

# Responsible Business Policy

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# 1 Foreword

Royal Schiphol Group's (RSG) ambition is to proudly offer a home for world travellers with its group of high-quality airports. Together, we are building sustainable airports that help move the Netherlands forward every day. We are the trusted partner of choice to connect travellers and cargo with the world in a fast, safe and increasingly sustainable manner. Our focus is on continuously improving the conditions for our passengers, employees and airlines and on reducing our impact on the environment and our neighbours. By striking this balance, we aim to maximise Dutch welfare at large.. Respecting and maintaining high awareness for business ethics and corporate culture, including human rights, is essential to reach the ambition, it is also in line with RSG's core values and the ethical way the company wants to operate.

This Responsible Business Policy (the Policy) describes how RSG respects and ensures ethical business conduct, including compliance with human rights, which encompasses taxation, fair competition, anti-bribery & corruption, and fair lobbying practices as well. It outlines which human rights are in particular relevant to RSG's airport operations (Key Human Rights topics), in line with the UN Guiding Principles on Business and Human Rights (UNGPs). It furthermore explains our governance of these topics, as well as the implemented processes for preventing, ceasing and mitigating human rights violations, monitoring and tracking of performance and remediation. In doing so, the Policy ensures compliance with the Minimum Safeguards, as part of the EU Taxonomy.<sup>1</sup>

RSG strives to respect human rights, acts in accordance with internationally recognised standards as embodied in the Universal Declaration of Human Rights and challenges its suppliers and partners to ensure they do the same. RSG is committed to avoid any violation of human rights and encourages all to whom this Policy applies and/ or is relevant to, to speak up and report early on any possible violation of human rights through the reporting lines.

The Policy applies to RSG and its consolidated group companies (together RSG). This means that consolidated group companies follow the principles of this Policy but may have their own approach and/or internal policy/procedures to comply with relevant principles.

Do you want to know what you need to do as employee working at the airport, supplier, passenger or any other stakeholder? Please refer to Chapters 4 and 5.

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<sup>1</sup> Articles 3 and 18 of the Regulation (EU) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 June 2020 on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088.

## 2 Commitment, vision and scope

### 2.1 Commitment and vision

We are committed to conduct our business in a responsible and sustainable manner. RSG aspires to contribute to driving positive changes that universally upholds human rights, conserves and nurtures our environment. This Policy outlines our commitment to respect and support human rights and other forms of responsible business conduct.

Our commitment is aligned with local- and international standards pertaining to human rights, including but not limited to the OECD Guidelines for Multinational Enterprises (OECD MNE Guidelines), UNGPs, and the ILO Declaration on Fundamental Principles and Rights at Work.

For the purpose of this Policy, RSG follows internationally recognised definitions of human rights. *Human rights are basic rights and freedoms inherent to all human beings, regardless of their race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.*<sup>2</sup>

Through our Policy, we are committed to taking adequate measures to identify, prevent and mitigate the risk of adverse impacts on human rights and other behaviour contradictory to RSG's responsible business principles as outlined in this Policy, but also other policies. In this context, we have implemented a human rights due diligence process in accordance with the six steps of OECD MNE Guidelines<sup>3</sup> and the UNGPs.<sup>4</sup>



**Figure 1**

### 2.2 Scope

The Policy is part of RSG's overarching compliance & integrity programme. Compliance with applicable (human rights and environmental related) laws and regulations is fundamental to the way we do business, and therefore we promote the same principles in our relationships with customers, suppliers, and other business partners. We require that all employees, consultants and any other third party which act in the name of RSG, comply with the principles of this Policy. We further expect RSG suppliers to be informed of the Policy and shall conform to it and it is expected that the supplier shall endeavour to share the principles of this Policy with any potential subcontractors. This Policy complements RSG's Code of Conduct as well as our Check-In document (supplier code) and License to Operate.

<sup>2</sup> United Nations' definition of Human Rights as described on their website.

<sup>3</sup> 2023 version.

<sup>4</sup> [guidingprinciplesbusinesshr\\_en.pdf \(ohchr.org\)](https://www.ohchr.org/en/guidingprinciplesbusinesshr_en.pdf)

## 3 Governance

Our commitment to responsible business is established and supported through RSG's Executive Committee and Supervisory Board.

RSG's Executive Committee has adopted this Policy. They have delegated the responsibility to drafting and implementing the Policy to a working group consisting of experts from relevant departments. The RSG Leadership Team, reporting to RSG's Executive Committee, is responsible for following up on the Policy and taking mitigating measures within their respective department and ensuring compliance with applicable laws and internal policies in their own operations.

In line with RSG's overview of compliance risk areas, the Director Corporate Legal oversees the overall implementation of this Policy and reports on the progress and impact to the Executive Committee, whereas the Director Corporate Affairs oversees the lobbying activities.

The Safety, Sustainability and Stakeholders Committee of the Supervisory Board is updated on the developments in relation to this Policy, when needed.

RSG reports on the effectiveness of this Policy, the associated risks and potential incidents in its annual report.

## 4 Key Human Rights topics

Periodically, RSG performs an analysis to identify, review and evaluate the human rights that are most relevant to the organisation: the Key Human Rights topics. The Key Human Rights topics are also assessed against the outcome of the 'double materiality assessment' of the Corporate Sustainability Reporting Directive (CSRD), also leading to overlap between the impacts, risks and opportunities and the Key Human Rights topics. This 'double materiality assessment' highlights RSG's potential positive impact as overlapping with its commitment in ensuring ethical business practices, by being compliant with the Code of Conduct and as identified through the human rights topics below. Non-compliance, of stakeholders in scope of the Code of Conduct and this Policy, may lead to internal and external human rights violations. This risk is consistently monitored and managed, as further detailed in Chapters 6-8.

We frequently engage and work together with relevant stakeholders related to these key topics.

Please note that RSG commits to respecting all human rights. The Key Human Rights topics only describe those human rights that are most relevant to RSG as an airport operator. Reviews and evaluation can result in the identification of new Key Human Rights topics and new measures to prevent or mitigate the violation of human rights in these areas.

We consider the following to be key Human Rights topics for RSG.

### 4.1 Equal treatment/ non-discrimination

RSG aims to promote an inclusive and diverse environment in which all employees, passengers and other persons are treated with respect and equally, regardless of their background, religion, disability, sexuality, or any other characteristic. Discrimination in any form will not be tolerated. We are committed to ensure that all RSG's policies are aimed at safeguarding equal opportunities, fair treatment and creating a culture of respect and understanding.

### 4.2 Freedom of speech

We are committed to fostering an environment where respectful dialogue thrives. RSG believes that it is important that everyone should be able to seek, receive and provide information by all kind of means, although always respectfully and in line with relevant laws, legislations, internal policies and the other key human right topics as mentioned in the Policy.

### 4.3 Freedom of association

Freedom of association is respected and protected at RSG. RSG employees, as well as those of its partners, have the right to form, join and/or leave associations, trade unions or other groups.

### 4.4 Freedom of belief, expression and religion

RSG recognises and respects the right to freedom of belief, expression, and religion. Every individual may express their own beliefs at RSG through clothing, symbols, or other features in accordance with RSG clothing regulations ("*Kledingreglement*").

Everyone at RSG has the right to express an opinion, as long as this is done in a respectful manner and doesn't compromise the safety of others. Everyone visiting the airport, as well as employees, are encouraged to show respect towards the beliefs and opinions of others.

The right to freedom of expression and belief may be restricted on grounds of safety or public order.

## **4.5 Human dignity**

RSG is committed to safeguarding the human dignity of everyone who visits or works at RSG's airport areas. Any form of unwanted behaviour in the workplace, or in any work-related circumstance outside the workplace, such as work-related events, will not be tolerated by RSG.

## **4.6 Labour conditions**

The term 'labour conditions' refers to the context and conditions in which RSG's and other employees perform their work. This includes various elements such as safe and healthy working conditions, child and forced labour, work-life balance, adequate and equal payment and equal opportunities.

### **4.6.1 Safe and healthy working conditions**

RSG considers the safety and health of its employees a top priority and is committed to creating and maintaining a safe working environment for everyone. All employees have a responsibility to follow health and safety regulations and actively contribute to a safe working environment as outlined in RSG's safety related policies.

### **4.6.2 Child and forced labour**

RSG has a strict 'zero-tolerance' policy on child and forced labour in all its operations and those of its partners. We follow the ILO definition of the minimum age for admission to employment or work, which is also in line with national legislation.

### **4.6.3 Work-life balance**

RSG aims to promote employee well-being and satisfaction by supporting a balance between professional duties and personal responsibilities. This means that employees have flexible working hours. Agreements on work rhythms and working hours always take into account a good balance between the interests of the employee, the interests of RSG and the interests of the team.

### **4.6.4 Adequate and equal payment**

RSG rewards all its employees fairly and equally for the same work or work of equal value. This applies to all internal and external employees, including full-time, part-time, temporary staff, trainees, and interns. The level of remuneration is determined based on criteria such as responsibilities, role and performance, and not on personal characteristics or circumstances.

### **4.6.5 Equal opportunities**

RSG aims to create a working environment with equal opportunities for all. Creating an inclusive and equal working culture where everyone has equal opportunities to grow and where RSG has a discrimination-free environment to help achieving this. This means that decisions on appointment, promotion and training are made based on qualifications and performance.

## **4.7 Liveable climate**

A "liveable climate" refers to an environment where people can live pleasantly and in a healthy way. It is about ensuring clean air.

### **4.7.1 Pollution to air**

RSG is actively committed to reducing air pollution to protect both the environment and public health.

### **4.7.2 Noise pollution**

RSG aims to make a positive contribution to the well-being of residents by minimizing noise pollution. RSG does this by implementing technical and operational measures that reduce noise pollution. More information can be found on [www.minderhinderschiphol.nl](http://www.minderhinderschiphol.nl).

## 4.8 Privacy

Protecting the privacy of all stakeholders involved and ensuring the security of all personal data collected is of paramount importance at RSG. Only personal data that is strictly necessary will be collected and processed. Before personal data is being processed, consent will be sought where necessary. In addition, RSG makes every effort to protect the personal data obtained to prevent any data breach. Please consult the RSG Privacy statement for more information.<sup>5</sup>

## 4.9 Safety

RSG is committed to the safety and security of everyone at RSG's airport areas. This applies to all employees working at the airport, but also to passengers and other visitors.

## 4.10 Human trafficking or smuggling

RSG is one of Europe's largest airports, making it a target for human trafficking. The responsibility in relation to human trafficking or smuggling lays with the Dutch Royal Military Police. RSG is actively committed to protecting everyone at the airport and preventing human trafficking and collaborating with the Dutch Royal Military Police. There is a 'zero-tolerance policy': if human smuggling, involvement or complicity is found, legal action is taken immediately.

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<sup>5</sup> <https://www.schiphol.nl/nl/pagina/privacy-en-cookies/>



## 5 Other responsible business topics

Human rights are at the heart of the Minimum Safeguards (EU Taxonomy). The Minimum Safeguards also focuses on taxation, fair competition and bribery & corruption. According to the EU Taxonomy, inadequate or non-existent corporate due diligence processes on human rights, including – amongst others – taxation, fair competition and bribery & corruption – are a sign of non-compliance with the Minimum Safeguards. This also proves to be a risk for RSG, as non-compliance can result in (significant) legal penalties, reputational damage, and potential loss of business and shareholder confidence.

The paragraphs below outline these three topics including the criteria that apply.

### 5.1 Taxation

With regard to the taxation approach of RSG, the OECD MNE Guidelines need to be followed. RSG needs to ensure that the financial, regulatory, and reputational risks associated with taxation are fully identified and evaluated. This also includes guidance on transfer pricing through the 'arm's length principle' (the price agreed in a transaction between two related parties must be the same as the price agreed in a comparable transaction between two non-related parties) to avoid inadequate prices.

In order to be compliant with the Minimum Safeguards in relation to taxation, RSG:

1. *does treat tax governance and compliance as important elements of oversight, and has adequate tax risk management strategies and processes in place as outlined in OECD MNE Guidelines covering tax;*
2. *prevents being convicted of tax evasion.*

RSG operates in various tax jurisdictions through its subsidiaries and makes every effort to assess all relevant tax risks. RSG has developed and implemented a tax control framework as part of its overall risk management programme. The tax risk management is managed by the Finance Operations department and is part of RSG's tax policy, which policy is adopted by the Executive Committee and in line with the Dutch Tax Governance Code.

RSG reports on the status of its compliance programme in relation to taxation and potential issues in its annual report.

### 5.2 Fair competition

Fair competition is reasonable and/or right competition in view of the interest of those competing. Specific legislation prescribes what is meant by fair competition and how organisations should deal with this. Given RSG's competitive position, special attention needs to be paid to fair competition.

In order to be compliant with the Minimum Safeguards in relation to fair competition, RSG:

1. *does promote employee awareness of the importance of compliance with all applicable competition laws and regulations and does train senior management in relation to competition issues;*
2. *prevents the company or its senior management, including the senior management of its subsidiaries, being convicted of breaching competition laws.*

RSG operates in a highly regulated environment and since the passing of the Dutch Aviation Act in 2006, the airport charges have been subject to independent regulation, currently the Dutch Authority of Consumers & Markets (ACM). RSG developed and implemented a compliance programme to ensure fair competition, including awareness training sessions for (senior) management and other relevant employees.

RSG reports on the status of its compliance programme in relation to fair competition and potential issues in its annual report.

### 5.3 Bribery & Corruption

Bribery is the act of offering someone money or something valuable in order to persuade them to do something in return. Corruption is a form of dishonesty or criminal offense which is undertaken by a person or an organisation which is entrusted in a position of authority, in order to acquire illicit benefits or abuse power for one's personal gain.

RSG has a role to play in avoiding bribery & corruption. In order to be compliant with the Minimum Safeguards in relation to (anti) bribery and corruption, RSG:

1. *has developed and adopted adequate internal controls, ethics and compliance programmes, or measures for preventing and detecting bribery.*
2. *prevents the company or its senior management, including the senior management of its subsidiaries, being convicted of corruption or bribery.*

RSG's employees are expected to act with the utmost integrity at all times. To help ensure this, there is a RSG-wide compliance and integrity programme in place, including the topics bribery and corruption and seeks to prevent potential integrity-related risks. These high standards also apply to the relationship with RSG's third-party suppliers and partners.

The principles regarding bribery are embedded in the Code of Conduct and Check-In document. Within the Code of Conduct, there is specific mention given to fraud and corruption. Reference is also made to business relations outlining RSG's policies around gifts, events, travel, sponsorship and donations. The procedures regarding reporting any suspected instances of fraud, corruption or misconduct are included as well.

We expect ourselves and our suppliers to act in line with the United States Foreign Corrupt Practices Act (FCPA), the (UK) Bribery Act, the *Wet ter voorkoming van Witwassen en Financieringen van Terrorisme* (WWFT), the United Nations Convention Against Corruption (UNCAC) and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

RSG is committed to improving awareness around these important topics within the organisation, including training sessions for leadership and other relevant employees as well as e-learning for the entire organisation.

RSG reports on the status of its compliance programme in relation to bribery & corruption and potential issues in its annual report.

## 6 Risk Analysis

As part of our due diligence process, RSG has conducted a systematic and structured approach to conduct a human rights risk analysis, accumulating into a risk register. The purpose of this analysis is to identify the Key Human Rights Topics and to mitigate and manage potential human right risks associated with our operations and value chain, and measure the impact of these risks on affected stakeholders (both internally and externally). Our objective is to ensure transparency and accountability in addressing human rights risks.

The identification of human rights risks is comprised of conducting a yearly review of RSG's operations and value chain. This participatory evaluation can involve both internal and external stakeholder engagement as well as desk research (including the airport sector and NGOs). The engagement focuses on RSG's human rights impacts, which can potentially arise in RSG's value chain and the stakeholder groups that could potentially be affected by these risks.

After the identification of the Key Human Rights topics, risks have been assessed based on their likelihood and potential impact (figures 2 and 3). The risk matrix is aligned with the UNGP (principle 14)<sup>6</sup> and RSG's enterprise risk management approach.

Level of severity	Low 1	Moderate 2	High 3	Very high 4
Scale	Minor impact to health and safety: first aid case	Slight impact to health and safety: minor injury or illness (no loss time)	Moderate impact to health and safety: serious injury that needs rehabilitation	Significant impact to health and safety: physical disability of fatality
Scope	No negative impact to stakeholder	Impact to some stakeholders in particular stakeholder group	Impact to most stakeholders in particular stakeholder group	Impact to all stakeholders' group (such as local residents, employees and suppliers)
Remedability	Take less than a year (1< year) to restore the impact	Take 1 - 3 years to restore the impact	Take 3-5 years to restore impact	Impossible to restore or will take longer than 5 years (>5 years) to restore impact

  

Level of likelihood	Very unlikely 1	Unlikely 2	Likely 3	Very likely 4
	Human right violation has never occurred in the company's business activity, but it happen to peers (never/unlikely to happen in 3 years)	Human rights violation has happened in het past and may continue to occur sometimes in a department (happened/ may occur once every 3 years)	Human right violation has happened in the past and may continue to occur frequently today (happened/ may occur once a year)	Human right violation has occurred in an ongoing manner until now (happened /may mutiple times a year)

Figure 2

Human right risk assessment matrix

		Moderate	High	Very high	Very high
4		Moderate	High	High	Very high
3		Low	Moderate	High	High
2		Low	Low	Moderate	Moderate
1					
	Severity	1	2	3	4
		Likelihood			

Figure 3

<sup>6</sup> [guidingprinciplesbusinesshr\\_en.pdf \(ohchr.org\)](https://www.ohchr.org/en/guidingprinciplesbusinesshr_en.pdf)

For each risk, the inherent risk and accompanying risk level is determined. Following this, mitigating measures and controls are identified and assessed, resulting in a residual score. The residual score is mapped against the risk appetite to determine to what extent the residual score is acceptable to RSG. The risk appetite differs per topic. If necessary, further mitigating measures are identified and an action plan is set up to enhance policies, procedures, and due diligence processes to prevent potential human rights violations. Lastly, our risk register is complemented by an overview of incidents or violations that RSG has encountered, if any, as well as focal points of considerations, including an explanation of such incident and the remediation that followed.

The outcome of the risk analysis is discussed with the Executive Committee, Leadership Team and relevant business areas on an annual basis, or more frequently if needed. RSG is committed to addressing identified human rights risks, including regularly reviewing and updating the risk register by conducting the human rights risk analysis.

## 7 Cease, prevent or mitigate

At RSG, we are committed to upholding the highest standards of human rights and integrity in all aspects of our operations. We recognise the importance of providing a safe and respectful environment for everyone associated with our organization. If you believe there has been a violation of human rights or integrity concerns that relates to RSG (see Chapter 2 for the definition of human rights), we encourage you to speak up (RSG's whistleblowing mechanism).

### 7.1 Reporting procedure

#### 7.1.1 Contacting the Compliance & Ethics team:

If there are concerns related to human rights violations or other violations in relation to this Policy, please contact the Compliance & Ethics team. They can be reached by sending an email to: [integriteit@schiphol.nl](mailto:integriteit@schiphol.nl).

#### 7.1.2 Detailed complaint submission

Provide our Compliance & Ethics team with a detailed account of the alleged violation. Include at least the following information:

- Your name and contact information;
- A comprehensive description of the incident;
- Any relevant supporting documents or evidence;
- Date, time, and location of the incident; and
- Names and positions of individuals involved (if known).

#### 7.1.3 Anonymous complaint submission

We also provide a confidential and anonymous reporting mechanism to encourage individuals to report any observed or experienced human rights violations. This includes an anonymous [Integrity Reporting Line \(Speak Up\)](#). External parties can also use the Integrity Reporting Line if they wish to report any non-integrity behaviour within RSG.

#### 7.1.4 Investigation process

In the event of a (potential) human rights violation, team Compliance & Ethics can investigate the alleged violation. This may involve interviews, document review, and collaboration with relevant departments and/or parties. All human rights reports made to RSG are processed and evaluated within the relevant department and/or external party.

#### 7.1.5 Resolution and corrective action

When actual or potential human rights impacts are identified where RSG is involved in, it will be assessed whether RSG has caused, contributed to, or is indirectly linked to the impact and take appropriate measures to enable remediation in accordance with the OECD MNE Guidelines:

If RSG causes an adverse human right, appropriate measures are taken to cease, prevent and mitigate the impact:

- **Cease:** immediate actions to stop any ongoing violations or unethical behaviour. This may also include employment related measures.
- **Prevent:** implementation of preventive measures, including additional training, policy enhancements, or procedural changes.
- **Mitigate:** measures to address the impact of the violation, such as support for affected individuals or the implementation of safeguards to prevent recurrence.

If RSG contributes to an adverse impact, measures are taken to cease, prevent and mitigate the impact to the extent of the contribution and RSG will seek leverage to mitigate any remaining adverse impact. If RSG is directly linked to an adverse impact, RSG will use or seek leverage to mitigate the adverse impact.

To meet our responsibility, we strive to continuously improve our due diligence process to identify, cease prevent and mitigate actual or potential human rights impacts that we may cause or contribute to through own activities, or that we may be directly linked to by our business relationships.

#### **7.1.6 Feedback and communication**

We are committed to keeping you informed about the progress of the investigation and the actions taken to address the issue. Your feedback is valuable in helping us continuously improve our processes.

We take all complaints related to human rights and integrity seriously and are dedicated to resolving them promptly and effectively. Your willingness to come forward with your concerns is essential in maintaining a culture of accountability and transparency within our organization and at the airports we operate.

## 8 Monitoring and tracking

In our commitment to upholding human rights within RSG, we recognize the importance of implementing monitoring and tracking procedures to ensure a safe and respectful environment for all individuals associated with our organisation. This comprehensive procedure is designed to proactively identify, address, and prevent potential human rights violations.

### 8.1 Monitoring and Tracking procedure

#### 8.1.1 Identification of key risk areas

We have identified key risk areas and potential human rights issues within our organization. These areas may include but are not limited to hiring practices, employee relations, workplace discrimination, and interactions with external stakeholders.

#### 8.1.2 Training and awareness programmes

Responsible Business conduct is part of the integrity training programme to educate employees and stakeholders on human rights principles and the organization's commitment to upholding them. These programs will emphasize how to prevent, recognize and where to report potential violations of this Policy.

#### 8.1.3 Documentation and record-keeping

Team Compliance & Ethics will maintain detailed records of reported incidents, investigations, and actions taken. This documentation will include the nature of the complaint, steps taken to address it, and any corrective measures implemented.

#### 8.1.4 Regular audits and assessments

Scheduled audits and assessments will be conducted to evaluate the effectiveness of our human rights policies and procedures. These assessments will include a review of training programs, incident reports, and the overall organizational culture regarding human rights.

#### 8.1.5 Collaboration with external entities

We will collaborate with external entities, such as human rights organizations or independent auditors, to ensure an impartial evaluation of our efforts and identify areas for improvement.

#### 8.1.6 Immediate response to reported violations

Upon receiving a report of a human rights violation, team Compliance & Ethics can initiate investigation. Appropriate measures will be taken to address the violation, and corrective actions will be implemented promptly.

#### 8.1.7 Periodic reporting to leadership

Team Compliance & Ethics will provide periodic reports to the organizational leadership, summarizing the status of human rights monitoring and tracking efforts, including any trends, patterns, or emerging issues.

### 8.2 Continuous improvement

We are committed to continuously improve in relation to our human rights monitoring and tracking procedures. Feedback from stakeholders and lessons learned from investigations will be used to enhance our policies and practices.

We believe that proactive monitoring and tracking are essential elements in maintaining an organizational culture that respects and upholds human rights. Your collaboration and commitment to this procedure contribute significantly to our collective effort in creating a just and inclusive environment.

## 9 Metrics and targets

This chapter provides a comprehensive overview of the key metrics in relation to Responsible Business reported by RSG, that are compliant with the ESRS. These metrics cover the primary material topic:

1) Business ethics and corporate culture

ESRS Disclosure requirement	Metrics	ESRS reference	Target
1. Incidents, complaints and severe human rights impacts (S1-17)	<ul style="list-style-type: none"> <li>Total number of incidents of discrimination, including harassment, reported in the reporting period</li> </ul>	(ESRS S1-17, 103a) Disclose the total number of incidents of discrimination, including harassment, reported in the reporting period	N/A
	<ul style="list-style-type: none"> <li>Number of complaints filed through channels for people in RSG's own workforce to raise concerns (including grievance mechanisms) and, where applicable, to the National Contact Points for OECD Multinational Enterprises related to the matters defined in paragraph 2 of the S1 – Own workforce ESRS Standard, excluding those already reported in (a) above</li> </ul>	(ESRS S1-17, 103b) Disclose the number of complaints filed through channels for people in RSG's own workforce to raise concerns (including grievance mechanisms) and, where applicable, to the National Contact Points for OECD Multinational Enterprises related to the matters defined in paragraph 2 of the S1 – Own workforce ESRS Standard, excluding those already reported in (a) above	N/A
	<ul style="list-style-type: none"> <li>Total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed above, and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements</li> </ul>	(ESRS S1-17, 103c) Disclose the total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed above, and a reconciliation of such monetary amounts disclosed with the most relevant amount presented in the financial statements	N/A
	<ul style="list-style-type: none"> <li>Number of severe human rights incidents connected to RSG's workforce in the reporting period, including an indication of how many of these are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. If no such incidents have occurred, RSG shall state this</li> </ul>	(ESRS S1-17, 104a) Disclose the number of severe human rights incidents connected to RSG's workforce in the reporting period, including an indication of how many of these are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises. If no such incidents have occurred, RSG shall state this	N/A
	<ul style="list-style-type: none"> <li>The total amount of fines, penalties and compensation for damages for the incidents described in (a) above, and a</li> </ul>	(ESRS S1-17, 104b) Disclose the total amount of fines, penalties and compensation for damages for the incidents	N/A



	reconciliation of the monetary amounts disclosed in the most relevant amount in the financial statements	described in (a) above, and a reconciliation of the monetary amounts disclosed in the most relevant amount in the financial statements	
2. Incidents of corruption or bribery (G1-4)	<ul style="list-style-type: none"> <li>• Number of convictions and the amount of fines for violation of anti-corruption and anti-bribery laws</li> <li>• Any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery</li> </ul>	(ESRS G1-4, 24a) Disclose the number of convictions and the amount of fines for violations of anti-corruption and anti-bribery laws (ESRS G1-4, 24b) Disclose any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery	N/A  N/A

## **10 Stakeholder engagement and communication**

Living up to our Policy requires consistent and clear communication at all levels of our organisation and value chain. Understanding the Policy is critical to their effectiveness. We promote awareness, including through information campaigns, and encourage open discussion on how to improve and implement these values in our day-to-day business.

We communicate proactively with stakeholders and offer different channels for them to engage with us. We seek to understand their perspective on our products and services, our business performance, our role in society and other topics. This input is used in both defining our strategy and our decision-making processes and tells us how we can best align the interests of our businesses with the needs and expectations of our stakeholders and society.

We maintain contacts with many different stakeholders: our own employees, employees from other and/or contractual parties, passengers, local communities and supervisory authorities in different ways. Employees are continuously consulted via work and team meetings and regular contact with managers. An annual employee survey is also conducted for RSG's own employees. There are regular meetings between the Executive Committee and RSG's Central Works Council.

Important stakeholders for RSG are local, national and EU governmental bodies as well. RSG's lobbying activities reflect its vision and ambitions as well as the overall material impacts, risks and opportunities, since the activities emphasise environmental and public health considerations. This ensures that RSG's lobbying efforts not only address immediate concerns but also contribute to long-term sustainability goals. RSG is registered in the EU Transparency Register under the identification number 793750635630-82.

This Policy shall be circulated through specific communication initiatives. Creating an atmosphere of tolerance and transparency is our priority. We therefore encourage our colleagues to speak up about their concerns. It is important for us to have clear and easy reporting channels, as outlined in this Policy. The resources are available on our external corporate websites or internal communication platforms. Employees are encouraged to make use of these.

We report to the public on our human rights-related commitments, efforts and statements, consistent with this Policy, as part of our annual report. This reporting cross references the UNGP Reporting Framework. We actively engage with relevant stakeholders, recognizing their role in informing our due diligence processes and the development of effective remedies. We communicate regularly and transparently about our efforts to ensure respect for human rights, including by reporting our human rights-related efforts in line with applicable non-financial reporting standards, and participate in specialist forums to share lessons learnt and develop best practices for our industry. We investigate issues as they arise. Issues are discussed with the Executive Committee and are shared as needed with others within our organisation in order to ensure appropriate action is being taken. When we deem it necessary, we post updates to policies, resources and positions on our communication platforms in response to numerous stakeholder inquiries on notable/salient issues.

# 11 Remediation

Promoting human rights means both preventing potential problems and addressing them promptly, as well as seeking appropriate solutions when human rights are violated (see also Chapter 7). We encourage a climate of open feedback. Therefore, having complaints mechanisms in place for employees, passengers, business partners and other relevant stakeholders is key for effective remediation.

RSG aims to offer accessible and transparent processes to handle complaints in a systematic way. We urge stakeholders that witness or suspect a possible violation of these standards in our operations or throughout the value chain to raise their concerns with their manager, a colleague in Human Resources or Legal, or confidential advisers.

Employees and other stakeholders can also report concerns as described in Chapter 7.

If you are dissatisfied with the outcome of our internal investigation, you have the option to escalate the matter to relevant external authorities, such as human rights organizations or regulatory bodies.

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If you have any questions with regard to this Policy, you may always contact team Compliance & Ethics via [integriteit@schiphol.nl](mailto:integriteit@schiphol.nl).

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## 13 List of abbreviations

Abbreviation	Meaning
ACM	Dutch Authority of Consumers & Markets
CSDDD	Corporate Sustainability Due Diligence Directive
CSRD	Corporate Sustainability Reporting Directive
FCPA	United States Foreign Corrupt Practices Act
Key Human Rights Topics	human rights that are in particular relevant to RSG's airport operations
Minimum Safeguards	these safeguards ensure that companies engaging in sustainable activities meet certain standards when it comes to human and labour rights, bribery, taxation and fair competition
NGO	Non-Governmental Organisation
OECD MNE Guidelines	OECD Guidelines for Multinational Enterprises
Policy	this Responsible Business Policy
RSG	Royal Schiphol Group
UNCAC	United Nations Convention Against Corruption
UNGP	UN Guiding Principles on Business and Human Rights
WWFT	Wet ter voorkoming van Witwassen en Financieringen van Terrorisme

