

**Supplier Code of Conduct**  
ETHICAL COMPASS  
FOR OUR SUPPLIERS



# SUPPLIER CODE OF CONDUCT

## PREAMBLE

As one of the leading corporate groups in the aviation industry, Deutsche Lufthansa AG and its Group companies (Lufthansa Group) are committed to conducting their business activities in compliance with applicable laws, policies and regulations. We will always act responsibly and strive to **harmonize social, ecological and economic concerns**. The Lufthansa Group is a global advocate for the protection of human rights and the environment, offers a fair and ethical working environment that promotes diversity, equality and inclusion, and minimizes its impact on the environment. For us, **fair competition** is essential.

As a participant in the United Nations Global Compact, the Lufthansa Group supports the Universal Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We always strive to comply with the UN Guiding Principles on Business and Human Rights and the eleven core labor standards of the International Labor Organization (ILO) at all times.

For many years, the Lufthansa Group has also disclosed its environmental and climate protection performance, including in the context of reporting to CDP (formerly "Carbon Disclosure Project"). Since 2022, the Lufthansa Group has moreover had a climate protection target up to 2030 validated by the Science Based Targets Initiative (SBTi).

It goes without saying that **compliance with the law** is one of our fundamental principles. The Lufthansa Group is governed by the German Act on Corporate Due Diligence Obligations in Supply Chains and undertakes to comply with the Minamata Convention, the Stockholm Convention and the Basel Convention, among others. This Supplier Code of Conduct is based on the aforementioned regulations.

We also strive to build our **supplier relationships** on these values and expect our suppliers to share the same values with us. Our suppliers should support us in our endeavors and also firmly establish responsible and sustainable actions in our supply chain. We not only select our suppliers according to economic criteria, but also take quality, social standards and sustainability into account.

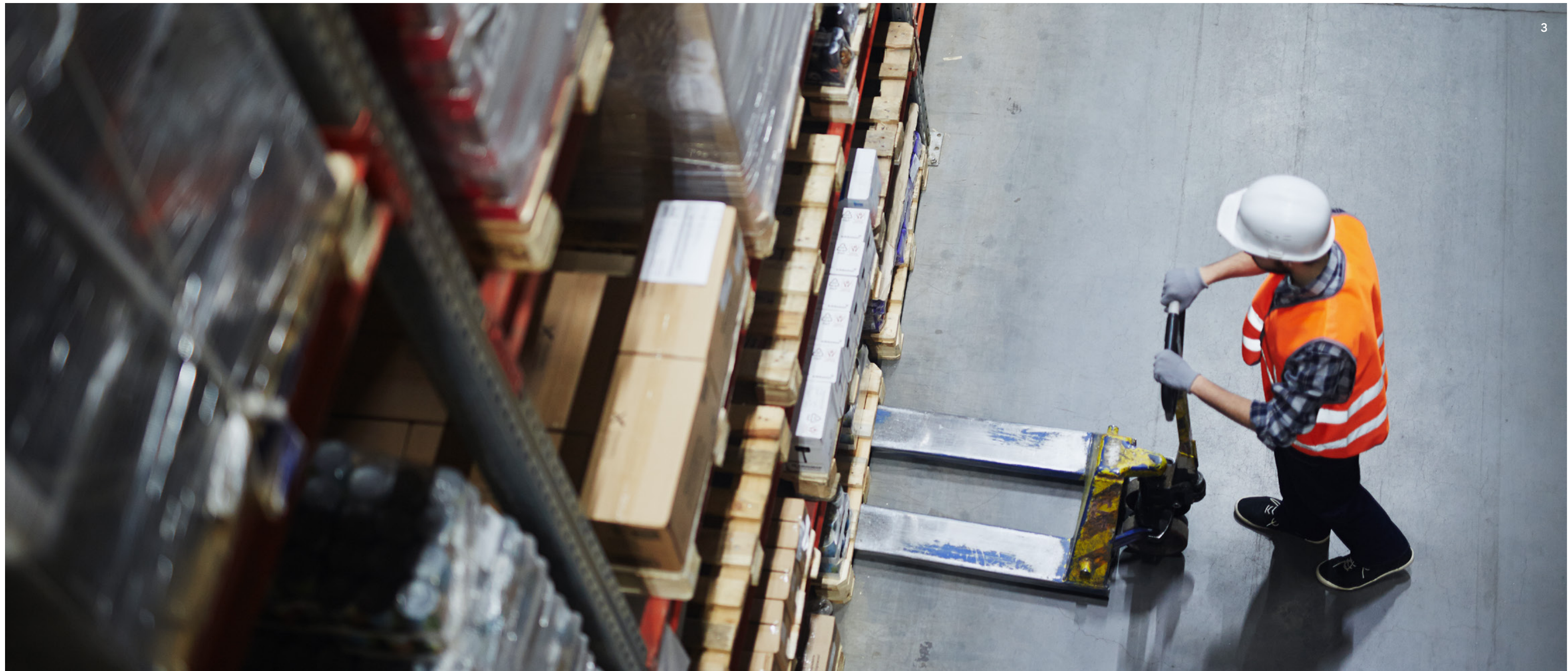
We have defined the principles for our own actions in our Code of Conduct. This **Supplier Code of Conduct** sets out our expectations towards our suppliers in more detail. It focuses on the three areas of environment, social affairs and governance and aims to ensure that our suppliers of goods and services comply with the listed standards.

**Respect for human rights, compliance with labor and health standards, environmental protection and acting with integrity** are particularly important to the Lufthansa Group. The Lufthansa Group therefore does not tolerate unethical business behavior such as corruption, bribery, forced labor, child labor or violations of environmental, labor and social standards.

In the long term, we only work with suppliers who share our values and attach the same importance to sustainability as we do.







## REQUIREMENTS FOR SUPPLIERS

This Code of Conduct applies to all suppliers of the Lufthansa Group. It defines value-based minimum standards for our suppliers, their employees and subcontractors.

The Lufthansa Group expects its suppliers to comply with the applicable laws and regulations of the countries in which they source, manufacture, offer or supply products or services. They should base their actions on the international regulations reflected in this Code of Conduct. This Code of Conduct does not replace local legislation to which suppliers are also subject, nor does it override it.





## ENVIRONMENT

As a member of the United Nations Global Compact, the Lufthansa Group expects its suppliers to continuously strive to recognize and minimize the negative environmental effects of their actions and to actively contribute to **environmental and climate protection**.

The Lufthansa Group considers it particularly important that its suppliers support its efforts to **protect the climate**, minimize harmful climate impacts, limit global warming and achieve its SBTi-validated targets. It therefore also encourages its suppliers to set their own climate protection targets. This also includes creating transparency about their own emissions and those of the upstream and downstream supply chain. They should set appropriate targets and take suitable measures to avoid or reduce greenhouse gas emissions and compensate for unavoidable emissions. The Lufthansa Group also considers it important that its suppliers do not cause any serious **environmental damage**. In particular, its suppliers should not cause harmful changes to the soil, pollute the air or water, release harmful noise emissions, or consume excessive amounts of water. The Lufthansa Group reserves the right to stipulate specific environmental and climate protection requirements with its suppliers and to regularly monitor compliance with these requirements.

The suppliers of the Lufthansa Group agree to comply with the "Minamata Convention on **Mercury**", the "Stockholm Convention on **Persistent Organic Pollutants**", the "Basel Convention on the Control of Transboundary Movements of Hazardous **Wastes** and their Disposal" and the "Montreal Protocol on **Substances that Deplete the Ozone Layer**" with the aim of preventing or minimizing environmental risks.



For the Lufthansa Group, responsibility for the environment means the prudent and efficient use of resources. Suppliers should develop, produce and deliver their products and services so that **consumption of natural resources** and the quantities of waste, wastewater, exhaust gases and other negative environmental impacts are minimized or avoided. This applies to their raw and basic materials, their production, (re)use, recycling and disposal.

Suppliers of the Lufthansa Group whose products contain raw materials as specified in the "**EU Regulation on Deforestation**" must prove that these raw materials were not produced from areas that have been deforested or whose production has damaged forest areas. They must also demonstrate that their production complies with human rights. This applies analogously to other basic products that will be included in this Regulation at a later date.

The Lufthansa Group prefers suppliers that respect and actively contribute to the protection of **biological diversity** and particularly **endangered species** in the raw materials, production, transportation, (re)use and recycling of their products and services. As a member of the United Nations Global Compact, the Lufthansa Group expects its suppliers to support initiatives that promote greater **environmental responsibility** and encourage the development and diffusion of **environmentally friendly technologies**.



## SOCIAL COMMITMENT

The Lufthansa Group expects its suppliers to refrain from participating in or contributing to human rights violations. They should respect internationally recognized **human rights as well as labor and social standards** and actively support their protection. This applies both in the area of their own business and in their supply chain.

Suppliers of the Lufthansa Group must not make use of **child labor**, especially not the worst forms of child labor. They should actively promote the elimination of child labor (ILO core labor standards 138 and 182).

Suppliers of the Lufthansa Group must not use or tolerate any form of **(modern) slavery, servitude, forced or compulsory labor, human trafficking** or comparable forms of exploitation, oppression or humiliation (ILO core labor standards 29 and 105). They must ensure that their employees carry out their work of their own free will and without restrictions to their freedom of movement. Our suppliers should actively campaign for the elimination of all forms of forced labor or slavery.

The Lufthansa Group expects its suppliers to respect the **freedom of association**, i.e. the right to form trade unions and employee representations, and the right to **collective bargaining** and to advocate for its recognition (ILO core labor standards 87 and 98).

The Lufthansa Group considers it important that its suppliers ensure **health and safety at the workplace** and comply with the laws of the respective place of work.

The Lufthansa Group expects its suppliers to pay their employees **appropriate and fair wages** in a timely manner, but no less than the minimum wage stipulated by applicable law.

Our goal is to connect people and cultures. That is why our actions are characterized by appreciation for every person. The suppliers of the Lufthansa Group shall likewise ensure **equal treatment of their employees and all people**, regardless of their national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or ideology. The Lufthansa Group agrees to the payment of equal pay for work of equal value and also demands this from its suppliers. Suppliers agree to ensure a **respectful working environment** that is free from harassment. This includes sexual harassment (ILO core labor standards 100 and 111). Suppliers of the Lufthansa Group should ensure that private or public **security personnel** that are engaged or deployed to protect their company or their projects **respect human rights**.

The Lufthansa Group attaches great importance to **responsible minerals sourcing**. Therefore, its use, source and origin in our supply chain should be traceable. We work closely with our direct suppliers to avoid using raw materials that directly or indirectly finance armed groups or which violate human rights. When procuring minerals, we expect our suppliers to act in accordance with the "**EU Conflict Minerals Regulation**".

The Lufthansa Group expects its suppliers to **respect rights to land, forests and water**. The company does not accept any unlawful evictions or appropriations.







## GOVERNANCE

Suppliers to the Lufthansa Group conduct their business in an ethical manner. In particular, they should never – neither directly nor through intermediaries – offer or promise a personal or inappropriate benefit with the aim of gaining an advantage. They will also not accept such a benefit in return for preferential treatment of a third party. The Lufthansa Group expects its suppliers to work against **corruption** in all its forms, including extortion and bribery, as well as against **money laundering**, and to expressly prohibit these activities. Suppliers to the Lufthansa Group are **fair competitors** and comply with all applicable antitrust laws.

The Lufthansa Group expects its suppliers to fulfill all legal **data protection requirements** of the respective Lufthansa Group company as well as its data protection guidelines and all contractually agreed obligations, such as the implementation of appropriate data protection measures. In particular, we assume that data protection is already ensured in the design of technical equipment and applications and through data protection-friendly default settings. This primarily concerns the protection of personal data and – where relevant – the protection of credit card data.

In addition, the supplier protects all **confidential information** of the Lufthansa Group and its respective business partners. The **protection of intellectual property** is a prerequisite for the suppliers selected by the Lufthansa Group.

Finally, the Lufthansa Group expects its suppliers to support the Lufthansa Group in **clarifying any indications** of violations of this Code of Conduct. The supplier is to undertake the best possible efforts to ensure that the whistleblower systems set up by the Lufthansa Group are open and known to its own employees, the employees of its suppliers and other stakeholders.

The Lufthansa Group encourages all suppliers to establish an adequate **management system for the protection of human rights, labor and social standards as well as climate and environmental protection**. Such a management system is adequate if the supplier appropriately identifies and assesses existing risks in the area of its own business and in its supply chain and takes preventive and corrective action if it identifies risks or even violations. The establishment of a whistleblower system is also part of an adequate management system. Our preferred supplier constantly strives to improve the efficiency and sustainability of its business activities in this regard. It is the responsibility of suppliers to train their employees, representatives and subcontractors accordingly.

Suppliers should use their influence to **appropriately address and ensure** the protection of human rights, labor and social standards, climate and environment, acting with integrity and the **expectations expressed in this Code of Conduct in their own**

**supply chains**. The suppliers must investigate particularly high-risk supply chains more closely in order to trace the origin of raw materials and preliminary products. This applies in particular to agricultural goods, textiles, metals and minerals. The Lufthansa Group expects its suppliers to disclose information about the deeper supply chain upon request.

To ensure and demonstrate compliance with human rights, labor and social standards, climate and environmental protection, ethical business behavior and agreed quality standards, Lufthansa Group suppliers will retain all relevant documents and make them available to the Lufthansa Group upon request. To this end, suppliers grant **audit rights** to the Lufthansa Group in order to verify compliance. These audits may include documents and on-site inspections and may be carried out by Lufthansa Group or by a qualified third party commissioned by Lufthansa Group after reasonable advance notice. If the results of such an audit by the Lufthansa Group indicate that the supplier does not comply with human rights, labor and social standards, climate and environmental protection, ethical business behavior or agreed quality standards, the Lufthansa Group expects the supplier to take the necessary **corrective actions** without delay. If the expectations of the Lufthansa Group are not met, the Lufthansa Group may review the business relationship and take measures that may go as far as terminating the business relationship.

The Lufthansa Group encourages its suppliers to **work together** with other players to achieve these goals, even across national and industry boundaries. The Lufthansa Group is aware of the obstacles involved in implementing and complying with all aspects of corporate and social responsibility. They **support their suppliers** in their ongoing efforts to fulfill this responsibility.

## REFERENCES

### Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal

<https://www.basel.int/default.aspx>

### CDP (Carbon Disclosure Project)

<https://www.cdp.net/en>

### Eleven core labor standards of the International Labor Organization (ILO)

<https://www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/lang--de/index.htm>

### EU Conflict Minerals Regulation

[https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation\\_de](https://policy.trade.ec.europa.eu/development-and-sustainability/conflict-minerals-regulation_de)

### EU Regulation on Deforestation

<https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX:32023R1115>

### United Nations Global Compact

<https://www.globalcompact.de/>

### German Act on Corporate Due Diligence Obligations in Supply Chains

<https://www.gesetze-im-internet.de/lksg/BJNR295910021.html>

### Minamata Convention on Mercury

<https://mercuryconvention.org/en>

### Montreal Protocol on Substances that Deplete the Ozone Layer

<https://ozone.unep.org/treaties/montreal-protocol>

### Paris Agreement

<https://eur-lex.europa.eu/content/paris-agreement/paris-agreement.html>

### Responsible Minerals Initiative

<https://www.responsiblemineralsinitiative.org/>

### Science Based Targets Initiative (SBTi)

<https://sciencebasedtargets.org>

### Stockholm Convention on Persistent Organic Pollutants

<https://www.pops.int/default.aspx>

### UN Guiding Principles on Business and Human Rights

<https://www.business-humanrights.org/de/schwerpunkt-themen/un-leitprinzipien/>



## LEGAL NOTICE

### Issuing Company

Deutsche Lufthansa Aktiengesellschaft, Cologne, Registereintragung / Registration: Amtsgericht Cologne HRB 2168

Vorsitzender des Aufsichtsrats / Chairman of the Supervisory Board: Dr. Karl-Ludwig Kley

Vorstand / Executive Board: Carsten Spohr (Vorsitzender / Chairman), Christina Foerster, Harry Hohmeister, Dr. Detlef Kayser, Dr. Michael Niggemann, Remco Steenbergen

### Department

Procurement Lufthansa Group

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