



HHLA PLT Italy S.r.l.

CODE OF ETHICS

A company's sustainable success requires responsible, law-abiding and morally irreproachable behavior. More and more companies are coming under public scrutiny as a result of legal violations, and in a world with increasingly complex and difficult to understand legal structures, conscientious behaviour is increasingly demanding.

For this reason, we have developed behavioural standards at HHLA PLT Italy S.r.l. (hereinafter, "HHLA PLT Italy" or, simply, the "Company"), as a part of HHLA Group, which provide safety and support for conduct in day-to-day work.

The HHLA PLT Italy Code of Ethics - as an integral part of the organisational, management and control model adopted by the Company pursuant to Legislative Decree 231/2001 ("Organisational Model") - summarises the rules of the game which are important for acting with integrity and within the law when dealing with business partners, officials, colleagues and the public.

These regulations cannot however describe every situation that might pose a problem. In case of doubt or reservations, you should therefore contact the HHLA PLT Italy Compliance Officer. You must also inform the HHLA PLT Italy Ethics Committee or your superior about violations of these regulations.

How HHLA PLT Italy, as a part of HHLA Group, is perceived by those around it essentially depends on the behaviour of each and every individual. Each employee is also an ambassador of the Company at all times.

Our good reputation is based on the fact that we do not make any compromises concerning morally and legally sound behaviour.

It is a matter of honour for us to respect to these rules!

Let us do everything we can together so that HHLA PLT Italy remains on its course to growth and sustainable success.

1. “DOING THE RIGHT THING, EVEN IF NO ONE IS WATCHING”

Acting responsibly – Integrity and lawful behaviour

Integrity and lawful behaviour are the cornerstones of HHLA PLT Italy’s business.

Within the Company, we are all required to comply with the law, aware that any violation of the rules, besides being morally reprehensible, would risk causing very serious direct and indirect damage to the reputation of HHLA PLT Italy.

Therefore, each one of us is responsible for observing the applicable rules, aimed at ensuring full and constant compliance, and defending the reputation of HHLA PLT Italy in our appearance and behaviour.

2. “WE EMBRACE THE DIVERSITY OF OUR COLLEAGUES”

Respect diversity – No discrimination

The diversity of our employees, with their different skills and talents, opens up opportunities for innovative and creative paths for the Company.

It is important that we create a working environment in which prejudices have no place and this can only happen if we engage with one another with acceptance and mutual respect.

We therefore strongly oppose any form of harassment, bullying and discrimination. We respect all colleagues, irrespective of their cultural background, skin color, nationality, gender, sexual orientation, religion, political opinion, age or physical characteristics or appearance.

3. “WE ARE LEADING OUR BUSINESS RELATIONS WITH FORESIGHT”

Fair competition

Competition and antitrust laws serve to protect free competition.

Violations of competition laws are punished with high fines. We do not tolerate unfair business practices, restrictive agreements or, more generally, conduct having the object or

effect of restricting free competition. We do not even want to raise the impression of such behaviour.

Therefore, we do not accept any:

- agreements with competitors on prices, price elements (e.g. surcharges and calculation bases), division of customers or territories;
- submission of fake offers for tenders;
- unauthorised sending, acceptance or exchange of inside information (e.g. on prices, margins, costs, market shares, capacity or planning).

It is not always easy to assess situations you might be confronted with in competition. When these situations arise, you will be supported by the regulations and examples of the HHLA Competition Guidelines. Expressing uncertainties and reservations openly and in good time can help to avoid unlawful actions. Please, therefore, contact your superior or the HHLA PLT Italy Compliance Officer in case of doubt.

4. “DOING BUSINESS – BUT NOT AT ANY PRICE”

Prevention of corruption – Accepting/granting benefits

Our relations with Public Administration and private business partners are based on utmost transparency. Our criteria for selecting and cooperating with business partners is based on objective factors, such as quality and service, but also on sustainability and integrity.

We therefore may not accept, request or grant money or any unjustified benefits, even if of modest value, which could influence a commercial decision or official action. It is also unlawful to grant benefits indirectly through consultants, mediators or agents. This applies both in relations with persons in the private sector as well as in relations with persons in the public sector (e.g. public officials). Benefits of any kind must always comply with the law and correspond to the compliance rules of both the giver and the receiver.

With particular regard to our relations with public officials, we take the greatest care because the corruption provisions here are especially strict. Even the granting of a benefit with a very low value will often be regarded as illegal and can put officials in a difficult position very quickly.

Our sponsorship commitment is appropriate, transparent and complies with the applicable law. We only donate to non-profit purposes.

To make it easier for you to assess these topics, you can find further explanations and examples in the HHLA Anti-corruption Guidelines, being an integral part of the Organisational Model.

5. “WE RESOLVE CONFLICTS BETWEEN BUSINESS AND PRIVATE INTERESTS WITH A TRANSPARENT APPROACH”

Dealing with conflicts of interest

In daily professional life we can be faced with situations in which the business interests of HHLA PLT Italy clash with our personal or private interests. This is referred to as a conflict of interest.

A conflict of interest can arise, for example, if an employee or one of his or her family members is involved in activities that could influence professional objectivity. Specifically, conflicts of interest can arise as a result of financial or personal interests with customers, suppliers, service providers or competitors (e.g. as a result of a side-line job at one of these groups).

Conflicts of interest do not constitute an offence per se. However, it is essential that we know how to deal with them correctly.

Whenever possible conflicts of interest exist or are in the making, we disclose them and seek suitable solutions together with the respective superior, the HHLA PLT Italy HR Department or Compliance Officer in order to maintain the interests of the Company.

6. “LEADING BY EXAMPLE”

Management’s exemplary function

Our management perform an exemplary function in their daily work life, even if it often involves “small things”.

Our management is required to comply with all the obligations laid down for employees, and are responsible for supervising employees, collaborators, suppliers, contractors and

partners so that they comply with the provisions of the company procedures and of this Code of Ethics, to the extent of their competence.

In particular, managers are obliged to lead by example and promote the ethics of integrity and lawful behaviour in daily business life. Any misconduct by the management has a knock on effect on their employees.

By setting a good example, we ensure the good reputation of HHLA PLT Italy and its employees into the future.

7. “WHAT IS CONFIDENTIAL REMAINS CONFIDENTIAL”

Dealing with confidential information

All information and other material in the possession of staff in connection with their work is the property of HHLA PLT Italy. Such information may relate to both current and future activities.

Our experience and our knowledge gained in the course of work are of great importance for the long-term success of the Company. We therefore treat confidential information of HHLA PLT Italy and the HHLA Group with the greatest care and protect it from unauthorised forwarding and abuse. This also applies to how we deal with the confidential information of our business partners.

We therefore ensure that confidential information is only passed on to persons authorised within the scope of their function. If we pass on confidential information to other persons, this exchange of information must be documented.

Typically, trade and business secrets (e.g. undisclosed information on customers, prices, sales, profits of a company that have not already been disclosed), as well as undisclosed figures and information from reports and accounts are regarded as confidential information.

Insider information is a particular form of confidential information. It consists of confidential, undisclosed information which could significantly influence the market price of shares if it became publicly known. The use or transmission of this information can represent criminal insider action and result in imprisonment or fines.

We therefore treat undisclosed information confidentially, we do not use it for private investment transactions or pass it on to friends, acquaintances, family members or other

third parties, in compliance with all the prescriptions required by law, the Organisational Model, and other company policies and regulations.

To avoid even the semblance of a breach of the insider trading laws, we recommend employees not to engage in transactions involving shares or other financial instruments of companies belonging to the HHLA Group during the three weeks preceding the end of a quarter or fiscal year until two days after the publication of the respective quarterly or fiscal year results.

Protection of privacy and personal data

When collecting, processing and using personal data, we take the greatest care and comply with the applicable law, so that nobody is impaired in their private sphere by the handling of these data.

We keep personal data safe and take the necessary precautionary measures to ensure that they are reliably secured against unauthorised access. Personal data may only be collected, processed and used to the extent that this is necessary for a specifically defined purpose and to fulfil a task correctly.

Please contact the HHLA PLT Italy Data Protection Officer (“DPO”) in case of doubt.

8. “WE ARE LED BY DILIGENCE AND RESPONSIBILITY WHEN USING COMPANY PROPERTY”

Handling company property

Company property and equipment should serve to support all of us to efficiently fulfil our tasks. It is therefore in our common interest to treat HHLA PLT Italy’s furniture, equipment, devices and IT facilities with utmost care and to protect them from premature ageing, misuse, loss and theft.

We are directly and personally responsible for the preservation of the company property and equipment entrusted to us for the performance of our duties, as well as for using them in accordance with the company’s interest.

We do not use company property for private purposes without the express written consent of the responsible superior.

9. “WE WANT TO KEEP SETTING TRENDS WHEN IT COMES TO OCCUPATIONAL SAFETY, ENVIRONMENTAL PROTECTION AND SUSTAINABILITY”

Occupational health and safety, environmental protection & sustainability

HHLA Group recognises its responsibility for sustainable economic operational management. We strive not to inflict damage either on people or the environment. We therefore take the necessary precautions at all workplaces to avoid damage to health and the environment and ensure that the existing environmental protection and occupational health and safety provisions are observed.

Each of us is jointly responsible for occupational health and safety and environmental protection in our respective division.

10. “WE APPROACH OUR RELATIONS WITH GOVERNMENT AUTHORITIES WITH FORESIGHT AND PRUDENCE”

Dealing with public authorities

We communicate with public authorities only through the employees or departments responsible for this. In this way, we ensure open communication which strives for cooperation, in which the interests of HHLA PLT Italy are adequately protected.

We actively cooperate in surveillance activities carried out by public authorities or judicial authorities. In the event of official requests that go beyond routine information, legal advisors must be involved. This, in particular, in the event of contact with public authorities whose task is to investigate and, where applicable, punish unlawful acts or breaches of law (e.g. police, public prosecutor’s office, competition authorities, etc.).

“SEEKING DIALOGUE AND EXPRESSING CONCERNS PUTS YOU ON THE RIGHT TRACK”

Behaviour in case of violations

Openly addressing abuses and misconduct is not always an easy task. Often it is simpler to stay out of things, but the potential damage can become even greater as a result of this. It is therefore important that each of us calls a spade when problems arise.

We expect that each employee who is in doubt on the interpretation of the principles expressed in this Code of Ethics, or has reservations regarding his/her own behaviour, will seek advice and help from:

- the respective superior or,
- the HHLA PLT Italy Compliance Officer.

If an employee has indications about a (possible) violation of this Code of Ethics, we expect him/her to report that violation to the HHLA PLT Italy Ethics Committee. The operating instructions for making reports provided for by the procedure “Management of whistleblowing reports” in Annex 4 of the Organisational Model of HHLA PLT Italy contains further information on how reports are being treated.

Only then is there the possibility that support will be provided and (further) damages will be averted.

HHLA PLT Italy ensures that employees who provide information about occurrences in good faith will not suffer any disadvantages from this. All communications will be treated confidentially and can also be made anonymously. This also applies to notifications and hints submitted to us by third parties.

Prohibition of retaliatory acts

We do not tolerate and prohibits the adoption of discriminatory or retaliatory measures of any kind against anyone who reports, in good faith, violations of this Code of Ethics or against anyone who has cooperated in the activities of verifying the validity of the report.

Discriminatory or retaliatory measures include, for example, change of job, unjustified disciplinary proceedings and sanctions (including dismissal), harassment in the workplace and any other form of retaliation leading to intolerable working conditions.

Disciplinary sanctions

Violation of the principles set out in this Code of Ethics have consequences. They can entail the application of the disciplinary sanctions provided for in Chapter VIII of the Organisational Model of HHLA PLT Italy (“Disciplinary system”), as well as, depending on the seriousness of the offence, possible legal, civil or criminal law sanctions.

Contact details of the Ethics Committee

Anyone who wishes to report conduct contrary to the principles set out in this Code of Ethics is invited to do so by contacting the HHLA PLT Italy Ethics Committee through the following reporting channels:

- **E-mail: compliance@hhl-plt.it;**
- **Mobile phone: +39 345 5670801;**
- **Mailbox for the Human Resources Department, located next to the stampers at the offices;**
- **Paper mail: Via degli Altiforni snc, 34145 Trieste.**