

GENERAL DECLARATION ON HUMAN RIGHTS

As part of its corporate responsibility HHLA commits itself to respect for and compliance with human rights. As a basis for this, HHLA orientates its actions in line with the General Declaration of Human Rights of the United Nations (UN) and the Guiding Principles for Business and Human Rights of the United Nations (UNGPR).

In addition, further international standards and agreements such as the principles of the UN Global Compact (UNGC) and the international core labour standards of the International Labour Organisation (ILO) are fundamental to our actions and corporate culture.

Along the lines on these standards, HHLA's Code of Conduct and other internal documents define binding guidelines for our activities and thus support respect for and compliance with internationally recognised human rights. The core values of our entrepreneurial behaviour are integrity, fairness, respect, sustainability and transparency. HHLA expects its employees to comply with all applicable laws and thus with the principles of human rights. In order to raise the awareness of our employees continuously, regular trainings are conducted on the Code of Conduct, prevention of corruption and other human rights-related topics such as occupational safety.

Preserving an environment worth living in for future generations and a sustainable approach both in our thinking and actions are a fundamental aspect of HHLA's corporate decisions. The use of modern technologies, compliance with best practice social standards, the implementation of highly efficient business processes and values-oriented corporate governance are core elements of our long-term sustainability strategy. In this con-

text, an HHLA terminal in Hamburg is for example the world's first certified climate-neutral terminal.

Compliance with human rights along the supply and value chain will be further strengthened by implementing an HHLA Supplier Code of Conduct. We also expect our suppliers to apply the principles of internationally recognized human rights agreements as the basis for their business activities. Within the framework of this policy, we have the possibility to check compliance with the principles contained therein, e.g. by conducting supplier audits.

We assume our responsibility already when entering into new business relationships by identifying risks at an early stage as part of a business partner screening. Within this framework, we identify risks also with respect to the observance of human rights and, if necessary, implement risk mitigation measures in order to minimise associated risks.

In addition to this risk-based approach, HHLA regularly analyses and evaluates the human rights risks and effects of its activities as part of its risk management system with the aim of avoiding adverse effects on human rights. If any risks are identified, appropriate risk mitigation measures are developed and implemented on a case-by-case basis.

The HHLA executive board is responsible for compliance with human rights at HHLA and thus also for implementing this general declaration. Furthermore, this statement shall serve as a commitment for all other senior managers at HHLA Group to promote respect for and compliance with human rights. Employees and third parties can report violations (also anonymously) using our whistle-blower

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system (phone: 040-3088-3777; email: compliance@hhl.de). Violations will not be tolerated and will be pursued consistently.

Compliance with human rights within HHLA will continue to be subject to constant review and development in order to further improve existing measures. We will provide information on this regularly in future annual reports.

Hamburg, March 2020

The Executive Board

Hamburger Hafen und Logistik Aktiengesellschaft