

Responsibility in Supply Chains

The new German Act on Due Diligence in Supply Chains (LkSG) came into force on January 1, 2023.

Its purpose is to improve the protection of human rights in global supply chains. This is the first time that binding, uniform guidelines on upholding due diligence obligations regarding human rights have been enshrined in law for companies.

The Act initially applies to companies with at least 3,000 employees and a head office, administrative center, registered office or branch office in Germany – which includes Fraport AG and all companies that are directly and indirectly controlled by it, also Media Frankfurt GmbH (hereinafter called "Media Frankfurt").

Exercising Due Diligence Obligations

The new Supply Chain Act encourages the Fraport Group to follow the road toward sustainable and responsible management that it embarked on many years ago. We consider human rights and the environment whenever making business decisions.

The core elements of the resultant due diligence obligations include setting up a risk management system in order to identify, prevent or minimize the risks of human rights violations and harm to the environment. In addition, the Act compels companies to take preventive and corrective measures, set up a publicized complaints procedure, and conduct regular reporting. The due diligence obligations relate to the company's own business operations, the actions of a contracting party and, on an ad hoc basis, the actions of further indirect suppliers. Media Frankfurt meets all its obligations in full. Respecting due diligence obligations regarding human rights is a top priority for us as a values-oriented company.

Policy Statement on Human Rights and Environmental Risks

The policy statement sets out Media Frankfurt expectations of its own employees and suppliers regarding the respect of human rights in supply chains. In the future, the policy statement will be reviewed annually and on an ad hoc basis, and updated as required. The environmental and human rights risks identified in the risk analysis as the highest priorities are mentioned in the document, and related preventive and corrective measures are described.

[To the statement](#)

Complaints Procedure

Reports of violations of human rights and breaches of environmental laws and regulations at the Fraport Group and at direct suppliers can be submitted through the following complaints/whistleblowing channels:

[Access whistleblower system](#)

Responsibilities and contact person

Complaints are handled by the Compliance department and, where necessary, with the support of other experts. The contact person is the head of the Compliance department, Elke Breuer.

How the complaints procedure works

Complaints are received by the Compliance department. The whistleblower receives a confirmation of receipt and is kept informed of the next steps that will be taken and the progress of the procedure.

In a first step, an initial assessment is carried out to check whether the reported breach falls within the material scope of the complaints procedure. Other requirements for instituting an investigation to establish the facts include

whether the incident that has been described can be judged on the whole to be plausible and generally possible and might indicate a violation of any law or a serious breach of an internal regulation. In this process, it is examined whether any collection, processing, or use of data that takes place in the course of the investigation is permissible under data protection law.

The aim of the investigation is to clarify the facts of the matter that are the subject of the report in a neutral, competent, and objective manner. The investigation of the facts is carried out by suitable persons, who are required to act independently and maintain confidentiality. They contact the whistleblower, check the validity of the report that has been received, and, if necessary, request the whistleblower to provide more information. Reports of breaches at a direct supplier are investigated jointly with the supplier. The investigation is conducted on the basis of documents and interviews and is recorded comprehensibly in a case file. Case files are deleted once a year if there is no legitimate interest in retaining them. The whistleblower receives feedback on the progress of the procedure within three months following confirmation of receipt of their report. Feedback is provided only insofar as this does not affect any internal investigations and the rights of the persons who are the subject of a report or who are named in the report are not adversely affected.

Each case concludes with a written final report, which remains strictly confidential. The list of people to whom the report is distributed depends on the nature and severity of the breaches that are identified and is determined on a case-by-case basis. Information is disclosed only if this is necessary and permitted under data protection law.

The final report includes penalties and suitable actions for remedying irregularities and preventing similar breaches in the future. After the investigation has been concluded, the whistleblower is notified of the follow-up actions to be taken, if this is permitted by law.

Protection against reprisals

At Fraport Group, special protection is given to whistleblowers who pass on information in good faith in order to expose irregularities. The Compliance department guarantees that they are protected by maximum confidentiality and, whenever legally possible, by ensuring their anonymity.

In terms of case management at the Fraport Group, this means that the identity of the whistleblower is disclosed solely to the persons who are responsible for receiving information or for instituting follow-up actions.

The Fraport Group ensures through the whistleblower system that whistleblowers who have sufficient reason to believe that their information is true are not obstructed, restricted, or influenced when they submit the information.

Whistleblowers who have been identified by name need not fear any reprisals, such as suspension, termination, relocation to other duties, disciplinary measures, discrimination, bullying or similar retaliation, from Media Frankfurt after they have submitted a report.

Information that is submitted with malicious intent or in bad faith to implicate employees is explicitly unwelcome. Information of this kind that is clearly intended only to harm, denounce, or disparage other people will not be processed. The whistleblower will not be given special protection against reprisals and can be subject to liability in these cases.

Risk Management

The Fraport Group has integrated the new due diligence obligations into its existing risk management system. As part of an annual risk analysis, the company determines whether human rights or environmental risks arise from its own business activities or the actions of direct suppliers. Preventive measures are also established.

The risks identified in the regular and ad hoc analysis as well as preventive and corrective measures taken are documented and submitted each year for inspection as a due diligence report to the German Office for Economic Affairs and Export Control as the responsible government agency.