



Code of Conduct



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Preface by the Executive Board of the Deutsche Lufthansa AG

Responsible and lawful conduct is an essential component of our corporate culture and the cornerstone on which we base our daily work.

The Executive Board of Deutsche Lufthansa AG has adopted this Code of Conduct as the foundation of a set of values for Lufthansa Group and reports to the Supervisory Board on a regular basis. The principles embedded in this Code of Conduct are not just the basis of fair competition, they also help us detect and avoid legal and reputational risks. The Code of Conduct sets a framework within which we make decisions as a company, and guidelines according to which we orient our conduct and against which we are measured.

To ensure the continued existence of a corporate culture based on trust and integrity, and to ensure the lasting success of our company, this Code of Conduct is binding upon all bodies, executives, and employees of Lufthansa Group.

We expect our business partners, and especially the contractors and suppliers who work for us, to adhere to the principles embedded in this Code of Conduct.

We all are called upon to observe this Code of Conduct and, where there is doubt, to obtain supplementary information and advice from the responsible people (for instance managers or the Lufthansa Group Compliance Office). Violations of this Code of Conduct will not be tolerated and may result in disciplinary measures and potentially even state-imposed sanctions.



Harry Hohmeister

Member of the Executive Board
Hub Management



Ulrik Svensson

Member of the Executive Board
and Chief Financial Officer



Carsten Spohr

Chairman of the Executive Board
and CEO



Dr Bettina Volkens

Member of the Executive Board
Corporate Human Resources
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Thorsten Dirks

Member of the Executive Board
Eurowings and
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1 We observe the rules of fair competition

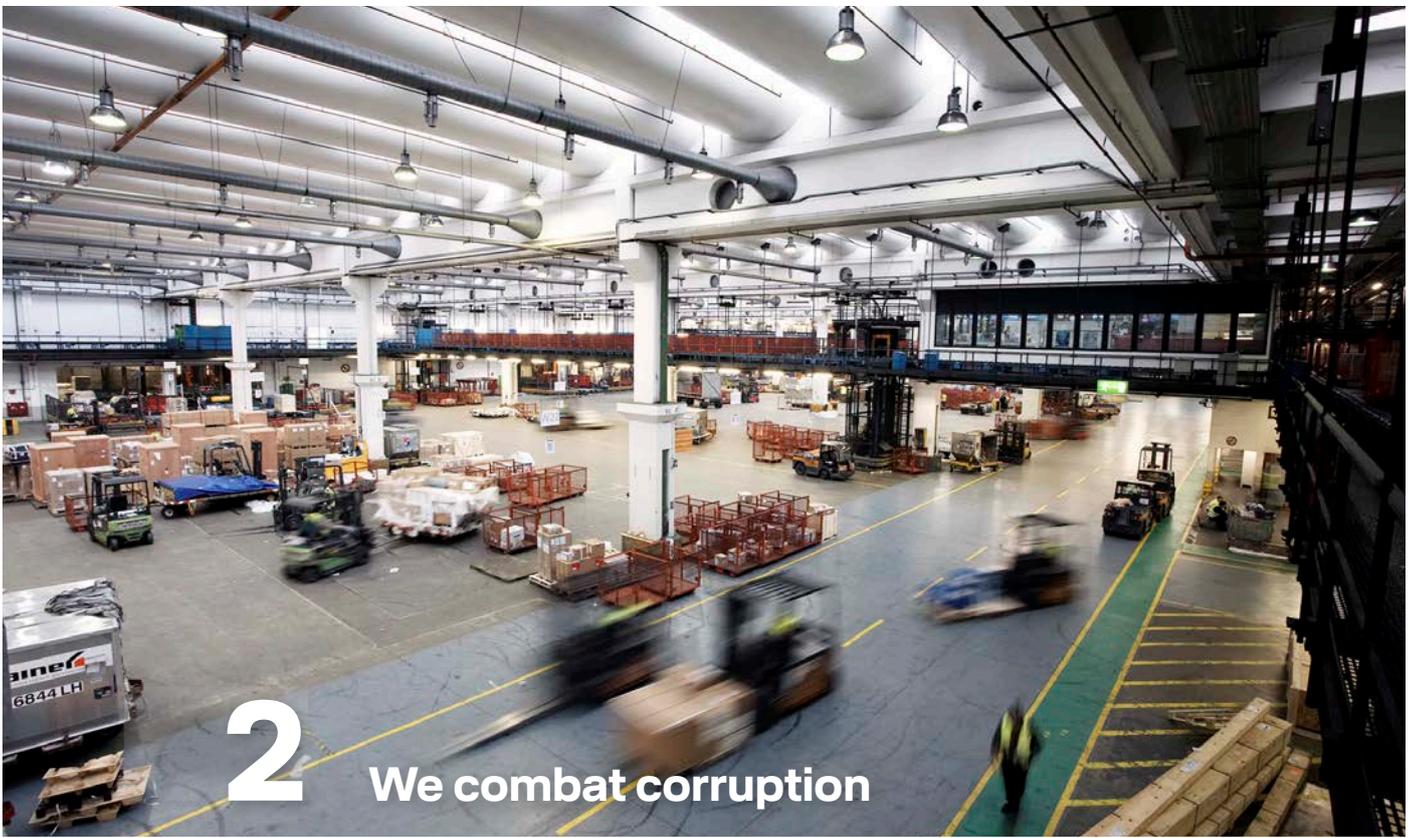
As a globally active corporate group, we are in constant competition. Fair competition is indispensable for us, as the long-term success of our company can only be ensured through lawful and honest competition.

One of the fundamental principles of Lufthansa Group is therefore that all of its bodies, executives, and employees act in accordance with the relevant provisions under competition law.

The standard we hold ourselves to is that we do not make or tolerate agreements with competitors regarding prices, price increases, terms and conditions or capacities, profits, profit margins, costs, sales and marketing measures, or other competition-relevant factors.

We refrain from any prohibited exchange of competition-sensitive information or coordinated conduct with competitors.

We likewise refrain from making agreements with competitors regarding non-competition, restrictions on business relationships with suppliers, submission of bids in tender processes, or the division of customers, markets, regions, or product portfolios.



2 We combat corruption

The Lufthansa Group companies and their employees act in a responsible manner and fight against all forms of bribery and corruption.

Both in the initiation and in the maintenance of business relationships, we base our decisions solely on objective criteria and allow ourselves to be guided neither by personal interests or relationships nor by material or immaterial personal advantages.

Our goal is to avoid even the appearance that gifts of any kind might be considered or construed as compensation for a certain desired behavior. This is particularly true in our dealings with government officials.

We therefore refrain from demanding, promising, granting, or accepting any material or immaterial advantages as compensation for the procurement of products or services.

Furthermore, all bodies, executives, and employees of Lufthansa Group companies are obligated to ensure that their business decisions remain free of conflicts of interest and are made exclusively in the best interests of Lufthansa Group.

In our understanding, a conflict of interest is already present if the relevant person's objective decision-making ability could be influenced by his or her own interests or the interests of third parties and there is the risk that business decisions will no longer be made for the exclusive benefit of our company.

We therefore avoid situations that might suggest a conflict of interest or the appearance of a conflict of interest.

We are aware of the risk that donations, sponsoring activities, or memberships may mask corrupting payments.



3 We comply with foreign trade requirements

Our principles also include strict adherence to national and international embargoes on countries and individuals. Embargoes that restrict the freedom of foreign trade with certain countries may be imposed for foreign policy and security policy reasons.

In our contracts involving the granting of funds and/or economic resources, we therefore take care not to violate any embargoes.

As a globally active company, we comply with the export control laws that are currently applicable. All bodies, executives, and employees of Lufthansa Group are obligated to familiarize themselves with and adhere to the laws governing import and export control.



4 We respect rules against market abuse

In the course of our activities, it may occur that we gain access to information about our company or, for example, our business partners that is not publicly known and would have the potential to influence stock prices significantly if it were publicly known. The bodies, executives, and employees with access to (potential) inside information regarding Lufthansa Group are registered in confidentiality or insider lists which are created for this purpose and are provided with comprehensive information regarding the legal obligations arising from their access to such information, and regarding the legal consequences of violations.

We are aware of our responsibilities in regard to prohibited insider trading and market manipulation and commit ourselves to particular discretion and restraint. In particular, we refrain from using inside information for our own benefit or disclosing it to third parties. Deutsche Lufthansa AG has appointed an ad-hoc committee to investigate and monitor insider-relevant facts.



5 We have an ombudsman system

To allow for the confidential submission of information regarding potential offences or violations of laws or rules applicable to our business, Lufthansa Group has established an ombudsman system. The Lufthansa Group ombudsman is an external attorney. He relays all compliance-relevant facts that are trans-

mitted to him to the Lufthansa Group Compliance Office and to Group Security. The identity of the whistleblower may only be disclosed to the Lufthansa Group Compliance Office or third parties if expressly permitted by the whistleblower or ordered by public authorities.



6 We act in accordance with human rights, labor standards and social standards

We respect and uphold the dignity of our employees, customers, and business partners. In all our actions, we ensure that we act in accordance with human rights, the principles of the UN Global Compact, and recognized international labor and social standards. In particular, we reject child labor, forced labor, and exploitation of any kind.

We do not tolerate any form of discrimination, including discrimination based on gender, age, skin color, family background, nationality, religious affiliation, sexual orientation, disability, political views or union activity.

We do not tolerate sexual harassment. In particular, this includes unwelcome advances, as well as physical and verbal attacks.

We adhere to the right of free assembly, freedom of association, and collective bargaining, as well as the relevant regulations to ensure fair working conditions. Free choice of occupation, equal pay, and the right to rest and take regular paid vacations are firmly embedded in our company. It is important to us to promote and preserve the health and safety of our employees. We promote social security in our sphere of responsibility and respect the right to freedom of opinion and freedom of expression.



7 Protecting the environment is important to us

We rise to the challenge of responsibly shaping modern mobility and its related services. To continuously reduce the detrimental environmental effects of our business activities, we deploy the necessary resources as efficiently as possible and work towards the development and proliferation of environmentally friendly technologies.

Following the environmental guidelines of Lufthansa Group, and maintaining and gradually expanding the certified, validated environmental management system are an essential foundation for this and, at the same time, the primary instrument for managing and continuously improving our environmental performance.

8 We are vigilant about product safety

In creating our products and providing our services, we fulfill the legal and company-internal requirements and take

great care to only use upstream products and materials of absolutely certain origin and suitability.



9

We maintain privacy protections and safeguard trade secrets

We only collect, process, and use personal data to the extent required for legitimate and clearly defined purposes. Moreover, to maintain the confidentiality of personal data, we enforce high standards regarding the secure use, retention, and storage of data and transmit such data only under the condition that there is a legitimate reason and that additional high-standard security measures are in place.

The success of Lufthansa Group is also dependent on its handling of confidential information. Data and information we gain access to on an operational level may only be used to the permitted extent. Such information may only be disclosed once it has been determined that the recipient is authorized to receive this information.

10

We obey laws to combat money laundering

Money laundering refers to the covert introduction of illegally acquired assets into the legitimate financial system, thereby concealing the criminal origin of the money. Money laundering is a crime in many countries.

Lufthansa Group does not tolerate violations of laws combating money laundering. Our objective is to only enter into business relationships with legitimate partners whose business activities are in accordance with legal provisions.

11

We pledge to protect company assets

It is the duty of every body, every executive, and every employee to handle the property of Lufthansa Group companies responsibly.

Company property may only be used for company purposes. The improper use for other purposes, in particular for inappropriate personal, illegal, or other unauthorized purposes, is prohibited.



Imprints

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