

**Declaration of Conformity by the Executive Board and the Supervisory Board of
HAPAG-LLOYD AKTIENGESELLSCHAFT
regarding the Recommendations of the
German Corporate Governance Code Commission
in accordance with Sec. 161 of the German Stock Corporation Act (AktG)**

The Executive Board and the Supervisory Board of Hapag-Lloyd Aktiengesellschaft hereby declare that the Company has, since the last declaration of conformity in March 2025, complied and will in future comply with the Recommendations of the "Government Commission on the German Corporate Governance Code" in the version of April 28, 2022 (GCGC) published in the official section of the Federal Gazette (*Bundesanzeiger*) on June 27, 2022, with the following exceptions:

- Purely as a precaution, a deviation from Recommendations C.7 and C.10 sentence 1 var. 2, sentence 2 GCGC is declared.

According to Recommendation C.7 GCGC, more than half of the shareholder representatives on the Supervisory Board shall be independent from the Company and its Executive Board. When assessing the independence of their members from the Company and its Executive Board, the shareholder representatives shall in particular take into account whether the Supervisory Board member (i) holding a position of responsibility at a company outside the group currently has or has had a significant business relationship with the Company or a company controlled by the latter or (ii) has been a member of the Supervisory Board for more than twelve years.

Of the eight shareholder representatives on the Supervisory Board of Hapag-Lloyd Aktiengesellschaft, five hold positions of responsibility in (group companies of) the core shareholders of Hapag-Lloyd Aktiengesellschaft: Dr Isabella Niklas being Spokesperson of the Management Board of HGV Hamburger Gesellschaft für Vermögens- und Beteiligungsmanagement mbH in Germany (HGV), Oscar Eduardo Hasbún Martínez being Chairman of the Board of Compañía Sud Americana de Vapores S.A. in Chile (CSAV) as well as member of the Board of Directors of Quiñenco S.A. in Chile (Quiñenco), Macario Valdés Raczynski being Chief Executive Officer of Quiñenco, Karl Gernandt being Chairman of the Board of Directors of Kühne Holding AG in Switzerland (Kühne) and Dr Andreas Rittstieg being member of the Board of Directors of Kühne. Hapag-Lloyd Aktiengesellschaft maintains a material business relationship with group companies of HGV, Quiñenco group, to which CSAV belongs, and the Kühne-group. Moreover, Karl Gernandt has been members of the Supervisory Board of Hapag-Lloyd Aktiengesellschaft for more than twelve years and Oscar Eduardo Hasbún Martínez is in his twelfth year in office. These circumstances indicate that Dr Isabella Niklas, Oscar Eduardo Hasbún Martínez, Macario Valdés Raczynski, Karl Gernandt and Dr Andreas Rittstieg, respectively, lack independence from the Company within the meaning of the GCGC. A deviation from Recommendation C.7 GCGC is therefore declared as a precautionary measure.

Moreover, according to Recommendation C.10 sentence 1 var. 2, sentence 2 GCGC, the Chair of the Audit Committee shall be independent from the Company and the Executive Board as well as independent from the controlling shareholder.

The Chair of the Audit and Financial Committee of Hapag-Lloyd Aktiengesellschaft, Oscar Eduardo Hasbún Martínez, is also the managing director of a shareholder with a significant direct interest in Hapag-Lloyd Aktiengesellschaft, with whom, as described above, there exists also a significant busi-

ness relationship. Against the background of the unclear prerequisites of the concept of independence from a controlling shareholder and the indicators of a lack of independence from the Company fulfilled in the present case, a deviation from Recommendation C.10 sentence 1 var. 2, sentence 2 GCGC is declared as a precautionary measure as well. It is the opinion of the Supervisory Board that the exercise of the office of Chair of the Audit and Financial Committee by Oscar Eduardo Hasbún Martínez is in the interest of the Company and all its shareholders, as Oscar Eduardo Hasbún Martínez is perfectly suited to chair the Audit and Financial Committee. In addition, it is to be assumed that other candidates for the Chair of the Audit and Financial Committee may lack the required independence within the meaning of Recommendation C.10 sentence 1 var. 2, sentence 2 GCGC for similar reasons.

Besides, there are no doubts as to the independent exercise of their offices by the five aforementioned members of the Supervisory Board.

- Recommendation G.10 GCGC is not complied with. According to this Recommendation, the variable remuneration granted to the members of the Executive Board shall be predominantly invested in Company shares by the respective Executive Board member. Granted long-term variable remuneration components shall be accessible to Executive Board members only after a period of four years. Due to the low level of free float, the remuneration system of the Company's Executive Board neither provides for any share-based remuneration nor for any multi-year holding obligation.

In the case of any inconsistency, the German version of this declaration prevails over the English one.

Hamburg, in March 2026
Executive Board and Supervisory Board
Hapag-Lloyd Aktiengesellschaft