



Noida
International Airport

Yamuna International Airport Private Limited

Code of Conduct



17.10.2024 – Version 1.0

1. Purpose and scope

The Zurich Airport Group conducts its activities in compliance with legal regulations and internal company directives and guidelines, particularly the Group Code of Conduct. A Group-wide compliance management system ensures that structures, measures, information, risk assessments, monitoring and control are coordinated and appropriately guaranteed. Compliance is a concept promoted at all levels of the hierarchy.

This Code of Conduct (CoC) defines Yamuna International Airport Private Limited (YIAPL) approach to overall corporate governance. The Code of Conduct applies to all employees and members of executive bodies of YIAPL, and forms part of the YIAPL's employment contracts.

2. Compliance culture and the responsibility of management bodies

The highest management body of YIAPL promotes a corporate culture of trust in which employees and other individuals feel able at all times to report compliance-related issues to their manager, to the relevant Compliance Office or to other designated internal bodies without facing negative consequences in their employment relationship.

3. Responsibility of all employees, regardless of subject area

All employees are responsible for compliance in their own area of responsibility. As such, they must familiarise themselves with the relevant legal standards, regulations and internal guidelines, and keep up to date with ongoing developments. If in doubt, they should seek advice from their manager, the Legal department of YIAPL or the Compliance Officer of Zurich Airport group. Managers are responsible for ensuring that their employees have access to the information and process instructions that are relevant to the performance of their tasks. They give employees the guarantee that any reports they make in the compliance reporting process will be handled fairly and transparently.

4. Subject-specific guidelines

4.1 Sustainability

The Zurich Airport Group and YIAPL have joined the United Nations Global Compact (UNGC). With this we pledge to uphold corporate governance in respect of human rights as well as our social and environmental responsibility. Through our business activities we aim to contribute to the achievement of the Sustainable Development Goals (SDGs).

4.2 Third-party compliance

Prior to entering into contracts with significant business partners, and during the performance of these contracts as circumstances require, we conduct documented third-party due diligence. This process examines the following points in particular:

- a) Management, group and ownership structures, main areas of business and countries in which the company operates;

- b) Sanctions lists, court cases and convictions, key press releases;
- c) Customer structure, creditworthiness, origin of assets; and
- d) Other aspects of relevance to conclusion of the contract in question.

4.3 Risk management and safety

Through our risk management system we ensure economically successful, risk-appropriate management of YIAPL. We enforce national and international aviation security guidelines. We live by the 'safety first' principle and promote an active safety culture that strengthens operational safety at our airports. We offer our employees targeted training courses and strive to continuously improve using the relevant national regulations as a basis.

4.4 Preventing corruption

YIAPL does not tolerate corrupt conduct. We understand 'corruption' to mean any abuse of a position of trust with a view to obtaining an unjustified advantage. Bribery of public officials – and private individuals in a business context – is considered to be corruption and can be prosecuted under criminal law and with measures under labour law. This applies to both the individual offering the bribe and the individual accepting the bribe.

To ensure correct conduct in an international environment, we keep up to date concerning the relevant local regulations and customs. Embassies, consulates and chambers of commerce provide information on customs and can offer support in unclear situations.

4.4.1 Gifts and invitations

Accepting and giving money, payments in kind, non-cash assets, invitations or other benefits is prohibited for all employees. The same applies to hidden commissions (kickbacks). The following exceptions apply:

- a) Courtesy gifts may be accepted/given provided that they do not call into question the recipient's independence and freedom of choice and have a total value not exceeding INR 10,000 per year and per person. The value per gift must not exceed INR 5,000. Even if they have not been accepted, gifts that exceed the stated value or where there is doubt as to their value are to be reported both to the relevant manager and to the local Compliance Office.
- b) Invitations to travel abroad may only be accepted/issued if there is a justified business context and if the invitee bears the travel and accommodation costs.

4.4.2 Conflicts of interest

We address and clarify conflicts of interest – particularly in the case of shareholdings in companies or work for companies that have business relationships with YIAPL – with the manager in question and the local Compliance Office. Personal interests include the interests of family members and associates.

4.4.3 Political funding and events

YIAPL is a member of various business-related umbrella and industry associations that campaign for their respective economic interests. We must comply with local and legal requirements and pay annual membership fees.

Events may be sponsored if they benefit the aviation industry or the airport's immediate regional environment and we receive adequate compensation for this. The event must attract a relevant number of participants and be embedded in the industry / region. We also sponsor social, sporting and cultural initiatives and events in the region. This sponsorship is free from political criteria and regulated by separate policies.

As a company, we do not make any monetary donations to political parties and do not support individuals with political election campaigns.

4.4.3 Contracts

Contracts can only be duly signed by two people (dual verification principle). In our contracts, we obligate our contractual partners to take all measures necessary to prevent corruption.

4.5 Competition and anti-trust law

We are aware that for many partners, our airport forms the very foundation of their business activities. We take this responsibility seriously and take care to treat all our partners equally.

We do not tolerate inadmissible competition agreements or abuse of market power. This includes cartels and conduct that hamper or disadvantage other companies in competition by abusing their position on the market, as well as all other violations of local competition law.

We comply with public procurement guidelines. We are non-discriminatory and transparent in awarding contracts and procuring goods and services.

4.6 Employee and social issues

We treat each other with respect in our day-to-day operations. We are trusting and supportive towards one other. We do not tolerate sexual harassment in the workplace. We respect different opinions and do not tolerate any form of discrimination based on origin, race, gender, age, language, social status, lifestyle or religious, ideological or political convictions, or because of a physical, mental or psychological disability.

We comply with the local legal standards, regulations and internal directives relating to occupational health and safety. We take all measures that experience has shown to be necessary, are applicable according to the state of the art, or are appropriate to the given circumstances to prevent workplace accidents and work-related diseases through

comprehensive occupational safety arrangements. We use ISO 45001:2018 as a guideline.

4.7 Fire safety and evacuation

Since the sites we operate experience high frequency, we pay special attention to fire safety and evacuation. We consistently comply with local fire safety and evacuation regulations and issue additional appropriate internal directives as required.

4.8 Environment

We pay attention to the impact that our activities have on the environment. To this end, we take measures to reduce the harmful effects that our activities have on air quality, water quality and biodiversity, we work towards reducing our general consumption of resources, we promote the circular economy, and we avoid waste. We take measures to reduce noise and its effects. YIAPL aims to reduce our greenhouse gas emissions to net zero by 2030 and to promote environmentally friendly technologies.

4.9 Human rights

We pledge to uphold internationally recognised human rights as set out in the United Nations' Universal Declaration of Human Rights, and we are committed to ensuring that these rights are also respected by our business partners. We comply with the following guidelines:

- a) UN Guiding Principles on Business and Human Rights.
- b) Core labour standards no. 138 and no. 182 and the Child Labour Guidance Tool of the International Labour Organization (ILO).

We take all due care to ensure that our business activities have no negative impact on human rights at any point in our value chain.

Within the scope of local legislation, we guarantee the exercise of freedom of expression, trade union organisation and freedom of assembly – especially for our employees.

We prevent forced labour and child labour in our value chain to the best of our ability.

4.10 Knowledge and data

The functionality, availability and security of IT systems are fundamental to our business processes. We regulate IT security locally according to legal requirements and operational needs.

We protect our trade secrets from unauthorised access and treat data relating to our business partners, consumers and other stakeholders with respect and due care. We do so in accordance with confidentiality obligations and data protection laws. Employees who have insider information must not disclose it until it is reported publicly. They must not exploit this knowledge, buy or sell shares or other securities of Flughafen Zürich AG

or use financial instruments derived therefrom, or advise third parties to buy or sell Flughafen Zürich AG shares or to use financial instruments derived therefrom. Incorrect information that is considered to constitute insider information may not be distributed.

When using social media, we are aware that private and public communication about our business activities has an influence on how YIAPL is viewed and we behave accordingly.

5. Reporting and communication

We create a fair, attractive and safe environment for our employees, partners and customers. We communicate with them – and our shareholders, political leaders and the public – openly, professionally and promptly. We ensure that information is adequately exchanged with neighbours and, in so doing, promote goodwill towards airport operations.

The designated compliance officer can be reached at compliance@niairport.in

Contact:

Pawan Jain
Head - Compliance, YIAPL
Pawan.jain@niairport.in
T +91 98 198 40 441