Rules of procedure

for the whistleblower system of Hamburger Hafen und Logistik Aktiengesellschaft (HHLA)

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1 PROVIDING INFORMATION

Integrity, fairness, respect, sustainability and transparency are important principles underlying HHLA's business activities. The whistleblower system forms part of HHLA's Compliance Management System and provides employees and external persons with a secure channel for reporting potential violations or risks. Reports help HHLA identify and clarify matters at an early stage and, where necessary, take appropriate action.

In particular, the following matters can be reported through the whistleblower system:

- potential violations falling within the material scope of the German Whistleblower Protection Act (*Hinweisgeberschutzgesetz, HinSchG*);
- potential violations of internal company rules and standards of conduct, in particular HHLA's Code of Conduct, as well as violations of requirements set out in HHLA's Supplier Code of Conduct;
- *potential human rights or environmental risks as well as violations of corresponding obligations under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG) within HHLA's own business operations or at direct or indirect suppliers.*

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2 REPORTING CHANNELS FOR WHISTLEBLOWERS

Various reporting channels are available for submitting reports. HHLA's foreign subsidiaries may also provide additional local Compliance contact addresses.

The central digital reporting channel is the HHLA Whistleblower Portal. It is available at all times to internal and external whistleblowers and also allows anonymous reports:

HHLA Whistleblower Portal: hhla.de/whistleblowersystem

Reports can be submitted digitally via the portal, and questions or additional information can be exchanged securely. Whistleblowers can choose whether they wish to communicate with a local HHLA Compliance contact person – where available – or with the central Compliance Department. They decide whether, and if so which, contact details they wish to provide.

When a report is submitted anonymously via the whistleblower portal, no information regarding the identity of the whistleblower is transmitted to HHLA. However, it cannot be ruled out in every case that a whistleblower may be identifiable from the content or circumstances of a report. Where such information allows conclusions to be drawn about the whistleblower's identity, that identity will be treated confidentially and protected in accordance with the applicable legal requirements.

Reports may also be submitted through the following internal reporting channels:

- **Email:** *compliance@hhla.de*
- **Compliance Hotline:** *+49 (0)40 3088 3777*
- **Postal address:** *Hamburger Hafen und Logistik Aktiengesellschaft, Group Compliance Officer, Bei St. Annen 1, 20457 Hamburg, GERMANY*
- **Personal meeting:** Appointments can be arranged via the channels listed above.

Within the scope of the HinSchG, whistleblowers may generally also contact a competent external reporting office. Information is available in particular from the Federal External Reporting Office at the German Federal Office of Justice. The option of making an external report is not restricted by the availability or use of HHLA's internal reporting channels.

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3 PRINCIPLES OF THE PROCEDURE

3.1 CONFIDENTIALITY AND DATA PROTECTION

Reports are treated confidentially. The identity of whistleblowers, as well as of persons who are the subject of a report or are otherwise named in it, is protected in accordance with the applicable legal requirements. As a general rule, access to reports is restricted to those persons responsible for handling them.

The persons responsible for handling reports are bound by confidentiality and act impartially and, within the framework of the applicable legal requirements, independently and free from instructions. They review the reported matter and, where necessary, carry out further clarification measures.

For reports relevant under the LkSG, the Human Rights Officer is involved in the review.

Personal data is processed only in accordance with the applicable data protection requirements. Further information is available in the Data Protection Information for the HHLA Whistleblower System.

3.2 PROTECTION FROM REPRISALS AND FAIR TREATMENT

Whistleblowers should not have to fear disadvantages as a result of making a report. Anyone who submits a report in accordance with the applicable legal requirements is protected from reprisals and other disadvantages resulting from the report. HHLA does not tolerate such retaliation.

At the same time, reports are reviewed objectively and with an open mind, and the rights of all persons affected by a report are respected. No adverse conclusions will be drawn against affected persons solely on the basis that a report has been made.

3.3 HANDLING OF REPORTS AND FEEDBACK

Where a means of contact is available, HHLA will acknowledge receipt of a report within seven days.

HHLA will then assess whether and to what extent the reported matter requires further clarification. Where necessary, whistleblowers may be asked to provide additional information.

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The HHLA Whistleblower Portal also allows this exchange to take place anonymously via a secure mailbox.

For reports falling within the scope of the LkSG, the reported matter will be discussed with the whistleblower, provided that a means of contact is available.

Where the review identifies a need for action, appropriate follow-up, remedial and/or preventive measures will be taken. To the extent legally permissible, whistleblowers will be informed about the progress of the review and any measures planned or taken. For reports falling within the scope of the HinSchG, the legally required feedback will generally be provided within three months.

If the review identifies no need for further action, the procedure will be closed and the whistleblower – where a means of contact is available – will be informed accordingly.

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