

ETHICAL GUIDELINES FOR THE EMPLOYEES OF THE SWISSPORT GROUP

CODE OF CONDUCT



6th Edition

1 September 2021

This Code of Conduct applies to the employees of Swissport International AG, Aguila Bid Ltd. and all their subsidiaries (hereinafter "Swissport").

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Dear Reader,

With our ambition to be the global leader in Aviation Services comes a great deal of responsibility, too. Just as we aspire to always deliver market leading, high-quality services for our customers, we are committed to ethical standards in the way we do business and interact with each other and with customers, partners, suppliers and others outside Swissport.

In our Code of Conduct, Swissport's Board of Directors and Group Executive Management set out the principles that define our ethical standards. At work, just as in private life, we are sometimes confronted with ethical dilemmas that can

be difficult to resolve. The Code of Conduct is a helpful guideline to find appropriate answers in such situations. It helps protect Swissport, its employees and third parties from economical, reputational, physical or emotional harm that may be caused by ethically problematic or by unlawful behavior, like discrimination, harassment or corruption.

Swissport's reputation is our most valuable asset. We all have a responsibility to protect it by acting responsibly and in line with our corporate values and the law. We show care in our interactions with others. We aim to be professional in our service delivery and we value our partnerships.

All employees, and others acting on our behalf, must comply with the Swissport Code of Conduct, regardless of their geographical location and the nature of their work.

Warwick Brady

President & CEO

Swissport International AG

INTRODUCTION

The Swissport Code of Conduct is a short and straightforward guideline to good and lawful behavior by its employees. It is a set of rules and expectations by the company for all its employees around the world. The goal of the Code of Conduct is to protect Swissport and its staff, as well as third parties, society and Swissport's stakeholders from harm which may be triggered by unethical or even unlawful behavior.

Our Code of Conduct is based on Corporate Principles and core values. It applies across the organization and is binding for all employees, regardless of the nature of the work, the location or local customs. The principles and core values are universal.

At Swissport we foster corporate behavior based on honesty, integrity and respect for the law. We are convinced these are essential prerequisites for our long-term success. The company's ethical and behavioral principles apply to our staff and those acting on our behalf. The principles are explained in this Code of Conduct, which is supplemented by more detailed standards, directives and guidelines. Among others, these are the Swissport Group Directives, the Competition Law Guidelines, the Swissport Anti-Corruption Guidelines, the Data Protection Policy, etc.

Adherence to the Code of Conduct is a condition of employment. All Swissport employees must read it, confirm with their signature that they have understood it and commit to comply. The Board of Directors and the Group Executive Management of Swissport have also committed themselves to the Code of Conduct and its provisions and are paying utmost attention to ensure full compliance.

Swissport does not tolerate violations and is committed to handling non-compliance cases rigorously. Employees should be aware that violations of the Code of Conduct can have grave consequences for the company and for themselves and that they will be held accountable. Therefore, if we become aware of a potential violation, we shall not look away, but instead critically question the situation, seek advice and speak up.



OUR CORE VALUES

PEOPLE

We show respect towards our people and their values. We work with enthusiasm and enjoyment and do not compromise on safety.

PROFESSIONALISM

We are pioneers. Working continuously on achieving sustainable results, we creatively explore new options and improved solutions.

PARTNERSHIP

Continually striving to exceed the expectations of our clients and our commitments, we deliver excellent service, in any place at any time.



OUR PRINCIPLES

COMPLIANCE WITH THE LAW AND HUMAN RIGHTS

Our Behavior Swissport upholds the highest standards in running its businesses. The company supports the protection of internationally proclaimed human rights and respects all applicable laws and regulations.

Swissport employees are expected to demonstrate integrity and always abide by applicable laws and regulations.

RESPECT FOR PEOPLE

Our Behavior Respect for each individual shall guide us at our workplace and when dealing with clients and other business partners. Swissport employees shall understand their personal responsibility in respecting other's rights and dignity, cultures and opinions.

Each employee has the right to work under safe and healthy conditions. At Swissport we are committed to ensure the required workplace conditions are always met. Our safety policy extends to all employees and to our partners.

Swissport employees are expected to contribute to this objective as well, as we believe that care for quality, health and safety cannot be delegated and is everyone's responsibility.

Swissport offers equal opportunities for recognition and career advancement to its staff, whatever their origin, gender, culture, belief or physical condition. The company does not tolerate any harassment and any form of discrimination whether based on age, gender, sexual orientation, race, disability, religion, political belief or any other dimension.

COMMITMENT TO PERFORMANCE

Our Behavior Swissport aims to continuously create value for its stakeholders and to achieve profitable growth in the longer term.

We look for employees with self-drive, an excellent sense for high quality and responsible business conduct. Swissport's staff shall be recognized based on their performance and their contribution to Swissport's success.

LOYALTY TOWARDS SWISSPORT

Our Behavior We put the interests of Swissport first and make a clear distinction between the interests of Swissport and our private interests.

We avoid possible conflicts of interest such as the representation of Swissport in any business dealing with ourselves or people close to us. In the event of doubt, we disclose such circumstances to the company. We abstain from improperly pushing for the promotion or employment of relatives and/or personal friends.

CARE FOR THE ENVIRONMENT

Our Behavior At Swissport, business and ecology go hand in hand. While we pursue a high-performance service delivery, we are committed to protect the environment and to help preserve natural resources in our business operations.

We are committed to deploy new, more sustainable equipment and technologies, and to continuously enhance our processes to reduce our environmental footprint. It is the duty of each employee to contribute to the efforts and commitments of Swissport.

RESPONSIBILITY TOWARDS SOCIETY

Our Behavior In providing mission-critical services to the global aviation service chain, both in Ground Services and Cargo Handling, Swissport is committed to high ethical and social standards in its dealings.

To ensure we keep to these standards, we comply with applicable local, national and international laws and regulations and work closely and trustingly with all relevant stakeholders, with customers, partners and authorities.

Swissport's membership in the UN Global Compact, which we joined in 2011, expresses our support for the "Ten Principles of the UN Global Compact" with respect to human rights, labor law, environment and anti-corruption.





AREAS OF APPLICATION

BUSINESS INTEGRITY

Swissport has a zero-tolerance policy for bribery and corruption.

Business integrity means that we adhere to the law and to our own Swissport principles. Bribery and corruption are criminal offences and Swissport follows a zero-tolerance policy.

In certain countries in which Swissport is active, the exchange of gifts and invitations is an important cultural element. On no account, however, may this or may these gifts be allowed to influence business decisions. In case of bribery, the giver will usually expect some kind of inappropriate, favorable treatment by the recipient in return for the (monetary or other) gift. Permissible gifts, by contrast, are not linked to any conditions. Monetary gifts are never permissible and any attempt must be reported to your superior or through one of the reporting channels mentioned in this Code.

The bribery of public officials or of other individuals, e.g. representatives of business partners, whether carried out at home or abroad, is a criminal offence and may result in substantial fines for Swissport and in fines or prison sentences for its employees. The total value of any internal or external invitation or gift must be within the bounds suggested by national and industry standards. For the exchange of gifts and invitations, employees are urged to use their common sense. In the event of any uncertainty in such cases in terms of the limits of acceptable business practice, employees should consult their superior or a member of the Group Legal Department.

No payments or gifts may be offered to our business partners or to public officers if they are intended to influence the conclusion of a business transaction or for any illegal purpose.



FAIR COMPETITION

Swissport is an advocate of fair and open competition.

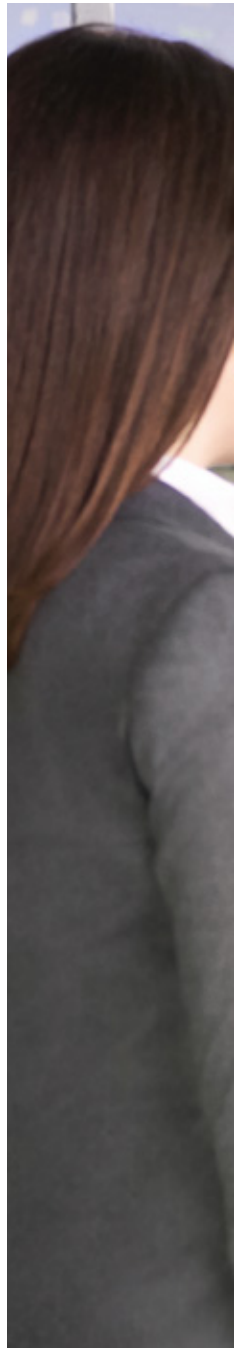
Swissport prohibits behavior which prevents or restricts fair competition. Antitrust law may on no account be violated. Any such violation may result in substantial fines for Swissport and in fines or prison sentences for its employees. In particular, price-fixing among competitors (verbal, written or in any other form), market allocation, exchange of sensitive business information with competitors and any other practices which may inhibit free competition are prohibited. Each individual Swissport employee shall follow the Swissport Competition Law Guidelines and, in case of doubt, consult with the Group Legal Department.

QUALITY, HEALTH, SAFETY & ENVIRONMENT

At Swissport health & safety is our top priority.

All employees share the duty and responsibility to conduct their work in a professional, safe and environmentally responsible manner, while striving to deliver top quality services. Relevant requirements are laid down in the Swissport Management Systems, policies and procedures. All employees shall commit themselves to our high standards.

We encourage open reporting to learn about any occurrences, incidents and accidents. At Swissport everyone is accountable to challenge unsafe situations. Employees are empowered to stop a task and report it to their line managers if they feel unsafe or not trained for it. We create an environment and provide the necessary channels which allow the reporting of such matters free from fear of reprisal. Everyone is responsible to speak up when they observe inappropriate behavior. Only by communicating openly can we continuously improve our working environment and protect our staff, customers and other stakeholders.





DATA PROTECTION

The privacy of every individual must be respected and protected.

Business secrets and confidential information shall not be divulged, unless such divulgence is required by law. Personal data may not be acquired by illegal means. Any processing of personal data must be limited to the extent required and in compliance with the applicable laws. All employees processing personal data need to ensure that such processing of data is in line with Swissport's Data Protection Policy.

No employee may illegally obtain or pass on any confidential or proprietary information or business secrets of Swissport to any third party (including family members or friends), nor use such information or secrets for any improper purpose. This shall also apply to any third party confidential or proprietary information or business secrets.

The above obligations shall continue to apply following any termination of employment with Swissport. All documents and any other data carriers containing confidential information must be returned to Swissport upon termination of employment.

COMPANY PROPERTY

All employees must exercise due care and responsibility in their use and handling of Swissport company property.

The use of funds or assets of Swissport for any unethical purpose is strictly prohibited. We document all transactions and obligations correctly, truthfully and in a manner which is as comprehensive and timely as possible. Our accounts are maintained in compliance with legal and accounting requirements and with our own internal guidelines. Our internal control systems ensure the correctness, the appropriateness and the reliability of our business processes. The obligation of employees and officers to protect Swissport's assets includes Swissport's proprietary information.

Proprietary information includes, but is not limited to, intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Swissport proprietary information and business documents are a valuable company asset, and must therefore be handled with the requisite care.

All Swissport proprietary information and business documentation (including information and documentation created by employees in the course of their employment) are the sole and exclusive property of Swissport, and may not be used by any employee for any illegal purpose. Any unauthorized use or distribution constitutes a violation of company policy and may result in civil or criminal penalties.

TAX & DUTY

Compliance with applicable tax law is of crucial importance.

It is Swissport Group's policy

- to take all reasonable measures to ensure that the Group companies are in compliance with applicable local tax laws and regulations in force in the respective countries where they operate and to meet all filing requirements on a timely basis
- to coordinate and use legal opportunities for saving taxes and for tax planning, to the extent such measures do not interfere with the efficiency of the business operations
- to seek guidance from professional tax advisers to ensure that any structures proposed to mitigate taxes are legally permissible and do not qualify as tax fraud or illegal tax evasion.





QUESTION AND SEEK ADVICE

At work we may face situations that pose an ethical dilemma.

And it is also in the nature of things that when working for a global organization like Swissport, many of us are confronted with various legal systems, cultures, manners and customs. This too, may leave us uncertain of how to act or react in a certain situation.

The Swissport Code of Conduct and supplementing directives can be very helpful in finding suitable answers in such situations, but will not always provide answers. If we are unsure about the correct behavior, we should ask ourselves the following questions:

- Are the actions we intend to take legal?
- Are we acting fairly, honestly and responsibly?
- Does our behavior comply with Swissport's Corporate Principles?
- Do our actions violate any other corporate guidelines and regulations?
- Do we have a personal problem with the action intended in moral terms?
- Does an action have negative consequences for Swissport or ourselves?
- Would we feel alright if media reported on our actions the next day?

Most often this will provide all the guidance we need. However, in case of persistent doubts or uncertainties, seeking advice is the right thing to do. Colleagues, our superior, or alternatively a local or regional Human Resources manager would be convenient contacts to seek advice in such situations of uncertainty.

Swissport promotes a culture based on trust and encourages its employees to ask questions. The most important goal is to prevent non-compliant behavior. Leaders at Swissport are responsible for ensuring that all employees reporting to them receive the advice and support they need to comply with the law and company guidelines.

In addition to locally and regionally available help, employees can use our external Swissport SpeakUp hotline to report concerns confidentially and even anonymously.



SPEAK UP!

Speaking up in good faith when you have a compliance concern is the right thing to do.

Swissport urges its employees to report any violation of the Swissport Code of Conduct. Reporting should primarily be done to your supervisor or your local or regional HR business partner. If your superior is part of the issue, you may inform the management of the level above or get in touch with a member of the Group Legal department. If you fear retaliation or if you want to report on a confidential basis, you can use Swissport's SpeakUp hotline via telephone or web intake. The SpeakUp contact details can be found in the Swissport Intranet and at your local bulletin board.

The external Swissport SpeakUp hotline is available for the reporting of suspected violations, including the reporting of persons believed to have violated or about to violate the Swissport Code of Conduct. The SpeakUp hotline comprises a web and telephone service enabling employees to report compliance concerns confidentially and anonymously. The hotline operates 24/7 in over 20 languages. It is open to our employees worldwide. All reports made in good faith will be kept confidential upon request. The reporting employees will be protected from retaliation and will not be penalized by the company. On the other hand, reports made in bad faith may be subject to legal prosecution or disciplinary action.



Swissport Intranet

We have created a comprehensive intranet page which makes available all the important contacts and channels required to easily speak up, if deemed necessary. It includes an illustrative video, management statements and the Code of Conduct.



TARGET AUDIENCE

Each employee is personally obliged to abide by the Swissport Code of Conduct.

The Swissport Code of Conduct is an integral part of Swissport's corporate governance. It applies to the Board of Directors, the Group Executive Management Board and any and all other employees of the entire Swissport Group. Each employee is personally obliged to abide by the Swissport Code of Conduct and its supplementing internal regulations and directives. Each Managing Director or head of a unit has to ensure that the Swissport Code of Conduct is included in staff training at least on an annual basis and shall monitor the observance thereof.

All individual Swissport employees are personally obliged to comply with all compulsory laws, local rules and regulations and with Swissport's internal regulations for their areas of activity.



EFFECTIVE DATE

The Swissport Code of Conduct is binding for all employees of the entire Swissport Group. It entered into effect on 3 March 2011 and shall be of unlimited duration. The current 6th Edition, released on 1 September 2021 replaces all and any older versions.

Christoph Mueller

Chairman of the Board of Directors
Swissport International AG

Warwick Brady

President & CEO
Swissport International AG

Thomas Gross

Group General Counsel
Swissport International AG





SWISSPORT INTERNATIONAL AG

P.O. Box

8058 Zurich-Airport

Switzerland

+41 43 815 00 22

group.communications@swissport.com

swissport.com