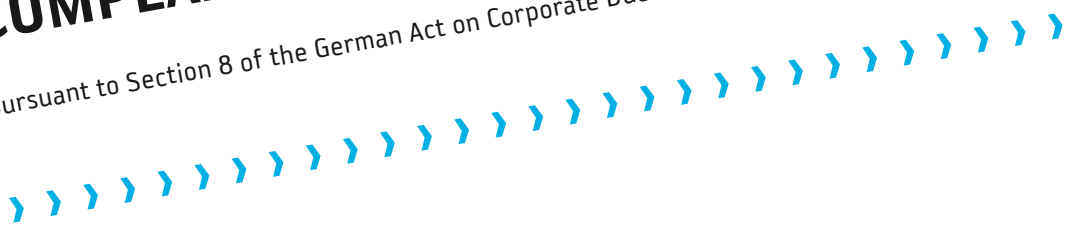




CODE OF PROCEDURE FOR COMPLAINTS PROCEDURE

pursuant to Section 8 of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)



in effect as of 1/1/2024

1. INTRODUCTION

Respect for human rights and environmental standards is a matter of course for Flughafen Hannover-Langenhagen GmbH (FHG), Aircargo Services Hannover GmbH (ASH), and Hannover Aviation Ground Services GmbH (AGS) (hereinafter referred to as the FHG Group). As the operator of Hannover Airport, the FHG Group provides facilities and equipment for handling passenger and cargo flights and offers associated services. Both as an employer and as an operator of the extensive infrastructure, our focus is on the environmentally friendly operation of the infrastructure and on fair and safe working conditions.

In order to create the opportunity of drawing the FHG Group's attention to human rights and environmental risks and to report violations of human rights or environmental obligations within the meaning of Section 2 LkSG which may have arisen as a result of the actions of the FHG Group or a supplier, the FHG Group has set up a corresponding complaints procedure.

In this code of procedure, the FHG Group establishes clear processes that guarantee that every report received is processed diligently and effectively.

2. AIM AND PURPOSE

The aim of the complaints procedure is to provide information about human rights or environmental risks in the company's own area of business and in the supply chain within the meaning of Section 2 LkSG as early as possible in order to enable the FHG Group to take effective measures at an early stage to prevent human and environmental rights violations. In addition, the information serves to supplement the regular analyses of human rights and environmental risks in the FHG Group supply chain and to take preventive measures to prevent the emergence or occurrence of such risks.

In order to achieve the objectives of the complaints procedure, this Code of Procedure sets out the following:

- The scope of this Code of Procedure for complaints
- The procedure according to which complaints are processed and handled within the FHG Group
- The rights of the parties involved

3. SCOPE

This Code of Procedure applies to any information, including anonymous information, submitted by one or more persons ("whistleblowers") regarding human rights or environmental risks and violations of human rights or environmental obligations within the meaning of Section 2 LkSG that have arisen as a result of the economic activities of the FHG Group or one of its direct or indirect suppliers in its supply chain within the meaning of Section 8 LkSG ("complaint").

4. COMPLAINT CHANNEL

Complaints can only be submitted via the electronic whistleblower system on the Hannover Airport website. The system is available at www.hannover-airport.de/hinweisgebersystem.

5. PROCEDURE

The German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) defines compliance with human rights and environmental protection requirements and also requires suppliers and business partners to meet these requirements.

The FHG Group therefore offers all employees, customers, and business partners the opportunity to report events or incidents in a protected space via this whistleblower system. The whistleblowers themselves decide whether they wish to remain anonymous. Every complaint received is recorded and processed accordingly. The individual procedural steps and any resulting measures are documented in a comprehensible manner.

Effective protection of whistleblowers against discrimination or punishment on the basis of a complaint is guaranteed. Anonymity has no influence on how the complaints procedure is conducted.

Information that is based on false claims or is solely intended to discredit persons or companies or otherwise constitutes an abusive use of the complaints procedure is not a complaint within the meaning of this Code of Procedure.

6. COURSE OF PROCEDURE

The complaints procedure consists of three phases: receipt, processing, and closure.

7. INITIATION OF THE PROCEDURE

Each procedure begins with the receipt of a complaint via the electronic whistleblower system. The information submitted should explain the facts and grievances in as much detail as possible. Various text fields are available for this purpose so that each whistleblower can provide information about the nature, time, and discovery. The software automatically confirms receipt of the complaint to each whistleblower, whether by name or anonymously.

8. PROCESSING PROCEDURE

The responsible persons in the FHG Group check the plausibility of the report. As part of the plausibility check, it is examined whether, based on the facts presented in the complaint in the subsequent discussion with the whistleblower, there is a possibility that a human rights or environmental risk or a violation of human rights or environmental obligations may have arisen or occurred as a result of the business activities of one of the direct or indirect suppliers of the FHG Group.

If a complaint is substantiated, the FHG Group will investigate it objectively and comprehensively, taking into account the legal and internal requirements and regulations as well as the rights of all parties involved in the procedure. The report is processed as quickly as possible and in accordance with the urgency of the matter. Whistleblowers are informed of the planned measures within three months wherever possible.

9. CLOSURE OF THE PROCEDURE

The procedure is closed following receipt if the plausibility check reveals that the information and grievances reported do not fall within the scope of the human rights and environmental risks of the LkSG.

The procedure is closed following receipt if the plausibility check reveals that the information and grievances reported are not attributable to the business activities of the company itself, a direct supplier, or an indirect supplier.

The procedure is closed with the whistleblowers following processing, once they have received information about the plausibility and the planned measures.

After the procedure has been closed, whistleblowers can request that the FHG Group follow up on the implementation of the corrective measures via the electronic whistleblower system. The results of the implementation are then re-evaluated with the whistleblowers.

10. DATA PROTECTION

Personal data is collected, processed, transmitted, and stored as part of the complaints procedure in compliance with data protection regulations. Section 10 (1) LkSG applies.

11. INFORMATION ON THE ACCESSIBILITY OF THE COMPLAINT CHANNELS

<https://hajg2c01.ithaj.de/Meldung>.