

Compliance Statement

Hamburger Hafen und Logistik Aktiengesellschaft and its group companies (HHLA) are well aware of the constantly increasing requirements to secure compliant behaviour in all relationships towards business partners, shareholders, employees, capital markets and further stakeholders. HHLA is truly committed to establish effective corporate compliance programmes to support this aim. HHLA has, therefore, established its own compliance management system with the core being a code of conduct. This code comprises the following main rules:

- 1. The actions of HHLA Group and its employees are led by integrity and lawful behaviour.**
- 2. HHLA respects and supports diversity, no discrimination of any kind is tolerated.**
- 3. The business relationships of HHLA are conducted by its employees in a fair manner. Coordinated behaviour or unlawful agreements which aim to limit competition are not tolerated.**
- 4. No employee may offer/award or demand/receive - directly or indirectly – any unlawful benefits to/from business partners or officials.**
- 5. Conflicts between the interests of HHLA and the private interests of its employees are solved by a transparent communication.**
- 6. Executive Board members and other HHLA managers act as role models.**
- 7. HHLA's business affairs and those of its business partners as well as personal data are being protected.**
- 8. Diligence and responsibility forms the conduct of every employee with HHLA's property.**
- 9. HHLA recognizes its responsibility for sustainable business practices. Each employee is responsible for occupational health, safety and environmental protection in his or her unit. Environmental pollution is being prevented or reduced as much as possible.**
- 10. HHLA strives to maintain a cooperative and open relationship with authorities and other government bodies whilst upholding its interests and rights.**

HHLA's employees are subject to an ongoing training programme which includes this code of conduct and trainings in other special topics such as anti-corruption, fair competition, confidentiality, work safety and protecting the environment. In line with its anti-corruption programme, the employees of HHLA are specifically being trained in HHLA's anti-corruption guideline (which comprises lawful behaviour towards all local and international business partners and government officials) and further internationally applicable regulations such as the US Foreign Corrupt Practices Act and the UK Bribery Act. Further internal guidelines

cover topics such as compliant behaviour in competition, data privacy and business partner screening.

Based on a supplier code of conduct, HHLA is also demanding compliant behaviour from its suppliers.

HHLA's compliance management system is regularly audited by qualified external auditors based on acknowledged compliance standards (German IDW PS 980/ISO 19600)

More information on HHLA's compliance management system can be found at HHLA's website (www.hhla.de/en/investor-relations/corporate-governance/compliance) and in the published annual reports in the corporate governance chapter.

Hamburg, 29.09.2021



Dr. John Maurer (Attorney-at-law)
Group Compliance Officer