

Code of Conduct



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Foreword

Schiphol connects your world. We have been doing this for over 100 years through our airports Amsterdam Airport Schiphol, Eindhoven Airport, Rotterdam The Hague Airport and Lelystad Airport. To continue connecting in the coming century, we challenge ourselves. With that, our guiding principle is to conduct business in a responsible manner and create a socially safe and pleasant place of work for everyone that works at our airports.

You are an important link in this. As the way you do your work for Schiphol, the way you behave and the way you cooperate with others is crucial to our success.

But what do we actually expect from you: what behaviour is desired and what fits Schiphol? What is integrity and how do we deal with this? And also very important: what do we do and what do we not do? This is the reason why the Code of Conduct has been drawn up. It is a guide for your actions when working at Schiphol.

The Code of Conduct applies to everyone, also to us. It goes without saying that we are to be aware of our behaviour and that we are to comply with this code to the best of our ability. We all have an exemplary role. Passengers, colleagues, customers, neighbours and partners, they all have to be able to trust our integrity and be able to rely on us. This is the way for us to continue to connect worlds and to improve ourselves.

Please therefore, read the Code of Conduct carefully and bear it in mind in your day-to-day work, because whatever you are working on, you have an important role to play and you make the difference. It's content should be logical and self-evident to you. We also encourage you to remind your colleagues of the Code of Conduct and to address their behaviour. Use the reporting procedure for any deviations from the Code of Conduct. Make dilemmas a subject of discussion amongst each other or with your manager. From personal experiences, we know that it helps to talk about topics and to thus find a solution together.

We firmly believe that together, we are capable of ensuring that we comply with our Code of Conduct.

Thank you for your cooperation.

The Executive Team of Royal Schiphol Group

Content

| | |
|--|----|
| Who is the Code of Conduct for? | 4 |
| Introduction | 5 |
| 1 General principles | 6 |
| 2 Responsibilities of managers | 8 |
| 3 Interaction | 9 |
| 4 Access to Schiphol | 10 |
| 5 Safety & Sustainability | 11 |
| 6 Business relations | 13 |
| 7 Responsible business conduct | 16 |
| 8 Use of Schiphol's IT and other facilities | 18 |
| 9 Privacy, cybersecurity, records management | 20 |
| 10 Fraud and corruption | 21 |
| 11 Undermining and other criminal activities | 22 |
| 12 Reporting misconduct | 23 |
| 13 Internal reporting procedure | 24 |
| 14 Offboarding | 31 |

Who is the Code of Conduct for?

This Code of Conduct applies to everyone working for Schiphol Nederland B.V and Royal Schiphol Group N.V. (hereinafter jointly referred to as Schiphol). The Code of Conduct therefore applies to you if:

- you have an employment contract with Schiphol;
- you carry out work for Schiphol as a contracting party;
- you have access to Schiphol's (computer) network, (as commissioned by Schiphol);
- you are a user of Schiphol's computer network;
- (by means of an @schiphol.nl email address or an @st.nl email address).

The Code of Conduct also applies to persons whose employment contract or contract for services has been terminated or are yet to begin (including job applicants).

The Code of Conduct is also applicable to N.V. Luchthaven Lelystad, Rotterdam Airport B.V. and Eindhoven Airport N.V. These organisations have included the Code of Conduct in their own regulations.

We also require our supply chain partners to act in line with this [Code of Conduct](#), the [Responsible Business Policy](#) and [the Check-In document principles](#).

Introduction

The Code of Conduct describes how we do our work and how we cooperate with other parties. It is critical to note that whatever you are working on, you have an important role to play and you can make a difference. The Code of Conduct serves as a guide.

Please act in accordance with the Code of Conduct not just yourself, but also help others do so. An essential principle is to **Speak Up**: ask questions and make dilemmas a subject of discussion. Hold each other accountable for behaviour inconsistent with the Code of Conduct. In doing so, you help to prevent misconduct, integrity violations and incidents as much as possible. This is ultimately how we contribute to achieving our Destination: Creating the world's most sustainable and high-quality airports.

If you suspect anyone of acting in violation with the Code of Conduct, you are obligated to report it. You can report to your manager or a senior manager. You can also use one of the following channels to report:

- to the Compliance & Ethics team,
- directly to the Integrity Committee, whether or not anonymously via the Integrity Reporting Line,
- or to the trusted persons.

Besides filing a report through the internal channels mentioned above, you can also report (potential) misconduct directly to an authorised external authority (also anonymously via 'Meld Misdaad Anoniem', 0800-7000). You can always consult an advisor (e.g. a trusted person) in confidence about how to act if you suspect misconduct (e.g. file a report).

General principles

Our reputation depends to a large extent on the professional conduct and actions of our internal and external employees. Please keep that in mind. As an employee of Schiphol, we expect you to always act in the best interests of Schiphol.

Whether or not on behalf of Schiphol, it is crucial that you always comply with all relevant laws and regulations. Consider national and international legislation in the field of safety, security, the environment, anti-discrimination, human rights, competition, public procurement, privacy, fraud and corruption. You are also required to adhere to the internal regulations and procedures, such as the [Schiphol Regulations](#), [The Responsible Business Policy](#) and other compliance policies.

Confidentiality and ancillary activities

Schiphol imposes a duty of confidentiality. We have also established a policy for paid or unpaid ancillary activities. You cannot simply carry out ancillary activities. This is subject to terms and conditions set out in the collective labour agreement. If you are not covered by the collective labour agreement, you will find the arrangements relating to ancillary activities set out in your employment contract.

Preventing conflicts of interest among employees

Schiphol is reluctant in its hiring of (whether on the basis of an employment contract or otherwise) persons that hold a private relationship with an employee, such as family ties, friendships or personal (affectionate) relationships. If a private relationship of yours should apply for a position, always report this to your manager and the HR Business Partner. Naturally, there is no absolute prohibition. The purpose is that we avoid that there is even a theoretical possibility that, through private relationships, a conflict of interest may arise. This is also applicable for internal job moving: if a private relationship exists between a candidate and the employee, we take this into consideration.

When an affectionate relationship develops in the workplace, you must always report this to both your manager and the HR Business Partner. In case the relationship gives rise to (the appearance of) a conflict of interest, a suitable solution will be found through mutual consultation.

Communicating on behalf of Schiphol

There are only two departments that are allowed to communicate about Schiphol, for example in the media. These are the Executive Team and the Media Relations Department of Corporate Affairs (D/CA). Employees from other departments are only allowed to communicate about Schiphol after consultation and authorisation from the Executive Team and/or the Media Relations Department of Corporate Affairs (D/CA).

Adhere to the Code of Conduct

We assume that you comply with the Code of Conduct. We encourage this and are eager to help you, for example with our Onboarding, an e-learning training course and various other training courses. We also supervise compliance with the Code of Conduct. If the Code of Conduct is breached, (disciplinary) measures may be imposed.

What do we expect from you?

Below we explain what the above principles mean in practical terms.

- Always act in the interests of Schiphol.
- Act respectfully and cooperatively towards colleagues.
- Whether or not on behalf of Schiphol, please comply with all relevant national and international laws and regulations.
- Adhere to the relevant internal regulations and procedures.
- Address your colleagues if you notice that they are not adhering to rules and arrangements.
- Maintain confidentiality about all information on Schiphol of which you know or ought to know that it is confidential.
- Make sure that you have prior written consent from your manager if you intend to carry out paid or unpaid ancillary activities.
- Ask for consent in advance from the Corporate Affairs Department (Media Relations) and/or the Executive Team if you want to provide a journalist with information or if you have been invited to speak or present for or on behalf of the company.
- Report any suspicion of breach of the Code of Conduct (see Chapter 13).

2

Responsibilities of managers

Managers lead by example. Therefore, you do not only act in accordance with the Code of Conduct, but you also fulfil a supportive, monitoring and corrective role.

What do we expect from you?

- Always set a good example.
- Make sure that new colleagues in your team become familiar with the Code of Conduct.
- Be alert to any breaches of the Code of Conduct and report them.
- Make dilemmas a subject of discussion.
- Encourage colleagues to always report (possible) breaches of the Code of Conduct.

**Make dilemmas
a subject of discussion**

Interaction

We can only work together in a positive way and achieve our results in the proper way in a socially safe working environment. Respect for one another is our basic principle.

Schiphol wants to be an organisation where diversity, equity and inclusion are self-explanatory. We are committed to creating an inclusive and pleasant work environment that embraces and empowers all individuals, regardless of background, age, race, ethnic origin, colour, sex, religion, gender identity, sexual preference(s) or other (personal) preferences. We believe that diversity, equity and inclusion are important preconditions for operating and maintaining a successful organisation.

Refrain from all forms of unwanted behaviour. Unwanted behaviour in any event means: approaching someone in such a way that this person experiences, or may experience, the approach to be threatening, humiliating, discriminating or intimidating. This in any case refers to the following

Situations:

- A. Sexual harassment: behaviour of a sexual nature that a person finds unwelcome or threatening.
- B. Aggression and violence: harassing someone psychologically or physically, threatening or assaulting a person.
- C. Discrimination: making unlawful distinctions between groups or individuals on the basis of age, sexual orientation, religion and belief, race, gender, nationality, disability or chronic illness, political opinion, marital status, working hours, employment contract or on any other grounds whatsoever.
- D. Bullying: systematically inflicting hurt on and/or harassing a person.

What do we expect from you?

- You must refrain from any type of behaviour that may be interpreted as unwanted.
- Act respectfully and cooperatively towards colleagues and third parties, such as passengers.
- Report any unwanted behaviour that you come across. More information is available in the internal reporting procedure in Chapter 13.

4

Access to Schiphol

To be able to work at Schiphol, you have been given a Schiphol Pass. The Schiphol Pass is a personal identity document and provides access to the security-restricted areas. It is therefore important to be very mindful when using the Schiphol Pass.

Comply with the screening policy

You do not immediately receive a Schiphol Pass. Before you start your work, you must first possess a Certificate of No Objection (VGB) or a Certification of Conduct (VOG). This is dependent on your role. You can request a Schiphol Pass as soon as you have received a VGB or VOG. More information on the Schiphol Pass and the screening process may be found in the screening policy. More information on the conditions and the usage of the Schiphol Pass may be found in the [Schiphol Regulations](#) and the [Schiphol Admissions Regulations](#).

What do we expect from you?

- Have a Certificate of No Objection or Certification of Conduct before you start your work at Schiphol.
- Use the Schiphol Pass responsibly.
- Never lend your pass to another person or allow another person access with your pass.
- Always wear the Schiphol Pass visibly when working.
- If you have lost your Schiphol Pass, make sure to report this as soon as possible to the Badge Centre by calling +31 (0)20 601 2626, or, if outside office hours, to Schiphol's Security Control Centre via +31 (0)20 601 3000).

Safety & Sustainability

Safety

Safety comes first is essential for both achieving the Destination and Schiphol's Vision 2050. This means that we always initially consider whether safety is sufficiently assured in everything we do as an organisation, not only in realising our strategic objectives, but also in our day-to-day activities. The long-term ambition is zero safety incidents. Surely, if zero incidents in one day is possible, it is also possible in a week, a month and a whole year.

What do we expect from you?

- Take responsibility by working safely and by complying with laws and regulations. You have an exemplary role for your internal and external colleagues.
- Follow the [rules that apply on the airport grounds](#), including the Schiphol Regulations, Golden Rules of Safety, HSE-standard for construction, maintenance and technical areas or premises and complete the Safety & Security test to obtain a Schiphol Pass.
- **Address** internal and external colleagues, including managers, when (potentially) unsafe work situations occur.
- **Report** (potentially) dangerous situations, incidents and accidents, and take action.

Reporting incidents

| Unsafe situations | Incidents | Accidents (emergency) |
|--|---|---|
| <p>Situation in which there is a high risk of an incident or accident.</p> <p>For example, unsafe situations that have already been corrected.</p> | <p>Events that under slightly different conditions are very likely to have resulted in an accident.</p> <p>For example slippery road surface due to ice, moving walkways at excessive speed, missing fire extinguisher.</p> | <p>Event requiring emergency services.</p> <p>For example road traffic accident with injury, oil spill or fire.</p> |
| <p>Call telephone number:</p> | <p>Call telephone number:</p> | <p>Call emergency number:</p> |
| <p>Airside: 020 601 2126 Landside / terminal: 020 601 2555</p> | <p>Airside: 020 601 2126 Landside / terminal: 020 601 2555</p> | <p>020 601 2222</p> |

Sustainability

Schiphol aims to create the world's most sustainable and high-quality airports. As an employee, you contribute to this through the performance of your work. Key sustainability goals for 2030 are: emission-free and waste-free airports. Together with sector partners, Schiphol is making the civil aviation industry more sustainable. This is how Schiphol also contributes to achieving the UN Sustainable Development Goals.

What do we expect from you?

- Incorporate sustainability in your work.
- Put the topic of sustainability regularly on the agendas of the MT meetings or team meetings.
- Commute to work by bike and public transport as often as possible.
- Lock your screen or log out when you are not using your computer and separate your waste and use refillable bottles.

6

Business relations

If you maintain business relations, the interests of Schiphol will always be your starting point. Always act correctly and transparently in contact with business relations.

Always make sure that you do not end up in a (seemingly) dependent position by mixing business and private interests. By private interests we mean your personal interests, but also the interests of partners, blood relatives and relatives by marriage up to the fourth degree. It is critical to avoid being susceptible to influence.

It is not permitted to request or accept money or other means of payment from current or potential business relations. Furthermore, you may not accept any gifts, entertainment, favours or services, if they are not in line with this Code of Conduct.

Business gifts

Are you being offered a personal business gift? If so, you may only accept one gift a year per supplier, and only if this gift does not exceed a market value of €100. It goes without saying that you may only accept a gift if you have a clear business relationship with the supplier. If you have been offered a gift that contravenes this policy, you immediately have to inform your manager.

If Schiphol is offered a gift through you as an employee, which falls outside the scope of this regulation, it may nevertheless be decided to accept this gift for Schiphol. This can only be done in very exceptional circumstances where accepting a gift is in the interest of Schiphol and after due consideration and written permission from the Executive Team.

Employees of the Corporate Procurement Department (D/CP) may not accept business gifts under any circumstances, in order to avoid any conflict of interest or the appearance thereof. All employees must at all times avoid conflicts of interest or the appearance thereof.

Events

Did you receive an invitation from a customer or supplier to attend an event, for example, a football match, golf event, company anniversary, theatre visit or exhibition? If so, the following rules apply:

- You immediately notify your manager that you have been invited to an event by a party.
- Your manager then decides in consultation with you whether you may reasonably accept the invitation, under which conditions, if any, and how the party issuing the invitation will be notified accordingly.
- Any travel and accommodation expenses related to the event will in principle be borne by you. You may be able to claim these expenses based on the expense claims policy.

Business visits

If you visit the companies of customers or suppliers as part of your work for Schiphol, you first pay for the expenses of these company visits and then claim these expenses from Schiphol. Always bear in mind that you are representing Schiphol during such company visits and therefore act in accordance to what can be expected of you.

Business travel

If you are going to travel for business purposes, please adhere to the policy for business travel.

Sponsorship and donations

We apply a stringent policy on sponsorship and donations in the name of Schiphol. All requests for sponsoring or donations are to be submitted to the Corporate Affairs Department (D/CA). Such requests are approved only after the Executive Team's consent. Sponsorships and donations at departmental level or from the departmental budget are not allowed.

If external parties such as suppliers request or receive sponsoring or donations from Schiphol, please bear in mind the Schiphol Code of Conduct. Never lose sight of the business relationship.

If you are making a personal sponsorship or donation request yourself, for example through LinkedIn, be sure to always mention that the sponsorship or donation request is done in a personal capacity with no relation to Schiphol, and that acquisition on the basis of the sponsorship request is not appreciated.

Interest stake in an external party

If you have or if are you about to have, either directly or indirectly, a substantial interest stake in a (potential) contractor of Schiphol or an entity affiliated with it, you are obligated to notify your manager in writing beforehand.

What do we expect from you

- Act in line with the policy described above when dealing with external relations. When in doubt on how to act in a particular situation, always immediately consult your manager.
- Always act according to the Insider Dealing Policy. This policy explains how you should deal with insider information (confidential and/or sensitive information).

Conducting property transactions

You may not conduct any property transaction(s) for your own account, in which a potential conflict may arise between business- and private interests, without explicit permission from the Commercial Director. This may imply, for example, the acquisition, development, disposal or participation in real estate or real estate securities where it may reasonably be expected that Schiphol is linked and/or involved.

Responsible business conduct

Business with external parties is done in a responsible and professional manner. That is why we always observe the following principles in contacts with third parties:

- Choose reliable partners (business relations, suppliers and service providers).
- Do not grant these partners any private orders.
- Set out material arrangements, agreements and contracts in writing.
- Freeze relations temporarily if a partner intentionally violates the law or a substantial provision of Schiphol's Code of Conduct. Then consult your manager on possible termination of the relationship.
- Pay close attention to all payments that Schiphol makes, either directly or indirectly, now or at a later date, which are related to a supplier's order. Ensure that those payments only benefit that supplier's company and no one else.
- Ensure that you do not conduct business with individuals, entities and or in countries against which international sanctions have been proclaimed.

Fair competition and the fair treatment of business relations and suppliers

At Schiphol we believe that it is important to interact with our business partners and potential contract partners in a business-like and professional manner. Therefore, always act according to the following policy:

- Relevant business relations and suppliers have an equal opportunity to compete for contracts.
- Potential contract partners receive the same information.
- The information provided to business relations and suppliers is correct, neutral and not misleading.
- Involve the responsible procurement officer and/or lawyer timely (ie: upfront in the preparation phase).
- Treat internal and external information with care by following the instructions given in the area of information security policy, among others.
- Take steps to ensure we do not become dependent on a company, unless it can be justified.
- Treat information from a contract partner as confidential and do not share it with other contract partners.
- Do not make any prohibited price agreements.
- Do not abuse Schiphol's economically dominant position.

For questions about this subject, please contact the Corporate Legal Department (D/CL). On the intranet you can find more information about what we expect from you.

You can also find more information in [Schiphol Check-in](#). This document helps us to do business responsibly and ensures that suppliers are also bound by values that Schiphol considers important.

Tendering procedure

Under certain circumstances, Schiphol is subject to the tendering process: tenders will have to be invited for certain contracts. The aim is to give parties equal opportunity and to promote a level playing field. If you are involved in a tendering process, do not engage in meetings or discussions with any of the interested or participating parties outside of the tendering process framework.

The tendering rules are available here. If you have any questions on the tendering process, please contact the Corporate Procurement Department (D/CP).

Lobbying

If you are involved in lobbying, you must act according to the Public Affairs and Lobbying Policy. This policy defines the meaning of lobbying and the associated rules. You must also act in accordance with the Public Affairs and Lobbying Policy if you maintain contacts with civil servants and politicians.

What do we expect from you?

- Act in line with the policy described above to ensure fair competition and the fair treatment of business relations and suppliers.
- When in doubt on how to act in a particular situation, always immediately discuss this with your manager.

**Equal opportunities
and a level
playing field**

Use of Schiphol's IT and other facilities

Does Schiphol make certain property or facilities available for your work, such as IT facilities, equipment, software or connections? If so, these are then intended for business use. Careful use is key. The same applies to the use of a business mobile phone, company clothing and the Schiphol Pass, for example. If your employment or contract for services terminates, such assets are to be returned.

IT-facilities

IT facilities include all the facilities required for electronical and digital exchange of information and storage that is made available by or on behalf of Schiphol. These facilities include the intranet, the internet, email, an email address, mobile equipment, (wireless) local loop facilities, such as Wi-Fi, and all other facilities that have been made available, whether or not provided with a username/password.

The Digital conditions of use provide detailed rules on the following subjects:

- A. use of ICT facilities
- B. use of your Digital Identity (i.e. username/name)
- C. email use
- D. use of the internet
- E. use of social media
- F. use of smartphone, laptop or tablet
- G. storage of information
- H. copyrights
- I. private use
- J. inspection

The above conditions of use form an integral part of the Code of Conduct.

What do we expect from you?

- Handle the belongings that have been made available to you with care.
- Read the Digital conditions of use and act in line with these conditions.
- Be aware that private statements on social media can be linked to Schiphol. Therefore, be sure to exercise restraint.
- In case of loss of a belonging, such as a mobile phone or Schiphol Pass, please immediately report this to the appropriate department: IT Service Desk (+31 (0)20-601 4445), Badge Centre (+31 (0)20-601 2626).
- You have to hand in your items upon termination of your employment. More information on this can be found in Chapter 14.

Privacy, cybersecurity, records management

Schiphol processes a wide variety of data that we receive and share with various parties. The basic principle is that passengers, customers, business partners and Schiphol employees may rely on us when we process their data, personal or otherwise. Non-compliance with privacy laws or any incidents involving personal data can have adverse effects. Moreover, this may seriously affect Schiphol's reputation and result in substantial penalties and claims.

If you store and archive information, you are responsible for ensuring that this is done properly. Make sure that documents are easy to find or retrieve. Apply the privacy and information classification policy and keep the applicable retention periods in mind. Please make sure to grant the correct authorisations. We always keep business-sensitive information and competition-sensitive information in a safe place, both physically and digitally. On the intranet you can find more information on how to deal with confidential information.

What do we expect from you?

- Commit to a high level of personal data protection.
- Know what needs to be done to protect personal data and Schiphol data, to avoid any data leaks.
- Report potential or actual data leaks to the IT Service Desk (+31 (0)20-601 4445).
- Make sure you are up-to-date on the Privacy policy and the SCSC Information security policy of the Schiphol Cyber Security Centre (SCSC).
- When processing personal data, act according to the ten basic principles in processing personal data which are listed in the privacy policy.
- Know which Privacy Champion or Privacy Officer to turn to for questions and advice.
- Classify information, store information with the proper authorisation and, at all times, share this information in accordance with the Information classification policy.
- Be aware of the risks involved in sharing information.
- Always keep business-sensitive information and competition-sensitive information in a safe place, both physically and digitally.
- Act according to the Digital conditions of use. Do not share any passwords with anyone. Never click on unknown links or download/open unknown attachments.

Fraud and corruption

Schiphol operates a zero tolerance policy in terms of fraud and corruption. In addition, Schiphol expects its employees to act in a financially transparent manner. All forms of fraud, bribery and corruption (including facilitation payments) are strictly prohibited.

Fraud is defined as all unauthorised irregularities caused intentionally with material or immaterial gains in mind on the part of the fraudster or parties known to the fraudster, due to which Schiphol and/or the employees concerned suffer or may suffer damage or a loss.

Corruption includes all acts of offering and promising unlawful or undue financial benefits or other benefits to staff members of business relations or potential business relations, government officials, candidates for public office and political organisations as well as accepting and demanding unlawful or undue financial benefits or other benefits. It does not matter whether this staff member personally engages in corruption or does so via an intermediary. Corruption also includes all forms of extortion, embezzlement and facilitating payments.

What do we expect from you?

- Only accept or provide gifts or invitations for events if they seem proportionate and reasonable; have a legitimate purpose; and may not create a conflict of interest or the appearance thereof. Accepting or providing cash or any equivalent of such as part of a gift is prohibited. More information on contact with external relations can be found in chapter 6.
- Do not provide gifts and/or donations to political parties or government officials.
- Report any suspicion of fraud, corruption and bribery to your manager, a senior manager or team Compliance & Ethics. You can also file a (anonymous) report via the Speak Up reporting line. More information on the internal reporting procedure can be found in chapter 13.

**Report any
suspicion of fraud
and corruption**

Undermining and other criminal activities

Criminals may attempt to abuse our infrastructure, our operations and the businesses at Schiphol. Unfortunately, being a logistical hub and gateway to the Netherlands and Europe also attracts criminals. At Schiphol we are watchful, and it helps if you are watchful too.

In maintaining a safe airport, you are expected to report any suspicion and/or indicators of undermining, such as drug trafficking or arms trafficking and other criminal activities, as well as (possible) radicalisation and other forms of insider threat.

Undermining is defined as criminals from the underworld trying to abuse the processes and infrastructure of the upper world. Undermining is understood to mean crimes involving a Schiphol Pass holder and/or a Schiphol Pass holder misusing their position or authority. Insider threat, 'a threat from within the organisation', is understood to mean the risk of crime involving Schiphol Pass holders.

What do we expect from you?

- Report any suspicion and/or indicators of undermining, such as drug trafficking or arms trafficking and other criminal activities to your manager, a senior manager or the company detective.
- You can always consult an advisor (e.g. a trusted person) in confidence about how to act if you suspect misconduct (e.g. file a report).
- Report signs of (possible) radicalisation and other forms of insider threat to your manager, a senior manager or the company detectives.
- For non-urgent reports you may also make use of the Integrity Reporting Line as described in Chapter 13 to make a report, whether or not anonymously.
- Report imminent danger immediately by calling the emergency number: +31 (0)20 601 2222.

Reporting misconduct

Working (together) in an honest, respectful and ethical manner is a matter of great importance for Schiphol. This goes beyond our internal cooperation: we also refer to our cooperation with third parties. We make sure that we act in the best interests of Schiphol, according to all relevant laws and regulations, and in line with our Code of Conduct.

What do we expect from you?

- Report any careless, unethical or dishonest actions or any (other) suspicion of misconduct at Schiphol (or another organisation with which we cooperate for example). For example, if you have any reasonable grounds to suspect:
 - a. an actual or impending criminal act;
 - b. an actual or impending violation of (European) laws and regulations;
 - c. a risk to public health, security or the environment;
 - d. informing or threatening to deliberately inform public bodies incorrectly;
 - e. a violation of the company Code of Conduct, or
 - f. actually, or threatening to deliberately withhold, destroy or manipulate information about such facts.
- In the event of an integrity dilemma, use the questions listed in the diagram below to find an answer. Of course, you may also always discuss the matter with your manager or the Compliance & Ethics team. If your answer to one or more questions in the diagram is no, this is an indication to not do anything yet but to first seek additional advice. If in doubt, always ask for advice.



Internal reporting procedure

The internal reporting procedure is set up to report integrity violations or other misconduct or the suspicion thereof. At Schiphol, we believe it is important for everyone to feel at liberty to speak up and to address one another on behaviour that may not be in line with legislation (i.e. fraud), internal policies (for example the Responsible Business Policy) or this Code of Conduct (the Speak Up and Feedback principles). It is important to be able to openly talk about these subjects as this is how we can help each other avoid making mistakes or to learn from them. This will make us better at our jobs and we continue to have a great place to work.

What do we expect from you?

- Do not turn a blind eye to all forms of (possible) misconduct. Address this and report it. Below sets out how to report. It also provides information on confidentiality, how your protection is ensured if you are the reporter or the person involved, as well as the different processes, depending on your role in the reporting.

Reporting incidents

- If you suspect misconduct or actions that conflict with the Code of Conduct, you should notify your manager or a senior manager. Additionally, it is also possible to file a report to Team Compliance & Ethics (via e-mail, telephone or verbal), (anonymously) via the Speak Up reporting line or to the trusted person. See in the table below how to file a report via the Speak Up reporting line.
- You may also request the Integrity Committee to schedule a meeting, within a reasonable timeframe, to file a report.
- If you are considering making a report, the trusted person can act as a sounding board.
- The Integrity Committee only handles reports that concern a (potential) violation of the Code of Conduct. Employment law issues are not covered by this and are not handled by the Integrity Committee. For this, please contact a HR Business Partner.
- Abuse of the reporting procedure will not be tolerated. Filing a false report is a serious breach of the Code of Conduct and may result in a disciplinary measure.
- If you file a report, in any case do so within one year from the time at which the alleged breach of the Code of Conduct occurred. In principle, a report will not be processed after the beforementioned one-year period unless, in the opinion of the Integrity

Committee, there is a justifiable reason for the late report and/ or the content of the report still appears to be relevant.







- Besides filing a report through one of the ways set out above, you can also report misconduct or a violation of (European) laws and regulations directly to a relevant authority (such as the police, FIOD, or ILT). This can be done, for example, in the event of an imminent threat of acute danger.
- When reporting internally, the misconduct or violation can be addressed most quickly and, if necessary, Schiphol can take immediate action to stop the misconduct or violation.

Filing a report via the Speak Up reporting line

You can file an (anonymous) report via the Speak Up reporting line. This can be done in various ways, such as calling a phone number, visiting the Speak Up webpage or downloading the Speak Up app.

The table on the next page describes how to file the report. It also contains information about the alternative reporting procedures in case your report concerns a member of the Integrity Committee or a member of the Executive Team.

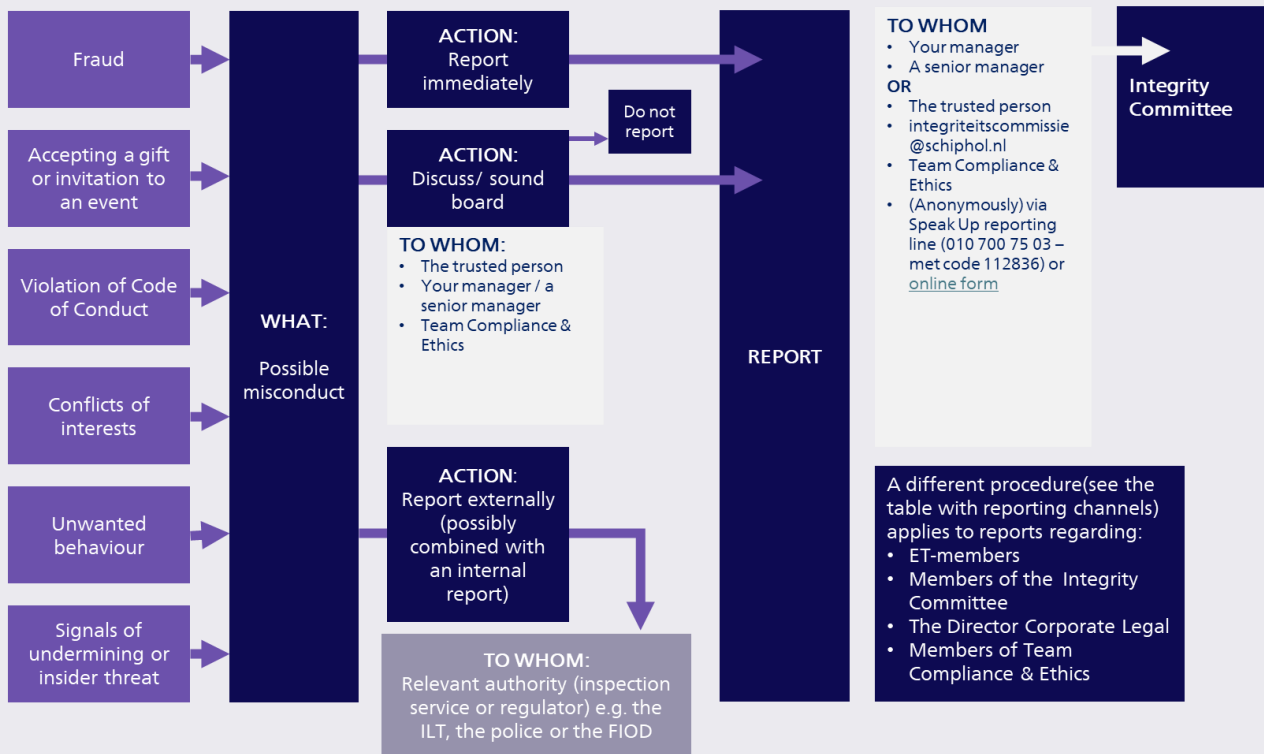
De SpeakUp reporting line - the reporting channels:

| Situation, report concerns | Report is received by | Link webpage | Call to 010 700 75 03, and use code | App |
|--|--|---|-------------------------------------|---|
| General report | The Integrity Committee and/or Team Compliance & Ethics | https://schiphol.speakup.report/integritycommittee | 112836 |  |
| A member of the Integrity Committee, not being the director Corporate Legal | The director Corporate Legal. The director Corporate Legal discusses the report with the members of the Integrity Committee not being involved in the report | https://schiphol.speakup.report/corporatesecretary | 112801 |  |
| A member of Team Compliance & Ethics, not being the director Corporate Legal | The director Corporate Legal. The director Corporate Legal discusses the report with the members of the Integrity Committee not being involved in the report | https://schiphol.speakup.report/corporatesecretary | 112801 |  |
| The director Corporate Legal | The CEO. Based on the content of the report the CEO may decide with/by whom the report is handled | https://schiphol.speakup.report/ceo | 112847 |  |
| An Executive Team member, not being the CEO | The director Corporate Legal. The director Corporate Legal shares the report with the CEO | https://schiphol.speakup.report/corporatesecretary | 112801 |  |
| The CEO | The director Corporate Legal. The director Corporate Legal shares the report with the Supervisory Board | https://schiphol.speakup.report/corporatesecretary | 112801 |  |

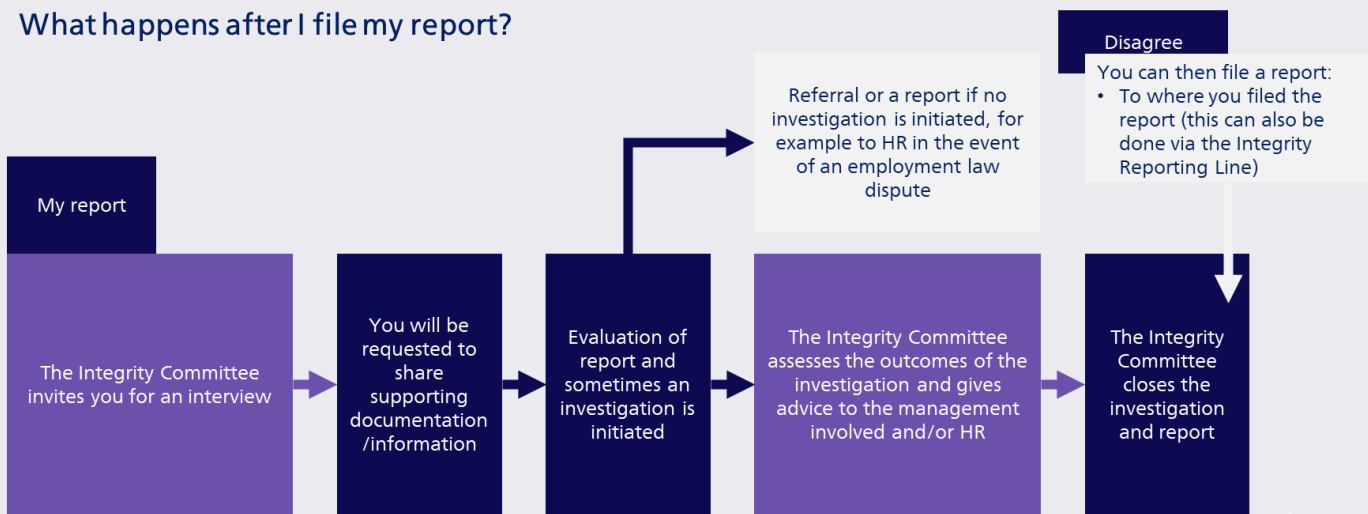
Steps taken after receiving an integrity report

- If a manager or trusted person receives a report about a suspected breach of this Code of Conduct or a violation of the (European) law, it will be passed on to the secretary of the Integrity Committee. Reports received through the Integrity Reporting Line are also forwarded to the Integrity Committee anonymously. The present composition of the Integrity Committee can be found on the intranet.
- Once a report is received, the Integrity Committee assesses the report and determines the action to be taken. If required, the Integrity Committee may seek more information from the reporter, whether via the Integrity Reporting Line and whether anonymously, and/or hear other parties involved.
- More information on how the Integrity Committee works can be found in the Committee's task description on the intranet.
- The reporter will receive a confirmation within seven days after the Integrity Committee has received the report in question. Where reasonably possible, the reporter will regularly be kept informed of the progress.
- Within three months, after the Integrity Committee shared the confirmation of receipt of the report, the reporter receives information about the conclusion and, if applicable, the follow-up to the report.
- All reports are handled confidentially. This protects the reporter's identity and the purpose of the report.
- If you are involved in an investigation, we ask that you be cooperative. If you are involved in an investigation as a third party, we also expect you to be truthful and provide all the information you have.
- Being a person involved; you will receive feedback on your report to the extent possible.
- All those involved in the investigation have a duty of confidentiality both before, during and after said investigation.

What can I report and how do I do this?



What happens after I file my report?



The Integrity Committee strives for the shortest possible lead time. In any case, within three months after the initial notification of receiving the report by the Integrity Committee, the reporter receives information about the outcomes of the investigation, if possible.

See the Investigation protocol for more information about the investigation process.

Protection of the reporter

- As a reporter, you may not be disadvantaged as a result of filing a report. Schiphol cannot protect the reporter if:
 - a. the reporter does not abide by the reporting procedure;
 - b. a false report is being made (a report with malicious intent);
 - c. the report concerns a serious violation or a crime implicating the actual reporter.
- If the reporter is dissatisfied with the way the report was handled or with the outcome, feels threatened or is having to contend with retaliatory measures, they may submit a report directly to the person or committee who initially was notified of the report. The report can of course also be reported through the Integrity Reporting Line.

Protecting the persons involved

- If a formal investigation is initiated into a person, the person involved will be notified about this, as soon as possible when there is no risk that the person involved will destroy evidence or obstruct the investigation.
- As a reporter, a person involved, or as another person involved in the report, you may be assisted by a third party for support (e.g. by a trusted person).*
- In case the person that is the subject of the investigation is dissatisfied with the manner in which the Integrity Commission has handled the report, you may make this known to the person, department or commission that initially took note of the report. Make this known in any case within a month after the investigation has been finalised.
- Also, Schiphol takes no action against persons involved because they assist the reporter.

**In exceptional cases, Schiphol may offer reimbursement for the costs of an authorised representative for an employee involved in the investigation. This means that the costs of (legal) assistance for employees involved in an (integrity) investigation will be reimbursed under certain conditions. This concerns an exceptional situation where the costs must be at least reasonable and proportionate given the nature and extent of the alleged violation. Additionally, the requirement applies that the costs must not be insured or reimbursed elsewhere. An exceptional situation as described above may occur in the case of so-called 'Serious' reports, such as possibly in the case of alleged fraud or sexual harassment, where either dismissal or a financial consequence/fine is imminent."*

Report about me... what next?



The lead time is as short as possible. Within three months, the subjected person receives information about the status of the investigation and if applicable the conclusions (receiving the investigation report). If the deadlines are not met, you will be informed.

See the *Investigation protocol* for more information about the investigation process.

14

Offboarding

If your work for Schiphol ends, we expect that you complete your work properly. This means that you leave behind your workplace in a tidy condition and that you hand over your work. You must also hand in your Schiphol belongings. Your manager will inform you of ways to stay in touch with Schiphol after you have finished working for Schiphol, for example through the alumni network.

What do we expect from you?

- Timely hand in your Schiphol Pass to the Badge Centre in the prescribed manner.
- Also, timely hand in Schiphol belongings in the prescribed manner, such as your telephone, laptop, uniform and keys.
- Ensure a full transfer of your work to colleagues.
- Timely adjust your social media, i.e. LinkedIn, Facebook, to make clear that you are no longer carrying out work for Schiphol.
- Be aware that, even after your work for Schiphol has ended, certain provisions from the employment contract/contract for services continue to apply, such as the duty of confidentiality.

