# Yamuna International Airport Private Limited Business Partners' Code of Conduct

#### Introduction

Yamuna International Airport Limited (YIAPL), part of Zurich Airport Group, is the concessionaire of Noida International Airport on design, build, finance, operate and transfer basis. Sustainable development and adherence to the values of Zurich Airport Group are essential in order for us to reach our business targets. We therefore work together with our business partners to ensure responsible and sustainable conduct is enshrined along the entire value chain.

Within the scope of this Code of Conduct, our business partners are all third parties who work by order of or on behalf of YIAPL, as part of a joint project, or as the result of other business relationships. Among others, these include suppliers, service providers, recipients of ground handling authorizations and tenants.

# Responsibilities of our Business Partners

## Basic principles

As a minimum requirement, YIAPL assumes the relevant legal regulations to be followed during business activities. Legal regulations that should be followed as a matter of course include the following, in particular:

- Regulations on equal opportunities, occupational safety and working conditions
- Environmental law
- Anti-corruption law plus conduct for preventing corruption
- Labour Laws
- Data Protection Laws

Based on its values, YIAPL accepts responsibility for sustainable corporate governance above and beyond these regulations. As a subsidiary of Zurich Airport Ltd., a signatory to the United Nations Global Compact, YIAPL is committed to upholding internationally recognised human rights standards, as articulated in the United Nations Universal Declaration of Human Rights.

YIAPL expects, above and beyond adherence to the applicable laws, that the Business Partners also align themselves to additional rules and regulations that allow for responsible and sustainable business practices.

#### Transparency and the right to inspection

YIAPL may evaluate and inspect its value chain, business partners and the business partnership according to various parameters and, in particular, regarding the expectations detailed below, and is reliant on the cooperation of business partners. YIAPL expects transparency and the handover of relevant information, plus acceptance of any work needed to procure such information.

The regularity and content of the inspections depend on the corresponding business relationship and the associated risk profile. On request, the business partners shall take measures to rectify any identified deficiencies.

## Adherence to regulations

In the event of conflict between standards detailed in this Code of Conduct and legal regulations, YIAPL expects its Business Partners to align themselves with the stricter requirements of the two in each case. Specific contractual arrangements between a business partner and YIAPL is not substituted by this Code of Conduct.

Serious violations of the Code of Conduct for Business Partners or the absence of effective measures following a corresponding request shall be considered sufficient reason to terminate the business relationship at the next possible date.

#### Conduct

## Conduct with the environment

YIAPL expects its business partners to be aware of the environmental impacts of their activities, and to make an active contribution to protecting the environment and climate. They should take measures to reduce the harmful impacts of their activities on the environment, air, water and biodiversity, take steps towards reducing their general consumption of resources, support the circular economy, and prevent waste and excess noise.

YIAPL reserves the right to agree on specific requirements regarding environmental and climate protection with their Business Partners, and to demand a report on their implementation.

## Conduct with people

# Human rights

YIAPL expects its business partners to follow the guiding principles on business and human rights from the United Nations or corresponding international regulations, and to comply with human rights and labour rights according to the United Nations Universal Declaration of Human Rights and ILO core labour standards.

During their own activities and along their entire value chain, Business Partners shall ensure that their business activities do not have a negative impact in terms of human rights or contribute towards such impacts. In particular, they shall ensure adherence with the following goals:

- Prohibition of forced labour and child labour
- Prohibition of discrimination due to origin, race, gender, age, language, social position, way of life, religious, ideological, or political conviction, or because of any physical, mental or psychological disability
- Respectful conduct and protection of privacy
- Equal salaries for the same work
- Suitable working conditions
- Freedom of expression

# Specific employee-related interests

Business partners shall adhere to applicable local legal provisions, regulations and internal guidelines relating to occupational safety and health protection. They shall implement all measures that according to past experience are deemed necessary, are applicable according to current technological standards and are appropriate according to prevailing conditions in order to prevent occupational accidents and illnesses through a consistent occupational safety organization.

# Fire prevention and evacuation

YIAPL pays special attention to fire prevention and evacuation. As a result, Business Partners are also obliged to consistently adhere to local fire prevention and evacuation regulations, to follow the instructions of YIAPL, and to implement additional, appropriate internal instructions where necessary in order to ensure health and safety at the workplace.

## Prevention of corruption

YIAPL does not tolerate any corrupt behaviour by its Business Partners. Corruption is considered as being the misuse of a position of authority to gain an undue advantage. Corruption also includes the bribery of office holders and private individuals in a business context. The prevention of corruption applies to both the person making the bribe and the person accepting it.

Business partners shall not engage in corrupt behaviour nor support it in any way. They shall take measures to ensure that corrupt behaviour is prevented during the course of their own business activities.

# Conduct with competitors

YIAPL expects fair and transparent dealings in business with their business partners. YIAPL does not tolerate any impermissible agreements affecting competition nor the abuse of market power. These include cartels and other conduct that obstructs or disadvantages other companies in competition through the abuse of market dominance, plus all other violations of locally applicable competition law.

#### Conduct with information

The functionality, availability and security of IT systems are essential for the business processes of YIAPL YIAPL expects its Business Partners to protect their IT systems from cyberattacks and access by unauthorised persons through the implementation of appropriate security standards, and to handle sensitive data with due respect and care. In doing so, they shall observe the duties of confidentiality and data protection laws.

#### Whistleblower system

YIAPL expects its Business Partners to support it in investigating reports that point to violations against this Code of Conduct. YIAPL accepts reported incidents according to a uniform process and investigate them based on risk. Whistle- blowers shall not be subjected to any prejudice as a result of their actions.