

# BAA's code of ethics policy

Ethical behaviour underpins the way we behave, do business and treat one other. Our values determine our behaviour and we must support and uphold them so they are an integral part of day to day life in BAA. This policy aims to guide our actions and those of people both with whom we work closely, encouraging a way of working which is honest, responsible and respectful, generating trust.

## Purpose

To ensure there is clarity in what is expected of each and every one of us in terms of ethical behaviour.

## Scope

This code applies to all employees of BAA and all those working alongside, in partnership and on behalf of BAA.

## Policy and procedures

Every employee of BAA should:

- Treat everyone with dignity and respect listening carefully to our stakeholders.
- Treat the company's assets and equipment as you would your own.
- Operate within the letter and the spirit of law, exercising power and influence responsibly.
- Respect the laws and customs in countries in which we operate.

BAA is committed to achieving the highest standards of corporate responsibility in all its business dealings and relationships. This Code of Ethics is underpinned by a number of policies guiding the way we behave, including:

- Code of Professional Conduct
- BAA Supply Chain Code of Conduct
- BAA Retail Code of Conduct
- Equal Opportunities
- Health and Safety
- Sustainable Development
- Information Security
- Socially Responsible Investment
- International Investment
- BAA Employee Share Transaction Rules
- Whistle blowing – “Speak Up”

These policies underpin BAA's acceptance of the principles of the Universal Declaration of Human Rights and the International Labour Organisation Conventions. These apply to the management and operation of BAA, and everyone involved. In addition, BAA's Ethics Committee has the role of considering any ethical issues which may arise in the business under this policy.

## Compliance

In establishing whether or not any conduct or activity may be in contravention of this Code, ask yourself whether it:

- Is legal?
- Is in breach of this or any other policies?
- Could be perceived as bringing you, your colleagues, BAA or associated companies into disrepute?
- Could be perceived as compromising you, your colleagues, BAA or associated companies?
- Could be considered by the public as ethical, appropriate and acceptable?

If you are in any doubt, stop and contact either your line manager or any member of Human Resources.

Contravention of this code could lead to disciplinary action.