment

Fraport Slovenija 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 Slovenija values culture: we stand for fair, respectful, and cooperative relationships.

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.

- Prepovedujemo kakršno koli diskriminacijo na podlagi ustavne politične dejavnosti, članstva v sindikatih, invalidnosti ali spolne usmerjenosti.

- We prohibit any discrimination based on constitutional political activity, membership in an employee's organization, disability, or sexual orientation.

2.3 Varstvo okolja

Fraport Slovenija se zavezuje k trajnostnemu, obzirnemu in skrbnemu pristopu do naravnih virov in okolja. Naš cilj je zmanjšati negativne vplive naših dejavnosti na ljudi in okolje. Zmanjševanje hrupa in varstvo podnebja imata pri tem posebno vlogo.

Naša okoljska politika med drugim temelji na naslednjih načelih:

- Zavezani smo k okolju prijaznemu poslovanju. Prizadevamo si za varovanje okolja ter za zagotavljanje varnih in zdravih delovnih pogojev za naše zaposlene.
- Zaposlene spodbujamo k odgovorni rabi naravnih virov.
- Prizadevamo si za razvoj in širjenje okolju prijaznih tehnologij z uporabo ekoloških meril pri izbiri izdelkov in storitev.
- Kot del naše odgovornosti si prizadevamo omejiti emisije podnebno pomembnih plinov in onesnaževalcev zraka na neizogibni minimum.

2.3 Environmental Protection

Fraport Slovenija undertakes to adopt a sustainable, considerate 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. Naša odgovornost kot poslovni partner

3.1 Preprečevanje korupcije

Korupcija je na splošno opredeljena kot zloraba zaupane oblasti za osebno ali zasebno korist. Korupcija ne povzroča le materialne škode, ampak ovira tudi gospodarski, politični in družbeni razvoj države in tako na koncu spodkopava temelje družbe.

Integriteta pri poslovanju in preprečevanje korupcije sta pomembna načela Fraporta Slovenija. Ne podkupujemo in se ne pustimo podkupiti. Ne toleriramo nobene oblike korupcije in se izogibamo celo zgolj videzu neupravičenega vpliva.

Darila in vabila

Ugodnosti v obliki daril in vabil so del običajnih oblik socialnih stikov v poslovnem življenju. Kljub temu lahko neprimerne ugodnosti razumemo kot nedopustne oblike vplivanja, ki so lahko tudi zakonsko kaznive.

Vsi zaposleni se zavezujejo, da v poslovnih stikih ne bodo ponujali ali sprejemali daril ali vabil, ki bi lahko nedopustno vplivala na poslovni odnos.

Glede daril in vabil upoštevamo naslednja načela:

- **Primernost:** Darila ali vabila morajo biti v skladu z lokalnimi običaji in družbeno sprejemljivim vedenjem. Lahko so gesta vljudnosti in hvaležnosti, vendar ne smejo biti nerazumno visoke vrednosti.

- **Povezanost s poslovno dejavnostjo:** Ugodnosti se nikoli ne sme sprejeti ali odobriti, da bi vplivali na določeno

3. Our Responsibility as 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 Slovenia. 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, inappropriate benefits can be understood as inadmissible forms of influence, which 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

poslovno odločitev. Izogibati se je treba celo videzu takšnega vpliva.

- **Pogostost:** Dajanje ali sprejemanje daril in vabil mora biti omejeno na občasne priložnosti.

- Vabila ali darila **javnim uslužbencem** pomenijo večje tveganje in so na splošno prepovedana. Izjeme je treba vnaprej dogovoriti s Pooblaščen osebo za skladnost.

- **Dokumentacija:** Upoštevati je treba notranja pravila, postopke odobritve in dokumentacije.

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 are to be regulated in coordination with Compliance.

- **Documentation:** The internal rules, approval and documentation processes must be observed.

Konflikt interesov

Naš uspeh temelji na poslovnih odločitvah, ki jih sprejemamo izključno v interesu Fraport Slovenija. Zaposleni ne smejo slediti osebnim interesom, ki so v nasprotju z interesi Fraport Slovenija, ali osebno izkoriščati poslovnih priložnosti, do katerih je Fraport Slovenija upravičen.

Conflicts of Interest

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

Navzkrižje interesov lahko nastane na več načinov, npr. prek finančnih interesov pri dobaviteljih, strankah ali poslovnih partnerjih, v okviru sekundarne zaposlitve ali preko osebnih odnosov med zaposlenimi na delovnem mestu in s poslovnimi partnerji.

Če obstaja ali bi lahko prišlo do nasprotja interesov, izvajamo naslednje **ukrepe:**

- Prizadeti delavec o tem pisno obvesti svojega nadrejenega.

- Nadrejeni sprejme ustrezne ukrepe za ustrezno zmanjšanje tveganj za družbo, ki izhajajo iz nasprotja interesov.

- Dokumentiramo navzkrižje interesov, odločitev, ali in kateri ukrepi so potrebni, ter sprejete ukrepe.

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 taken.

Donacije in sponzorstva

Prevzemamo družbeno odgovornost. Kot zaupanja vreden partner naše skupnosti

Donations and Sponsoring

We assume social responsibility. As a trusted partner for our community, we

promoviramo kulturo, izobraževanje, šport ter ekološke in družbene zadeve.

promote culture, education, sports, and ecological and social matters.

Pri tem upoštevamo naslednja **načela**:

- Donacije in sponzorstva uporabljamo samo za namene, ki so skladni z zahtevami integritete in se izogibamo celo videzu neupravičenega vpliva.
- Donacije in sponzorstva se dodeljujejo na podlagi preglednih in jasnih meril.

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 Poštena in svobodna konkurenca

Zaščita svobodne konkurence je bistvena zahteva za bogastvo, rast in zaposlovanje. Fraport Slovenija se zavzema za neomejeno in pošteno konkurenco. Do naših poslovnih partnerjev ravnamo pošteno. Naš cilj je prevladati v konkurenci s svojimi vrednotami in strokovnim znanjem, ko nastopamo na trgu. Fraport Slovenija ne tolerira nobenega nekonkurenčnega ravnanja.

3.2 Fair and Free Competition

The protection of free competition is an essential requirement for wealth, growth and employment. Fraport Slovenija 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 Slovenija does not tolerate any anti-competitive behaviour.

Še posebej veljajo naslednja **načela**:

- S konkurenti ne sklepamo nobenih nezakonitih dogovorov, zlasti o cenah, tržnih segmentih, zmogljivostih in/ali strankah.
- S konkurenti ne izmenjujemo občutljivih/strateških informacij, kot so cene, komponente cen, stroški ali naložbe.
- S kupci ali dobavitelji se ne dogovarjamo o nezakonitih omejitvah in nikogar ne izključujemo nezakonito.
- Z močnimi tržnimi položaji ravnamo pošteno in odgovorno.
- Ne manipuliramo z razpisnimi postopki in ne oddajamo lažnih ponudb.

Če niste prepričani, ali je načrtovani pristop združljiv s pravnimi zahtevami ali

The following **principles** apply in particular:

- We do not enter into any unlawful agreements with competitors, in particular on prices, market segments, capacities 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

internimi pravili, se vedno pravočasno obrnite na odgovorno pravno službo.

requirements or internal rules, always contact the responsible legal department in a timely manner.

3.3 Prepoved trgovanja z notranjimi informacijami

Pogoj za učinkovito delovanje kapitalskih trgov je, da imajo vse osebe, ki trgujejo na kapitalskem trgu, enake informacije. Nihče ne bi smel pridobiti prednosti na račun drugih, ker ima informacijsko prednost (notranje informacije) pred širšo javnostjo, ki mu omogoča napovedovanje gibanja cen delnic in drugih vrednostnih papirjev.

Kot družba, ki kotira na borzi, za Fraport AG, njegove izvršilne organe in zaposlene veljajo prepovedi in obveznosti Uredbe EU o zlorabah trga. Obveznosti in omejitve pri trgovanju z delnicami in drugimi vrednostnimi papirji so lahko zaradi razmerja s Fraportom AG tudi subjekti in zaposleni v družbah v skupini ter celo zunanje tretje osebe.

Notranja informacija je informacija, ki

- ni javno znana,
- je natančna,
- se neposredno ali posredno nanaša na izdajatelja (npr. Fraport Slovenija) ali finančni instrument (npr. delnico Fraport AG), in
- če bi bila objavljena, bi verjetno pomembno vplivala na ceno finančnega instrumenta.

Prepovedana je uporaba notranjih informacij za pridobitev ali posredno ali neposredno prodajo delnic za svoj račun ali za račun tretje osebe in drugih vrednostnih papirjev, na katere se notranji podatki nanašajo.

Načeloma je treba notranje informacije v podjetju obravnavati tudi zaupno. Razkrije se lahko le, če obstaja

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.

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

poseben, preverljiv razlog, torej če je razkritje potrebno pri rednem opravljanju zaposlitve in opravljanju delavčeve naloge.

necessary in the regular course of employment and performance of the employee's respective task.

3.4 Prepoved pranja denarja in financiranja terorizma

Pranje denarja (prikrito vnašanje nezakonito pridobljenega premoženja v zakoniti gospodarski cikel) in financiranje terorizma (zagotavljanje sredstev za izvajanje terorističnih dejavnosti) sta resna grožnja in sta zato prepovedana v številnih državah po svetu.

Fraport Slovenija podpira boj držav proti pranju denarja in financiranju terorizma ter spoštuje nacionalne in mednarodne gospodarske sankcije.

V zvezi s tem je treba izvajati naslednje ukrepe:

- Pregled delovanja poslovnega partnerja (BPDD). Naš cilj je ohraniti poslovne odnose le z uglednimi partnerji, ki delujejo pošteno in katerih operativni viri izvirajo iz zakonitih poslovnih transakcij.
- Če obstaja sum pranja denarja ali financiranja terorizma, nemudoma obvestimo Fraport AG Compliance. Fraport Slovenija sumljive primere prijavi pristojnim.
- Za zmanjšanje tveganja pranja denarja in drugih tveganj skladnosti je treba gotovinske transakcije zmanjšati na minimum.
- Upoštevamo pravno zavezujoče sankcije.

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 Slovenija 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 Compliance immediately. Fraport Slovenija 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. Naša odgovornost na delovnem mestu

4.1 Sodelovanje med zaposlenimi

Načelo spoštovanja je ključna sestavina naše kulture vrednot. Fraport Slovenija se zavzema za poštene, spoštljive medsebojne odnose v duhu partnerstva. Ne dopuščamo nobene oblike ustrahovanja ali verbalne, fizične ali spolne prisile, nasilja ali nadlegovanja. Rasistični, antisemitski, protiverski in seksistični napadi ne bodo tolerirani.

Zahteve do naših zaposlenih so naslednje:

- Vsi smo Fraport, ne glede na to, kje in v kateri družbi skupine delujemo. Skupaj dosežemo zastavljene cilje.
- Identificiramo se s svojim delom in smo ambasadorji našega podjetja.
- Smo ponudniki storitev in vemo, kdo so naše stranke. Vsak dan vsi prispevamo k »Gute Reise« in s tem k uspehu podjetja. Naše podjetje nas pri tem podpira in postavlja okvir za razvoj in kvalifikacije.
- Cenimo in uporabljamo raznolikost naših sodelavcev in iščemo medsebojno izmenjavo. Drug z drugim delujemo odkrito in spoštljivo ter cenimo delo drug drugega.

4.2 Varnost in zdravje pri delu

Celostno, integrirano varnost in zdravje pri delu je ključni element naše splošne odgovornosti podjetja. Fraport Slovenija s preventivnimi ukrepi ščiti zaposlene pred nesrečami, zdravstvenimi tveganji pri delu in poklicnimi boleznimi.

4. Our Responsibility at the Workplace

4.1 Cooperation between Employees

The principle of respect is a key component of our 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 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 "Gute Reise" and thus to the success of the company. Our company supports us in this and sets the framework for 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 Slovenija takes preventive measures to protect employees from accidents, work-related health risks, and occupational diseases.

Vodilna načela varnosti in zdravja pri delu so zavezujoča za vse zaposlene:

- Operativni procesi morajo biti zasnovani tako, da zagotavljajo varno in zdravo delovanje. Varnost in zdravje sta sestavni del načrtovanja in izvajanja aktivnosti.
- Nadrejeni so dolžni ravnati odgovorno in zglede z vidika varnosti in zdravja pri delu.
- Z ustreznimi ukrepi in primernim obnašanjem so vodje in zaposleni dolžni ustvarjati varne delovne pogoje, ki ne škodujejo zdravju.

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 **Varno ravnanje s podatki in poslovnimi skrivnostmi**

Varnost in celovitost podatkov ter zaupnih informacij v poslovanju Fraport Slovenija šteje za eno temeljnih načel poslovanja.

V primeru posebnih letov ali posebnih letal, ki pristajajo na našem letališču, je potrebno **spoštovati in upoštevati želje in zahteve naročnika / poslovnega partnerja**, zato slikanje ali javno objavljanje takih dogodkov in okoliščin na družabnih omrežjih ali drugih medijih brez izrecnega dovoljenja Službe za komuniciranje Fraport Slovenije, **ni dovoljeno**.

Dostop na nadzorovane dele letališča je dovoljen tistim zaposlenim, ki imajo veljavno dovoljenje za gibanje po javnih letališčih (izda ga Javna agencija za civilno letalstvo), veljavno letališko identifikacijsko kartico, na kateri so označena posamezna območja, na katera lahko oseba vstopa, ter na tem območju opravlja službena opravila.

4.3 **Secure Handling of Data and Business Secrets**

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

In the case of special flights or special aircraft landing at our airport, it is necessary to **respect and consider the wishes and requirements of the client / business partner**, therefore, taking pictures and public publication of such events and circumstances on social media or other media without the express permission from Corporate Communications of Fraport Slovenia **is not permitted**.

Access to Security restricted areas of the airport is allowed to those employees who have a valid permit to move around public airport (issued by the Civil Aviation Agency), a valid airport identification card, which indicates the individual areas that a person can enter, and are performing official duties on that area.

Osební podatki

Zbiranje in obdelava osebnih podatkov sta dovoljena le za določen namen in zahtevata privolitve posameznika, na katerega se nanašajo osebni podatki, ali drugo pravno podlago.

Fraport Slovenija izpolnjuje zakonske zahteve in varuje osebne podatke zaposlenih, strank, dobaviteljev in drugih oseb.

"Osební podatki" pomenijo vse informacije v zvezi z določeno ali določljivo fizično osebo.

Vsak zaposleni mora:

- z osebnimi podatki ravnati zaupno in jih sodelavcem razkriti le v obsegu, ki je potreben za opravljanje njegovih dolžnosti.
- se vzdržati zbiranja ali nadaljnje obdelave osebnih podatkov brez pooblastila in v primeru dvoma poiskati nasvet o varstvu podatkov.
- izbriše osebne podatke v okviru odgovornosti in na podlagi družbenih konceptov izbrisa, če namen obdelave ne velja več.
- v primeru kršitve varnosti podatkov nemudoma obvesti svojega nadrejenega in Pooblaščenca osebo za varstvo osebnih podatkov.

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 Slovenija 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.

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 company 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.

Informacije in poslovne skrivnosti

Od informacij je odvisen naš uspeh in uspeh naših strank. Zato so zaščita celovitosti in razpoložljivosti podatkov ter zaupnost informacij ključni cilji.

Fraport Slovenija zagotavlja zakonito in varovano zaupnost v poslovnih odnosih ter zagotavlja zaščito poslovnih skrivnosti pred nepooblaščenim pridobitvijo, uporabo in razkritjem.

Zaposleni morajo ohraniti zaupnost o zadevah, katerih tajnost določajo pravni

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 Slovenija 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

predpisi ali odredi delodajalec; to velja tudi po prenehanju delovnega razmerja.

ordered by the employer; this shall also apply beyond the termination of the employment relationship.

4.4 Socialna omrežja

Pri komuniciranju s strankami, zaposlenimi in širšo javnostjo uporabljamo družbene medije, kot so Facebook, LinkedIn, Instagram, Twitter in interne komunikacijske platforme.

Tudi v digitalnem prostoru drug drugega obravnavamo pošteno in pozitivno. Pri tem se zavedamo, da vsega, kar je objavljeno na internetu, ni mogoče preprosto umakniti. Prepovedano je objavljati prispevke, ki:

- diskriminirajo ali žalijo druge osebe
- reproducirajo protiustavno ali provokativno vsebino
- škodujejo našemu ugledu in ugledu naših zaposlenih
- ogrožajo mirno vzdušje v skupini Fraport AG

Poleg tega niso dovoljeni prispevki, ki zlorabljajo intelektualno lastnino drugih ali objavljajo zaupne ali interne podatke ali informacije.

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 Zaščita premoženja

Fraport Slovenija posluje učinkovito in stroškovno ozaveščeno - zato je zaščita premoženja družbe sestavni del naše odgovornosti pri delu.

Varovanje premoženja, zlasti lastnine, se nanaša tudi na dragocenosti, ki so jih Fraportu Slovenija zaupali stranke, poslovni partnerji ali potniki.

Za zaščito premoženja veljajo naslednja načela:

4.5 Protection of Assets

Fraport Slovenija 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 Slovenija by customers, business partners, or passengers.

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

- Zaposleni so dolžni varovati premoženje Fraport Slovenija pred izgubo, poškodbo in zlorabo.
- Upoštevati je treba organizacijske ukrepe za kontrolo računov in sprostitev plačil.
- Predmeti in druga sredstva, ki jih zagotovi Fraport Slovenija, se smejo uporabljati le za operativne namene, če ni drugače urejeno; z njimi je treba ravnati skrbno in obzirno.
- Zaposleni morajo s sredstvi in predmeti tretjih oseb, ki so jim zaupani, ravnati skrbno in pazljivo.

- Employees are obliged to protect Fraport Slovenia 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 Slovenia 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.

5. Naša podpora vam

5. Our Support for You

5.1 Kontakti za vaša vprašanja

5.1 Contacts for Your Questions

Etični kodeks ne vsebuje podrobnih navodil, kako ravnati v vseh situacijah, ki se pojavljajo v vsakdanjem delovnem življenju, temveč ponuja osnovo za odgovorno ravnanje v zvezi z izzivi vsakodnevnega poslovanja.

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.

Na vprašanja o razlagi in uporabi teh pravil v delovni praksi ali o obsežnejših smernicah vam lahko odgovorijo vaši nadrejeni, oddelek za skladnost poslovanja Fraport AG ali Pooblaščenca oseba za skladnost poslovanja Fraport Slovenija.

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 Officer of Fraport Slovenija.

Če imate vprašanja o skladnosti ali uporabi smernic družbe Fraport, se lahko obrnete tudi na službo za pomoč uporabnikom oddelka za skladnost na naslovu compliance-helpdesk@fraport.de.

If you have any questions about compliance or the application of Fraport guidelines, you may also contact the help desk of the Compliance Department at compliance-helpdesk@fraport.de.

5.2 Obravnava napak in kršitev pravil

5.2 Dealing with Mistakes and Rule Violations

Za korporativno kulturo v Fraportu so značilne vrednote kompetentnost, zanesljivost, odprtost, pogum, predanost in zaupanje. Vrednost poguma pomeni

The corporate culture at Fraport is characterized by the values of competence, reliability, openness, courage, commitment, and trust. The value of courage is to make

sprejemanje odločitev, prevzemanje odgovornosti in prenašanje nasprotovanja. Pri tem lahko pride do napak. Ključnega pomena je, da se te napake prepoznajo in popravijo. Družba Fraport Slovenija spodbuja odprt pristop do napak. Le tako se lahko iz napak učimo in se še naprej razvijamo.

Ključni pogoj za naš uspeh je zagotavljanje integritete v vseh poslovnih procesih. Zaposleni so dolžni ravnati v skladu z veljavno zakonodajo, tem etičnim kodeksom in notranjimi pravili. V primeru kršitev morajo poleg možnih posledic po kazenskem pravu in pravu o odgovornosti pričakovati tudi posledice po delovnem pravu.

5.3 Kanali za poročanje o domnevnih kršitvah skladnosti

V primeru kršitev zakonov ali notranjih pravil je Fraport zainteresiran za sprejemanje informacij o takšnih kršitvah. Hvaležni smo za vsako informacijo, ki pomaga pri prepoznavanju in odpravi nepravilnosti. To je bistvenega pomena za preprečitev gospodarske škode in škode našemu ugledu.

Od vseh zaposlenih pričakujemo odgovorno ravnanje in spodbujanje odprte interakcije v smislu kulture zaupanja med zaposlenimi in ustreznimi vodstvenimi delavci, ki so na voljo kot prva kontaktna točka.

V kolikor zaposleni ne želijo kontaktirati odgovornega vodstva, so na voljo različni kanali za prijavo kršitev etičnega kodeksa ali gospodarskih prekrškov.

Podrobne informacije o nadaljnjih kanalih poročanja najdete na intranetu ali na spletni strani družbe www.fraport-slovenija.si pod "Skladnost poslovanja in prijava kršitev".

decisions, take responsibility, and endure opposition. Mistakes can occur doing so. It is crucial that these mistakes are recognized and corrected. Fraport Slovenija 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 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 offenses can be reported.

Detailed information on further reporting channels can be found on the intranet or on our corporate website at www.fraport-slovenija.si under "Compliance and Whistleblowing".

Za nemška in mednarodna podjetja v skupini poročila sprejema Pooblaščen oseb za skladnost poslovanja ali elektronski sistem poročanja v ustreznem lokalnem jeziku.

For German and international Group companies, reports are accepted by the local Compliance Officer or the electronic reporting system, in the respective local language.