



# Responsible Business Policy

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**This Responsible Business Policy describes how Eindhoven Airport respects and ensures compliance with human rights.**

## **Colophon**

Responsible Business Policy

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**Eindhoven Airport N.V.**

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# Foreword

As part of the Royal Schiphol Group, Eindhoven Airport N.V. is also committed to more sustainable and high-quality aviation. Respecting and upholding human rights is essential to achieve this ambition. This is also in line with ESG core values and the company's wish to operate with integrity.

This Responsible Business Policy (the Policy) is derived from Royal Schiphol Group's overarching Responsible Business Policy. This Policy describes how Eindhoven Airport respects and ensures compliance with human rights, including with regard to the subjects of taxation, fair competition, bribery and corruption. It outlines which human rights are particularly relevant in relation to Eindhoven Airport's airport operations (Key Human Rights Topics), in line with the UN Guiding Principles on Business and Human Rights (UNGPs). Furthermore, the Policy outlines governance practices, including the processes implemented for preventing, ceasing and mitigating human rights violations, monitoring the implementation of the Policy and any remedial measures. In this way, the Policy ensures compliance with the Minimum Safeguards, as part of the EU Taxonomy.<sup>1</sup>

Eindhoven Airport strives to respect human rights and act in accordance with internationally recognised standards as set out in the Universal Declaration of Human Rights. Eindhoven Airport expects its suppliers and partners to do the same. Eindhoven Airport is committed to preventing any violation of human rights and encourages anyone to whom this policy applies to raise potential human rights violations and report them early through the reporting procedure (as described in chapter 7).

Do you want to know what you need to do as employee working at the airport, supplier, passenger or any other stakeholder? Then refer to chapters 4, 5 and 7.

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<sup>1</sup> Articles 3 and 18 of Regulation (EU) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.



# Commitment, vision and scope

## 2.1 Commitment and vision

We are committed to conduct business in a responsible and sustainable manner. Eindhoven Airport strives to contribute to positive changes that respect human rights and protect our environment. This Policy describes our commitment to respect and comply with human rights and other forms of responsible business.

Our commitment is in line with local and international standards relating to human rights, including but not limited to the OECD Guidelines for Multinational Enterprises (OECD MNE Guidelines), UNGPs and the ILO Declaration on Fundamental Principles and Rights at Work.

For the purpose of this Policy, Eindhoven Airport follows internationally recognised definitions of human rights. Human rights are basic rights and freedoms inherent to all human beings, regardless of their race, sex, nationality, ethnicity, language, religion or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and much more. Everyone is entitled to these rights, without discrimination.<sup>2</sup>

Through our Policy, we are committed to taking adequate measures to identify, prevent and mitigate the risk of adverse effects on human rights and other behaviour contrary to the responsible business principles as set out in this Policy, but also in other policies. In this context, a human rights due diligence process has been implemented in accordance with the six steps of the OECD MNE Guidelines and the UNGPs.<sup>3</sup>



Figure 1

<sup>2</sup> Definition of human rights according to the United Nations (as described on the UN website).

<sup>3</sup> [https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr\\_en.pdf](https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinessshr_en.pdf)

## 2.2 Scope

Compliance with applicable (human rights-related) laws and regulations is fundamental to the way we do business. Therefore, we promote the same principles in our relationships with customers, suppliers and other business partners. Eindhoven Airport requires that all employees, contractors and other third parties who act on behalf of Eindhoven Airport comply with the principles of this Policy. Furthermore, we expect Eindhoven Airport's suppliers to be informed of this Policy and will conform to it and endeavour to share the principles of this Policy with potential subcontractors. This Policy complements Eindhoven Airport's General Purchasing Conditions, Supplier Code and Code of Conduct.



# Governance

Our commitment to responsible business is established and supported by Eindhoven Airport's Leadership Team and Supervisory Board.

Eindhoven Airport's Leadership Team has adopted this Policy. The Leadership Team is responsible for following-up on the Policy, taking mitigating measures within their departments and ensuring compliance with applicable laws and internal and other regulations in their own operations. For various human rights topics, specific officers (internal Compliance Officers) have been appointed to oversee compliance with human rights topics assigned to them at Eindhoven Airport.

The COO oversees the overall implementation of this Policy and reports semi-annually (through the Corporate Compliance Officer) at the Leadership Team meeting on progress and impact. For the purpose of reporting, members of the Leadership Team provide information on the status of the Key Human Rights Topics under their responsibility and departments.

The Supervisory Board is updated annually of the progress and results in relation to this Policy.



# Key Human Rights Topics

In cooperation with Royal Schiphol Group, Eindhoven Airport periodically performs an analysis to identify, assess and evaluate the human rights that are most relevant to the organisation: the Key Human Rights Topics. The Key Human Rights Topics are also assessed against the outcome of the 'double materiality analysis' of the Corporate Sustainability Reporting Directive (CSRD), also leading to an overlap between the impacts, risks and opportunities with the Key Human Rights topics. We cooperate with relevant stakeholders on these topics.

We note that Eindhoven Airport commits to respecting all human rights. The Key Human Rights Topics only describe the human rights that are most relevant to Eindhoven Airport as an airport operator. Reviews and evaluations can result in the identification of new topics that can be identified as Key Human Rights Topics. This includes the identification of measures to prevent or mitigate potential human rights violations in these areas.

Currently, we have identified the following Key Human Rights Topics.

## 4.1 Equal treatment/ prohibition of discrimination

Eindhoven Airport strives to promote an inclusive and diverse environment in which all employees, passengers and other persons are treated with respect and equality, regardless of their background, religion, disability, sexuality or any other characteristic. Discrimination in any form will not be tolerated. We are committed to ensure that all Eindhoven Airport's policies are aimed at safeguarding equal opportunities, fair treatment and creating a culture of respect and understanding.

## 4.2 Freedom of association

Freedom of association is respected and protected at Eindhoven Airport. Employees of Eindhoven Airport and those of its partners have the right to form, join and/or leave associations, unions or other groups.

## 4.3 Freedom of belief, expression and religion

Eindhoven Airport recognises and respects the right to freedom of belief, expression and religion. At Eindhoven Airport, everyone may express their own beliefs through clothing, symbols or other features in accordance with reasonable regulations of Eindhoven Airport and those of its partner companies in this regard.

Everyone at Eindhoven Airport has the right to express an opinion, as long as this is done in a respectful manner and does not endanger the safety of others. Everyone visiting the airport, as well as employees, are encouraged to show respect towards the beliefs and opinions of others.



The right to freedom of expression and belief may be restricted on the basis of safety or public order.

## 4.4 Human dignity

Eindhoven Airport is committed to safeguarding the human dignity of everyone who visits or works at the airport. Any form of unwanted behaviour in the workplace or in any work-related circumstances outside the workplace, such as work-related events, will not be tolerated by Eindhoven Airport.

## 4.5 Working conditions

The term 'working conditions' refers to the context and conditions in which Eindhoven Airport employees perform their work. This includes various elements such as: safe and healthy working conditions, child and forced labour, work-life balance, adequate and equal payment and equal opportunities.

### 4.5.1 Safe and healthy working conditions

Eindhoven Airport considers the safety and health of its employees a top priority and is committed to creating and maintaining a safe working environment for everyone. All employees have a responsibility to follow health and safety regulations and actively contribute to a safe working environment as described in Eindhoven Airport's safety policy (Safety & Security Manual).

### 4.5.2 Child and forced labour

Eindhoven Airport maintains a strict zero tolerance policy on child and forced labour in all its operations and those of its partners. We follow the ILO definition of the minimum age for admission to employment or work, which is also in line with national legislation.<sup>4</sup>

### 4.5.3 Work-life balance

Eindhoven Airport aims to promote employee well-being and satisfaction by supporting a balance between professional duties and personal responsibilities. This means that employees have flexible working hours wherever possible. Agreements on work rhythms and working hours always take into account a good balance between the interests of the employee, the interests of Eindhoven Airport and the interests of the team.

### 5.4.4 Adequate and equal payment

Eindhoven Airport rewards all its employees fairly and equally for the same work or work of equal value. This applies to all internal and external employees, including full-time, part-time, temporary staff and trainees. The level of remuneration is determined based on criteria such as responsibilities, position and performance and not on personal characteristics or circumstances.

### 5.4.5 Equal opportunities

Eindhoven Airport aims to create a working environment with equal opportunities for everyone. Creating an inclusive and equal work culture where everyone has equal opportunities to grow and

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<sup>4</sup> [wetten.nl - Regeling - Verdrag betreffende de minimumleeftijd voor toelating tot het arbeidsproces - BWBV0003701 \(overheid.nl\)](https://wetten.nl/Regeling-Verdrag-betreffende-de-minimumleeftijd-voor-toelating-tot-het-arbeidsproces-BWBV0003701-overheid.nl)

where Eindhoven Airport has a discrimination-free environment to help achieve this. This means that decisions on appointment, promotion and training are made on the basis of qualifications and performance.

## 4.6 Liveable climate

A "liveable climate" refers to an environment where people can live pleasantly and in a healthy manner.

### 4.6.1 Air pollution

Eindhoven Airport is actively committed to reducing combustion emissions to protect both the environment and public health.

### 4.6.2 Noise pollution

Eindhoven Airport wants to make a positive contribution to residents' well-being by minimising noise pollution. Eindhoven Airport does this by implementing technical and operational measures that reduce noise pollution. More information can be found on [www.samenopdehoogte.nl](http://www.samenopdehoogte.nl).

## 4.7 Privacy

Protecting the privacy of all stakeholders involved and ensuring the security of all personal data collected is of great importance at Eindhoven Airport. Only personal data that is strictly necessary will be collected and processed. Before personal data is processed, consent will be sought where necessary. Eindhoven Airport also makes every effort to protect the personal data obtained in order to prevent data leaks. Please consult Eindhoven Airport's Privacy Statement for more information.<sup>5</sup>

## 4.8 Safety

Eindhoven Airport is committed to the safety and security of everyone at its airport area. This applies to all employees working at the airport, as well as to passengers and other visitors.

## 4.9 Human trafficking or smuggling

As the second largest airport in the Netherlands, Eindhoven Airport is a target for human trafficking and smuggling. The responsibility regarding human trafficking and smuggling lies with the Royal Netherlands Marechaussee. Eindhoven Airport is actively committed to protecting everyone at the airport, preventing human trafficking and smuggling, and cooperating with the Royal Netherlands Marechaussee. A zero tolerance policy is in place: if human trafficking or smuggling (including involvement or complicity) is found, immediate (legal) action will be taken.

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<sup>5</sup> <https://www.eindhovenairport.nl/nl/privacystatement>



# Other responsible business topics

Human rights are at the heart of the Minimum Safeguards (EU Taxonomy). The Minimum Safeguards also focus on taxation, fair competition and preventing bribery and corruption. According to the EU Taxonomy, inadequate or non-existent corporate due diligence processes on human rights, including - among others - taxation, fair competition and bribery & corruption, are a sign of non-compliance with the Minimum Safeguards.

The paragraphs below summarise these three topics as well as the criteria that apply.

## 5.1 Taxation

With regard to Eindhoven Airport's taxation approach, the OECD MNE Guidelines are to be followed. Eindhoven Airport ensures that the financial, regulatory and reputational risks associated with taxation are identified and assessed. This also includes the arm's length principle (the price agreed in a transaction between two related parties must be the same as the price agreed in a comparable transaction between two unrelated parties) to avoid inappropriate pricing.

To be compliant with the Minimum Safeguards in relation to taxation, Eindhoven Airport:

1. Has a governance structure that regards compliance as a key element of oversight. In addition, it has adequate tax risk management strategies and processes in place, as set out in the OECD MNE Guidelines covering taxation.
2. Prevents being found guilty of tax evasion.  
Eindhoven Airport uses a tax control framework as part of its overall risk management programme. The Finance department is charged with tax risk management.

## 5.2 Fair competition

Fair competition is reasonable and/or right competition in view of the interests of those competing. Specific legislation prescribes what is meant by fair competition and how organisations should deal with it.

To be compliant with the Minimum Safeguards in relation to fair competition, Eindhoven Airport:

1. Promotes employee awareness of the importance of compliance with all applicable competition laws and regulations and trains senior management in relation to competition issues.
2. Prevents the company or its senior management, including the senior management of its subsidiaries, being found not guilty of violating competition laws.

Eindhoven Airport operates in a highly regulated environment and since the introduction of the Dutch Aviation Act in 2006, the airport charges have been subject to independent regulation, supervised by the Netherlands Authority for Consumers & Markets (ACM).

## 5.3 Bribery and corruption

Bribery is the act of offering someone money or something valuable to persuade them to do something in return. Corruption is a form of dishonesty or criminal offence which is undertaken by a person or organisation which is entrusted in a position of authority to acquire illicit benefits or abuse power for personal gain.

Eindhoven Airport has a role to play in avoiding bribery and corruption. To be compliant with the Minimum Safeguards in relation to fair competition, Eindhoven Airport:

1. Developed adequate internal controls, integrity programmes or measures for preventing and detecting bribery.
2. Prevents the company or its senior management, including the senior management of its subsidiaries, being convicted on corruption and bribery.

Eindhoven Airport employees are expected to act with the utmost integrity at all times. To ensure this, Eindhoven Airport maintains a compliance policy, the Code of Conduct and the Supplier Code, which includes the topics of bribery and corruption and seeks to prevent potential integrity-related risks. These high standards also apply to the relationship with Eindhoven Airport's third-party suppliers and partners.

The principles relating to bribery are embedded in the Code of Conduct and the Supplier Code. The Code of Conduct gives specific mention to fraud and corruption. Reference is also made to business relations setting out Eindhoven Airport's policy on gifts, events, travel, sponsorship and donations. It also includes procedures on reporting suspected fraud, corruption or other misconduct.

We expect ourselves and our suppliers to act in accordance with the United States Foreign Corrupt Practices Act (FCPA), the (UK) Bribery Act, the Prevention of Money Laundering and Terrorist Financing Act (WWFT), the United Nations Convention against Corruption (UNCAC) and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

# Risk analysis

As part of the human rights due diligence process, Royal Schiphol Group has applied a systematic and structured approach to conduct a human rights risk analysis, accumulating into a risk register. This analysis was also conducted for Eindhoven Airport as part of the Royal Schiphol Group. The purpose of this analysis is to identify the Key Human Rights Topics and to mitigate and manage potential human rights risks associated with our operations, value chain, and other business activities. Part of the analysis also includes measuring the impact of these risks on affected stakeholders (both internally and externally). Our objective is to ensure transparency and accountability in dealing with human rights risks.

The identification of human rights risks consists of a yearly review of Eindhoven Airport's operations and value chain. This participatory evaluation includes the involvement of both internal and external stakeholders as well as desk research (including the airport sector and NGOs). The involvement focuses on Eindhoven Airport's impact on human rights risks that may arise in our value chain, and the stakeholder groups that may have been affected by these risks.

After the identification of the Key Human Rights Topics, risks have been assessed according to their likelihood and potential impact (Figures 2 and 3). The risk matrix is aligned with the UNGP (principle 14)<sup>6</sup> and Royal Schiphol Group's enterprise risk management approach.

Level of severity	Low	Moderate	High	Very high
	1	2	3	4
<b>Scale</b>	Minor impact to health and safety: first aid case	Slight impact to health and safety: minor injury or illness (no loss of time)	Moderate impact to health and safety: serious injury that needs rehabilitation	Significant impact to health and safety: physical disability or fatality
<b>Scope</b>	No negative impact to stakeholder(s)	Impact to some stakeholders in a particular stakeholder group	Impact to most stakeholders in a particular stakeholder group	Impact to all stakeholder groups (such as local residents, employees and suppliers)
<b>Remediation</b>	Takes less than a year (1< year) to restore the impact	Takes 1 to 3 years to restore the impact	Takes 3 to 5 years to restore the impact	Impossible to restore or will take longer than 5 years (>5 years) to restore the impact

Figure 2

<sup>6</sup> [guidingprinciplesbusinessshr\\_en.pdf \(ohchr.org\)](https://www.ohchr.org/en/guidingprinciplesbusinessshr_en.pdf)

Level of likelihood	Very unlikely	Unlikely	Likely	Very likely
	1	2	3	4
	Human rights violation has never occurred in the company's business activity, but it happened to peers (never/unlikely to happen in 3 years)	Human rights violation occurred in the past and may continue to occur sometimes in a department (occurred/may happen once every 3 years)	Human rights violation has occurred in the past and may continue to occur frequently today in a department (occurred/may happen once a year)	Human rights violation has occurred in an ongoing manner until now (occurred/may happen several times a year)

Figure 3

For each risk, the inherent risk and accompanying risk level were determined. Following this, mitigating measures and controls were identified and assessed to determine the residual risk. The residual risk is mapped against Eindhoven Airport's risk appetite to determine to what extent the residual risk is acceptable to Eindhoven Airport. The risk appetite differs per topic. If necessary, further mitigating measures are identified and an action plan is drawn up to enhance policies, procedures and due diligence processes to prevent potential human rights violations. Lastly, the risk register has been complemented by an overview of incidents or violations that Eindhoven Airport has encountered, if any, including an explanation of the incident and the remedial action that followed.

The outcome of the risk analysis is discussed with the Leadership Team and relevant departments within Eindhoven Airport on an annual basis. Eindhoven Airport strives to address identified human rights risks, including regularly reviewing and updating the risk register by conducting human rights risk analyses.



# Cease, prevent or mitigate

At Eindhoven Airport, we are committed to upholding the highest standard in terms of respecting human rights and integrity in all aspects of our operations. We recognise the importance of providing a safe and respectful environment for everyone associated with our organisation. If you think there has been a violation of human rights or an integrity issue that relates to Eindhoven Airport (see Chapter 2 for the definition of human rights), we encourage you to report this by means of the reporting procedure below.

## 7.1 Reporting procedure

### 7.1.1 Contacting the Integrity Reporting Centre

If there are concerns related to human rights violations or other violations related to this Policy, please contact the Meldpunt Integriteit (Integrity Reporting Centre) by sending an email to: [meldpuntintegriteit@eindhovenairport.nl](mailto:meldpuntintegriteit@eindhovenairport.nl).

### 7.1.2 Detailed complaint submission

Provide a detailed account of the alleged violation. Include at least the following information:

- Your name and contact information;
- A comprehensive description of the incident;
- Any relevant supporting documents or evidence;
- Date, time and location of the incident; and
- Names and positions of individuals involved (when known).

### 7.1.3 Anonymous complaint submission

We also provide a confidential and anonymous reporting mechanism to encourage individuals to report any observed or experienced human rights violations. This includes a Royal Schiphol Group anonymous Integrity Reporting Line. A report can be made by calling the freephone number, 0800 022 2931 or by [completing the online report form](#) (access code 73371). External parties can also use the Integrity Reporting Line if they wish to report any improper conduct within Eindhoven Airport. The report should then state that it is about Eindhoven Airport.

### 7.1.4 Investigation process

In the event of a (potential) human rights violation, the internal manager of the relevant human rights topic can investigate the alleged violation. This may include, for example, conducting interviews with those involved, reviewing documents and/or any other form of evidence, and collaboration with a relevant department and/or (third) parties. All reports of human rights violations are processed and evaluated within the relevant department and/or external party.

### 7.1.5 Resolution and corrective actions

When actual or potential human rights impacts are identified where Eindhoven Airport is involved, it will be assessed whether Eindhoven Airport has caused, contributed to, or is indirectly linked to the

impact. Eindhoven Airport will take appropriate measures to enable remediation in accordance with the OECD MNE Guidelines.

If Eindhoven Airport causes a violation of a human right, appropriate measures are taken to cease, prevent or mitigate the impact:

- **Cease:** immediate action to stop any persistent violation or improper conduct. This may also include HR-related measures.
- **Prevent:** implementation of preventive measures, including additional training, policy enhancements or procedural changes.
- **Mitigate:** measures to mitigate the impact of the violation, such as support for affected individuals or implementing safeguards to prevent recurrence.

If Eindhoven Airport has contributed to the harmful impact, measures are taken to cease, prevent and mitigate the harmful impact to the extent of the magnitude of the contribution. Eindhoven Airport will make further efforts (as far as its influence reaches) to mitigate any remaining negative impacts. If Eindhoven Airport is directly linked to an adverse impact, Eindhoven Airport will use its influence to mitigate the adverse impact.

To meet our responsibility, we strive to continuously improve our due diligence process to identify, cease, prevent and mitigate actual or potential human rights violations. This applies both to violations caused by Eindhoven Airport itself, which we contribute to through our own activities, or which we can be directly linked to through our business relationships.

#### **7.1.6 Feedback and communication**

We are committed to keeping you informed of the progress of the investigation and the actions taken to address the issue. Your feedback is valuable in helping us to continuously improve our processes.

We take all complaints related to human rights and integrity seriously and are dedicated to resolving them promptly and effectively. Your willingness to voice your concerns is essential in maintaining a culture of accountability and transparency within our organisation.





# Monitoring and tracking

In our commitment to upholding human rights within Eindhoven Airport, we recognise the importance of implementing robust monitoring and tracking procedures to ensure a safe and respectful environment for all individuals associated with our organisation. This procedure is designed to proactively identify, address and prevent potential human rights violations.

## 8.1 Monitoring and tracking procedure

### 8.1.1 Identification of key risk areas

We have identified key risk areas and potential human rights issues within our organisation. These areas may include but are not limited to recruitment practices, employee relations, workplace discrimination and interactions with external stakeholders.

### 8.1.2 Regular training and awareness programmes

Continuous training programmes will be conducted to educate employees and stakeholders on human rights principles and the organisation's commitment to upholding them. These programmes will focus on recognising and preventing potential violations.

### 8.1.3 Documentation and record-keeping

The internal Compliance Officer of a human rights topic will maintain detailed records of reported incidents, investigations, and actions taken. This documentation will include the nature of the complaint, steps taken to address it, and any corrective measures implemented.

### 8.1.4 Regular audits and assessments

Scheduled audits and assessments will be conducted to evaluate the effectiveness of our human rights policies and procedures. These assessments will include, among others, a review of training programmes, incident reports, and the overall organisational culture regarding human rights.

### 8.1.5 Collaboration with external parties

We will collaborate through Royal Schiphol Group with external parties, such as human rights organisations or independent auditors, to ensure an impartial evaluation of our efforts and identify areas for improvement.

### 8.1.6 Immediate response to reported violations

The internal Compliance Officer will initiate an investigation upon receipt of a report of a human rights violation. In the event that a violation is found, appropriate measures will be taken in time to correct the situation.

### 8.1.7 Periodic reporting

The COO will share (through the Corporate Compliance Officer) periodic reports with Eindhoven Airport's Leadership Team. This includes the status of human rights topics (including monitoring and supervision), including any trends, patterns, or emerging issues.

## 8.2 Continuous improvement

We are committed to continuously improve our human rights policy and procedures related to its monitoring. Feedback from stakeholders and lessons learned from investigations will be used to improve our policies and processes.

We believe that proactive supervision and monitoring are essential elements in maintaining an organisational culture that respects and guarantees human rights. Your collaboration and commitment to this procedure contribute to our collective effort to create a just and inclusive working environment.



# Stakeholder engagement and communication

Compliance with our Policy requires consistent and clear communication at all levels of our organisation and value chain. Understanding the Policy is important to its effectiveness. We promote awareness, including through information campaigns, and encourage open discussions on how to improve and implement these values in our day-to-day business.

We communicate proactively with stakeholders and offer various channels for them to engage with us. We seek to understand their perspective on our products and services, our business performance, our role in society and other topics. This input is used in both defining our strategy and our decision-making processes and tells us how we can align the interests of our organisation with the interests and expectations of our stakeholders and society.

We maintain contact with many different stakeholders in different ways: our own employees, employees of other and/or contractual parties, passengers, local communities and supervisory authorities. Employees are continuously consulted through work and team meetings and they have regular contact with managers. Moreover, annual employee surveys are conducted for Eindhoven Airport employees. There are regular meetings between Eindhoven Airport management and the Works Council.

This Policy will be circulated through specific communication initiatives. Our priority is to create an atmosphere of tolerance and transparency. Therefore, we encourage colleagues to raise their concerns. It is important for us to have clear and easy reporting channels, as described in this Policy. The resources are available on our website and internal communication platforms. Employees are encouraged to make use of these.

In accordance with this Policy, Royal Schiphol Group's annual report reports to the public on our human rights commitments, efforts and statements within the Royal Schiphol Group, of which Eindhoven Airport is part. This reporting includes a reference to the UNGP Reporting Framework. We actively engage with relevant stakeholders, recognising their role in providing information on our due-diligence processes and the development of effective remedies. We communicate regularly and transparently about our efforts to ensure respect for human rights, including by reporting our human rights-related efforts in line with applicable non-financial reporting standards, and participate in special forums to share lessons learned and develop best practices for our industry. We investigate issues as they arise. Issues are discussed with the Executive Team and shared as needed with others within the organisation to ensure appropriate action is taken. When we deem it necessary, we post updates to policies, resources, and positions on our communication platforms in response to stakeholder queries on key issues.



# Remediation

Promoting human rights means both preventing potential violations and addressing them promptly, as well as seeking appropriate solutions when human rights are violated (see also Chapter 7). We encourage a culture of open feedback. Therefore, having reporting mechanism in place for employees, passengers, business partners and other relevant stakeholders is important for effective remediation.

Eindhoven Airport aims to provide an accessible and transparent process to handle reports in a systematic manner. We urge stakeholders who witness or suspect a possible violation of this Policy within the (value chain of) the organisation to raise their concerns with their manager, a colleague within Human Resources or Legal, or with a confidential advisor.

Employees and other stakeholders can also report their concerns through the reporting procedure described in Chapter 7.

If you are dissatisfied with the outcome of our internal investigation, you have the option to escalate the matter to relevant external authorities, such as human rights organisations or regulatory bodies.

# Abbreviations list

Abbreviation	Meaning
ACM	Netherlands Authority for Consumers & Markets
Key Human Rights	Human rights that are in particular relevant to Eindhoven Airport's airport operations
CSRD	Corporate Sustainability Reporting Directive
FCPA	United States Foreign Corrupt Practices Act
Minimum Safeguards	These safeguards ensure that companies engaging in sustainable activities meet certain standards when it comes to human and labour rights, bribery, taxation and fair competition
NGO	Non-Governmental Organisation
OECD MNE Guidelines	OECD Guidelines for Multinational Enterprises
Policy	This Responsible Business Policy
RSG	Royal Schiphol Group
UNCAC	United Nations Convention Against Corruption
UNGP	UN Guiding Principles on Business and Human Rights
WWFT	Wet ter voorkoming van Witwassen en Financieren van Terrorisme (Prevention of Money Laundering and Terrorist Financing Act)