

# Hapag-Lloyd Global Code of Ethics





# Interview with Rolf Habben Jansen, CEO of Hapag-Lloyd

## **Rolf, why a Global Code of Ethics? Shouldn't making fair and responsible decisions be a given?**

Well, it should, yes. And I trust it already is. We have a tremendous team of great people, and I am proud that ethical conduct is such a high priority at Hapag-Lloyd. At the same time, there is immense value in emphasizing our virtues and core beliefs – not only for our employees to orient themselves, but also for our partners, customers and other stakeholders to reassure themselves about who we are at the core. Our Global Code of Ethics goes beyond legal requirements and guides our values and high ethical standards, thereby demonstrating our trustworthiness and integrity. And, of course, the world is changing rapidly, and our industry is particularly volatile. Reflecting and revising our behavior is an ongoing responsibility. The Global Code of Ethics defines our company's expectations for the working relationships of our employees, in particular with customers, suppliers, governments, authorities and competitors.

## **What are some of those core beliefs you mentioned?**

The most basic one is this: A great company is sustained by the ethics that cement

and shape it. It is our values that define us before anything else. To us, true success is far more than numbers. It is about how we conduct our business and relate to the people we interact with. For instance, there is: the respect and care we show towards colleagues and partners; the courage we gather to speak up in complex situations; the ability to leave room for the opinions of others; the willingness to lead by example each day; and the integrity to deliver on our promises and communicate honestly, clearly and thoughtfully – whether directly with customers or on social media. But there is also the responsible stance we take towards our environment. For Hapag-Lloyd, true success is being a valuable part of positive change in the world.

**In line with our values “We care, we move, we deliver.” ...**

Exactly. Hapag-Lloyd has always been a strong partner, a caring employer, and a beacon of professionalism. We can be proud of our identity. The Global Code of Ethics emphasizes it for our customers, suppliers and stakeholders in general. Compliance with all applicable laws and regulations is a matter of course for us.

**Will the Global Code of Ethics help inform everyday conduct?**

Inform, inspire, orient – in the end, this is what the Global Code of Ethics is for. It is an ethical guide that bundles all the rules and core values to be adopted and practiced by our employees. If it doesn't help you in a given matter, your supervisor and our Global Compliance Team will have an open ear for your concerns. We are happy for anyone eager to learn about it and play a part in cultivating a healthy dialogue across the entire company. There is only one way to grow and evolve: together.

**Is there anything you would like from the readers of the Global Code of Ethics?**

Well, if you're an employee, take it to heart.

Take time to read and reflect upon it and do your best to represent our values during every step of your professional journey with Hapag-Lloyd. If you are a customer or supplier, make sure that you agree with our core values. We are looking forward to a mutually rewarding and inspiring collaboration in the future!



# Contents

<b>2</b>	Interview	<b>14</b>	Our Business Ethics
<b>5</b>	Introduction	<b>22</b>	Our Interaction with Our Partners and Stakeholders
<b>6</b>	Living Our Values	<b>24</b>	Our Company and Assets
<b>9</b>	Our Employees	<b>28</b>	Reporting Violations
<b>12</b>	Our Planet	<b>30</b>	Compliance with Our Global Code of Ethics

# Introduction

At Hapag-Lloyd, we are “connecting the world across oceans”. This is our purpose, and we believe that this is exactly what we have been doing all along – for more than 175 years. In the late 19th and early 20th century, we connected people by transporting millions of emigrants to their new homelands. Today, we connect businesses, markets and economies. We facilitate global trade, boost the prosperity of countries and companies, and provide new possibilities wherever we operate. As outlined in our Strategy 2030, we set sail for a vision: to become the “Undisputed Number One for Quality” in the shipping industry.

Our greatest asset on this voyage are our employees around the globe. And what connects each of us are our common culture and corporate values: **“We care. We move. We deliver.”**

Having a compass is crucial in our industry. Our Global Code of Ethics is this compass, as it translates our values into standards and ethical principles that help Hapag-Lloyd and its employees to navigate when making decisions and acting accordingly.

The Global Code of Ethics goes beyond simply being compliant with all applicable international and national laws, rules and regulations, which we consider a matter of course. Our Global Code of Ethics stipulates our high ethical standards for doing business and our personal integrity in addition to setting the minimum requirements that should be met by all our business functions in every country we operate in, even when the local laws set lower requirements.

---

## Applicability

The provisions of the Global Code of Ethics apply to Hapag-Lloyd AG and all the companies in which Hapag-Lloyd AG has directly or indirectly the majority interest/voting rights or exercises managerial control (in this guideline “Subsidiaries” and, together with the Hapag-Lloyd AG, in this guideline “Hapag-Lloyd” or “the company”). All employees must familiarize themselves with this Global Code of Ethics and act accordingly.

The respective managing directors (or board members) are accountable for the implementation of this Global Code of Ethics in the Subsidiaries. If legal frameworks or special conditions require a deviation from this guideline, the procedure is to be agreed with the head of the department Global Human Resources of Hapag-Lloyd AG (in this document “Global Human Resources”).



# Living Our Values

**“We care. We move. We deliver.”** – these are our corporate values. They are at the heart of everything we do. Our corporate values define who we are and guide us on our way forward. They steer the way we do business, inspire us, motivate us and – like an internal compass – help us to find the right way. Our values affect the way we do business with all our stakeholders. This is what lies behind our values:

## **We care.**

Caring is deeply rooted in our DNA. At Hapag-Lloyd, we take care not just of our customers, but also of each other. We are one global family, and this means that we treat each other fairly and with respect despite our differences. We work together towards our mutual goals and appreciate a job well done. We all know that the weather is not always sunny in the shipping industry.. But, at Hapag-Lloyd, we stand by each other’s side even when things get tough. We tell each other the truth regardless of whether the news is good or bad.

Cargo has always been and remains our passion. This is evident in the way we take care of our customers and their cargo as if it were our own. We have grown as a company, but we have not changed the way we do business. With our strong global presence, we take care of our customers personally no matter where they are in the world. This is important for us, and we know that each of us can make a difference in our customers’ lives. Our customers can trust us to take care of their cargo. Our customers and partners know that we play fair and by the rules and do business honestly. We expect them to do the same, too. We build open and honest relationships with our customers and our partners, and we are transparent in the way we communicate with each other. We know that partnerships are extremely important for our business and that we are stronger together.

## We move

At Hapag-Lloyd, we are experts in moving cargo, and our goal is to do this better every day and everywhere. We have proven throughout our history that we embrace change. We believe that to be successful, we need to adapt to changing environments – just like we have been able to do for almost two centuries. We know that in today's environment, we need to become more agile and faster when making decisions. We also gain new skills and use technology as an enabler to become better every day to prepare ourselves for tomorrow's challenges. As we are bringing ideas to life, things don't always go as expected, but that is part of the process, as every challenge helps us learn and grow. By making small and meaningful changes every day, each of us is contributing to the transformation of our company and our industry.

Our goal is to make our customers' business easier. We listen to their needs carefully and use technology to develop new solutions. We improve our business every single day. And since we know that our business is only as strong as our partnerships, we drive mutual growth and collaborate with quality partners. Even though we are one of the biggest players in our industry, we are smaller than some of our competitors. We take advantage of our size and strive to be more personal, responsive and agile than the market. We know that each and every one of us, no matter what we do or where we are, plays an important role in moving our customers' business forward every day.

## We deliver

At Hapag-Lloyd, we deliver what we promise. Whether it has been sailing rough seas in our industry, mergers, executing on our Strategy 2030 or dealing with a global pandemic, we have repeatedly achieved what we have set out to do. We also deliver our customers' cargo together with our partners with consistent quality at all times and places. This is the way we do business – and why our customers can rely on us. We share the goal of becoming the “Undisputed

Number One for Quality”. We work passionately to deliver on that promise every day. We all have a role to play in making this vision a reality. This means that we make decisions – and take responsibility also when things don't go as planned. We focus on solutions instead of obstacles. Once we have come to a decision and made a plan, we stand behind it and get things done. We are reliable, and our colleagues and our customers can count on each of us to consistently deliver on our promises.

When we promise something to our customers, they can trust us to get it done – with number one quality. Our customers know what they get when they book with Hapag-Lloyd. We keep our promises. The quality of service we offer sets us apart, and our team of experts is here to make our customers' work easier. Knowing that we can only deliver together with our partners, we make sure to choose quality partners. Our partners know that we are reliable and that we deliver on our commitments – and that we expect them to do the same. Whenever we tell our customers that we will take care of their cargo, they know that they don't need to worry – because we will deliver. We know that our customers' success is our success.

## We care

- Do I treat my colleagues, customers and partners fairly and with respect?
- Do I build long-lasting and trusting relationships with my partners?
- Do I take care of my customers' cargo as if it were my own?
- Do I communicate openly and tell the truth even if I do not have good news?
- Am I open to feedback, and do I also give constructive feedback to others?
- Do I show appreciation for a job well done and say "thank you"?
- Do I see the company as one global team?
- Do I collaborate and share knowledge with my colleagues across the organisation?
- Am I here for my customers, and do I go the extra mile if necessary?
- Do I share knowledge with my colleagues to create win-win solutions?
- Do I play fair and by the rules no matter where we operate around the world?

## We move

- Do I strive to do things better every day?
- Do I embrace change and adapt to changing circumstances?
- Do I drive mutual growth together with our partners?
- Do I listen to my customers' needs? Do I develop solutions to move my customers' business forward?
- Do I proactively learn and try new things?
- Do I gain new skills needed not just today but also tomorrow?
- Do I make use of state-of-the-art tools and technology?
- Do I learn from mistakes?
- Do I push for faster decisions in my area of responsibility?
- Do I actively improve the quality of my work every day?

## We deliver

- Do I deliver what I promise and stick to agreements made?
- Do I take ownership, and am I accountable even when things do not go as planned?
- Do I consider my customers' success as ours?
- Do I get behind mutual decisions?
- Do I focus on solutions instead of obstacles?
- Do I resolve issues fast?
- Do I strive to deliver number one quality for my customers every day?
- Do I choose quality partners to jointly deliver number one quality?
- Do I offer quality service and expertise to my customers to make their work easier?
- Do I conduct my work reliably? Do I set clear expectations to my colleagues, customers and partners?

---

Ask  
yourself

# Our Employees

## **Our values guide us**

Our values define who we are as Hapag-Lloyd, where we are coming from, and where we are going. They are brought to life each day by our employees. To ensure this, the meaning of our values is reflected in our competency model, which comprises the eight value-based behaviors that describe the observable actions we expect

from all our employees. The value-based behaviors are an integral part of our yearly Global Staff Dialogue (GSD), which encourages both a strong feedback culture and the value-based behavior of each employee.

## **Leadership**

The role as a manager, defined as someone who leads employees, is also inseparably linked to the responsibility towards one's own employees. The standard they set is the standard we can expect from our teams. As a manager at Hapag-Lloyd, it is therefore a matter of setting an example with optimism and courage as well as of promoting the corporate values of Hapag-Lloyd – “We care. We move. We deliver.” – through their own actions and to create trust. Furthermore, managers assess their employees based on their performance and give them honest and fair feedback. In turn, our managers are open to feedback themselves and help to foster a genuine feedback culture. As part of their leadership, managers do their utmost to discourage and appropriately respond to unacceptable behavior as well as to act as intermediaries in possible disputes. They demonstrate exemplary integrity and a strong ethical awareness through their day-to-day activities and prove their competence, especially in conflict situations.

## Respecting human rights

Every human being is entitled to human rights. Within Hapag-Lloyd and along our value chain, we are committed to respecting human rights and treating everyone with dignity and respect (see Policy Statement on Social Responsibility and Human Rights).

### We are particularly committed to the following human rights standards:

- the effective abolition of child labor
- the elimination of all forms of forced labor or modern slavery as well as human trafficking
- the promotion of good living and working conditions, be it occupational health and safety, freedom of association and the right of collective bargaining, diversity, equality and inclusion, adequate remuneration and the rights of local communities.

All human rights are equally important. Each employee is responsible for respecting human rights while being a rightsholder at the same time. Causing, contributing to, or being linked to violations of human rights shall always be avoided.

- Treat others with dignity and respect.
- Before acting, think about the impacts that your actions or omissions will have on other persons, including your colleagues and people along Hapag-Lloyd's value chain. Your actions or omissions can have an impact on their well-being.
- Remember that Hapag-Lloyd's commitment to doing business in a responsible manner towards people and their rights is your commitment too, and that you are expected to act accordingly.
- Support the company's efforts to continuously uphold human rights.
- Immediately report actual or potential violations of human rights in our company and along our value chain through the Speak Up Line. Identifying risks enables Hapag-Lloyd to address them by taking preventive or remedial action.

## Promoting inclusion and diversity

We constantly strive to foster an inclusive work environment in which everyone has equal opportunities and in which differences are welcome and embraced to improve our interaction and business performance. At Hapag-Lloyd, we work with diverse colleagues regardless of their nationality, ethnic or social origin, color, religion, sexual orientation, disability, belief, political opinion and union affiliation, gender, age, marital status, health status or the like. Diversity is a fundamental component of our identity and, as an international company, is deeply anchored in our corporate culture. Since Hapag-Lloyd's success is based on the success of our employees, we support personal and professional development regardless of origin and identity and build on talent and diversity.

- Ask yourself if you have unconscious thought patterns and attitudes that influence your judgement of people and situations.
- Ask yourself how you can contribute to a positive work environment.
- Treat every person with respect, dignity, appreciation, and fairness, this also means refraining from harassment including unwanted verbal expressions, gestures, comments or touching.
- Use the collaborative potential of our diverse colleagues to create high-performing, innovative teams.
- Encourage others in their professional development.
- Report behaviors that may constitute bullying, harassment or discrimination either through the Speak Up Line, to your supervisor or your Human Resources department and address them openly and directly.



### Health and safety in the workplace

The health and safety of our employees is of central importance to us. Hapag-Lloyd complies with local occupational health and safety laws. In our view, this also includes compliance with local laws on maximum working hours. We take the measures needed to prevent work-related injuries and create work conditions that promote health. For this purpose, it is not permitted to work under the influence of alcohol, drugs and other substances that have an influence on the execution of an employee's work and on the safety of the employee and others. In addition, all employees at Hapag-Lloyd are required to consider their health and safety as the highest priority as well as to practice and comply with occupational health and safety regulations.

- Ask yourself on a regular basis how you can maintain your health and safety at work and take advantage of preventive and health-promoting measures on a voluntary basis.
- Comply with occupational health and safety regulations and take responsibility for your own safety and that of others.
- Keep an eye out for real and potential risks in your work environment, and report them immediately to your manager, the occupational health and safety specialist or through the Speak Up Line.



# Our Planet

At Hapag-Lloyd, our commitment to climate and environmental protection is one of the core elements of our corporate activity. We believe that it is part of our responsibility to keep our environmental footprint as small as possible and to integrate sustainable practices into all aspects of our operations. With this objective in mind, the Liner Shipping division has implemented the ISO 14001 environmental management standard to continuously improve our environmental performance.

## **Our commitment to sustainable practice is based on:**

- Strong leadership and commitment towards environmental sustainability
- Inclusion of suppliers and partners (see our “Hapag-Lloyd Supplier Code of Conduct”)
- Setting ourselves ambitious targets and reporting transparently on our progress
- Constant improvement of environment performance
- Employee engagement and training
- Adherence to all local and international environmental laws and regulations as well as regular monitoring and assessment of compliance to ensure continuous improvement

### Climate protection and reduction of emissions

Our sights are firmly set on reaching our decarbonization goal of operating our fleet net zero by 2045. In doing so, we are also supporting our customers in their efforts to achieve their own decarbonization targets. Besides the reduction of greenhouse gases, we are also focusing on the reduction of air pollutants.

- Align with the company's decarbonization targets and use your creativity to help them to be reached.
- Engage with the implementation of measures to reduce our direct and indirect greenhouse gas emissions (including those in our value chain).
- Support the implementation of measures to improve our energy efficiency, including an environmentally responsible behavior at the office.

### Protection of water and marine biodiversity

We aim to keep our impact on marine biodiversity as low as possible and to protect life under water and on land to the best of our ability. We therefore draw on a wide range of measures and are actively involved in pollution prevention, which remains a high priority for us.

- Protect natural ecosystems and reduce environmental pollution within your sphere of influence.
- Help to avoid the transport of sensitive cargoes that pose a risk to endangered species.
- Apply the safety standards in place to help avoid oil spills.

### The responsible use of resources and transport care

The use of resources and materials plays a decisive role, particularly with regard to the circular economy and the relevant recycling processes. As a result, we specifically monitor the efficient use of resources and are working on waste avoidance and recycling. The prevention of accidents with possible implications for people, the environment, cargo and assets has high priority. Precautionary measures are in place worldwide.

- Handle resources (e.g., water, energy and materials) with care.
- Focus on minimising the generation of waste, and reuse items whenever possible.
- Participate in proper waste disposal methods and consider the environmental impact throughout the lifecycle of products and services.
- Apply given standards to avoid losses of containers at sea and on land.
- Ensure the safety and well-being of employees, cargo and the environment.

# Our Business Ethics

As a global company, compliance with worldwide regulatory requirements and internal policies is fundamental to the way we do business. We adhere to all applicable local, national and international laws and regulations relevant to our business activities, and we expect the same from all our business partners. In some cases – such as in a specific country or industry or with a specific business partner – stricter rules than those described in this Global Code of Ethics may exist. In such cases, the stricter standard shall be applied.

## **Zero tolerance for bribery and corruption**

Hapag-Lloyd is determined to achieve and keep the highest ethical standards in all its business transactions. Corruption is illegal and has a disastrous impact on societies and companies. We do not accept unethical or corrupt practices, extortion or bribery performed by employees or business partners. Hapag-Lloyd does not tolerate any form of corruption or bribery – whether public or private, active or passive – either in relation to government officials or in the private sector. Hapag-Lloyd strongly discourages facilitation payments and is working with industry bodies to eliminate them.

**Bribery:** The offer, promise, payment or transfer of anything of value (active bribery) or the request for, agreement to receive, or receipt of anything of value (passive bribery), whether directly or indirectly, to or from any person (whether a private person, corporate entity or government official) in order to influence business decisions or gain inappropriate business advantages.

**Government official:** This term refers to any officer or employee of commercial enterprises, institutions, agencies, departments, instrumentalities and other public entities that are owned and/or controlled by the government (whether completely or partially).

**Gifts and business courtesies:** We care about business relations with our business partners, and we acknowledge that gifts, entertainment and hospitality are often part of sincere business relationships. However, gifts, entertainment and hospitality can be used in an improper way or give an improper impression, including potentially being deemed as bribery.

To ensure our independence and as an expression of our high ethical standards, our employees are only permitted to offer and/or receive gifts, entertainment and hospitality in line with the Corporate Guideline Business Courtesies and never in exchange for any favors or with a corrupt intent.

Our employees are prohibited from offering, accepting, receiving or giving any gifts except for locally and culturally appropriate small giveaways arising from usual business conventions as long as they do not influence entrepreneurial decision-making. Offering, giving or receiving cash or cash equivalents is not acceptable. Gifts shall never be sent to or received at private addresses.

Hospitalities may only be offered, provided or accepted if such hospitalities are related to a legitimate business purpose and serve the normal course of business. Hospitalities must not be offered, provided or accepted in exchange for business or favorable treatment. Hospitalities provided by Hapag-Lloyd must be attended by at least one Hapag-Lloyd employee and accurately recorded in Hapag-Lloyd's financial records. Our employees are not allowed to request invitations.

In most jurisdictions, gifts, entertainment and hospitality for government officials are subject to stricter requirements than for business partners and must therefore be approached with extra care.

**Travel expenses:** It is not permitted for business partners to take or to sponsor costs for travel or accommodation. Exceptions are to be approved in advance in accordance with the rules on receiving sponsorship defined in the Corporate Guideline Sponsoring and Donation.





**Financial benefits:** It is not permitted to ask for or accept payments, loans or any other financial benefits from a business partner for personal benefit. Employees are only allowed to accept offered discounts and other benefits from business partners if they are granted to all employees of Hapag-Lloyd.

**Donations, sponsorships, charitable contributions:** Due to our obligations to society, Hapag-Lloyd provides financial and material donations for the promotion of science and research, art, culture and sport as well as for social, charitable and environmental activities. Each donation must be approved in accordance with the Corporate Guideline Sponsoring and Donations.

**Third-party intermediaries:** We act in a responsible and compliant manner ourselves, and we expect the same from the third parties acting on our behalf. We acknowledge that the acts of third-party intermediaries can represent some significant risks when it comes to bribery and corruption. Therefore, we only engage with third-party intermediaries when there is a legitimate business need for the services to be provided, upon conducting risk-based due diligence and in accordance with anti-bribery and anti-corruption law as well as our internal guidelines.

- Ask yourself: “Is the gift or invitation I have received appropriate and in line with our internal policies?” and “What would I say if a colleague or my supervisor received it?”
- Make sure that a gift or invitation is not an attempt to influence your business decision.
- Ask yourself: “Am I in a sensitive position right now – such as a contract negotiation or tender participation – to accept an invitation from a business partner? Or is it not in conformity with the local culture?”
- Ask yourself: “Is a public official involved in this transaction? Should I be particularly careful with gifts and invitations?”
- Never ask a third party (e.g., a supplier) to give or accept bribes and facilitation payments on behalf of Hapag-Lloyd. Follow our Third Party Management Policy when engaging with third parties who interact with government officials on behalf of Hapag-Lloyd.



### **Economic sanctions and embargoes**

As an internationally operating company, Hapag-Lloyd must ensure that it does not do business with entities or persons under sanctions and does not accept the shipment of cargo subject to trade sanctions, in particular to the laws and regulations of the European Union, the Federal Republic of Germany, the United States of America, and the United Nations as well as to other special international, national or regional laws and regulations.

To ensure compliance with applicable laws and regulations regarding sanctioned persons, companies, organizations, vessels and categories of goods, Hapag-Lloyd has implemented various measures. All employees are expected to comply with and apply Hapag-Lloyd's internal policies and procedures related to economic sanctions and embargoes.

Non-compliance with regulations regarding economic sanctions may result in civil and criminal proceedings against Hapag-Lloyd, affect its reputation and image, or lead to disciplinary measures. Employees are regularly informed by the Global Compliance Team about relevant regulations and their impact on the business. Furthermore, in case of doubt, all employees may contact the Compliance Team to request additional information.

- Do not do business with sanctioned parties.
- Watch out for potential red flags! There is a variety of indications for potential sanctions violations (e.g., parties located in a sanctioned country, "in transit to clauses" are included, etc.).
- If you have any questions or concerns, please write to the Global Compliance Team.



## Fraud

Hapag-Lloyd strictly prohibits any type of fraud and views it as an act that is unacceptable, incompatible with our values, and highly damaging to our reputation and image.

Hapag-Lloyd has zero tolerance for fraud and takes all forms of fraud very seriously. All Hapag-Lloyd employees must therefore strictly refrain from engaging – directly or indirectly – in any act or attempt that may constitute fraud. Any breach of this rule by a Hapag-Lloyd employee will result in the rigorous imposition of disciplinary measures as well as possible criminal and/or civil proceedings.

Fraud is an intentional act of deception by an employee or contractor with the intent to gain direct or indirect personal advantage (funds, assets, or any other type of benefit of whatever form) for their own or a third party's benefit resulting from a breach of Hapag-Lloyd's rules or a violation of international or national law.

## Compliance with competition law

Hapag-Lloyd is committed to strict compliance with all applicable competition and antitrust legislation globally. We therefore must ensure compliance with the Hapag-Lloyd internal policies and competition legislation in each country in which we conduct business.

Hapag-Lloyd competes openly and fairly and does not tolerate any form of illegal collusive practices with competitors that have the objective or effect of restricting or eliminating competition. Hapag-Lloyd's directors and employees do not agree to or participate in any anti-competitive agreements intended to:

- Fix prices (including price elements such as surcharges and discounts);
- Share or allocate geographical markets or areas, customers or classes of customers, including bid-rigging;
- Improperly restrict other specifics or parameters that have effects on competition on the market.

In addition, exchanging competitively sensitive information with a competitor is prohibited. Thus, when working with competitors, we ensure that competitively sensitive information of Hapag-Lloyd is not shared and that similar information of competitors is not received. Further, our Global Code of Ethics commits us also internally to strict compliance with antitrust regulations, including the "Competition Law Guidelines - Information Exchanges between HL Liners and HL Terminals", which clearly regulate the permissible exchange of information between the liner shipping business and terminal business.

Competitively sensitive information is non-public business information that would otherwise not be available to your competitor and would likely give them a strategic advantage, as it would reduce the uncertainty about our future strategy on the market. This includes, for example, information on:

- Prices (including rates), (local) surcharges, increases, rebates or pricing policies
- Capacities or their utilisation, volumes, costs or cost structures
- Customer details
- General business strategy, such as commercial plans or investment or R&D strategies
- and any other information that could influence the market behavior of our competitors

## **Do not align with competitors on business terms, prices, contract terms with customers, or any other parameter influencing our strategy on the market.**

Do not discuss or exchange commercially sensitive information with competitors.

- Remember that your counterpart is your competitor. You do not want to reveal to competitors what is the recipe for your / Hapag-Lloyd's success.
- When in doubt regarding competitive relevance, do not pass on the information and make sure to consult with the departments Compliance or Legal..

When interacting with competitors (e.g., in the context of operational agreements or industry association meetings) always make sure that there is a clearly worded, written agenda and that detailed meeting minutes are provided afterwards.

- If competitively sensitive information is shared or discussed, you must immediately:
  - ✓ Object to the discussion.
  - ✓ Ensure that the objection is recorded in the minutes.
  - ✓ Leave if the discussions continue.
  - ✓ Report the incident to Compliance / Legal Team.

### **Anti-money laundering**

The activities of Hapag-Lloyd shall not be misused for money laundering. Applicable laws and regulations to combat money laundering are fully respected. Therefore, Hapag-Lloyd does not accept proceedings that involve illegal activity. Conducting business with unknown third parties should be subject to background checks should there be any concerns about the integrity or the source of their funds. In addition, Hapag-Lloyd does not accept payment to or from a third party that is not a customer or supplier of Hapag-Lloyd, unless prior approval has been obtained by the relevant departments.

### **Conflict of interest**

A conflict of interest might arise when an employee faces a situation in which a business decision that is in the best interest of Hapag-Lloyd is in conflict with one's own personal interest. Examples of conflict of interest include hiring or giving any preferential treatment to a friend or a family member or running a private business on the side that competes with the business of Hapag-Lloyd.

When having a conflict of interest, our employees are expected to act with integrity, in line with our ethical standards, and in the best interests of Hapag-Lloyd. Possible or potential conflicts of interest must be reported to the superior responsible and Human Resources department.. Once a potential conflict of interest is identified, all appropriate actions should be taken to resolve and manage the conflict. When needed, the Global Compliance Team will support the process by providing advice and consultation.



# Our Interaction with Our Partners and Stakeholders

At Hapag-Lloyd, we firmly believe that to achieve long-term success, we need to act responsibly in our interactions with all our stakeholders. By always adhering to high standards of ethical and legal compliance, we maintain and protect our name and reputation. We expect all the stakeholders we engage with to share our standards and approach.

## Customers

To become the “Undisputed Number One for Quality” is the ultimate promise we make to our customers. In the Liner Shipping division, we provide our customers with high-quality services in line with our voluntary ISO 9001 certification and strive to offer the best possible performance at competitive prices in every area of operations. We always treat our customers fairly and respectfully, and we are always open to their feedback, as it enables us to further improve our services. In delivering on our promises to our customers and building lasting relationships, we comply with the legal and ethical standards set forth in this Global Code of Ethics.

## Suppliers and other business partners

Hapag-Lloyd relies on its suppliers and other business partners to achieve its vision. We build fair and responsible relationships with our contractual partners to thrive together. Our social and environmental standards as well as our standards on business ethics determine how we conduct business. These standards are clearly defined for our suppliers in our “Hapag-Lloyd Supplier Code of Conduct”, which binds Hapag-Lloyd and the suppliers equally to the same standards of ethical and responsible business practices.

The relationship with our business partners is based on the individual and collective compliance with applicable international, national and local laws and regulations, including, but not limited to, applicable regulatory compliance and trade sanctions as well as anti-corruption, anti-bribery, environmental, labor, competition and privacy laws. We hold the principles of fair treatment and fair competition in high regard.

- Thoroughly familiarize yourself with the standards set out in the Supplier Code of Conduct, which are also binding for Hapag-Lloyd.
- Be aware that our commitment to ethical, social and environmentally responsible business practices applies to our entire value chain, and act accordingly.
- Keep in mind that we share the responsibility for ethical, social, and environmentally responsible business practices with our suppliers and business partners. Consciously and fairly play your part in it.

## Working with governments and authorities

We maintain good relationships with governments and authorities and support them in the execution of their duties. In all interactions with governments and authorities, we act ethically and transparently and comply with the applicable laws and internal rules on engaging with government representatives as well as with our anti-corruption guidance.

## Representation

The behavior of an employee always reflects on Hapag-Lloyd. Behavior that reflects negatively on Hapag-Lloyd’s reputation with customers, other employees and/or the general public should be avoided. All official external representations must be agreed with the department Group Communications at Hapag-Lloyd AG. Only authorized representatives are permitted to communicate information about Hapag-Lloyd to the media and to third parties on behalf of the company. Further details are set out in the Corporate Guideline Communication. In order to maintain and protect Hapag-Lloyd’s good reputation, the provisions of the Global Code of Ethics should be observed not only during working time, but also when engaging in non-work-related activities. In general, Hapag-Lloyd supports the voluntary activities of its employees. If the activities are related to the employee’s work with Hapag-Lloyd, prior approval from the respective Human Resources department is required, as the activities may fulfill the requirements to potentially qualify as an additional business or a conflict of interest.

# Our Company and Assets

## Company resources

The handling of all properties, equipment and other assets of Hapag-Lloyd by its employees is to be performed with care. The use of company equipment is exclusively for the company purposes for which it was intended and should be used in a responsible, secure, efficient and cost-conscious manner. All employees are expected to protect company property against misuse, damage, destruction, loss, theft and unauthorized access. The misuse of company resources for purposes that are inappropriate, illegal or unauthorized is strictly prohibited.

## Internal control

Internal controls throughout our business processes help us to achieve our business objectives and help our employees to avoid or correct any shortcomings in a timely manner. The senior management is accountable for defining and implementing internal control as required for their area of responsibility, such as with policies that set out

what is expected and with procedures that put these policies into action. The design and operation of these policies, procedures and controls is to be periodically reviewed by the senior management for their continued adequacy and effectiveness.

Although the senior management is responsible for the design, implementation and review of the policies, procedures and controls, it is their employee's responsibility to apply these policies, procedures and controls reliably and at all times in daily operations as well as to notify the management in case of observed gaps, shortcomings or ambiguities. The senior management supervises and holds their employees accountable for living up to their responsibilities.

The corresponding tasks and responsibilities can be delegated by the senior management to their managers and specialists. However, overall accountability always remains with the respective senior management.

### **Risk management**

Since every commercial activity requires decisions to be made under uncertainty, risks and opportunities are an inherent part of doing business. The aim of an effective risk culture is to consciously enter into, respond to, monitor and control risks and opportunities. Risk culture is one aspect of our corporate culture and provides us with guidance on how to approach uncertainty and exercise good judgment. An actively cultivated risk culture facilitates the exploration of opportunities while also encouraging the transparent communication of risks.

### **Accounting and reporting**

Hapag-Lloyd is committed to complying with all legal requirements as well as with both local and international financial reporting standards in order to facilitate accurate accounting and financial reporting. This commitment extends to strict adherence to tax laws and regulations as well as to non-financial reporting requirements.

Maintaining financial integrity is a fundamental pillar of how we conduct our business. Ensuring the accuracy of our financial books and records, which offer a clear and transparent depiction of our business, constitutes a crucial duty. Accordingly, all business transactions must be recorded properly and completely.

- No person shall engage in a transaction that is not recorded properly and completely.
- No person shall participate in requesting or creating of false invoices, payroll records, expense reports or other documents or in making false and/or misleading financial arrangements.

### **Protecting personal data**

Hapag-Lloyd is committed to a fair, respectful and transparent handling of personal data. Every employee is to take the protection of personal data entrusted to them by customers, business partners and fellow employees seriously. We and our service providers take great care to strictly respect confidentiality. We ensure that personal data is only used for defined and legitimate purposes. We do our best to ensure that personal data is protected adequately from unauthorized access and disclosure as well as to maintain the integrity and availability of data. We also comply with relevant rights of individuals (e.g., on information and disclosure), and we cooperate with the respective supervisory authorities. Should a breach of personal data protection occur, we act responsibly to take immediate action to prevent any harm to the affected individuals.

## Information & cybersecurity

Information and cybersecurity are paramount and at the core of our business at Hapag-Lloyd. Strong cybersecurity capabilities and resilience enable us to protect our employees and serve our customers efficiently and securely.

Since we are committed to transparency and collaboration, we actively engage with industry peers, regulatory bodies and stakeholders to address cybersecurity challenges. Through continuous education, compliance and vigilance, we nurture a cyber-resilient culture, ensuring the confidentiality, integrity and availability of our operations and our customers' data.

Since we are dedicated to proactive measures, we regularly assess evolving risks and explore solutions to fortify our defenses and improve our operations. Recognizing the potential of Artificial Intelligence (AI), Hapag-Lloyd integrates these technologies with a commitment to ethical standards, data protection, and human oversight. Our approach aims to ensure transparency in AI decision-making processes, fairness in outcomes, and compliance with applicable regulations. Employees utilizing AI tools are expected to validate results, safeguard sensitive information, and promptly report any ethical, privacy, or security concerns.

### What does this mean for you as an employee?

- Always use strong passwords, such as passphrases. Use different passwords for different systems.
- Only data classified as public are allowed to be shared on social media or processed with AI tools.
- Use two-factor authentication.
- Be aware of phishing e-mails and report them. Always check before you click!
- Use the provided secure communication methods when sending sensitive data.
- Identify potential risks and report immediately any suspicious activities (mails, calls, people, IT performance, etc.). In case of uncertainty, contact the department Chief Information Security Office at Hapag-Lloyd AG for support.
- Protect your information and devices in public (e.g., do not leave your laptop unattended, be careful when working in public places, such as trains, airports, etc.), and make sure that you connect to the Hapag-Lloyd networks and systems securely when on a public WIFI system (e.g., via a VPN).
- Educate yourself on the newest cybersecurity topics by attending/viewing our trainings on a regular basis, and familiarize yourself with the additional information and resources available on the CISO page on the intranet.
- Use your professional judgement to critically assess the outputs and recommendations provided by AI tools.

## Behavior on social media

**Transparency:** At Hapag-Lloyd, we value honesty and accuracy in all communications. Employees are expected to be clear and accurate when discussing our company, products and services. This includes, for example, hiding behind nicknames, having missing or unclear profile pictures, or assuming false identities. As employees of Hapag-Lloyd, we are proud to make our affiliation known. In the same vein, we are committed to sharing original content. When publishing content not created by Hapag-Lloyd (whether copyrighted or not), employees should ensure that Hapag-Lloyd has the right or permission to do so and that credit is given to the creator. Should mistakes occur in our social media posts, we will correct them and acknowledge the corrections, thereby demonstrating our commitment to accuracy and accountability. The same holds true for paid promotions or advertising: Employees should clearly label such content as “sponsored” or an “ad(vertisement)” in compliance with applicable platform guidelines and regulations.

**Respect:** Respect is at the heart of our social media interactions. At Hapag-Lloyd, employees are expected to promote a culture of civility, empathy and inclusivity as well as to acknowledge diverse perspectives and engage in constructive dialogue as a matter of course. As part of this, employees are expected to abstain from insensitive statements, harassment and hate speech at all times. In the same vein, they are expected to promote a culture of feedback and constructive criticism and to ensure that our social media responses are always respectful and professional while acknowledging concerns and providing help.

**Confidentiality:** Protecting sensitive information is paramount. At Hapag-Lloyd, employees are expected to never disclose confidential company information, trade secrets or proprietary data on social media. Likewise, it goes without saying that employees should respect the privacy of their fellow employees as well as of our partners and customers. Never share personal information without properly obtaining prior consent.

**Compliance & education:** At Hapag-Lloyd, employees are expected to comply with all relevant laws and regulations governing social media use, including copyright, trademark and data-protection laws. They must also follow industry-specific guidelines and standards. Furthermore, to ensure that our online presence remains ethical and effective, employees are encouraged to stay informed about the latest best practices, new features and emerging trends on social media.

# Reporting Violations

## Speaking up

At Hapag-Lloyd, we support and promote a Speak up culture. We expect and encourage internal and external stakeholders to speak up when they observe or suspect compliance-related misconduct. Speaking up is the best way that our employees and business partners can help to protect our company and address any potential issues so as to avoid financial harm and reputational damage. We expect our managers – but also all of our employees – to promote the Speak Up culture and thereby contribute to fostering a safe and ethical workplace.

Hapag-Lloyd has in place a Whistleblower and Non-Retaliation Policy as well as a trusted reporting system with adequate protection for anyone who wants to report any potential compliance-related concerns

### Compliance-related concern:

any non-compliant or illegal conduct which a person may suspect, on reasonable grounds, has occurred or is occurring implicating Hapag-Lloyd and/or its employee(s). This includes, but is not limited to bribery, corruption, competition law violations, fraud, money laundering, sanctions, data breaches, discrimination and harassment, any violation of human rights, social and environmental obligations.

Multiple reporting channels are available, and employees are encouraged to use the reporting channel they feel most comfortable with. Reports can be made via our Speak Up Line. This is a web-based mechanism hosted on a secure, external website, is available 24/7 in multiple languages, and allows reporting anonymously. Employees can also report to a local or regional

Compliance Officer, the Global Compliance Team, to a direct supervisor, to the local, regional or Global Human Resources department or to a member of the Ethics Committee at Hapag-Lloyd AG. Regardless of the specific channel used, all reported compliance-related concerns shall be forwarded to the Global Compliance Team.

Every report is taken seriously and handled in accordance with a standardized process that complies with the requirements of the relevant laws. Hapag-Lloyd does not tolerate any form of retaliation against whistleblowers.



Click here or scan the QR code below to access Hapag-Lloyd's Speak Up Line.

Information about potential compliance-related concerns is received by the Global Compliance Team and, after an initial review, it is forwarded to the responsible department or the Ethics Committee at Hapag-Lloyd AG. The Ethics Committee consists of the department heads of Corporate Audit, Compliance, Legal, Global Human Resources and Fleet. In the event of a report concerning the Terminal and Infrastructure division of Hapag-Lloyd, a Board member from that division shall be represented on the Ethics Committee.



Hapag-Lloyd

REPAIR WITH  
"CORTEN"  
STEEL ONLY



FANU  
4561  
0844

TIR  
PLATE  
INSIDE

APPROVED FOR TRANSPORT  
UNDER CUSTOMS SEAL  
DBTC 44881 DEKRA/2020  
TYPE 1AA-100000 MANUFACTURED IN CHINA  
CSC SAFETY APPROVAL  
Hapag-Lloyd



ACEP-D  
RH-3

# Compliance with Our Global Code of Ethics

## **Review of the Global Code of Ethics**

The Global Code of Ethics is annually reviewed and, if necessary, updated as a standard part of Hapag-Lloyd's Internal Control System (ICS) procedures in order to ensure that it is kept current and adequate.

## **Acknowledgment & sign-off**

The Global Code of Ethics is brought to the attention of all employees of Hapag-Lloyd, who are required to acknowledge their awareness and understanding of the included rules.

## **Non-compliance**

Non-compliance with Hapag-Lloyd's Global Code of Ethics is a violation of Hapag-Lloyd's internal regulations and may result in disciplinary measures. Major violations may even lead to termination of the employment contract, reporting to the appropriate authorities, or other legal consequences.

**Title:** Global Code of Ethics  
**Revision:** 01  
**Effective Date:** 01.12.2025



