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Revision Control								
Review Date		Description of the Change						
00	19/05/2022	First publication.						
01	31/07/2023	Update of the document, with due adaptation to the German Supply Chain Audit Act (LkSG).						
02	30/10/2023	Update of the document, with the inclusion of topics on Conflict of Interest, Money Laundering, Personal Data Protection and Information Security.						

Fraport

CODE OF CONDUCT FOR SUPPLIERS

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1 PRINCIPLES

This Code of Conduct establishes the requirements and principles for all commercial and contractual transactions between Fraport (Fraport Brasil S.A. Aeroporto de Fortaleza and Fraport Brasil S.A. Aeroporto de Porto Alegre) and its contractors, suppliers, and service providers (hereinafter referred to as "Business Partners"), whether persons governed by public or private law.

Business Partners doing business with Fraport must accept and comply with their national legislation and internationally recognized standards, guidelines and principles, in particular, the principles of the United Nations Supplier Code of Conduct (www.unglobalcompact.org), the Universal Declaration of Human Rights, the Charter of the United Nations, the Conventions of the International Labor Organization (ILO), the OECD Guidelines for Multinational Enterprises and the German supply chain audit law (*Lieferkettensorgfaltspflichtengesetz* or LkSG, in German).

Business Partners have an obligation to ensure that all other companies (e.g. sub-suppliers, third-party companies, etc.) involved in providing services consistently disseminate and apply these standards.

2 HUMAN RIGHTS AND FAIR WORKING CONDITIONS

2.1 OCCUPATIONAL HEALTH AND SAFETY

Our Business Partners must ensure a safe, healthy and hygienic working environment and take the necessary measures to prevent accidents and adverse health effects that may arise as a result of their activities. Business Partners are therefore obliged to ensure that security standards are respected in their relations with employees and business partners. Business Partners will take appropriate measures for this purpose and must operate systems in order to identify and avoid potential health risks due to accidents, injuries and occupational illnesses on the part of their employees.



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2.2 REMUNERATION AND WORKING HOURS

Working hours must comply with applicable national regulations and laws and International Labor Organization (ILO) Standards. Business Partners are obliged to guarantee their employees the legal remuneration or compensation provided for in collective bargaining agreements during the execution of their contract and only employ suppliers or third parties who also adhere to these standards.

2.3 COMBATTING ILLEGAL EMPLOYMENT

Business Partners must comply with standards regarding the employment of personnel and are under an obligation to effectively combat illegal employment.

2.4 FORCED LABOR

Business Partners must refrain from any form of forced labor. All forms of forced labor, as well as slave labor, must be rejected.

2.5 CHILD LABOR

No form of exploitation of children and young people is tolerated. Child labor, as defined in ILO Conventions and national legislation, is completely prohibited.

Young people should not be exposed to situations that are dangerous, unsafe or likely to harm their health.

2.6 RIGHT OF ASSOCIATION AN RIGHT TO COLLECTIVE BARGAINING

Business Partners must respect the right to freedom of association and the right to collective bargaining as defined by national legislation.

Business Partners will take measures to ensure that free and independent association of workers for the purposes of conducting negotiations is possible and granted.



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2.7 DISCRIMINATION

Business Partners must refrain from engaging in any form of discrimination. No employee may be discriminated against on the basis of their gender, age, skin color, race, culture, ethnicity, nationality, birthplace, sexual orientation, disability, political activities or membership in an employee organization, religion or creed, or conceptual worldview.

2.8 DISCIPLINARY MEASURES

All employees must be treated with dignity and respect. Sanctions, fines, other punishments or disciplinary measures should be applied only to the extent that they comply with current national and international standards, as well as internationally recognized human rights.

Business Partners must take appropriate measures to ensure that no employee is subjected to coercion, harassment or verbal, psychological, moral, sexual or corporal violence.

3 ENVIRONMENTAL AND CLIMATE PROTECTION

Business Partners must observe and adhere to applicable standards and legal provisions for environmental and climate protection and must establish systems and measures to minimize environmental impact and pollution on an ongoing basis. This includes preventing emissions and waste, as well as taking necessary steps to improve resource efficiency.

4 BUSINESS INTEGRITY

4.1 PROHIBITION OF CORRUPTION

Fraport does not tolerate any form of corruption or other unfair commercial practices. Business Partners represent that they will not offer, promise or grant any impermissible advantages to influence decision-making. Business Partners will take all necessary measures to prevent corruption or any other criminal offense or criminal act.



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4.2 DUTY TO COOPERATE

Business Partners must notify Fraport in writing immediately when they become aware of facts that give rise to a suspicion of serious misconduct to the detriment of Fraport, as well as keep Fraport updated in writing on the progress and results of the matter to be clarified, when such infraction is possibly within the scope of responsibility of the Business Partners.

If the suspicion is confirmed, the Business Partners will take appropriate measures, without undue delay, to end the misconduct and to limit the negative impact on Fraport to a minimum.

4.3 ANTITRUST AND FREE COMPETITION

The Business Partner shall comply with all applicable national and international antitrust laws and regulations, as well as competition laws. The Business Partner must refrain from establishing prices or conditions with competitors and from any and all other agreements or understandings that restrict competition, especially with competitors for market sharing or customer sharing purposes.

4.4 DUE DILIGENCE IN THE SUPPLY CHAIN

The Business Partner must perform environmental and human rights due diligence and address them appropriately throughout the supply chain.

If the Business Partner commits a culpable violation of serious human rights or environmental due diligence obligations related to the contract, Fraport will have the right to terminate the contract on an extraordinary basis.

4.5 REPORT OF IMPROPER SITUATIONS

The Business Partner must inform all its employees as well as all involved business partners (sub-suppliers, suppliers, service providers) about the contents of this Code of Conduct and all relevant legal provisions in a manner accessible to them.



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The Commercial Partner must inform its employees and suppliers about the use of Fraport's anonymous reporting channel and must recommend that they transmit information about this reporting system to the entire supply chain.

The whistleblowing channel can be accessed through the flink contatoseguro.com.br/fraport.

4.6 COMMUNICATION AND ACCESS TO INFORMATION

Business Partners must inform all their employees, as well as all involved business partners (subsuppliers, suppliers, service providers) about the content of this Code of Conduct and all relevant legal provisions, in a form that is accessible to them.

This Code of Conduct can be viewed and printed at any time online at: https://portoalegre-airport.com.br/pt/negocios/codigo-de-conduta-para-parceiros-de-negocio

4.7 AVOIDING OF CONFLICTS OF INTEREST

The Business Partner is obliged to take their decisions on the basis of objective considerations and not to allow themselves to be improperly guided by personal interests. A Business Partner that becomes aware of a potential conflict of interest shall take internal measures to remedy these conflicts and notify Fraport without delay.

4.8 MONEY LAUNDERING

The Business Partner is required to uphold the relevant legal provisions on money laundering prevention and duly comply to the reporting obligations.

4.9 DATA PROTECTION AND DATA SECURITY

The Business Partner shall comply with the applicable laws and regulations regarding data protection and data security.



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5 FINAL DISPOSITIONS

Fraport will have the right to verify compliance by its Business Partners with the abovementioned requirements either by itself or by third parties.

If it is found that the guidelines provided for in this Code are not met, the Business Partner will be notified to take the necessary corrective measures, in a timely manner, in accordance with the guidelines of this Code.

In case of failure to comply with this Code, after notification, Fraport may take action regarding the suspension or discontinuation of its activities as a Business Partner.