

General Declaration on Human Rights

HHLA as a responsible company 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 (UNGP).

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. The key aspects of the Code of Conduct include corruption prevention as well as sustainability, occupational health and safety, respect for diversity and condemnation of all forms of discrimination. 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 context, an HHLA terminal in Hamburg is for example the world's first certified climate-neutral terminal.

Observance of human rights along the supply and value chains is further strengthened by the 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.

At least once per year, we assess potential risks concerning human rights and environmental pollution with regard to both our own business activities and those of our suppliers. Based on these risk analyses, risks can be prioritised and managed. In so doing, we conduct interviews with experts and structured evaluations e.g. of our suppliers' regions of origin and product groups. The pri-

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Identified risks based on these analyses include the following items, which can prove potentially relevant along our value chain:

- Working condition risks
- Environmental risks
- Discrimination risks
- Health and safety risks

We will minimise risks that we identify – whether in our own business activities or with suppliers – by taking appropriate measures. With regard to our own business activities, guidelines concerning topics such as occupational safety have been implemented to limit these risks. The Compliance department regularly verifies that these provisions are being observed.

Depending on the risk level, we may initially collect additional information from our suppliers or service providers, for instance by requesting risk strategies and action plans or by carrying out human rights audits. Following a closer examination of the risks, where applicable, we work with the suppliers to define the way to deal with them. Furthermore, we offer all our suppliers information material concerning human rights and environmental due diligence along the supply chain.

HHLA thoroughly reviews every violation of human and environmental rights. Remedial action is assessed and implemented on a case-by-case basis depending on the violation. This can lead to the suspension or termination of the business relationship. We regularly evaluate the effectiveness of our established measures so that we can continuously improve. This includes repeatedly

questioning our existing processes and re-sharpening them if necessary.

We report annually on the risks we have identified as well as on the measures we take to avoid them. We also assess the effectiveness of our measures and derive conclusions for future activities.

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, affected third parties and other stakeholders can report violations concerning their own business units, suppliers and upstream suppliers – also anonymously – using our whistleblower system (+49 40 3088 3777; compliance@hhl.de; www.hhl.de/compliance). Violations will not be tolerated and will be rigorously pursued.

The observance of human rights within HHLA will continue to be constantly monitored and further developed in the future so that we can further improve the existing measures. We will regularly report on this matter in the Annual Report.

Hamburg, January 2023

The Executive Board

Hamburger Hafen und Logistik Aktiengesellschaft