




CODE OF CONDUCT FOR FRAPORT EMPLOYEES

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ABOUT THIS DOCUMENT


Fraport Brasil, in the condition of a subsidiary of Fraport AG Frankfurt Airport Services Worldwide, works continuously to optimize processes, products and services, attentive to its employees, customers, shareholders, the environment and to society, at the same time preparing to respond to future challenges, as soon as manifest themselves.

This increases the value of the Company in the long term, which benefits employees, other parties interested parties and serves to express alignment every time more sustainable operations of business.

Everything Fraport does, every day, is based on core values of honesty, integrity, reliability, responsibility, transparency, loyalty, dedication, and justice.


The company is also committed to defend the principles of the Covenant Global United Nations, in areas of human rights, standards labor, environmental protection and combating corruption.

Likewise, it is guided by the main labor standards of the International Organization of Labor (ILO), by conventions of the United Nations and the OECD Guidelines for Business Multinationals, as well as by all laws and regulations in force in countries where Fraport AG operates.

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1 PRINCIPLES IN BUSINESS

1.1 LEGALITY

In each State where it operates, Fraport Brasil will follow the laws and local regulations. In situations in which the law is silent, it will apply its own standards, based on their corporate culture and values.

In case of conflict between the law in force in the country and the principles contained in the Fraport Brasil Code of Conduct, the law will prevail.


1.2 POLITICAL NEUTRALITY

Fraport Brasil opts for neutrality when it comes to parties and political candidates. The name and resources of the Company may not be used to promote the interests of parties or political candidates.

1.3 BUSINESS ETHICS

Fraport Brasil is committed to high ethical standards. Therefore, the Company does not accept the practice of corruption on the part of its employees and observes this principle in its relationship with all other audiences. Like this therefore, Fraport Brasil will not offer customers potential customers, governments, public officials or any representatives of such entities rewards or benefits for violating the applicable laws. These attitudes are absolutely unacceptable and should not occur even indirectly.

Employees must not, under any circumstances, endanger the image and business of Fraport Brasil in the world due to unethical behaviors. Sponsorships are also not allowed to Fraport Brasil events or activities without prior approval from the Management Board. Likewise, an employee is not permitted request or accept sponsorship from suppliers for any activity of particular interests, as this may affect the professional relationship. Likewise, everyone must also guide their actions in the primaries of loyalty, honesty, respect, responsibility, and caution.

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1.3.1 Whistleblowing Channel

The Ethics Committee is made up of those responsible for the HR and Internal Audit. Furthermore, in complex cases the Committee counts on with the participation of the CEO.

The Whistleblowing Channel can be activated by all employees and other public, internal and external, who want to register complaints, reports, questions or suggestions related to ethics, fraud or any form of misconduct involving the Company.

Employees and other stakeholders can contact the Whistleblowing Channel through the website <https://contatoseguro.com.br/fraport> as well as by calling 0800 601 6928.

In neither case is it possible to identify the person who sent the registry unless it wishes to be identified. Its identity is completely preserved, that is, what is analyzed is the question presented, not the person presenting it.

The right to anonymity, however, should not be a reason for presenting of false reports, whose main purpose is not the legitimate preservation of ethics. This would divert the attention of the Ethics Committee from issues that are truly important, characterizing as misuse of this channel.


Matters that are not the scope of the Whistleblowing Channel:

- a) Questions or complaints about cleaning services and maintenance.
- b) Goals and results of the Results Assessment Program.
- c) Working hours, overtime, benefits, and problems with its management.

Situations such as those presented must be discussed directly with the employee's immediate management or with the area in charge for the service in question.

1.3.2 Conflicts of interest

It will not be tolerated conflicts of interest that influence (or appear to influence) employees in their decision-making or performance of its functions at Fraport Brasil.

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The following situations characterize conflicts of interest:


- a) Use of confidential company information in the employee's private activities.
- b) Use of position, resources, information, or the name of Fraport Brazil to obtain personal advantage.
- c) Working in parallel activities that affect your performance or constitutes competition with any activity of the Company.
- d) Professional activity or shareholding in suppliers or client companies operating at airports located in Brazil.
- e) Hiring a supplier, employee or customer for a private service and as a result of this contracting, this relationship prevents Fraport's employee from making impartial decisions as a professional of the Company.

If any of the Conflict-of-Interest situations occur the employee must communicate formally, by writing, its immediate superior so that the Head of Compliance can be informed to take appropriate measures to reduce any risk involved. This entire process will be formalized with decisions taken when applicable.

To avoid situations of conflict of interest, it is **PROHIBITED** to have labor subordination between relatives of any degree (husband, children, brothers-in-law, cousins, etc.), as well as between employees with affective relationship. In this situation, one of the two employees must be relocated to another department, depending on available opportunities. If there is no possibility of relocation, there may be dismissal of one of the employees.

Employees must also avoid affective relationship or degree of kinship with suppliers and customers, including whether their position confers power of influence in commercial transactions or allow access to privileged information. It is the responsibility of employee to report cases of this nature (whether new or already existing) to the immediate manager and the Head of Compliance.

If the employee has shares in other companies or another professional activity, it must inform the immediate manager before assuming the position for conflict-of-interest analysis together with the Head of Compliance. If there are any uncertainties about the existence of conflicts, it will be decided by the Management Board.

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1.3.3 Prevention against corruption

Brazilian legislation applicable to corruption must necessarily be observed, especially Law 12,846/2013 and Decree 8,420/2015. In relationships with users, suppliers and service providers service, as well as with institutions, government bodies and public servants in general, the interests of Fraport Brasil and the personal interests of its employees must be maintained strictly separated on both sides.

Any practices that involve favoritism, concession or promise (directly or indirectly) of personal advantages, regardless of their nature, to authorities or employees of any instance of the public sector, which constitute an illegal practice in accordance with current legislation, are considered unacceptable.

All institutional actions related to authorities, politicians and public employees, such as: offering gifts and courtesies, invitations to participate in Fraport Brasil events, invitations to visit the airport site, requests for hearings, etc. must be previously authorized by the Management Board.


1.3.4 Gifts and hospitality

Employees should also not solicit business partners or accept any type of personal benefit, such as: gifts, payments, private services, loans, favors, etc., as these may affect or insinuate that they affect their objectivity in business decisions.

Institutional gifts without commercial value and with the Company logo are acceptable (such as office supplies, diary, pen, calendar, cap, book, etc.) and, therefore, may remain with the employee.

Gifts that have commercial value, even with the company logo, tickets to sporting events and shows must be refused and returned to the companies that sent them.

In cases where non-acceptance of the gift is unfeasible, due to the risk of creating a problem in the relationship between the companies, the gift must be delivered to the person responsible for the area, who will be responsible for holding a draw among all employees in the area. All

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cases in which draws are made must be formalized to the Company's Internal Audit by email, informing the origin of the gift, along with a photo of the material.

Employees, when invited to participate in events sponsored or promoted by partners, suppliers or representatives of their relationship group, can only accept to participate after formal approval from the responsible Management Board member.

Any offering of gifts, presents and hospitality by Fraport Brasil is prohibited, except in cases expressly planned and approved by the Management Board as institutional actions.

1.3.5 Antitrust and Free Competition Laws


Fraport Brasil respects the principles of fair competition with other companies operating in the market and expects its employees and service providers to observe all applicable national and international antitrust laws, as well as laws against unfair competition, whenever applicable to the scope of their specific responsibilities. Agreements, understandings, or activities that affect prices or conditions, the allocation of sales territories or customers, or obstruction of free and open competition in an impermissible manner are not permitted. Agreements and understandings between customers and suppliers with the intention of restricting the freedom of contractual partners regarding setting prices and other conditions are also prohibited.

1.3.6 Donations and Sponsorships

As a reliable partner for our community, we promote culture, education, sports, and ecological and social awareness.

To do this, we consider the following principles:

- a) We use donations and sponsorships only for purposes compatible with the principles of integrity, aiming to avoid even considering the possibility of undue influence on the part of others.
- b) Donations and sponsorships are granted based on transparency and clear criteria defined by Fraport Management.

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1.3.7 Prohibition of Insider Trading

A condition for the efficient functioning of capital markets is that all people trading in the capital market have the same information. No one should obtain an advantage at the expense of others, by having obtained privileged information (compared to the general public) that allows them to make predictions about the evolution of the price of shares and other securities.

As a company listed on the Frankfurt Stock Exchange, the prohibitions and obligations of the European Market Abuse Regulation apply to Fraport and its subsidiaries, its executive bodies and employees and even external third parties may be subject to obligations and restrictions in share trading and other securities due to its relationship with Fraport.

Privileged information is information that:


- a) They are not public knowledge.
- b) Are accurate.
- c) Be directly or indirectly related to an issuer (e.g. Fraport AG) or a financial instrument (e.g. Fraport AG share).
- d) If they were public, they would be likely to have a significant effect on the price of the financial asset.

It is prohibited to use privileged information to acquire or sell, directly or indirectly, for one's own account or that of others, shares, and other securities to which the privileged information relates.

As a matter of principle, privileged information must also be treated confidentially within the company. It may be disclosed only if there is a specific and verifiable reason, i.e., if the disclosure is necessary in the regular course of employment and performance of the employee's respective duty.

1.3.8 Prohibition of Money Laundering and Terrorism Financing

Fraport supports States' fight against money laundering and terrorist financing and observes national and international economic sanctions.

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The following measures, where applicable, must be implemented in this context:

- a) We perform risk-based identity checks of business partners. It is our goal to maintain business relationships only with reputable partners who act with integrity and whose operational resources originate from legitimate business transactions.
- b) If money laundering or terrorist financing is suspected, we inform the Compliance area immediately. Fraport reports suspected cases to the competent authorities.
- c) To reduce money laundering and other compliance risks, cash transactions must be kept to a minimum.
- d) We observe legally applicable sanctions.

1.3.9 Social media

When communicating with our customers, employees and the general public, we use social media such as Facebook, LinkedIn, Instagram and internal communication.

We also treat each other fairly and positively in the digital space. In doing so, we must remember that any publication on the Internet cannot simply be removed.

IT IS PROHIBITED to make posts in the name of Fraport that may:


- a) Discriminate or insult others.
- b) Reproduce unconstitutional or inflammatory content.
- c) Harm our reputation and that of our employees.
- d) Endangering the climate of peace within the Group.

Additionally, contributions that misuse the intellectual property of others or publish confidential or internal data or information are not permitted.

1.4 PERSONAL DATA

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

Fraport complies with legal requirements and protects the personal data of employees, customers, suppliers, and other related people. "Personal data" means any information that can identify a natural person.

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Every employee must:

- a) Treat personal data responsibly and only disclose such data to colleagues to the extent necessary to carry out their duties.
- b) Refrain from collecting or processing personal data without authorization and, if in doubt, seek data protection advice.
- c) Delete personal data within the scope of responsibility and based on departmental deletion concepts if the purpose of processing is no longer applicable.
- d) Inform your superior and the Data Protection Officer at Fraport immediately in the event of a data security breach.

1.5 COMMERCIAL INFORMATION AND SECRETS

Information determines our success and the success of our customers. For this reason, protecting data integrity, data availability and information confidentiality are vital objectives.

Fraport provides legitimate business confidentiality and guarantees the protection of trade secrets against unauthorized collection, use and disclosure.

Employees must maintain secrecy on matters whose confidentiality obligation is provided by legal regulations or ordered by Fraport; this also applies after the employment relationship ends.


2 HUMAN RIGHTS

2.1 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING RIGHTS

The fundamental right to freedom of association and the right to collective bargaining are respected, in order to establish general working conditions within the group.

Fraport Brasil offers authorized bodies representing workers open and trusting collaboration, seeking to guarantee a fair exchange of interests.

Fraport is committed to complying with all negotiations agreed with entities representing employees as well as all Labor Legislation in force in Brazil.

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2.2 CHILD LABOR AND FORCED LABOR

Fraport Brasil rejects all forms of forced labor and child labor.

The minimum age permitted for employment must not be lower than that which, by law, is mandatory for school attendance and can never be lower than 16 years old (or 14 years old, to the extent permitted by national legislation, in accordance with Convention No. 138 of the ILO. In Brazil, for example, minors can work as apprentices from the age of 14). Persons under the age of 18 should not work at night, nor be exposed to any dangerous or unsafe situation, or any situation that may adversely affect health.


The Company is committed to ensuring that the rights of children and adolescents are respected. It does not tolerate any form of exploitation of children or adolescents. Ensures that International Labor Organization (ILO) conventions, international standards, and regulations for the protection of children and adolescent employees are complied with.

2.3 DIVERSITY

As a company with an international alignment, Fraport Brasil promotes diversity in its team, acting in accordance with the principle of equality and rejecting all forms of discrimination.

Prohibits all forms of discrimination, exclusion or preferential treatment, particularly on the basis of:

- a) Ethnic, national and/or social origin.
- b) Race and skin color.
- c) Gender.
- d) Age.
- e) Religion, creed, and/or worldview.
- f) Political activities.
- g) Membership in a workers' organization.
- h) Deficiency.
- i) Sexual orientation.

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3 GUIDELINES RELATED TO THE COMPANY'S INTERNAL ENVIRONMENT

3.1 RELATIONSHIP WITH CO-WORKERS


For the working relationship to be harmonious and pleasant, all employees must:

- a) Treat colleagues, third parties, subordinates and leaders with courtesy and respect.
- b) Always exercise constructive feedback at all levels.
- c) Respect colleagues' space in shared areas, adapting the volume of voice and using vocabulary and subjects consistent with the corporate environment.
- d) Keep the work environment clean and organized.
- e) Always have positive attitudes, collaborating to solve problems and conflicts.
- f) Promote diversity, practicing inclusion.
- g) Always maintain an ethical stance that can be an example of conduct.
- h) Respect and disseminate the principles of Fraport Brasil: Quality, Safety and Respect for the Environment.
- i) Work with energy, passion, and respect for people.

3.2 CLOTHING

Some basic rules must be observed by employees when presenting themselves publicly, whether in front of co-workers or in front of clients, authorities and other audiences with which Fraport Brasil interacts:

- a) Employees who work in operational areas must wear uniforms provided by the Company, in accordance with the needs of the process and safety standards;
- b) Employees who work in administrative areas must wear clothing appropriate to the business environment. Therefore, clothing that could affect the professional image and safety of the employee or that is incompatible with the business environment should not be worn;
- c) When the employee is in external activity, representing Fraport Brasil, they must wear formal attire.
- d) On Fridays it is possible to wear a casual style. Employees who wear uniforms must use them strictly as required in the uniform policy, reinforcing that there is no casual style for uniformed personnel.

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3.3 OCCUPATIONAL HEALTH

Fraport Brasil has an Occupational Health area focused on preventing occupational diseases and worker well-being. Therefore, in addition to the periodic exams required by law by NR 07 (Occupational Health Medical Control Program) to obtain the Occupational Health Certificate (ASO), Fraport Brasil can carry out other preventive exams. Therefore, upon being summoned, the employee must appear on the defined date and time.

Other procedures that must be observed:

- a) The employee must inform his immediate superior and HR about absences due to health reasons and present a medical certificate relating to the period of absence.
- b) The employee must contact HR when it is necessary to be away for more than 15 (fifteen) days.
- c) An employee who is away for 15 (fifteen) days or more, after being released from the INSS, will only be able to return to their activities upon obtaining a medical certificate issued by the occupational doctor from the Company's medical service.
- d) During the period in which they are away, the employee must dedicate themselves to their treatment and must not carry out any activity contrary to medical advice, as such conduct could harm, worsen or delay their recovery.


It is up to each employee to be permanently aware of the guidelines and determinations of the Company's Occupational Health area, especially in risk situations or alerts in case of local public health problems.

3.4 WORKPLACE SAFETY

Fraport Brasil has a broad Occupational Safety program, aimed at preventing accidents and occupational illnesses, as well as hygiene and ergonomics in the workplace, in order to provide a safe and healthy workplace.

The duties of all employees are:

- a) Mandatory use of safety equipment (PPE), as indicated by Occupational Safety professionals.
- b) Inform the immediate superior or the Occupational Safety department of any situation that could put people's safety at risk and harm the smooth running of activities.

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- c) Immediately inform the Occupational Safety department if they suffer (or witness) an accident at work or while traveling, as well as follow the guidelines of this department.
- d) Ensure their own safety, especially in the work environment, and that of the people around, whether co-workers or passengers.

3.5 ENVIRONMENT

The Fraport Group has a global environmental policy and is committed to adopting a sustainable, considerate, and careful approach to natural resources and the environment.


It is our objective to minimize the negative impacts of our activities on people and the environment. Noise reduction and climate protection play a special role in this.

Our environmental policy is based, among others, on the following principles:

- a) We are committed to conducting our business activities in an environmentally friendly manner. We strive to protect the environment and ensure safe and healthy working conditions for our employees.
- b) We encourage our employees to use natural resources responsibly.
- c) We work to develop and disseminate friendly technologies, applying ecological criteria in the selection of products and services.
- d) As part of our responsibility, we strive to limit emissions of climate-relevant gases and air pollutants to an unavoidable minimum.

3.6 ALCOHOL AND DRUG CONSUMPTION

The consumption of alcohol and drugs is strictly prohibited during working hours, whether inside or outside the Company's facilities. Employees who perform ARSO activities (Operational Safety Risk Activity in Civil Aviation) must meet the requirements of the PPSP program (Risk Prevention Program associated with the misuse of Psychoactive Substances) implemented by Fraport Brasil based on RBAC 120.

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3.7 USE OF COMPANY RESOURCES

Fraport Brasil provides several resources so that its employees can perform their activities in the best possible way. It is everyone's obligation to use them rationally and only for professional activities related to the Company.

3.8 CORPORATE SYSTEMS AND OTHER IT RESOURCES

The employee must use corporate systems and other IT resources only for professional activities, always respecting the interests and values of Fraport Brasil and ensuring that confidential and sensitive information is protected against unauthorized access.

Likewise, the employee is fully responsible for their personal passwords to access the systems, responding directly and personally for all actions that may occur as a result of their use.

4 COMPLIANCE WITH THE CODE OF CONDUCT

4.1 RESPONSIBILITIES AND PENALTIES

As the business environment is quite dynamic, situations may arise that are not described in this Code of Conduct. In this case, questions and suggestions must be forwarded to the Ethics Committee, which will seek the Company's official position. When relevant, addenda will be prepared and will become part of this document.

It is the responsibility of leaders to set an example, acting in accordance with the principles defined in this document. At the same time, they must ensure that all employees are familiar with the content of this Code and respect its guidelines.

It is the responsibility of employees to read the Code of Conduct, seek clarification in case of doubt, follow its determinations and communicate non-compliant behavior to leaders or the Ethics Committee.

Violations of this Code or any other Company procedures, guidelines or policies may result in disciplinary and legal actions for any and all employees, regardless of hierarchical level, guaranteeing those involved the full exercise of contradictory and full defense.