

Salzburg Airport Code of Conduct

1. Preamble

The Salzburg Airport Group Code of Conduct is based on the corporate mission statement of Salzburg Airport and contains binding rules of conduct for all employees. It shall apply from 1 August 2024 and shall replace the previous Code of Conduct (Version 3.0), effective from 1 February 2023.

The present Code of Conduct includes guidelines for ethical and legally sound conduct and decision-making for all employees of the Salzburg Airport Group.

It also includes guidelines and principles for lawful behaviour which is respectful of values in everyday business. Compliance with such behavioural guidelines safeguards company reputation and therefore also reputation of the employees.

Any behaviour challenging or compromising the integrity of Salzburg Airport Group or its employees shall not be accepted by the company management in any case.

Non-compliance with the Code of Conduct principles may impair the reputation of our company. Non-compliant behavior can have disciplinary and employment law consequences and may also result in criminal prosecution.

2. External and internal relationships

2.1 Company owners

The guidelines of the present Code of Conduct are based on the 'Salzburg Corporate Governance Kodex' (dated 22 July 2022) that applies to all companies directly or indirectly owned by Land Salzburg or Stadt Salzburg as their (majority) shareholders.

We regard righteous, transparent and sincere behaviour towards our company owners as a given.

2.2 Customers first

We can only be successful by offering top-notch service to our customers. Therefore, Salzburg Airport Group is committed to a strong service culture, striving to constantly surpass our customer's expectations.

We commit to delivering our services in the best interest of our customers.

2.3 We care about our suppliers

Salzburg Airport Group has committed to an ethically and legally sound corporate leadership and we therefore expect our suppliers to abide by some basic principles, including compliance with applicable law, human rights, refraining from child labour, providing health insurance and labour protection to employees as well as promoting environmental protection.

2.4 Sustainably responsible

We are aware of our responsibility towards people and the environment, which is reflected in our everyday business.

Salzburg Airport makes major efforts to minimise negative effects on the environment and society as far as possible (e.g. by funding soundproof windows).

Thanks to the creation of a Citizens' Board ('BürgerInnenbeirat'), local residents are able to actively engage in shaping the environmental policy of Salzburg Airport. Joint efforts ensure that Salzburg Airport Group may continue its economic success in a sustainable and ecological manner.

2.5 Our employees are our most valuable asset

At Salzburg Airport, our employees are our most valuable asset. Respectful interaction with people and the environment is our top priority. We go to great lengths to improve the qualification and working conditions of our staff and do our best to improve their motivation.

Salzburg Airport aims to promote both professional and personal growth of staff as good as possible.

3. Internal Code of Conduct

3.1 Integrity and respect

Employees shall fulfil their assigned tasks with commitment and loyalty.

We respect the diversity of cultural, ethnic and religious backgrounds and commit to the principle of equal treatment regardless of age, disabilities, skin colour, sexual identity, gender or belief.

We do not tolerate any discrimination whatsoever based on the features listed above. Furthermore, we do not tolerate any incidents of sexual harassment or other forms of personal attacks.

3.2 Health and safety

Our employees' health and safety are of utmost importance to us. Therefore, we highly value complying with legal requirements and internal provisions for labour protection. We actively promote workplace health and take preventive measures for long-term health and working capacity of our employees.

3.3 Avoiding conflicts of interest: Full speed ahead at the Airport

We exclusively act in the best interest of our company. We avoid any conflict of interests that might adversely affect our business.

Conflicts of interest may also arise by having a (remunerated) secondary employment. Any secondary employment must be reported to the Team People & Culture and must be approved by the company management.

3.4 No chance for corruption

Business practices sometimes may include the moderate exchange of gifts, offers and invitations. Occasional gifts of low monetary value and customary hospitality gestures shall be admitted in accordance with legal provisions.

However, accepting or giving gifts, making offers or invitations are able to unduly influence a business relationship. Accepting or giving money as a gift is prohibited in any case, independently of the monetary value.

Any form of corruption and any behaviour favouring corruption is strictly prohibited. Employees violating this principle must reckon to face severe measures, including dismissal.

3.5 Non-disclosure and privacy

Salzburg Airport Group management and employees shall treat information of any kind with confidentiality, especially information so far undisclosed to the public, and shall not share such information with third parties.

This especially includes financial and operational figures and customer, supplier or employee data as well as other information relating to the business of Salzburg Airport Group, its operational activities and future business strategies.

The obligation to maintain confidentiality with regards to sensitive information shall continue to apply even after termination of the employment relationship.

Suitable security measures shall be implemented for our IT systems and data. Such measures are constantly monitored and improved by a comprehensive information security management system (ISMS).

Salzburg Airport Group shall take the necessary measures to observe the provisions of the EU General Data Protection Regulation (GDPR) and any national data protection legislation to ensure legal compliance with personal data protection.

Official statements, notably such given to media representatives, shall exclusively be delivered by the CEO or specially designates persons.

Social media posts shall be exclusively managed by the Marketing Team, which is specifically authorised for this purpose.

That does not apply to publications in social media used for employer branding and as a communication channel between applicants and the company (e.g. Xing, LinkedIn) as well as publications to promote the 'amadeus terminal 2' on platforms such as Facebook.

3.6 Property of the company

We shall use our business assets properly and carefully. We shall not use company property for private or non-business purposes, excluding private use of company property as agreed contractually or arranged by company policies (e.g. permanently assigned company vehicles, rented equipment and rented vehicles).

Please always consider carefully whether you are using company property for the originally intended purpose or not.

3.7 Compliance with legal regulations and instructions from the employer

The company management and employees shall commit to complying with all regulations applicable to airport operations and other activities of the company (laws, directives, policies, etc.) and all internal rules (employee instructions, etc.).

The superiors shall notify all employees within their respective responsibility of the Code of Conduct and verifiably bring it to their attention.

3.8 Whistleblowing: Reporting channel

If employees notice any wrongdoings (e.g. corruption cases), they may report this in accordance with the Austrian Whistleblower Protection Act ('HinweisgeberInnenschutzgesetz', 'HSchG') via the internal mailing channel:

Hinweisgeber@salzburg-airport.at

The Whistleblowing Officer (Head of Compliance & Internal Audit) shall be responsible for confidential treatment of any notifications.

3.9 Resolving ambiguities

If any wordings in external or internal regulations remain unclear or if they may be interpreted ambiguously, these regulations shall be forwarded to the Department of Human Resources, Compliance & Legal Affairs for further investigation.

Salzburg, 20 July 2024



Bettina Ganghofer, MA
Managing Director