

Code of Conduct



COMMITTED TO OUR COMMON VALUES

Flughafen Zürich AG operates Switzerland's intercontinental traffic hub and is an important commercial and services centre. Air traffic is managed within a highly complex regulatory environment. A whole host of statutory requirements governs the operation of an airport. The level of public interest in Zurich Airport and the management of its air traffic are likewise high. It is our aim with this Code of Conduct to pass on basic values to all the employees of Flughafen Zürich AG and to draw attention to laws which represent the framework and the foundation for the fulfilment of our entrepreneurial goals.

We are all committed to this Code of Conduct. Some principles of conduct are discussed more precisely in other documents, and the employees who deal with these regulations in their daily work are familiar with them. Other principles address our interactions with and respect for employees, customers, service partners, consumers, authorities and other stakeholder groups.

Zurich-Airport, February 1, 2017



Stephan Widrig
Chief Executive Officer



Lukas Brosi
Chief Financial Officer

PRINCIPLES OF CONDUCT IN OUR EVERYDAY BUSINESS

The following principles of conduct have a superordinate character and are amended by the sustainability commitment and further existing statements such as those on strategy, safety policy and environmental guidelines.

The Code of Conduct embodies fundamental values and standards of behaviour that should not be called into question by strategic changes or changes in our objectives.

The Code of Conduct obligates the employees of Flughafen Zürich AG to conduct themselves according to the ethically and legally based principles set forth in this document. The Code of Conduct is part of the employment contract. Violations have legal consequences for employment relationships, such as written warnings or the termination of employment.

CORPORATE PRINCIPLES

Corporate governance

We are committed to the principles of corporate governance as set forth in the Corporate Governance Guidelines of SIX Swiss Exchange.

Compliance

Our professional activities take place in compliance with statutory requirements and internal company instructions and guidelines. Through company compliance measures we ensure that we have the necessary structures for information, documentation and control.

All managers are responsible for ensuring that they themselves and the employees they supervise are familiar with the laws and instructions and are informed of changes which affect their work.

RISK, SAFETY AND SECURITY

Risk management

We maintain a comprehensive risk management system in order to operate the airport as a traffic hub and commercial and services centre in a manner that is economically successful and commensurate with the risks. The risk management system also encompasses all of the company's foreign activities.

Safety

We maintain an active safety culture that strengthens safety through familiarity and compliance with statutory requirements, targeted training for employees and the pursuit of ongoing improvements to processes (airport quality characteristic). We follow the principle «safety first» in our daily operations.

Security

We adhere to international and national security requirements for the security of all of Zurich Airport, especially of Flughafen Zürich AG, and the security of consumers, business customers and service partners.

Safety at work

Occupational health and safety at work is of high importance for us. It is our goal to avoid industrial and non-industrial accidents and to minimize absences caused by illness or accidents.

MARKET, PUBLIC AND ENVIRONMENT

Transparency and communication

We cultivate open, modern and professional communications with our employees, consumers, business customers, service partners and shareholders as well as with the public and political leaders and decision-makers.

When using social media we are aware that private and public communication about the airport has an impact on the perception of Flughafen Zürich AG. Further we know that private and business activities may coincide. We behave accordingly.

Market position and conduct in competition

We are aware that the airport, as an infrastructure, is the foundation of the business activity of many of our partners. We take this responsibility seriously and make sure that our partners are treated as equals, that no unfair prices or business conditions are imposed upon them and that any market leadership of the airport is not abused in any other way.

We do not tolerate any illegal competitive agreements (cartels or similar agreements).

Supply management

We observe the requirements of public procurement. In such cases of the allocation of mandates and the order of services and goods we respect the principles of non-discrimination, transparency and equal treatment.

Corruption and bribery

We do not tolerate any kind of corruption. Gifts or invitations may only be offered or accepted according to internal directives and within legal bounds.

We do not tolerate any bribery, neither with respect to officials or staff of government offices nor to business clients or service partners and their staff. It is forbidden to offer, promise or award any advantage for illegal behaviour or any behaviour contrary to duty or to influence the discretionary power.

We do not tolerate that an employee demands, secures the promise of or accepts any bribe money or other benefits for illegal behaviour or any behaviour contrary to duty or to influence the discretionary power.

Environmental protection

We comply with environment-related legal provisions and requirements efficiently and effectively. We are in command of our environmentally relevant processes and we work to develop our environmental efficiency and know-how under consideration of economic factors.

KNOWLEDGE AND DATA

Data protection and Confidentiality

We protect the business secrets of Flughafen Zürich AG from access by unauthorised persons. Information that must be kept secret and confidential documents must be identified or marked as such.

We treat our business customers, service partners, consumers and other stakeholder groups and their data with respect. We exercise care with their sensitive information and data and observe our duties of confidentiality and of data protection laws.

Data security

The functionality, availability and security of IT systems are fundamental for important airport processes. We comply with internal regulations governing IT security. Additionally, we bear in mind the risks that arise from the loss or theft of our data or unnoticed changes to it.

Insider trading

Insider knowledge is knowledge of plans or of facts not known by the public about Flughafen Zürich AG or its associated companies whose declaration could potentially have an effect on stocks or other securities of Flughafen Zürich AG. Wrong information which could have such effect may not be distributed.

Employees who have insider knowledge may not utilize such knowledge and buy or sell stocks or other securities of Flughafen Zürich AG and may not use any derivative financial instruments.

Until there has been a public announcement of such plans or facts, they may not be revealed by an employee. Employees may not motivate persons associated with the employee or third parties to buy or sell stocks or other securities of Flughafen Zürich AG or to use any derivative financial instruments.

SOCIAL INVOLVEMENT

Employee's interactions

Our interactions with each other are characterised by respect and trust, and we support one another in our daily work. We do not tolerate sexual harassment by employees.

We respect differences of opinion and lifestyle and do not tolerate discrimination or harassment of employees as a result of differences of opinion and lifestyle.

We do not tolerate discrimination of or reprisals against those who have, in good faith, reported unethical or illegal conduct.

We grant all our employees equal opportunities.

Conflicts of interest

If personal or personal financial interests arise in conjunction with a business transaction, the affected employee discusses them internally with his or her supervisor or seeks support from the company's legal service so that solutions suitable to the individual situation can be found.

The interests of family members and related persons are also considered to be personal interests.

Social responsibility

We do not do business in countries which are involved in military conflicts or are subject to economic sanctions imposed by the United Nations. If we already have business activities in such countries, we withdraw from them as far as possible and sensible.

We do not permit child labour or accept it from our partners.

We structure our business relationships to be commensurate with the risks associated with them.

REPORTING PROCESS

Assistance in the event of signs of violations

If an infringement against this Code of Conduct is suspected, the supervisor of the employee or human resources must be informed.

In the event of any uncertainty about whether a violation of the Code of Conduct has occurred or where there are signs of such a violation, any employee has the possibility and right to report it to the General Secretary. The General Secretary guarantees the reporting employee anonymity, and forwards the information in a purely anonymous form to the appropriate office within the company. In case the sender remains unknown, reports may not be tracked if information is not sufficient and therefore further inquiry is not possible.