

SUPPLIER CODE OF CONDUCT

(VERSION 2.0 01/2023)

In its relationships with employees, customers, suppliers, competitors and other stakeholders, HHLA strives for a relationship characterized by integrity, fairness, responsibility and sustainability and expects its suppliers to follow these principles described in more detail below in their own business relationships.

1. Area of Application

This Supplier Code of Conduct applies to all natural and legal persons who sell or provide goods or other services - either directly or via third parties, e.g. affiliated companies, distribution partners, subcontractors or agents (hereinafter referred to as “suppliers”) - to the HHLA holding company or group companies in which HHLA has a direct or indirect stake of more than 50 percent,

The suppliers of HHLA are required to act in accordance with the legal and ethical principles described in this Supplier Code of Conduct. The supplier should also pass on these requirements in his supply chain.

2. Basic Requirements of Conduct

2.1 Human Rights

HHLA respects and adheres to human rights as expressed in the United Nations´ Universal Declaration of Human Rights, their adherence also being a first priority in the European Union. HHLA also bases its actions on the principles of the United Nations Global Compact

(UNGC). The suppliers are expected to comply with human rights and the core labour standards of the International Labour Organisation (ILO).

Child labour

HHLA rejects any form of child labour, defined by the core labour standards of the ILO and the principles of the UNGC. It is expected that the suppliers prohibit the work of children and, when hiring young employees, observe the local laws for the respective legal minimum age.

Forced labour

HHLA rejects any form of forced labour or human trafficking. It is expected that the suppliers do not tolerate or benefit from any forced labour, such as through indentured servitude, threats of violence to discipline or similar measures.

Discrimination

HHLA expects its suppliers to promote equal treatment of employees. No employee should be discriminated against, irrespective of his cultural background, skin colour, nationality, gender, sexual orientation, religion, political views, age, physical characteristics or appearance.

Freedom of association

HHLA actively promotes the organisation of employee participation. Therefore, suppliers

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are expected to respect the rights of their employees in accordance with applicable law, e.g. to associate freely, to join unions, to form a workers council and to exercise the right of collective bargaining.

Security forces

We expect that our suppliers employ no private or public security forces to protect the company if their activities violate human rights, private freedoms or labour laws.

Forced eviction

HHLA rejects all forms of illegal forced eviction and expropriation for the acquisition, development or other use of land, forests and water bodies, and also expects this from its suppliers.

Other human rights

Suppliers are expected to respect and support the observance of all other national human rights that apply at the place of employment, as well as all internationally applicable human rights.

2.2 Occupational health and safety

HHLA guarantees safe and humane working conditions and promotes health-conscious behaviour. HHLA expects its suppliers to take

care of the protection and health of their employees and to comply with the applicable legislation.

Working environment

HHLA expects its suppliers to create fair, safe and healthy working conditions. It is expected that health hazards are excluded or minimized and, in accordance with the applicable regulations, the adherence of working hours and breaks, rest and vacation periods, remuneration and maternity/paternity leave is ensured.

Emergency preparedness

HHLA expects its suppliers to take precautionary measures for first aid, fire protection, rescuing persons from danger areas and effective alarms within the company.

2.3 Environmental protection/Sustainability

HHLA accelerates the development and propagation of sustainable, environmentally friendly technologies and promotes sustainability and environmental awareness.

Suppliers are expected to observe all applicable environmental protection regulations and requirements and to ensure careful stewardship of natural resources to the extent possible, by using climate friendly products, reducing emissions and consuming less energy in order to protect the environment. This also applies to the prevention of the degradation of

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the quality of life, for example through harmful soil contamination, pollution of the air and water bodies, harmful noise emissions and the denial of access to drinking water and sanitary installations.

Waste and effluents management

Suppliers ensure that the disposal of all waste and effluents is initiated or carried out in a safe and environmentally friendly manner according to the applicable regulations.

Chemicals

Our suppliers deliver no products to HHLA that contain any of the chemicals listed in Article 3 paragraph 1 (a) and Annex A of the Stockholm Convention on Persistent Organic Pollutants of 23 May 2001.

Our suppliers ensure that the products delivered to HHLA either are not produced using mercury or mercury compounds, or that mercury waste has been properly handled.

2.4 Behaviour in business environment

HHLA attaches great importance to the fair treatment of all business partners, which is one of the basic requirements for cooperation in business. HHLA expects its suppliers to ensure a corporate policy based on fairness and responsibility and to comply with all relevant legal requirements.

Fair competition

HHLA expects its suppliers to comply with the applicable competition and antitrust laws and to neither participate in illegal agreements with competitors, nor to pass on information without authorisation or to make unlawful agreements restricting competition.

Prevention of corruption

HHLA expects its suppliers to ensure compliance with anti-corruption laws and to ensure that their employees do not accept, demand or grant any unjustified benefits. Suppliers are expected to act against and prohibit any form of corruption.

Preventing conflicts of interest

HHLA expect its suppliers to make decisions in their business relationship with HHLA exclusively based on objective, factual criteria and to avoid conflicts of interest through private interests or other activities, including those of relatives or other related persons.

Risk management

We expect suppliers to identify human rights and environmental risks along their supply chains and, if applicable, to immediately implement the appropriate measures.

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Protection of confidential information/data protection

HHLA expects its suppliers to protect the confidential information entrusted by HHLA, its customers or other suppliers or business partners. Confidential information may only be used and disclosed in a manner authorized by HHLA. The special protection, the processing for legitimate purposes and the use of personal data of employees and business partners must also be ensured by the implementation of appropriate measures based on applicable laws.

Information and reports on violations

Information concerning weak points or other circumstances that can lead to legal infringements can particularly be provided – also anonymously – via our whistleblower system (www.hhla.de/en/compliance). Reports will be handled confidentially. Should the whistleblower's identity be known, it will be kept secret upon request. HHLA assures whistleblowers that, in the event that they have made anonymous reports, no steps will be taken to identify them. Excluded from this are cases of misuse.

3. Compliance with the Supplier Code of Conduct

HHLA can review the compliance with the aforementioned principles and requirements

via self-declarations by suppliers or via supplier-audits or in another suitable manner.

If applicable statutory provisions are more restrictive than the regulations applicable at HHLA, these provisions precede.

In the event of a material violation of the principles and requirements of this Supplier Code of Conduct, HHLA is entitled to terminate the contractual agreements entered into within the framework of the business relationship immediately, in full or in part.



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4. Agreement with the Supplier Code of Conduct

As supplier to HHLA, we will support the HHLA-Supplier Code of Conduct by committing our company and all affiliated companies to fulfil the relevant requirements. We will also urge our suppliers to ensure this.

We hereby acknowledge the HHLA Supplier Code of Conduct within the framework of our business relationship and the contracts concluded with HHLA in this context.

We hereby confirm that we comply with the aforementioned principles and requirements by applying an equivalent Code of Conduct (included as attachment hereto) within our company.

(Please mark as appropriate)

We are bound by this declaration until further notice. This declaration will automatically expire if it is replaced by an updated version submitted by HHLA and corresponding declaration by us. If we want to refrain from this declaration, we will inform HHLA in writing, with the result that HHLA has the rights provided under 3. for terminating the contractual agreements in the context of the business relationship.

Date, supplier signature and stamp/seal