



Code of Conduct for Employees of FraAlliance GmbH

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1. Introduction

1.1 Foreword

Dear employees,

FraAlliance is a joint venture between Fraport and Lufthansa with the aim of revolutionizing the travel experience at Frankfurt Airport. Through FraAlliance, Lufthansa and Fraport are committed to further developing the FRA hub together. Through active, customer-focused and solution-oriented cooperation, we are jointly shaping the future of the FRA hub.

Our vision is to offer guests the smoothest and best intermodal travel experience in Europe. We design individual, sustainable and innovative products and services to make FRA Terminal 1 the first choice. This vision is based on our team values "Be Customer Centric", "Envision Big & Green", "Behave Entrepreneurial", "Dare to Fail", "Cherish Discussions", "Trust in the Team" and "Celebrate Work".

At the same time, we are committed to treating each other and our partners fairly and appreciatively. In addition to our commitment to compliance with the relevant laws and regulations, we are sending a clear signal of the values that guide our actions.

With this Code of Conduct, we clarify our responsibilities as a company, as business partners and as employees in the workplace, and show how we meet these responsibilities. Please read the Code of Conduct carefully and comply with the rules in your daily work. Integrity is the basis for our actions!

We are all FraAlliance and together we achieve our goals.

Frankfurt, 22.02.2024

Place, Date



Jörg Harnisch

Dirk Schusdziara

1.2 Scope

The Code of Conduct applies to all employees and the management of FraAlliance GmbH.

The Code of Conduct represents the general framework and the maxims for action by which FraAlliance GmbH is guided. Its implementation is defined by further internal company regulations and instructions.

All managers have the task of communicating the Code of Conduct to the company and ensuring compliance with it. As role models, they bear special responsibility.



2. Our corporate social responsibility

2.1 Compliance with laws, recognized standards and guidelines

FraAlliance GmbH is committed to its social responsibility for sustainable development. This means assuming responsibility in the areas of economy, ecology, and social affairs and an approach that complies with laws and rules.

We are committed to internationally recognized standards, guiding principles and principles, such as the principles of the UN Global Compact, the UN's Agenda 2030 with its Sustainable Development Goals, the UN's Universal Declaration of Human Rights and the core labor standards of the International Labor Organization (ILO). We are committed to complying with the applicable national laws.

2.2 Compliance with human rights

Companies are important social actors and have an original responsibility to promote human rights. FraAlliance GmbH respects human rights, takes its responsibility to comply with legal requirements seriously and avoids human rights violations in the course of its business activities.

Compliance 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 practices like slavery, servitude or other forms of domination or oppression in the working environment.
- We respect the fundamental right to freedom of association and the resulting right to collective bargaining to regulate general working conditions in the Group within the framework of national laws.
- We ensure an appropriate wage - remuneration at FraAlliance GmbH is in no way lower than the applicable statutory minimum standards.
- We undertake to comply with the relevant statutory regulations and applicable company standards on working hours, vacation, and public holidays.

2.3 Diversity

As a cosmopolitan company, we value the diversity and variety of our employees. This allows different perspectives and experiences to flow into our work. With this diversity lived in everyday life, we can develop innovative solutions with our customers for them. The appreciation and recognition of the diversity of our employees contributes greatly to the economic success of FraAlliance GmbH.

2.4 Equal opportunities and equal treatment

FraAlliance GmbH promotes diversity in its workforce and prevents any form of discrimination. The principle of mutual respect is an essential part of our value culture: FraAlliance GmbH stands for fair, respectful and cooperative dealings with each other.

These principles form the basis of our actions:

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

2.5 Environmental protection

FraAlliance GmbH is committed to using natural resources and the environment in a sustainable, careful and precautionary manner. It is our goal to minimize the negative effects of our activities on people and the environment. Climate protection plays a special role in this.

In terms of our environmental policy, we are guided by the following guidelines, among others:

- We are committed to conducting our business activities in an environmentally sound 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 unavoidable levels.



3. Our responsibility as a 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 hinders the economic, political and social development of a country and thus undermines the foundations of a society.

For FraAlliance GmbH, integrity in business dealings and the prevention of corruption are important principles. 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.

3.2 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 gifts can be understood as inadmissible forms of influence, which may also be punishable by law.

All employees undertake not to offer or accept gifts or invitations in business dealings that could influence a business relationship in an improper manner.

We observe the following **principles** in connection with gifts and invitations:

- **Appropriateness:** Gifts or invitations must be in accordance with local customs and socially customary behavior. They may be made as a gesture of courtesy and appreciation, but may not be of unreasonably high value.
- **Business connection:** A benefit may never be accepted or granted in order to influence a specific business decision. Even the appearance of such influence must be avoided.
- **Frequency:** Giving or accepting gifts and entertainment should be limited to sporadic occasions.
- Invitations or gifts to **public officials** involve a higher risk and are generally prohibited. Exceptions are to be regulated in consultation with Compliance.
- **Documentation:** The internal rules, approval and documentation processes must be complied with.

3.3 Conflicts of interest

Our success is based on the fact that business decisions are made solely in the interests of FraAlliance GmbH. Employees may not pursue personal interests that conflict with the interests of FraAlliance GmbH or take advantage of business opportunities available to FraAlliance GmbH for their own personal benefit.

Conflicts of interest can arise in many ways, e.g. through financial interests in suppliers, customers or business partners, in the context of sideline activities or through personal relationships between employees at the workplace and with business partners.

If a conflict of interest exists or could exist, we implement the following measures:

- The employee concerned shall inform his or her manager of this in writing.
- The manager takes appropriate measures to adequately reduce the risks to the company arising from the conflict of interest.
- We document the conflict of interest, the decision as to whether and which measures are necessary, and any measures that have been initiated.

3.4 Donations and Sponsoring

We assume social responsibility and are committed to being a good neighbor in culture, education, sports, and ecological and social issues.

We take into account the following principles:

- We use donations and sponsorship only for purposes of integrity and avoid even the appearance of undue influence.
- Donations and sponsorship are awarded on the basis of transparent and clear guidelines.

3.5 Fair and free competition

The protection of free competition is an essential prerequisite for prosperity, growth and employment. FraAlliance GmbH is committed to unrestricted and fair competition. We deal fairly with our business partners and want to convince the market with our values, competence and commitment. FraAlliance GmbH does not tolerate any anti-competitive behavior.

The following principles apply in particular:

- We do not enter into any unlawful agreements with competitors, in particular on prices, markets, capacities or customers.
- We do not exchange sensitive/strategic information such as prices, price components, costs or investments with competitors.
- We do not agree to 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 bidding procedures or submit sham bids.

If you are unsure whether a planned course of action is compatible with legal requirements or internal rules, always contact the responsible legal department in a timely manner.

3.6 Prohibition of insider trading

A prerequisite for the efficient functioning of capital markets is that all persons trading on the capital market have the same information at their disposal. No one should gain an advantage at the expense of others, because he has an information advantage over the general public (insider information), which allows him to make predictions about the price performance of securities.

As a group company of Fraport AG and Lufthansa Group, obligations and restrictions may arise when trading securities due to the relationships with Fraport AG and Lufthansa Group, respectively. The prohibitions and obligations of the EU Market Abuse Regulation apply to these two listed companies.

Insider information is:

- Not publicly known
- Precise information,
- Directly or indirectly related to an issuer (e.g. Fraport AG or Lufthansa Group) or a financial instrument (e.g. the Fraport AG or Lufthansa Group share), and
- If it were made public, likely to have a significant effect on the price of the financial instrument.

It is prohibited to directly or indirectly acquire or dispose of securities to which the insider information relates for one's own account or for the account of third parties using insider information.

As a matter of principle, insider information must also be treated confidentially within the company. It may only be disclosed if there is a specific, verifiable reason for doing so, i.e. if the disclosure is necessary in the normal course of the employee's employment and fulfillment of the respective task

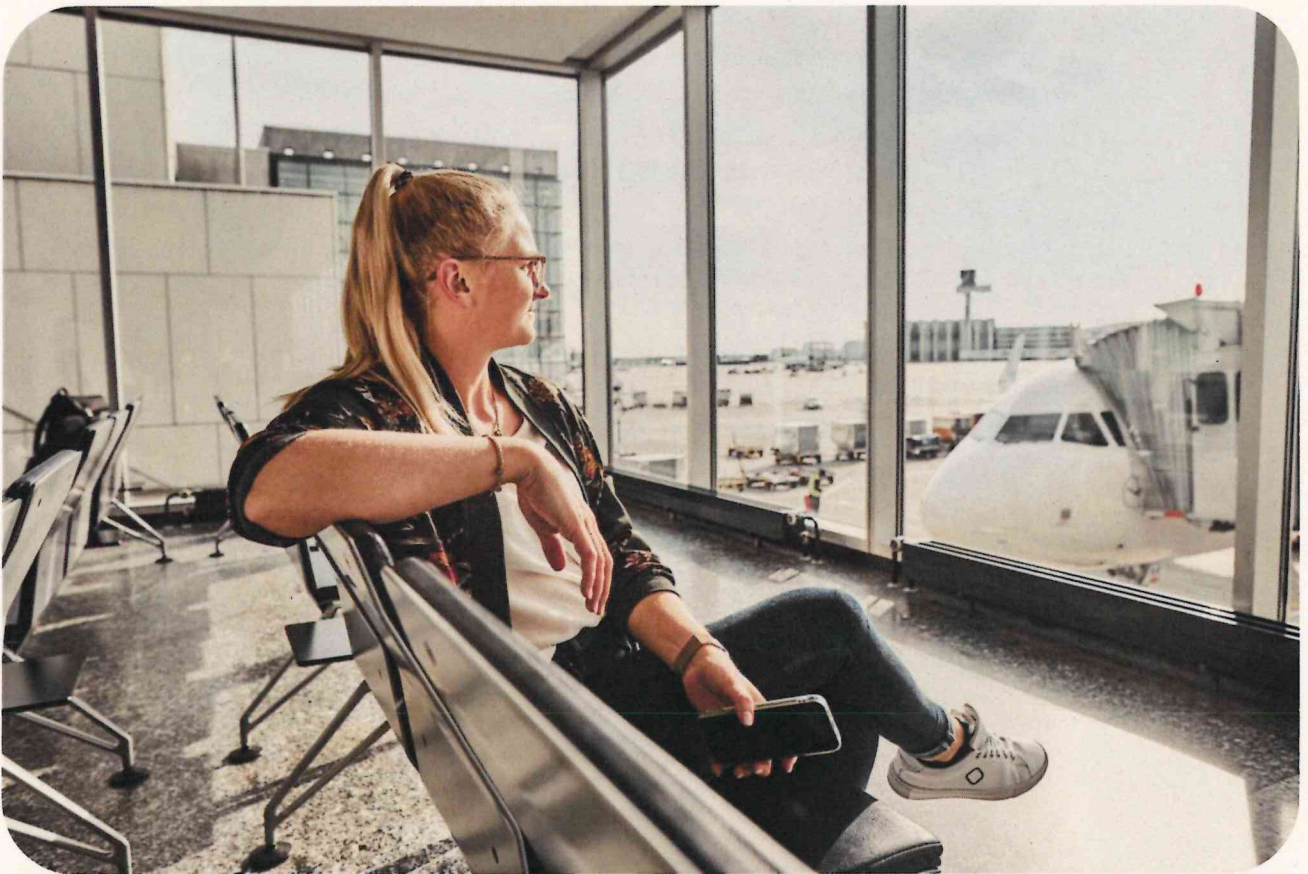
3.7 Prohibition of money laundering and terrorist financing

Money laundering (the covert introduction of illegally acquired assets into the legal economy) and terrorist financing (providing assets to carry out terrorist activities) are serious threats and are prohibited in many countries around the world.

FraAlliance GmbH supports the fight of states against money laundering and terrorism financing and observes the national and international economic sanctions.

The following measures are to be implemented:

- We check the identity of business partners on a risk basis. Our goal is to maintain business relationships only with reputable partners of integrity whose resources originate from legitimate business transactions.
- In the event of suspicion of money laundering or terrorist financing, we inform Compliance immediately. FraAlliance GmbH 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. Our responsibility in the workplace

4.1 Cooperation between Employees

The principle of respect is a key component of our culture of values. FraAlliance GmbH 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. FraAlliance GmbH takes preventive measures to protect employees from accidents, work-related health risks, and occupational diseases.

Health and safety are high individual assets that are also important for the success and reputation of our company. In addition, the unrestricted ability to make decisions is an indispensable prerequisite for the responsible performance of our tasks and the safeguarding of our competitive position. For these reasons, working under the influence of alcohol, drugs and other intoxicants or their consumption during working hours is generally not permitted, subject to co-determination rights.

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 Secure handling of data and trade secrets

The security and integrity of data and confidential information in business dealings is one of the basic principles of business activity for FraAlliance GmbH.

The collection and processing of personal data is only permitted for a specific purpose and requires the consent of the data subject or another legal basis.

FraAlliance GmbH complies with the legal requirements and protects the personal data of employees, customers, suppliers and other persons concerned.

"Personal data" means any information relating to an identified or identifiable natural person.

Each employee must:

- treat personal data confidentially and may only disclose such data to colleagues to the extent necessary for the performance of their 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 departmental deletion concepts if the purpose of processing no longer applies.
- in the event of data security breaches, inform his or her manager and the data protection management / data protection officer without delay.

4.4 Information and trade secrets

Information determines our success and that of our customers. For this reason, the protection goals of data integrity, availability and the trustworthiness of information are at the forefront.

FraAlliance GmbH stands for legitimate and protectable confidentiality in business dealings and ensures the protection of trade secrets from unauthorized acquisition, use and disclosure.

Employees shall maintain confidentiality about matters whose secrecy is provided for by statutory regulations or ordered by the employer; this shall also apply beyond the termination of the employment relationship.

4.5 Social media

We use social media such as Facebook, LinkedIn, Instagram, Twitter and internal communication platforms to communicate with our customers, employees and the general public.

We also treat each other fairly and appreciatively in the digital space. In doing so, we bear in mind that anything that has been published on the Internet cannot be taken back so quickly.

Not allowed are contributions that:

- Discriminate against or insult other persons
- Reproduce unconstitutional or inflammatory content
- Injure our reputation and that of our employees
- Endanger the peace of the company

Furthermore, no contributions are permitted that misuse the intellectual property of other or publish confidential or internal data or information.

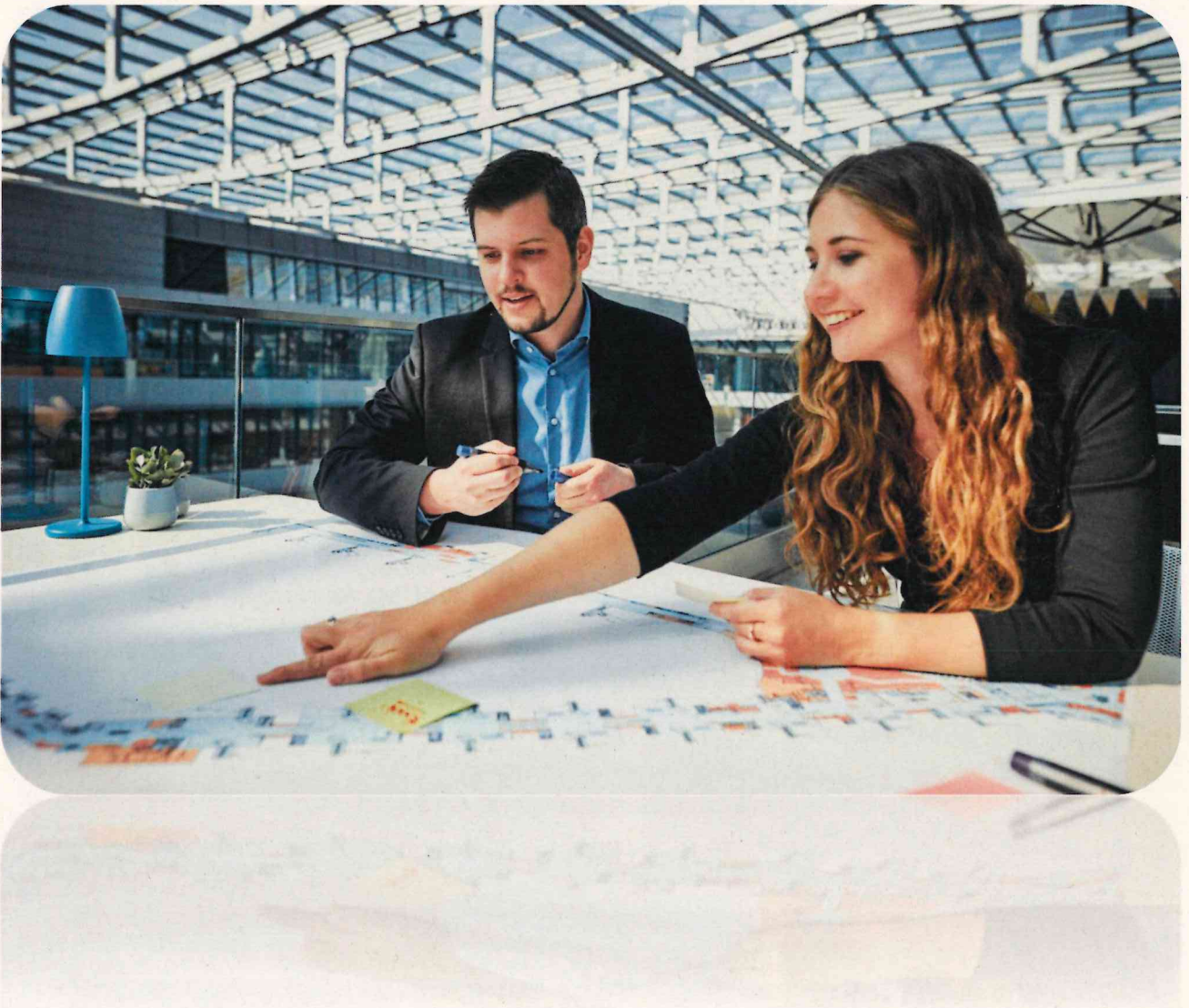
4.6 Protection of assets

FraAlliance GmbH operates efficiently and cost-consciously - that is why the protection of corporate assets is an integral part of our responsibility in the workplace.

The protection of assets, especially property, also refers to valuables that have been entrusted to FraAlliance GmbH by customers, business partners or passengers.

The following principles apply to the protection of assets:

- Employees are obliged to protect property and assets of FraAlliance GmbH 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 FraAlliance GmbH are only to be used for operational purposes, unless otherwise regulated - they are to be treated with care and consideration.
- Employees shall treat third-party assets and objects entrusted to them with consideration and care.



5. Our support for you

5.1 Contact for your questions

The Code of Conduct does not contain detailed instructions on how to act in all situations that may arise in everyday working life. Instead, it represents a guideline for dealing responsibly with the challenges of everyday business.

Questions about the interpretation and application of these rules in working practice or about far-reaching guidelines can be answered by the managers or the compliance officer of FraAlliance GmbH.

If you have any questions about compliance or the application of FraAlliance guidelines, you can contact compliance@fraalliance.de.

5.2 Dealing with errors and rule violations

The corporate culture of FraAlliance GmbH is characterized by the team values "Be customer centric", "Envision Big & Green", "Behave Entrepreneurial", "Dare to fail", "Cherish Discussions", "Trust in the Team" and "Celebrate Work". Crucial is that these mistakes are recognized and corrected. FraAlliance GmbH promotes an open approach to mistakes. Only in this way can we learn from our mistakes and continue to develop.

A key prerequisite for our success is ensuring integrity in all business processes. Employees are required to comply with applicable laws, this Code of Conduct and internal rules. In the event of violations, they must expect consequences under employment law in addition to the possible consequences under criminal law and liability law.

5.3 Reporting channels for suspected compliance violations

Should violations of laws or internal rules occur, FraAlliance GmbH is interested in receiving information about such misconduct. We are grateful for any information that helps us to identify and remedy misconduct. This is the only way we can prevent economic disadvantages and damage to our reputation.

We expect all employees to act responsibly and promote open communication in the spirit of a culture of trust between employees and the respective managers, who are available as the first point of contact.

If employees do not wish to approach management, various reporting channels are available. These can be used to report violations of the Code of Conduct or cases of white-collar crime.

At FraAlliance GmbH, the compliance officer and the electronic whistleblower system are available to provide information.

Detailed information on further reporting channels can be found on the homepage www.fraalliance under "Compliance".

