



Code of conduct

issue 1-7-2022

Code of Conduct

This is the Code of Conduct of Eindhoven Airport N.V. The Code describes what we expect from you and how we treat each other and relations.

Colophon

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Issue 1-7-2022

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Foreword

We make our region even better. That is our purpose.

The fulfilment of our purpose offers great opportunities, but with that comes great responsibility. A connecting and human airport, a good neighbour, a dignified entrance and an inspiring testing ground is shaped by all of us.

This means that you, too, are an important link in this. Because our success is determined by the way you do your work for Eindhoven Airport, how you behave and how you cooperate with others.

But what do we actually expect from you: what behaviour is desirable and what suits Eindhoven Airport? What is integrity and how do we deal with it? And also very important: what to do and what not to do? The Code of Conduct has been drawn up for this purpose. The Code serves as a guide to what you should do and what you should refrain from doing while working for Eindhoven Airport.

The Code of Conduct is there for everyone, including us. It goes without saying that we are aware of our behaviour and comply with this Code to the best of our ability. We all have an exemplary role to play. Travellers, colleagues, customers, neighbours and partners should be able to trust and rely on our integrity. Because this is the only way we can continue to connect and improve ourselves.

So read the Code of Conduct carefully and put it into practice in your daily work, because whatever work you do, you are important and you make the difference. When reading the Code of Conduct, you should come across actions that are logical and obvious to you. We also encourage you to make your colleagues aware of the Code of Conduct and confront them about their behaviour. If you observe any deviations from the Code of Conduct, you should use the reporting procedure. Discuss dilemmas with each other or with your supervisor.

We are confident that together we are able to ensure compliance with our Code of Conduct.

We thank you in advance for your cooperation!

Eindhoven Airport Leadership Team

Roel Hellemons, Mirjam van den Bogaard, Michelle van Waasdijk,
Olaf Broeders, Niels Huybregts & Mark Botter

Who is this Code of Conduct for?

This Code of Conduct is for everyone who wants to work, is going to work, works or has worked for or at Eindhoven Airport. So the Code applies to you if you:

- have an employment contract with Eindhoven Airport N.V.;
- work at or for Eindhoven Airport as a contractor;
- have access to Eindhoven Airport's computer or other network (on behalf of Eindhoven Airport);
- use Eindhoven Airport's computer network (through an @eindhovenairport.nl e-mail address).

The Code of Conduct also applies to persons whose employment contract or contract for services with Eindhoven Airport has ended or is yet to start (including job applicants).

Finally, we require our supply chain partners to act in line with this Code of Conduct, as also follows from the [Supplier Code](#).

Introduction

The Code of Conduct is about how we do our work and how we cooperate with other parties. So whatever work you do, you are important and you can make a difference. The Code of Conduct serves as a guide in this regard.

You should work in line with the code of conduct, but also help others do the same. A key principle here is to **Speak Up**: ask questions and discuss dilemmas. Confront each other about behaviour that is not in line with the Code of Conduct. In doing so, you help prevent abuses and incidents as much as possible.

If you suspect that someone is acting in violation of the Code of Conduct, you are obliged to report it. You can make a report in the following ways:

- to your supervisor or a senior manager;
- directly or through the (anonymous) Integrity Reporting Line to the Integrity Committee;
- or to the (external) confidential counsellor.

The contact details of the confidential counsellor can be found on [the HR page at Serviceplein](#).

Besides making a report through the (internal) channels mentioned above, you can report any abuses or violations of Union law directly to a competent external authority (such as the police, Fiscal Intelligence and Investigation Service (FIOD) or Human Environment and Transport Inspectorate (ILT)). This can be done, for example, in the event of a threat of imminent danger.



General principles

Our reputation depends largely on the professional behaviour and actions of our internal and external employees. Be aware of that. We expect you, as an Eindhoven Airport employee, to always act in the interests of Eindhoven Airport.

Importantly, you (whether on behalf of Eindhoven Airport or not) must always comply with all relevant laws and regulations. Examples are national and international legislation on safety, security, environment, anti-discrimination, human rights, competition, procurement, privacy, fraud and bribery. You should also adhere to internal regulations and procedures, such as the [house rules](#) and the rules from the [Safety & Security Manual](#).

Confidentiality and ancillary activities

Eindhoven Airport has a duty of confidentiality. The conditions can be found in the [Terms and Conditions of Employment](#).

Preventing conflicts of interest between employees

We are reluctant when it comes to hiring immediate family members of employees (under an employment contract or otherwise). Of course, there is no absolute prohibition. The intention is to avoid even the theoretical possibility of family members getting into a conflict of interest. This is also important for internal mobility: if there are family ties between an applicant and other employees, we take that into consideration.

Speaking on behalf of Eindhoven Airport

Within Eindhoven Airport, the Communications department is responsible for communications to the media, for example. Messages are always coordinated with the (relevant) members of the LT. If you are approached by the media as an Eindhoven Airport employee, please contact the Communications department first for further coordination.

Social Media

Are you active on social media? Nice! Eindhoven Airport encourages the use of social media. So use them if you like it and if they do not interfere with your work. When communicating externally, always realise that Eindhoven Airport's reputation partly depends on the actions of its employees. Please refer to [Use of social media](#).

Follow the code of conduct

We assume you comply with the Code of Conduct. We encourage this and we are happy to help you with, for example, our Onboarding and an E-learning. We also monitor compliance with the Code of Conduct. If the Code of Conduct is violated, we may impose disciplinary or other measures. Depending on the nature and severity of the misconduct, examples of such measures are: an official warning, fine, suspension of pay, pay freeze, suspension and dismissal.

What do we expect from you and other colleagues?

Below, we set out what the above principles mean in concrete terms.

- Always act in the interests of Eindhoven Airport.
- Be a good colleague and act respectfully towards colleagues.
- Comply (whether or not on behalf of Eindhoven Airport) with all relevant national and international laws and regulations.
- Follow relevant internal regulations and procedures.
- Talk to your colleagues if you notice they are not following rules and agreements.
- Maintain confidentiality about all information on Eindhoven Airport that you know or should know is confidential.
- Ask permission from the Communications department or LT beforehand if you want to give information to a journalist and also when being invited to speak or give a presentation for or on behalf of the company. Inform not only your supervisor but also the Communications department when you are invited to speak or give a presentation for or on behalf of the company.
- Report a suspected breach of the Code of Conduct to your supervisor or a senior manager, directly to the integrity committee or to the (external) confidential counsellor. ([see Chapter 13](#))



Responsibilities of supervisors

Optimal leadership

As a supervisor, you have a role model function. Therefore, not only do you yourself act in line with the Code of Conduct, but you also have a stimulating, signalling and corrective role.

What do we expect from you?

- Always set a good example.
- Make sure colleagues in your team are aware of the Code of Conduct.
- Be alert to violations of the Code of Conduct and report them.
- Make dilemmas a subject of discussion.
- Encourage colleagues to always report a (possible) violation of the Code of Conduct.



Manners

Inclusiveness

Working together in a pleasant way and properly achieving our results is only possible in a socially safe working environment. Respect for each other is our guiding principle. So refrain from all undesirable manners.

Undesirable manners are in any case: approaching someone in such a way that this person experiences (or may experience) the approach as threatening, humiliating, discriminatory or intimidating. This includes the following situations in any case:

- A. Sexually transgressive behaviour: sexual attention that the employee perceives as unwanted and threatening and that may harm the working relationship.
- B. Aggression and violence: psychologically or physically harassing, threatening or assaulting someone during work or in connection with work.
- C. Discrimination: unlawful discrimination between groups or individuals based on age, sexual orientation, religion and belief, race, gender, nationality, disability or chronic illness, political opinion, marital status, working hours, employment contract or on any ground whatsoever.
- D. Bullying: the situation in which one or more employees systematically hurt and/or harass another employee.

What do we expect from you?

- Refrain from any manners that could be considered undesirable.
- Act respectfully towards colleagues and third parties, such as passengers.
- Report any undesirable manners you observe. You can do this to your supervisor or a senior manager. If you do not want this or if this is not possible, you can also contact the confidential counsellor. It is also possible to make a report to the Integrity Committee. More information can be found in the [internal reporting scheme in Chapter 13](#).



Access to Eindhoven Airport

To perform your duties for Eindhoven Airport, you have an Airport Identification Card. The Airport Identification Card is a personal identification document and allows access to secure areas in some cases. So it is important to be very careful when using the Airport Identification Card.

Apply for a security clearance first

You don't get an Airport Identification Card right away. Before your work begins, you must first have a security clearance. You can apply for an Airport Identification Card once you have obtained a security clearance. More information on the conditions and use of the Airport Identification Card can be found in the [house rules](#) and [Access Policy](#).

What do we expect from you?

- Obtain a security clearance before you start working for Eindhoven Airport.
- Keep your Airport Identification Card safe.
- Never lend your Airport Identification Card to another person or provide another person with access using your card.
- Always carry the Airport Identification Card visibly when working in secure areas.
- Have you lost your Airport Identification Card? Please report this as soon as possible to the Badge Centre (040-2919840) or, if there is no answer and outside office hours, to the Airport Operations Department (040-2919823).



Safety & Sustainability

Safety

Safety is our top priority. A safe, healthy (working) environment at our airport is a responsibility of all parties involved. Together with our partners, we work to ensure the safety of passengers and visitors to Eindhoven Airport while maintaining the highest safety standards in the workplace. As operator, Eindhoven Airport N.V. monitors compliance with the rules. The safety management system ensures safety at the airport. Identifying incidents, recognising trends, analysing the incidents and implementing improvement potential are of great importance. The long-term ambition is zero security incidents. Because if it is possible to have zero incidents in one day, it is also possible to have zero incidents in a week, in a month and in an entire year.

What do we expect from you?

- Take responsibility by working safely and complying with laws and regulations.
- Comply with the rules that apply on the airport site, such as the Eindhoven Airport [house rules](#), the [Safety & Security Manual](#) and the HSE standard for construction, maintenance sites.
- Confront internal and external colleagues, including supervisors, when (potentially) unsafe work situations occur.
- Report (potentially) unsafe situations, incidents and accidents, and take action.

Reporting incidents

FIRE | ACCIDENT | SOMEONE BECOMING UNWELL

- Report fire immediately via fire alarm or the emergency number 040-2919844
- If any accident occurs or if someone becomes unwell, you should report this by calling 040-2919823/4 or, in case of an emergency, by calling the emergency number 040-2919844
- Report the nature and location and whether there are any victims (how many?)
- State your name and where you can be reached.
- Try to extinguish incipient fires, but never put yourself in danger.
- Help others to safety if necessary.
- Never use the lift in case of fire

EVACUATION

- Switch off electrical appliances and close windows in rooms where no staff are present
- In the event of an evacuation, leave the building immediately via the designated escape routes
- Follow the instructions of the emergency response officers
- Escort visitors out of the building
- Proceed to the assembly point (follow the instructions of the emergency response officers)
- Remain at the assembly point and wait for further instructions

MALFUNCTIONS | DAMAGE | LEAKAGE

- Report malfunctions, damage and leakage directly through the Airport Operations department
- Try to limit the malfunction, damage or leakage but never put yourself in danger
- Do not drive or walk through leaked liquids

UNSAFE SITUATIONS | SUSPICIOUS SITUATIONS | UNATTENDED LUGGAGE

- Always pay attention to your own safety
- Be alert to anything out of the ordinary, e.g. suspicious behaviour of persons/passengers and unattended luggage
- Report unattended luggage, unsafe or suspicious situations immediately to the Airport Security Control Room 040-2919841

PUBLIC ORDER | THEFT

- Report situations that require the arrival of the Royal Marechaussee by calling 088-9580433 (EMERGENCY e.g. vandalism or fighting) or 088-9580231 (NO EMERGENCY e.g. shoplifting)
- Then report to the Airport Operations department at 040-2919823/4 that the Royal Marechaussee has been called in (except for theft)

Sustainability

Eindhoven Airport wants to contribute to sustainable aviation. Any development of the airport must be responsible and sustainable: reduced noise pollution and environmental impact; especially reducing emissions of CO₂ and nitrogen, among others, are basic requirements. As an employee, you contribute to this in the performance of your duties. Key sustainability goals for 2030 include: emission-free and waste-free airport. Together with sector and non-sector partners, Eindhoven Airport is working on making the aviation sector more sustainable. In doing so, Eindhoven Airport is also implementing the United Nations' Sustainable Development Goals.

What do we expect from you?

- Include sustainability in your work.
- Put sustainability regularly on the team meeting agenda.
- Lock your screen or log off when you are no longer using your computer, separate your waste and use refillable bottles and cups as much as possible.



Contacts with external relations

If you maintain contacts with external relations, the interests of Eindhoven Airport always come first. You always act correctly and transparently in contacts with external relations.

Always avoid ending up in a (seemingly) dependent position by mixing business and private interests. By private interests, we mean your personal interests, as well as interests of partners and relatives by blood or marriage up to the third degree. Avoid even the appearance of being influenced.

You are not allowed to solicit or accept money or other means of payment from current or potential external relations. Nor should you accept any gifts, entertainment, favours or services if this is not in line with this Code of Conduct.

Business gifts

Are you offered a personalised business gift? You may accept one gift per supplier per year. But this is only allowed if the market value of the gift does not exceed € 100. Of course, you should only accept a gift if you have a clear business relationship with the supplier. If you are offered a business gift that violates this policy, you should discuss it with your supervisor immediately.

If Eindhoven Airport is offered (through you as an employee) a gift that is not covered by this scheme, the decision may be made to still accept this gift for Eindhoven Airport. This is only possible in a very exceptional situation in which accepting the gift is in the interests of Eindhoven Airport and after consultation with and with written permission from the LT.

All employees must avoid a conflict of interest (and the appearance thereof) at all times.

Events

If you get an invitation from customers or suppliers to attend an event (e.g. a football match, golf event, company anniversary, theatre visit or exhibition), the following rules apply:

- You immediately inform your supervisor that a party has invited you to an event.
- Your supervisor will decide in consultation with you whether you can reasonably accept the invitation, what conditions, if any, will apply, and how the inviting party will be notified.
- You will pay for any travel and accommodation costs associated with the event yourself. You may be able to claim these costs under the claims policy.

Company visits

If you visit companies of customers or suppliers as part of your work for Eindhoven Airport, you pay any costs of those company visits yourself and claim them from Eindhoven Airport afterwards. Always be aware that you are representing Eindhoven Airport during a company visit. Act accordingly.

Business trips

Also adhere to this Code of Conduct during business trips.

Sponsorship and donations

We have a strict policy on sponsorship and donations on behalf of Eindhoven Airport. Requests for sponsorship or donations should always be submitted to the management. Such a request will be approved only after the management board has given its consent. Sponsorship and donations at the departmental level or from the departmental budget are not allowed.

If external parties (such as suppliers) request or receive sponsorship or donations from Eindhoven Airport, please take this Code of Conduct into account. Keep the business relationship in mind. If you make a personal sponsorship or donation request yourself, for example on LinkedIn, you should always say that it is a sponsorship or donation request in a personal capacity and that any acquisition based on the sponsorship request is not appreciated.

Interest in an external party

If you have or will acquire a direct or indirect substantial interest in a (potential) contractor of Eindhoven Airport or an affiliated entity, you are obliged to notify your supervisor in writing in advance.

What do we expect from you?

- Act in line with the policy described above for contacts with external relations. If you are unsure how to act in a certain situation, you should always discuss this with your supervisor immediately.

Do you work in the Commercial department and/or deal with real estate-related issues?

- You may not conduct real estate transactions for your own account in the airport area (Eindhoven Airport business park and Flight Forum) without the management board's permission. Examples are acquiring, developing, disposing of or participating in real estate or real estate securities. This prohibition obviously does not apply to usual transactions, such as the purchase of a home. This provision also applies to employees who do not work in the Commercial department, but who have knowledge of or are involved in specific real estate-related issues based on their job.



Responsible business conduct

Collaborating

We conduct business with external parties in a responsible and professional manner. Therefore, when dealing with third parties, we always observe the following principles:

- Choose reliable partners (relations, suppliers and service providers).
- Do not give these partners any private assignments.
- Put material arrangements, agreements and contracts in writing.
- Temporarily freeze the relationship if a partner knowingly violates the law or a substantial provision of the Eindhoven Airport Code of Conduct. Then consult your supervisor about possible termination of the relationship.
- Pay close attention to all payments made by Eindhoven Airport (directly or indirectly, now or in the future) that are related to a supplier order. Ensure that those payments only benefit that supplier's business and no one else.
- Ensure you are not doing business in or with countries against which international sanctions have been declared.

Fair treatment of external relations and fair competition

At Eindhoven Airport, we consider it important to deal with our external and potential contracting partners in a businesslike and professional manner. Therefore, always act in line with the following policy:

- External relations and suppliers are given equal opportunities to compete for contracts.
- Potential contracting partners are provided with the same information.
- Information provided to external relations and suppliers is correct, neutral and not misleading. Engage the responsible procurement officer and/or legal counsel in a timely manner.
- Handle internal and external information with care by, for example, following instructions on information security policies.
- Make sure you do not become dependent on a company in any way (unless it can be justified).
- Treat information coming from a contracting partner as confidential and do not share it with other contracting partners.
- Do not make prohibited price agreements.

Contact the Legal department if you have any questions on this topic. More information can also be found in the [Supplier Code](#). This helps us do business responsibly and ensures that suppliers are also bound by values that Eindhoven Airport considers important.

Tendering

Eindhoven Airport is liable to tender under certain circumstances: certain contracts must be put out to tender in the market. The aim is to give parties equal opportunities and promote fair competition. If you are involved in a tendering process, do not talk to interested/participating parties outside the framework of the tendering process.

Contact the Procurement Manager if you have any questions about tendering.

Contacts with administrative level

Within Eindhoven Airport, the LT and the Legal & Corporate Affairs department have contacts with the administrative level, such as government, civil servants and politicians. Any of your contacts with government authorities should be coordinated with your immediate LT member.

What do we expect from you?

- Act in line with the policy described above for fair treatment of external relations and for fair competition.
- If you are unsure how to act in a certain situation, you should always discuss this with your supervisor immediately.



Use of IT facilities

If Eindhoven Airport makes certain IT facilities available for your work, the [Digital Terms of Use](#) apply. Facilities provided are always for business use. Careful use is paramount.

If your employment contract or contract for services is terminated, you must hand in all Eindhoven Airport property.

The [Digital Terms of Use](#) contain more information and rules about the following topics:

- Use of IT facilities
- Digital Identity
- Use of e-mail
- Use of Internet
- Use of instant messaging
- Use of social media
- Use of smartphone, tablet or laptop
- Storage of information
- Copyright
- Private use
- Control
- Adoption and publication

What do we expect from you?

- Handle IT facilities with care.
- Read the [Digital Terms of Use](#) and act accordingly.
- If you have any doubts or questions, contact the IT Service Desk (040-2919847 or it@eindhovenairport.nl).



Privacy, cyber security, records management

Eindhoven Airport processes a lot of different data that we receive and share with various parties. The basic principle is that passengers, customers, business partners and employees can trust us when we process their personal and other data. Non-compliance with privacy laws or incidents involving personal data can have adverse consequences for data subjects. Moreover, they can seriously damage Eindhoven Airport's reputation and lead to high fines and claims.

If you store and archive documents, you are responsible for ensuring that this is done properly. Make sure documents are easy to find and retrieve. In doing so, follow the [Privacy](#) and [Information Classification](#) policy, and take into account the applicable retention periods. Make sure you grant the right authorisations. We always keep company-sensitive and/or competitively sensitive information secure, both physically and digitally.

What do we expect from you?

- Commit to a high level of personal data protection.
- Know what to do to protect personal data and the data of Eindhoven Airport so that no data breaches occur.
- Report a (potential) data breach to the IT Service Desk.
- Make sure you are aware of the [privacy policy](#).
- When processing personal data, act in accordance with the 10 basic principles for processing personal data contained in the [privacy policy](#).
- Know which privacy colleague (or Privacy Officer) to go to for questions and advice.
- Classify information, store it with appropriate authorisation, and always share it in accordance with the [Information Classification Policy](#).
- Be aware of the risks of sharing information. Always keep company-sensitive and/or competitively sensitive information secure, both physically and digitally.
- Act according to the [Digital Terms of Use](#); do not share passwords, do not click on unknown links and do not open unknown attachments.



Fraud and corruption

Eindhoven Airport has a zero tolerance policy when it comes to fraud and corruption. In addition, Eindhoven Airport expects employees to act with financial transparency.

By fraud we mean all unauthorised, deliberately caused irregularities, by which the fraudster or an acquaintance of the fraudster intends to achieve material or immaterial gain, and which can lead to damage for Eindhoven Airport and/or for employees involved.

Corruption means offering and promising unlawful or undue financial or other benefits to employees of (potential) business relations, government officials, candidates for public office and political organisations as well as accepting and demanding unlawful or undue financial or other benefits. It does not matter whether an employee does this himself or works with a middleman. Corruption also includes all forms of extortion, embezzlement and facilitation payments.

What do we expect from you?

- Report any suspicion of fraud and corruption to your supervisor or a senior manager, directly to the integrity committee or to the (external) confidential counsellor. More information about this can be found in the [internal reporting scheme in Chapter 13](#).



Subversion and other criminal activities

Sometimes criminals try to abuse our infrastructure, our operations and the companies at Eindhoven Airport. Being a logistics hub and gateway to the Netherlands and Europe unfortunately also attracts criminals. At Eindhoven Airport, we are alert to it, and it helps if you are alert too.

To maintain a safe airport, you are therefore expected to report any suspicion and/or signs of subversion, such as drug or arms trafficking and other criminal activities, as well as (possible) radicalisation and other forms of insider threat.

When criminals from the underworld try to abuse the processes and infrastructure of legitimate business, this is called subversion. Subversion is defined as crime involving an Airport Identification Card holder who abuses his/her position or powers. By insider threat (a threat from within the organisation), we mean the risk of crime involving Airport Identification Card holders.

What do we expect from you?

- Report any suspicion and/or signs of subversion, such as drug or arms trafficking and other criminal activities, to your supervisor, a senior manager, Security Manager or the Royal Marechaussee.
- If you are approached or feel pressurised which may be related to subversion, report it to your supervisor, a senior manager, Security Manager or the Royal Marechaussee.
- Report signs of (possible) radicalisation and other forms of insider threat to your supervisor, a senior manager, Security Manager or the Royal Marechaussee.
- For more information and the internal and external reporting routes, see [Guide to re-reporting routes for subversion](#).
- Report any acute danger immediately via the Eindhoven Airport emergency number: 040-2919844.

A report to the Royal Marechaussee can be submitted via:

- the Customer Contact Centre: 0800-1814
- Criminal Intelligence Team: 030-2761216 (This can be done anonymously.)



Reporting abuses

At Eindhoven Airport, working (together) honestly, respectfully and with integrity is paramount. In doing so, we look not only at our internal cooperation, but also at our cooperation with third parties. We ensure that we act in the interests of Eindhoven Airport, in accordance with all relevant laws and regulations, and in line with this Code of Conduct.

What do we expect from you?

- Report careless or unethical conduct or any (other) suspected abuse at Eindhoven Airport, or at another organisation (with which we cooperate, for example). For example, if you have good reasons to suspect:
 - a. an (imminent) criminal offence;
 - b. an (imminent) violation of European or other laws and regulations;
 - c. a danger to public health, safety or the environment;
 - d. (imminent) deliberate misinformation of public bodies;
 - e. a violation of rules of conduct applicable within the company or
 - f. that information about these facts is knowingly withheld, destroyed or manipulated (or there is a threat thereof).
- When faced with an integrity or other dilemma, use the questions in the diagram below to arrive at an answer. Of course, it is also always possible to discuss this with your supervisor or the Corporate Compliance Officer. If your answer to one or more questions in the diagram is “no”, this means that you should refrain from doing something and, for example, seek additional advice first. When in doubt, always seek advice.





Internal reporting scheme

The internal reporting scheme is designed to report abuses and suspected abuses. Within Eindhoven Airport we believe it is important that everyone feels safe to speak up and to confront each other about behaviour that is not (or possibly not) in line with legislation (e.g. fraud), internal policy or this Code of Conduct. It is important to discuss these issues, because in this way we can help each other avoid or learn from mistakes. This allows us to get better at our work and maintain a pleasant workplace.

What do we expect from you?

- Don't close your eyes to (possible) abuses. Discuss and report them. The reporting procedure is explained below. This section also contains more information on, among other things, confidentiality, how you are protected as a person reporting or person involved, and what the different procedures are, depending on your role in the report.

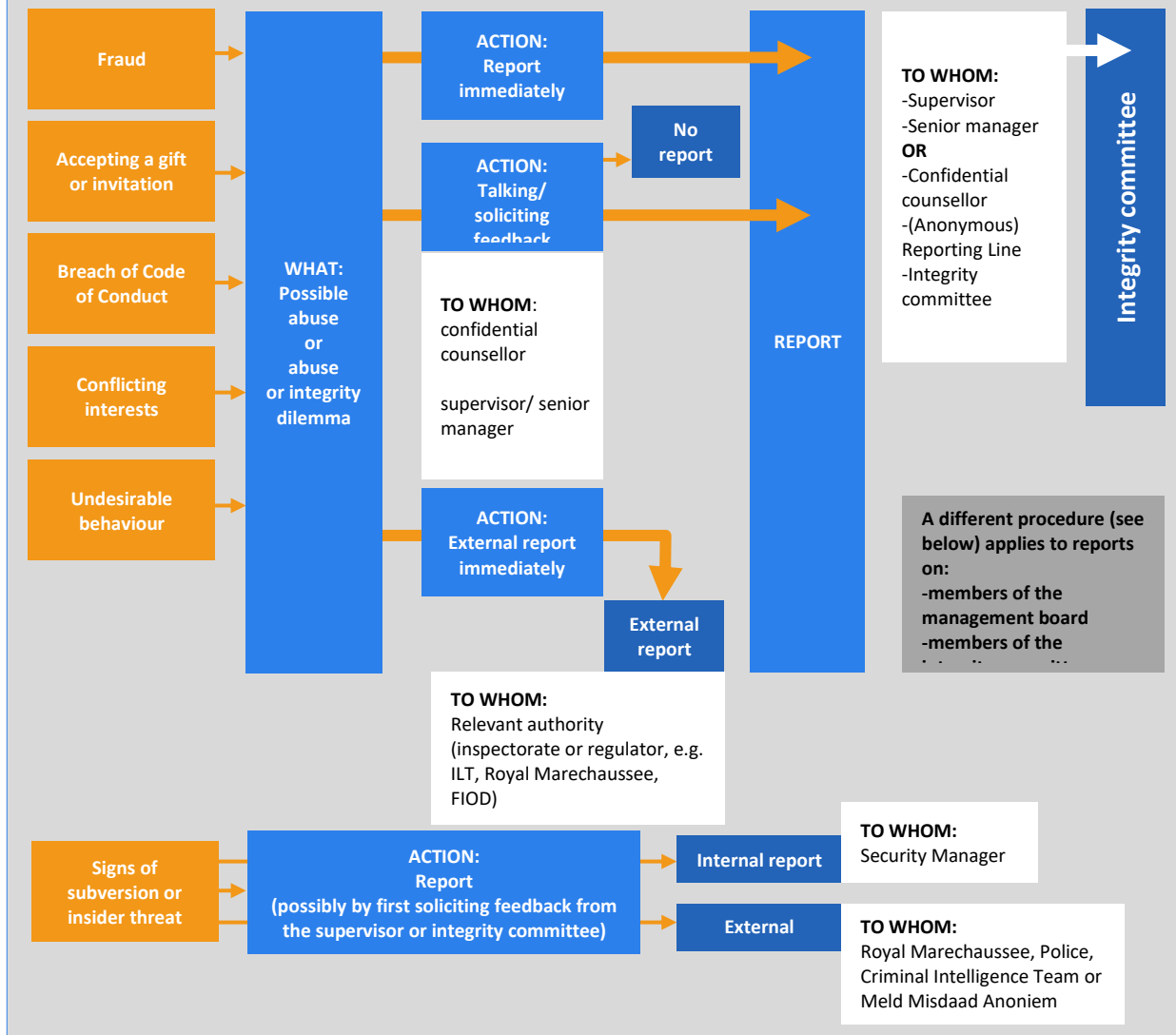
Making a report

- If, as an employee, you suspect any abuse or acts in violation of this Code of Conduct, you should make this known to your supervisor or a senior manager. Moreover, you can always make an oral or written report directly or via the [\(anonymous\) Reporting Line](#) to the Integrity Committee, or to the confidential counsellor.
- You can also ask the Integrity Committee for an on-site meeting, within a reasonable time, in order to make a report.
- We want to minimise unclear and false reports. Therefore, only reports received in one of the manners referred to above will be considered. This means that other reports will not be dealt with. False reports are not tolerated. A false report is a serious breach of the Code of Conduct.
- If possible, a report should be made in any case within one year of the time when the alleged act in violation of the Code of Conduct took place. After that period, a report will not be considered unless, in the opinion of the Integrity Committee, there is a justified reason for the late report and/or the content of the report still appears relevant.
- Besides making a report to the internal channels mentioned above, you can also report any abuses or violations of Union law directly to a competent external authority (such as the police, Fiscal Intelligence and Investigation Service (FIOD) or Human Environment and Transport Inspectorate (ILT)). This can be done, for example, in the event of a threat of imminent danger.
- When an internal report is made, the abuse or violation can be dealt with most quickly and Eindhoven Airport may be able to take immediate measures to stop the abuse or violation.

Steps after a report has been received

- If a supervisor or confidential counsellor receives a report about a suspected violation of this Code of Conduct or about a violation of legislation, he or she will pass it on to the Integrity Committee. The committee consists of the Head of Legal & Corporate Affairs, the HR Manager and the Chair of the Works Council. The working procedure of the integrity committee is laid down in a [description of duties](#).
- The Integrity Committee assesses any report it receives and determines what action is needed. If so desired, the Integrity Committee may obtain additional information from the person reporting and/or hear other persons involved. The Integrity Committee may also decide to handle the report itself or ask the most expert person/department/committee to handle the report further.
- The person reporting will receive a confirmation of receipt within seven days of receipt of his or her report by the Integrity Committee. If possible, the person reporting is kept regularly informed of progress. The Integrity Committee ensures that each report is handled appropriately, is documented properly and is reported to the responsible authorities in the correct manner where necessary.
- Within three months after the confirmation of receipt has been sent, the person reporting will receive information on the assessment and (where applicable) follow-up of the report.
- All reports are treated confidentially, thereby protecting the identity of the person reporting and the content of the report.
- You should cooperate in any investigation you are involved in. If you are involved in an investigation as a third party, we also expect you to be honest and provide complete information.
- As a person involved, you will receive feedback on the report as far as possible.
- Both before, during and after the investigation, everyone involved in the investigation is obliged to maintain secrecy.

What can I report and how do I report it?



What happens to my report?



Alternative procedure

- Is the report about a member of the management board or a member of the Integrity Committee? Or is the report directly related to a member of the management board or Integrity Committee? Or is there another compelling reason not to make a report through the Integrity Committee? If so, an alternative procedure applies:
- Is your report about a management board member? Then the supervisor or confidential counsellor will forward the report to the company secretary (Head of Legal & Corporate Affairs). The company secretary then forwards the report to the chair of the Supervisory Board.
- If your report about a member of the Integrity Committee, the supervisor or confidential counsellor will send your report to the other members of the Integrity Committee who are not involved in the report. The other members of the Integrity Committee will then handle your report together with the CEO.

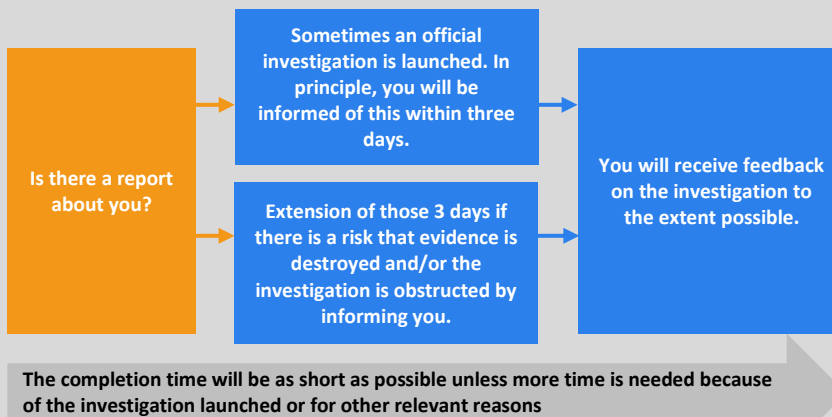
Protection of the person reporting

- The identity of the person reporting will be protected and Eindhoven Airport will not take any measures that would put the person reporting at a disadvantage as a result of making a report, unless one of the three following cases arises:
 - a. the person reporting does not comply with the reporting procedure;
 - b. a report is made with malicious intent;
 - c. the report is about a serious offence or crime involving the reporting person himself.
- If the person reporting is dissatisfied with the handling or outcome of the report, feels threatened or believes that he or she has faced reprisals, the person reporting can file a complaint directly with the person or committee that also handled the report in the first instance.

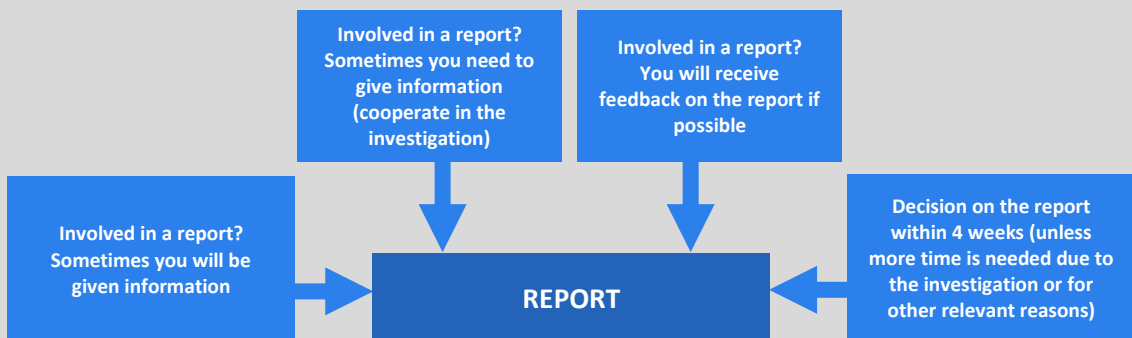
Protection of the persons involved

- If someone is the subject of an official investigation, the Integrity Committee will inform the person under investigation within three days, in principle. This period may be extended if there is a risk that the suspect will destroy evidence or obstruct the investigation.
- As the person reporting and as another person involved in the report, you may be assisted by a third party for support.
- Eindhoven Airport will also not take any measures against anyone who supports or assists the person reporting which would put him or her at a disadvantage.

What happens if there is a report about me?



What happens if I am involved in a report?



We will treat your identity and the content of your report confidentially. You will be kept informed about the progress as far as possible.

Data protection and privacy

- The Integrity Committee and designated officials shall treat all information in strict confidence. The privacy of both the person reporting and persons involved is safeguarded and protected.



Offboarding

If you stop working for Eindhoven Airport, we expect you to complete your work in a proper manner. This means leaving your workplace in a tidy manner and handing over your work. You also hand in your belongings.

What do we expect from you?

- Return your Airport Identity Pass to the Badge Centre on time and in the prescribed manner.
- Also return Eindhoven Airport property on time and in the prescribed manner. Examples are your phone, laptop, company clothing and keys.
- Ensure complete handover of your work to colleagues.
- Adjust your social media (such as LinkedIn, Facebook) in good time to make it clear that you no longer work for Eindhoven Airport.
- Be aware that even after your work for Eindhoven Airport has ended, some provisions of the employment contract/contract for services continue to apply, such as the confidentiality clause.