

FROM LANDING
TO TAKE OFF: WE CARE!



CODE OF CONDUCT

ETHICAL BEHAVIOUR GUIDELINES FOR THE SWISSPORT GROUP



INFORMATION FROM THE CEO



Swissport International Ltd. and its subsidiaries (collectively, “Swissport”) have a commitment to high ethical standards. We have set the bar high for all our activities to support our mission of “Strengthening our number-one position”.

As we continue to grow and expand our services we will face challenging ethical dilemmas. Our core values People, Professionalism and Partnership give us the strong foundation needed to act ethically and this Code of Conduct (“the Code”) provides a consistent guideline for how we work with our clients, each other, and our business partners and communities.

The Code acts as a compass, helping you to make the right choices when you need to and providing a way forward when handling difficult situations. It gives you a clear statement of the values and professional standards that we expect all our employees to uphold as we work to achieve our mission.

We sometimes face legal and ethical dilemmas at work and need to find appropriate solutions that strengthen and maintain our reputation for honesty, integrity and respect for the law. Our commitment to the Code will ensure that together we maintain a culture based on trust and truthfulness.

By signing up to the Code, we agree to abide by its guidelines; take responsibility for all business actions; report any violations and challenge any action that may undermine the principles.

It is my expectation that all employees commit to the highest standards of business conduct and will act with complete integrity and in line with the Code. You can be assured that all members of the Board, and the GEM have made the same commitment.

If you are ever in doubt, seek advice as set out in the Code and we will ensure that together we do the right thing for Swissport’s future as a profitable, world-class service leader.

A handwritten signature in black ink, appearing to read 'Eric Born', written in a cursive style.

Eric Born
President & CEO
Swissport International Ltd.

INTRODUCTION

Swissport International Ltd. including all its affiliates (hereinafter „Swissport“ or „Swissport Group“) believes in quality customer orientation that delivers top-class service on all levels through outstanding enthusiasm, commitment, professionalism and integrity of our personnel.

Swissport maintains and promotes a corporate culture and behaviour in which honesty, integrity and respect for the law are viewed as essential to achieving its desired success. Swissport’s ethical and behavioural principles, which apply throughout all the countries in which it is active, are enshrined and explained in this Code of Conduct, which is intended to serve as a guide to its corporate and employee ethical behaviour. This Code is supplemented by more detailed standards, directives and guidelines (e.g. the SPI Group Directive on financial authority levels, the SPI Antitrust law guidelines etc.) which are applicable to specific areas of Swissport’s activities. The Board of Directors and the Group Executive Management Board will insist on the observance of this Code of Conduct and its provisions.

Each employee shall seek guidance and promptly report any evidence of potential severe violations of this Code. The employee may contact his or her superior or, if appropriate and/or in cases of high severity from a Group perspective, to the SPI Legal department, through the Group Whistleblower e-mail hotline (hqi.whistleblower@swissport.com), the Group Whistleblower telephone hotline under +41 43 815 0005 or the Chairman of the Audit Committee. The Group Whistleblower e-mail or telephone and/or the Chairman of the Audit Committee can be contacted in severe matters and as a last resort under their official contact details. All good faith correspondence, whether oral or written, will be treated confidentially if permitted by law and requested.

OUR THREE CORE VALUES ARE:

PEOPLE

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

PROFESSIONALISM

We are pioneers; working constantly 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.



PRINCIPLES

The Code of Conduct is based on the following principles:

- behaviour with integrity and in compliance with the law
- the recognition of internationally proclaimed human rights
- respect for other cultures and opinions
- responsibility towards society
- care for the environment
- loyalty towards the Swissport Group
- fair, courteous and respectful behaviour towards colleagues, superiors, subordinates, customers, shareholders, authorities, business partners and the public
- professional behaviour and observance of the rules of good business practice and of internal and external rules and regulations
- protection from discrimination
- an open, transparent and constructive business style

Therefore, in our personal behaviour we, in particular:

- abstain from any discrimination of colleagues, employees, applicants, customers or business partners based on age, gender, race, disability, religion, political belief or any other category protected by law
- abstain from and prevent harassment
- abstain from any sexual harassment and especially do not enter into personal relationships with direct reports which might contravene moral standards or where moral pressure is used to force the workplace relationship
- make a clear distinction between the interests of Swissport and our private interests and avoid possible conflicts of interest such as the representation of Swissport in any business dealing or the making of any recommendation which may unduly influence an action of the company
- abstain from improperly pushing the promotion or employment of relatives and/or personal friends.

AREAS OF APPLICATION

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.



ETHICAL CONFLICT SITUATIONS

All employees shall familiarise themselves with the good business practice applicable to their area of activity, and shall behave with integrity and in compliance with the law. As a globally-active airport and aviation service provider, Swissport is confronted with various legal systems, cultures, manners and customs, and this can lead to situations of uncertainty. Whenever reasonable, Swissport shall respect the manners and customs of the countries in which it conducts its business. Should there be any serious ethical conflict with colleagues and/or their superiors Swissport employees should apply their common sense to determine the best course of action in such situations. In doing so, they may find it useful to ask themselves:

- Are the actions I intend to take legally permissible, and do they comply with the applicable values, guidelines and regulations?
- Have I informed myself adequately about Swissport's values, internal guidelines and external regulations?
- Do I have a personal problem with the action intended in moral terms?
- Am I acting fairly, honestly and responsibly?
- Would I be able to justify my actions to my family, my friends and my colleagues?
- Have I adequately considered alternatives?
- Have I consulted my colleagues at work and superiors?
- How am I likely to judge my actions with the benefit of hindsight?
- How would I feel if my actions were published the next day?
- Could Swissport lose customers or shareholders if they found out about this?

Every individual Swissport employee is personally obliged to comply with all compulsory laws, local rules and regulations and with Swissport's internal regulations for their area of activity.

COMPLIANCE & CORPORATE RESPONSIBILITY

In certain countries in which Swissport is active, the exchange of gifts and invitations is of substantial importance. On no account, however, may they be allowed to influence business decisions. In case of bribery, the giver will usually expect some kind of improperly favourable treatment by the recipient in return for their (monetary or other) gift. Monetary gifts are never permissible and any attempt must be reported to your superior or the Chairman of the Audit Committee. Permissible gifts, by contrast, are not linked to any conditions.

GOOD BUSINESS PRACTICE

The bribery of public officials or 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 Group General Counsel, SPI Legal Department.

No personal payments or exceptionally large gifts may be offered to our business partners or to public officers which 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. 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 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 the Group General Counsel, SPI Legal Department.

DATA PROTECTION

The privacy of every individual shall be respected and protected. Business secrets and confidential information shall not be divulged, unless such divulgence is required by mandatory law. Personal data may not be acquired by illegal means. Any processing of personal data must be limited to the extent required. All employees processing personal data should ensure that such data is correct. Swissport shall also provide the technical and organisational means required to ensure that personal data is protected against unauthorised processing.

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 inadmissible 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 shall be returned to Swissport upon termination of employment.

COMPANY PROPERTY

All employees shall exercise due care and responsibility in their use and handling of any of Swissport's 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 (if any), 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.

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 structure proposed to mitigate tax are legally permissible and do not qualify as tax fraud or illegal tax evasion.

TAX AND DUTY

Swissport will not tolerate any evidenced material violation of the Swissport Code of Conduct. Any such violation will result in disciplinary action.

OBSERVANCE & REPORTING

Evidenced failure to observe the values laid down in this Code of Conduct may result in disciplinary action that can extend to dismissal. Such disciplinary action may be taken not only against person violating the Swissport Code of Conduct, but also against any employees who consciously permit such violation or who attempt to influence or retaliate against subordinates for reporting such violations.

Since constant awareness is the best prevention of all, Swissport urges all its employees to report any violation of the Swissport Code of Conduct. Such reporting should primarily be addressed to your superior or your local HR manager. If your superior is part of the issue you should address the head of your business unit directly. As a last resort, if your fear retaliation and/or if you want to report on a confidential basis you should contact the Swissport Whistleblower e-mail hotline under hqi.whistleblower@swissport.com or the Swissport Whistleblower telephone hotline under +41 43 815 0005

All such communications will be treated in strict confidence, and will not result in any disciplinary action against the person making them in a good faith intention, even if the alleged violation proves unfounded in the subsequent internal investigation. In contrast, however, any violation of the Code of Conduct by the person making such communications, and any intentionally falsified claim of such violation (such as malicious and improper accusations) will result in disciplinary action.

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 4th Edition, released on August 1, 2015 replaces all and any older versions.

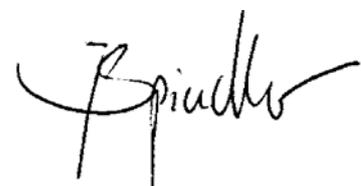
EFFECTIVE DATE



Dr. Thomas Staehelin
Chairman of the Board of Directors
Chairman of the Audit Committee
Swissport International Ltd.



Eric Born
President & CEO
Swissport International Ltd.



Dr. Johannes C. Spindler
EVP Group General Counsel
Swissport International Ltd.

SWISSPORT INTERNATIONAL LTD.

GROUND HANDLING, CARGO SERVICES,
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