

# **Rules of procedure**

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

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## 1 PROVIDING INFORMATION

HHLA's business activities are based on integrity, fairness, respect, sustainability and transparency. The whistleblower system of HHLA is an important component of HHLA's compliance management system and serves to detect and eliminate potential breaches of the law and violations of internal guidelines at HHLA and along the associated supply chains. Employees and concerned third parties as well as other stakeholders can report violations as part of HHLA's whistleblower system.

The whistleblower system is available in particular to receive information regarding potential violations within the HHLA Group or along the associated supply chains:

- Information on potential breaches by employees of the HHLA Group of applicable laws (in particular breaches of EU law in accordance with EU Directive 2019/1937 ("EU Whistleblower Directive"))
- Information on potential breaches by employees of the HHLA Group of internal company guidelines (e.g. violations of HHLA's Code of Conduct or HHLA's Supplier Code of Conduct)
- Information on potential violations of obligations related to human rights or the environment in accordance with the German Supply Chain Due Diligence Act

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(Lieferkettensorgfaltspflichtengesetz, LkSG) within HHLA's own business activities or those of HHLA's direct or indirect suppliers

- Information on potential risks related to human rights or the environment in accordance with LkSG within HHLA's own business activities or those of HHLA's direct or indirect suppliers

## 2 REPORTING CHANNELS

HHLA has established different channels to report tips and information. HHLA's foreign subsidiaries have also published additional compliance contact addresses for the event that whistleblowers only want to contact the respective local compliance officer.

As part of the activities to identify and combat human rights risks along the supply chain in accordance with LkSG, HHLA also established an additional office of ombudsperson for external whistleblowers to report information concerning potential human rights and environmental risks and violations along the supply chain. Detailed information on the reporting channels can be found under **2.1 (for internal whistleblowers)** or under **2.2 (for external whistleblowers)**.

### 2.1 REPORTING CHANNELS FOR INTERNAL WHISTLEBLOWERS

*"Seeking dialogue and expressing concerns puts you on the right track"*

HHLA expects its employees to look for advice and help from the respective supervisor or the respective compliance officer responsible if they have concerns regarding their own conduct or information regarding dubious activities that could represent a breach of HHLA's Code of Conduct or other regulations. HHLA will ensure that there are no ensuing disadvantages affecting employees who report these activities in good faith. All information received is treated confidentially and internal whistleblowers can choose to remain anonymous.

Information can be provided via the following reporting channels:

- **Email:** [compliance@hhl.de](mailto:compliance@hhl.de)
- **Compliance Hotline:** +49 40 3088 3777
- **Postal address:** *Hamburger Hafen und Logistik Aktiengesellschaft, Group Compliance Officer, Bei St. Annen 1, 20457 Hamburg*

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- **Personal meeting:** Appointments to be arranged via the channels mentioned above

The reporting channels are also being communicated to the employees by means of training sessions and internal corporate media.

## 2.2 REPORTING CHANNELS FOR EXTERNAL WHISTLEBLOWERS

In addition to the established internal reporting channels,

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

external stakeholders have the possibility to use the external office of an ombudsperson, which has been established specifically for human rights and environmental risks or supply chain violations.

- Office of the ombudsperson (Datenschutz nord GmbH, Mr Dominik Bleckmann, fully qualified lawyer):
  - **Email:** [compliance@dsn-group.de](mailto:compliance@dsn-group.de)
  - **Tel.:** +49 (0)421 696632349
  - **Postal address:** *Datenschutz nord GmbH, Dominik Bleckmann, Konsul-Smidt-Str. 88, 28217 Bremen, Germany*

Should a whistleblower contact the office of the ombudsperson directly, the report will first be forwarded for further consideration to HHLA's central compliance department after a review by the ombudsperson. Whistleblowers can decide whether and which contact data they want to submit or whether they want to remain anonymous. It will be secured that the identity of the whistleblower is protected reliably and not be made known to HHLA or third parties if so requested by the whistleblower.

## 3 PRINCIPLES OF THE PROCEDURE

The implemented reporting channels enable individuals to provide information, be it in writing using either the respective email address or by post, or verbally by phone. A meeting in person can also be arranged at the request of the whistleblower. The information received through the contact addresses mentioned above will be handled exclusively by the central Compliance Department of HHLA or the external office of ombudsperson and treated with strict confidentiality.

### 3.1 CONFIDENTIALITY AND DATA PROTECTION

The reporting channels are designed so that the identities of the whistleblowers – as long as they choose to remain anonymous – and third parties mentioned in the report are always confidential and that unauthorised employees have no access to that information. The employees of the HHLA Compliance Department are bound to confidentiality and work impartially. They review the issue and, if needed, carry out the further clarification of the specific case.

When reviewing possible violations in accordance with LkSG, the human rights officer who is also based in the central Compliance Department will play a central role in the process.

As part of the whistleblower system, HHLA only processes personal data based on the applicable data protection statutory requirements found mainly in the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG). Further information on data protection within the context of HHLA's whistleblower system can be found here: [Data protection information HHLA whistleblower system](#).

### 3.2 PROTECTION FROM REPRISALS AND FAIRNESS

Whistleblowers who report information in good faith are protected from negative consequences and reprisals. Therefore, unfair intentions resulting from reports will not be tolerated and will be prosecuted consistently. When clarifying information on violations, all people involved will be treated fairly.

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### **3.3 TRANSPARENCY AND FEEDBACK**

HHLA ensures the adequate briefing of whistleblowers – provided that this is legally possible (especially in terms of data protection legislation) – regarding the further steps and measures after receiving information on possible violations. As long as whistleblowers provide their contact information, the receipt of the information will be confirmed within seven days upon receipt. Over the further course of the process, it will be possible for whistleblowers to provide further information regarding the matter at hand and to come into contact with the office in charge of reviewing the case as part of a joint discussion. In the event of concrete suspicion of violations, it will be ensured that the appropriate remedial measures are adopted in order to immediately eliminate the risks or violation and that measures to prevent or avoid it from happening again are introduced. Whistleblowers will be informed of these planned or adopted follow-up measures – provided that this is legally possible (especially in terms of data protection legislation) – within an adequate period – at most within three months or six months if required by the special circumstances of the case. If the review of a case does not lead to any concrete initial suspicion, the investigation will be stopped and the whistleblower informed in an appropriate manner.