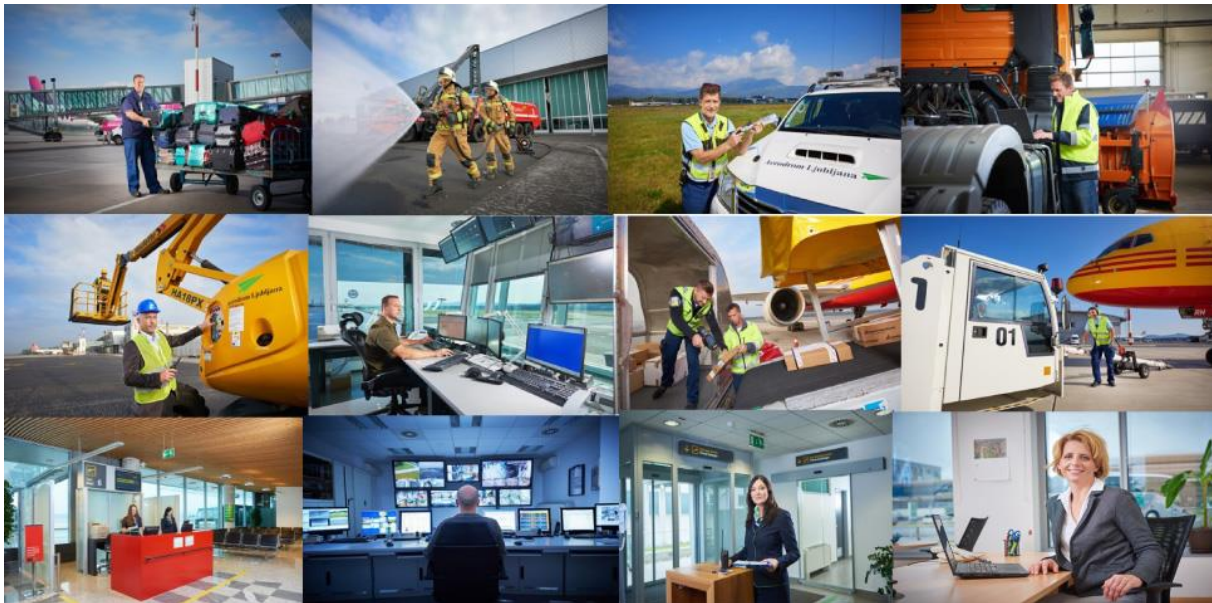


# **ETIČNI KODEKS ZA ZAPOSLENE / CODE OF CONDUCT FOR EMPLOYEES**



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*In the General policy of personal data protection and Personal data protection policy for employees and other personnel of the company you can find more information from Privacy Policy Fraport Slovenija, namely: about the controller, types of personal data, legal basis for processing, processing purposes, storage periods, obligations or voluntary data transfer, persons who have access to personal data, your rights regarding personal data and procedures for exercising these rights.*

Etični kodeks za zaposlene<sup>1</sup> velja za vse zaposlene in poslovodstvo družbe Fraport Slovenija.

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

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

This Code of Conduct applies to employees<sup>2</sup> and Management of Fraport Slovenija.

Code of Conduct represents the universal basis and the principles of action that guide Fraport Slovenija. 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, 01.07.2023

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

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<sup>1</sup> Fraport Slovenija z besedo " zaposlene "opredeljuje vse redno zaposlene, študente in pripravnike.

<sup>2</sup> Fraport Slovenija defines "employees" as meaning all employees, students and trainees.

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*“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 strategiji je, da postanemo »letališče prve izbire« v regiji in temelji na vrednotah kompetentnosti, zaupanja, predanosti, odprtosti, poguma in zanesljivosti. Hkrati se zavezujemo, da bomo med seboj ter s svojimi partnerji in sosedi 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.*

*Pozorno preberite Etični kodeks in upoštevajte pravila pri svojem vsakodnevem 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*

*“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 business strategy to be the “airport of choice” for the region, is based on the values of competence, trust, commitment, openness, courage and reliability. At the same time, we are committed to deal 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 corporate social responsibility as a company and as a business partner, as well as each employee’s responsibility in the workplace.*

*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*

## **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 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 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 za zaposlene so zavezujoča za celotno Fraport skupino, zato veljajo tudi za vse zaposlene in poslovodstvo Fraporta Slovenija.

Etični kodeks 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. 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 for Employees are binding on the entire Group. They apply to all Fraport Slovenija employees and top management.

The Fraport Slovenija Code of Conduct 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 Slovenija. 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. 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. Naša družbena odgovornost**

#### **3.1 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.

#### **3.2 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.

### **3. Our Corporate Social Responsibility**

#### **3.1 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.

#### **3.2 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.



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 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 Fraportu 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.

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

- We reject all forms of child labor.
- We strictly reject any form of forced labor as well as all forms of slavery or slave-like practices, servitude or other forms of domination or oppression in the work environment.
- We respect the fundamental right to the freedom of association and the right resulting from this to collective bargaining to regulate general labor conditions in the Group within the framework of national laws.
- We ensure appropriate wages – compensation at Fraport Slovenia 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.

## 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 Fraporta 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.

## 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 Slovenia'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.

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

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

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

### 3.3 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.

### 3.3 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.

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.

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.

## 4. Naša odgovornost kot poslovni partner

### 4.1 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.

### Konflikt interesov

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

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.

## 4. Our Responsibility as Business Partner

### 4.1 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 Slovenija. 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.

### 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.

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.

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

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

### Donations and Sponsoring

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

## 4.2 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.

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

## 4.2 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.

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

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

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

#### **4.4 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.
- Upošteevamo pravno zavezujoče sankcije.

#### **4.4 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.

## 5. Naša odgovornost na delovnem mestu

### 5.1 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.

### 5.2 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.

## 5. Our Responsibility at the Workplace

### 5.1 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.

### 5.2 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.

### 5.3 Varno ravnanje s podatki in poslovnimi skrivnostmi

Varnost in celovitost podatkov in zaupnih informacij v poslovanju Fraporta 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 Fraporta 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.

### 5.3 Secure Handling of Data and Business Secrets

Fraport Slovenia 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.

## 6. 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.

### Kanali za notranje prijave kršitev

1. **Direktno notranjemu zaupniku** na:

E: [taja.skobir@fraport-slovenija.si](mailto:taja.skobir@fraport-slovenija.si)

T: 04 2061 440

M: 041 642 921

2. **Notranjemu zaupniku preko posebnega obrazca na intranetu družbe**

3. **Notranjemu zaupniku preko elektronskega sistema za prijavo kršitev (BKMS)**, ki omogoča obojestransko anonimno komunikacijo

Vsi kanali za poročanje so predstavljeni na intranetu družbe:

<https://intranet.fraport-slovenija.si/ti-povej/porocanje-o-krsitvah>

Notranji zaupnik družbe Fraport Slovenija, v skladu z Zakonom o zaščiti prijaviteljev, zagotavlja zaščito prijavitelja in mu v primeru povračilnih ukrepov nudi informacije o pravnih možnostih in mu pomaga v upravnih in sodnih postopkih.

V kolikor je obojestranska komunikacija možna, je notranji zaupnik, ne glede na uporabljen kanal, v roku 7 dni dolžan potrditi sprejem prijave.

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

## 6. Violence 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.

### Internal Reporting channels

1. **Direct** to Internal Person of Trust:

E: [taja.skobir@fraport-slovenija.si](mailto:taja.skobir@fraport-slovenija.si)

T: 04 2061 440

M: 041 642 921

2. **To the Internal Person of Trust via a special form on the company's intranet**

3. **To the Internal Person of Trust via the electronic system for reporting violations (BKMS)**, which enables two-way anonymous communication.

All reporting channels are presented on the company's intranet:

<https://intranet.fraport-slovenija.si/ti-povej/porocanje-o-krsitvah>

Fraport Slovenija's Internal Person of Trust, in accordance with the Law on the Protection of Whistleblowers, ensures the protection of the whistleblower and, in case of retaliatory measures, provides him/her with information about legal options and assists him/her in administrative and judicial proceedings.

If two-way communication is possible, the Internal Person of Trust, regardless of the channel used, is obliged to confirm the acceptance of the application within 7 days.

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

postopke). Možno je, da bi se od prijavitelja zahtevalo, da nastopi v vlogi pričē.

Vse zaposlene se spodbuja k prijavi kršitev ali domnevnih kršitev zakonskih predpisov in internih navodil. Prijavitelj ne bo utrpel nobenih posledic, če je prijava podana v dobri veri in z dokazi.

Zlonamerne prijave bodo obravnavane kot kršitev pogodbe o zaposlitvi.

### **6.1 Obnavanje napak in kršitev pravil**

Za korporativno kulturo Fraporta Slovenija so značilne vrednote kompetentnosti, zanesljivosti, odprtosti, poguma, predanosti in zaupanja. Vrednost poguma je sprejemanje odločitev, prevzemanje odgovornosti in prenašanje nasprotovanja. Pri tem lahko pride do napak. Ključno je, da se te napake prepoznajo in popravijo. Fraport Slovenija spodbuja odprt pristop do napak. Le tako se lahko učimo iz svojih napak in se še naprej razvijamo.

Ključna zahteva za naš uspeh je zagotavljanje integritete v vseh poslovnih procesih. Zaposleni so dolžni spoštovati veljavno zakonodajo, ta etični kodeks in notranje akte. V primeru kršitev je poleg morebitnih kazenskopravnih posledic lahko pričakovati tudi delovnopravne posledice.

proceedings). It is possible that the person submitting the report might be called on to testify as a witness.

Every employee is encouraged to report violations, or suspected violations against legal regulations and internal guidelines. Whistleblowers will not suffer any disadvantages if their notification is given to the best of their knowledge and on the basis of sufficient evidence.

Malicious reports will be treated as a violation of an employment contract.

### **6.1 Dealing with Mistakes and Rule Violations**

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