

# Human Rights Report 2025



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## Four elements for simple orientation.



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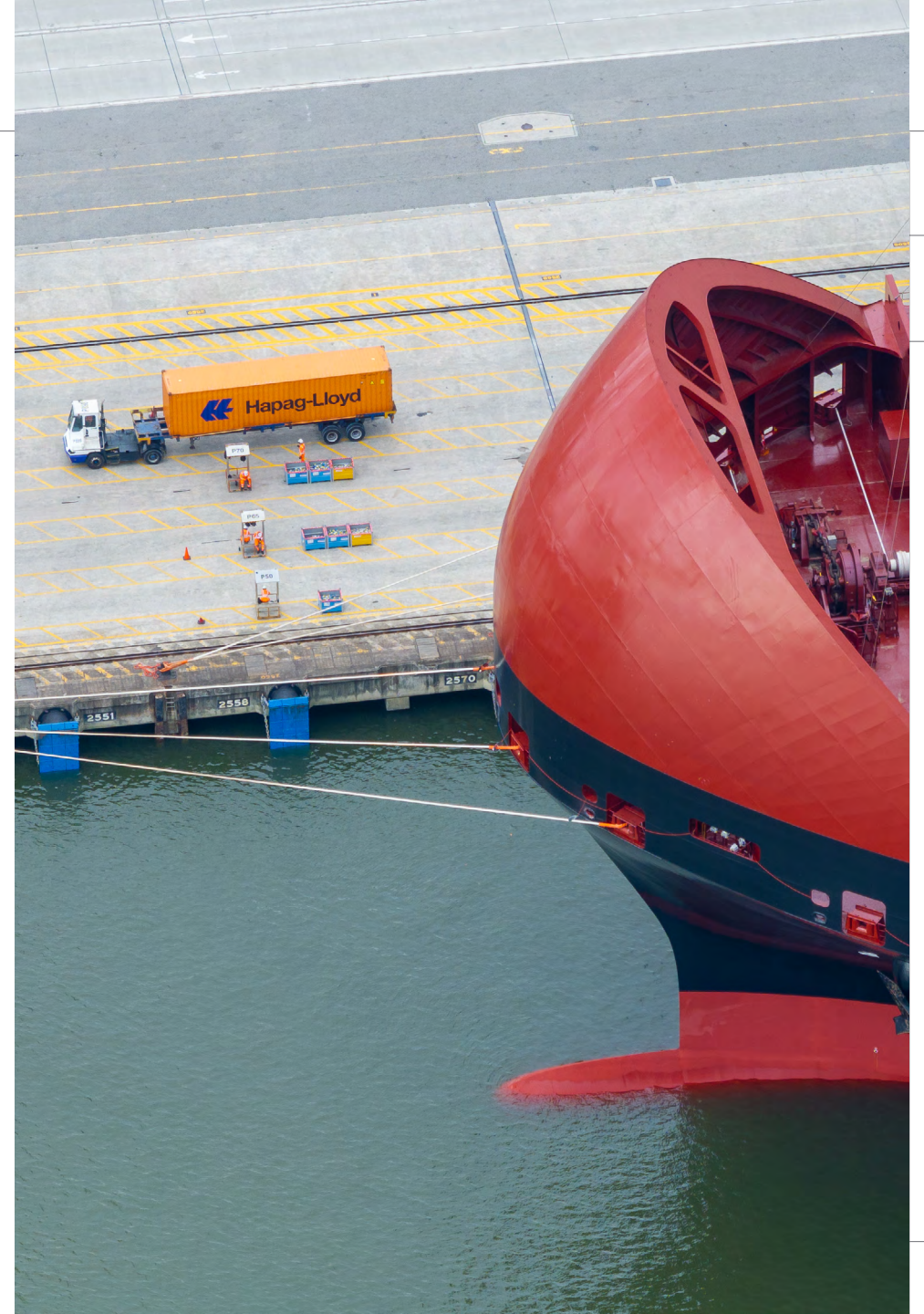
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# FOREWORD BY THE HUMAN RIGHTS OFFICER

Global supply chains connect people, markets, and regions around the world. They create economic opportunities – but they also entail responsibility. As the world’s fifth-largest container liner shipping company, Hapag-Lloyd is fully aware of this responsibility. Protecting human rights along our value chain is not an abstract objective for us, but a concrete task that we approach systematically, thoughtfully, and with a clear sense of proportion.

In my role as Human Rights Officer, it is particularly important to me that our human rights due diligence is not reduced to a formal exercise of documentation. What truly matters is that we assess risks realistically, set clear priorities, and take action where our leverage can make the greatest difference and where impacts may be most severe. At its core, this work is about people – about the conditions under which they work, the respect they are shown, and the opportunities available to them.

This risk-based approach requires careful analysis, internal alignment, and ongoing dialogue with our business partners. It also requires openness and a willingness to learn. Not every measure delivers immediate results, and not every challenge can be addressed alone. That is why the systematic evaluation of experience and the continuous refinement of our approach are so important. Progress in this area is rarely linear – but it is meaningful when it is sustained.

We want to share what we encounter along this journey – our progress, our experience, and our areas for improvement – with our colleagues, customers, suppliers, investors, and all other interested stakeholders. For this reason, we have decided to continue publishing a Human Rights Report independently of formal reporting requirements under the German Act on Due Diligence in Supply Chains (LkSG) or other applicable laws. This report illustrates how governance, risk analysis, supplier engagement, and grievance mechanisms interact at Hapag-Lloyd. At the same time, it underscores that implementing corporate sustainability due diligence is an essential component of our Strategy 2030. Only by living up to our social responsibility can we truly be a Sustainability Driver and the Number One for Quality.

I would like to express my sincere appreciation to our colleagues around the world who contribute to this effort every day – through responsible decision-making, open dialogue, and constructive feedback. Our commitment also extends to the many people working throughout our global value chains. Their working conditions, safety, and dignity remain at the center of our efforts. This report is not the conclusion of a process; it is another step on a path we will continue to pursue with determination and a strong sense of responsibility.

## **Michael Pradel**

Senior Managing Director Global Procurement  
Human Rights Officer of Hapag-Lloyd AG



**“Human rights are about people – their safety, dignity, and fair treatment. We take responsibility across our value chain, with clear priorities and real action.”**



# EXECUTIVE SUMMARY

Protecting human rights along global value chains is, for Hapag-Lloyd, both an expression of corporate responsibility and an important element of a resilient business model. Since 2023, we have been implementing a structured and systematic Corporate Sustainability Due Diligence approach, building on existing policies and processes.

At the core of our human rights due diligence is a risk-based approach. We identify and prioritize human rights and selected environmental risks where potential impacts on affected individuals may be most severe and where we can exercise meaningful leverage. Severity of potential impacts on rights-holders remains the primary criterion for prioritization. On this basis, we steer preventive and remedial measures within our operations and along our value chain.

In 2025, we further strengthened and expanded our Corporate Sustainability Due Diligence system. Key developments included starting with the integration of additional subsidiaries into the CSDD framework, the refinement of our risk analysis methodology, the continued rollout of category-specific supplier surveys, and the expansion of structured supplier dialogue formats, including peer-exchange workshops in Europe and Asia. A particular focus was placed on the three prioritized procurement categories – Truck, Depot, and Chartering – where risk exposure and leverage were assessed as most significant. In Truck and Depot operations, we deepened engagement with suppliers through targeted risk assessments, enhanced contractual requirements, and capacity-building measures addressing working conditions, occupational safety, and fair treatment. In Chartering, we advanced a dedicated project to strengthen social standards in charter vessel operations, including reinforced requirements regarding collective bargaining coverage as well as intensified dialogue with vessel owners and seafarers' representatives.

This report demonstrates how governance, risk analysis, supplier engagement, grievance mechanisms, and effectiveness reviews interact as part of an integrated system. It underscores that human rights due diligence at Hapag-Lloyd is part of our group-wide risk management and supports compliance with Minimum Safeguards, enabling the classification of economic activities as environmentally sustainable in alignment with the EU Taxonomy. Furthermore, these processes serve as the foundation for our reporting under the CSRD (Corporate Sustainability Reporting Directive), providing the necessary data and transparency to meet social disclosure standards. Our approach is also designed to support our customers in meeting their due diligence efforts and reporting obligations in an evolving regulatory environment.

Our corporate values – *We care. We move. We deliver.* – as well as our ambition to be the **Undisputed Number One for Quality** and a **Sustainability Driver** under our Strategy 2030, shape how we continue to advance this work. By embedding corporate sustainability due diligence into governance, procurement, operations, and risk management processes, we aim not only to mitigate risks but to contribute to tangible improvements in working conditions, occupational safety, equal treatment, and responsible business conduct across our global value chain.



## WHY WE REPORT

Since 2023, we have implemented a structured and systematic Due Diligence approach, building on existing policies and processes. At its core lies a risk-based approach that guides how we identify, prioritize, and address potential risks for people and the environment (see page 9). This approach forms the foundation of our Corporate Sustainability Due Diligence system (CSDD system) and serves as the guiding principle throughout this report.

This report is designed to provide transparency on how we meet our responsibilities, why we focus on certain priorities, and how we learn from experience. Unlike in previous years, this report for the 2025 financial year no longer follows a questionnaire prescribed by the German Federal Office for Economic Affairs and Export Control (BAFA). Instead, it places the substantive narrative at the center – from our motivation and the interaction of different binding due diligence frameworks (see graphic on the right) to our Corporate Sustainability Due Diligence system and the concrete measures we implement and their impact.

### Our values and strategy 2030 as the starting point

At Hapag-Lloyd, the way we address human rights risks along our value chain is not driven by regulation alone. It reflects our corporate values – We care. We move. We deliver. – and our long-term strategic orientation. These values shape how we make decisions, assume responsibility, and engage with employees, business partners, and society at large.

Within the broader framework of [Hapag-Lloyd's Strategy 2030](#), this commitment translates into concrete priorities. Social sustainability contributes directly to two of the five strategic pillars: **Undisputed Number One for Quality** and **Sustainability Driver**. For us, the protection of human rights is therefore not an add-on sustainability topic, but an integral element of quality, reliability, and long-term value creation. An increasing number of our customers share this perspective – a development we welcome and one that is evident in the growing dialogue on social sustainability.

Quality at Hapag-Lloyd means more than operational excellence. It also encompasses the reliability of our processes, the integrity of our value chains, and the responsible treatment of people. Violations of fundamental labour and human rights not only harm those affected, but also undermine quality, reputation, and the resilience of our business model. Through our [Global Code of Ethics](#) and our [Supplier Code of Conduct](#), we clearly articulate the standards we set for ourselves and for our suppliers.

As a Sustainability Driver, Hapag-Lloyd also sees itself as a company that actively shapes sustainability. Alongside the decarbonization of our fleet, corporate sustainability due diligence is a key lever in this effort: it helps us identify risks at an early stage, initiate structural improvements, and work with partners to develop sustainable solutions.

## OUR HUMAN RIGHTS DUE DILIGENCE DRIVERS



- 1 German Act on Due Diligence in Supply Chains
- 2 Corporate Sustainability Due Diligence Directive
- 3 Human Rights Due Diligence





## GOVERNANCE AND RESPONSIBILITIES — HUMAN RIGHTS AS PART OF CORPORATE GOVERNANCE

At Hapag-Lloyd, the fulfillment of corporate sustainability due diligence obligations is firmly embedded in a range of corporate policies and processes, including the Global Code of Ethics, the Supplier Code of Conduct, the Procurement Policy, supplier contracts, and the grievance mechanism. Human rights are therefore not treated as an isolated compliance issue, but as an integral part of responsible business conduct.

### Responsibility at executive board level

Through its Policy Statement on Social Responsibility and Human Rights, the Executive Board defines the strategic framework and key principles to fulfill the company's due diligence obligations, and receives regular updates on material developments, risks, and measures.

### Role of the human rights officer and the human rights office

The operational management and oversight of the Corporate Sustainability Due Diligence system is carried out by the Human Rights Officer appointed by the Executive Board. To support the system implementation, Hapag-Lloyd established the Human Rights Office at its headquarters in Hamburg in 2023. Key responsibilities of the Human Rights Officer and the Human Rights Office include in particular:

- development and monitoring of the Corporate Sustainability Due Diligence System
- coordination of risk analyses
- definition, tracking, and evaluation of measures to address identified risks
- the involvement of relevant functional and operational departments at the corporate, regional and local level
- regular reporting by the Human Rights Officer to the Executive Board



### POLICY STATEMENT: HUMAN RIGHTS AT HAPAG-LLOYD

Hapag-Lloyd recognizes its responsibility to respect human rights within the Group and throughout its value chains. Guided by our corporate values, “We care. We move. We deliver.”, we align in particular with the internationally recognized frameworks and standards, including key human rights, labour, safety, and environmental conventions, such as the International Bill of Human Rights, the ILO core labour standards, the Maritime Labour Convention and relevant UN and OECD guidelines.



The full [Policy Statement on Social Responsibility and Human Rights of the Executive Board](#) is available online.





## CORPORATE SUSTAINABILITY DUE DILIGENCE SYSTEM

### HOW WE MANAGE HUMAN RIGHTS RISKS ACROSS OUR OPERATIONS AND VALUE CHAIN

Hapag-Lloyd has developed a CSDD system that provides the operational framework for implementing corporate sustainability due diligence. Rather than serving as a rigid set of rules, it functions as a dynamic, learning system that is continuously developed and refined.



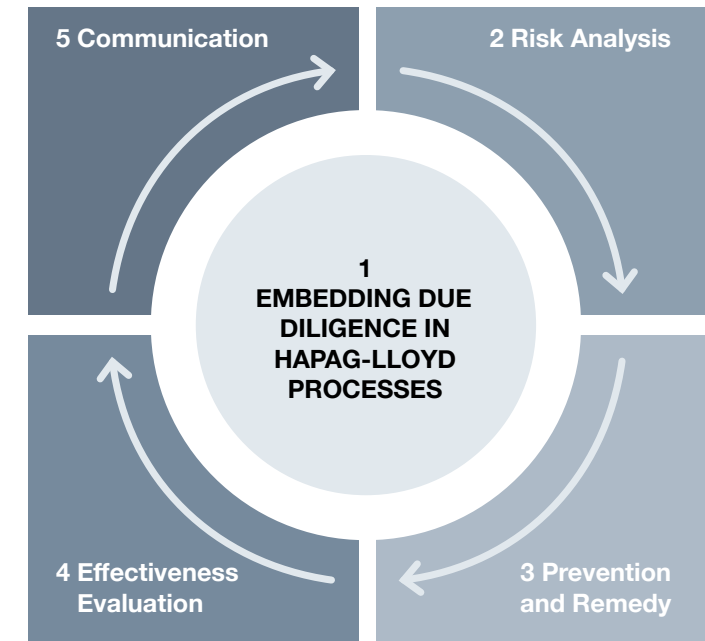
The CSDD system feeds the Hapag-Lloyd's group-wide risk management. This integration ensures that human rights risks are systematically identified, assessed, and managed – parallel to other material corporate risks. In 2025, Hapag-Lloyd started a project to expand the coverage of the CSDD system, integrating subsidiaries which were not yet part of it.

Within the CSDD system, the risk analysis serves as the starting point of the annual corporate sustainability due diligence process. Its results feed directly into decision-making processes and inform the prioritization of measures. At the same time, insights gained from implemented measures, grievance cases, and projects – for example, with suppliers to enhance social sustainability in the value chain – are used to reassess risks and adjust priorities where necessary.

A key characteristic of Hapag-Lloyd's CSDD system is the consistent feedback loop between its individual elements. Insights from one area do not remain isolated; instead, they are systematically used to further develop other elements of the system. For example, indications from the grievance mechanism may lead to the reprioritization of risks, the adjustment of training content, or the initiation of new preventive or remedial measures.

This learning logic helps ensure that the system not only meets formal requirements but also delivers tangible impact.

### HAPAG-LLOYD'S DUE DILIGENCE PROCESS



At the core of our due diligence approach is the ongoing integration of human rights responsibilities into our existing business processes, including their firm anchoring in company policies. Risk analysis marks the beginning of a recurring annual cycle in which potential risk exposure is reassessed, appropriate preventive and corrective actions are identified, their effectiveness is evaluated, and the outcomes are transparently communicated.



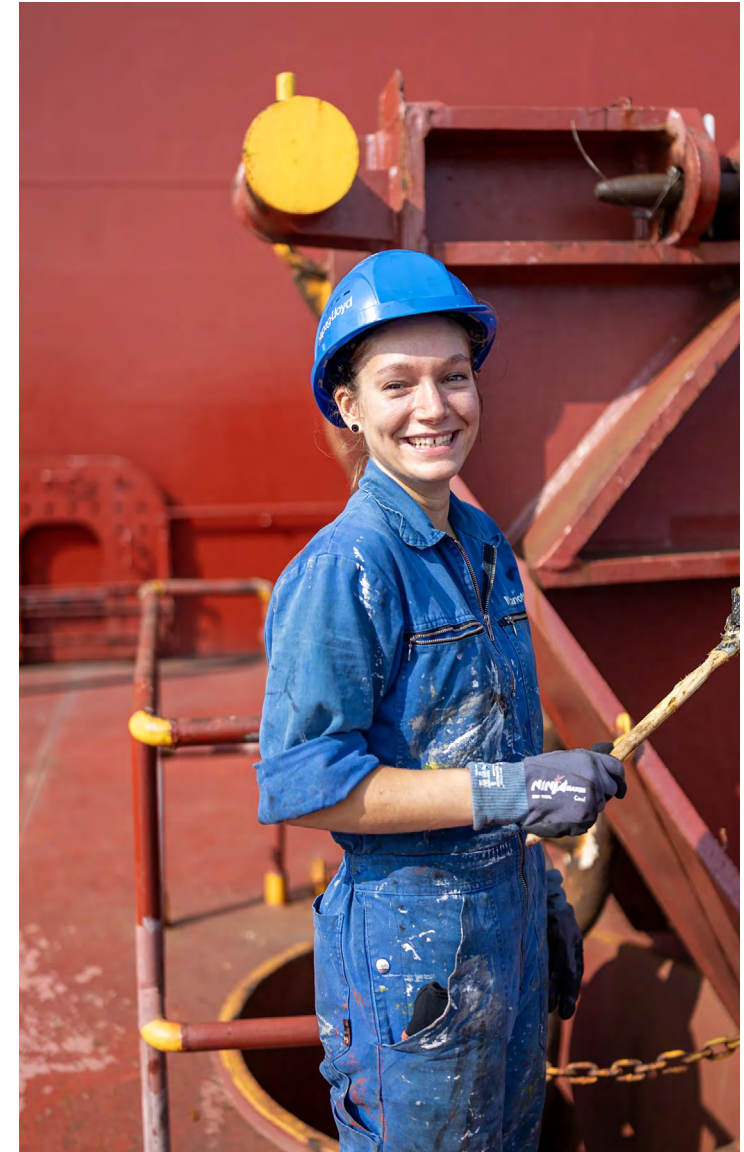


## Involvement of functions and regions

Human rights due diligence is a cross-functional responsibility, both within Hapag-Lloyd's own operations and along the value chain. Effective implementation therefore requires close collaboration across multiple functions, coordinated by the Human Rights Office.

The CSDD system is designed to reflect both this need for cross-functional cooperation and the company's decentralized organizational structure. By appointing topic owners at locations worldwide, depending on their ability to address potential human rights and environment-related risks, e.g., Human Resources takes care of human rights-related topics for the own workforce, while departments with procurement tasks do it for the upstream value chain.

## CSDD SYSTEM: TOPIC OWNERS TAKE RESPONSIBILITY ACROSS GLOBAL LOCATIONS AND DEPARTMENTS





## RISK-BASED APPROACH – RESPONSIBILITY WITH IMPACT

Hapag-Lloyd's value creation is global and complex, shaped by a wide range of actors, activities, and geographic contexts. With more than 300 vessels, around 130 services worldwide, and customers served in over 400 locations, the company's activities rely on a far-reaching operational and logistics network. This global network of shipping routes, terminals, inland transport connections, port service providers, and suppliers creates economic opportunities, but it also entails diverse human rights and environmental risks that vary significantly depending on region, activity, and business partner.

Given this complexity and diversity of potential impacts, Hapag-Lloyd applies a risk-based approach to corporate sustainability due

diligence. This approach is internationally recognized, aligned with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. For Hapag-Lloyd, it also reflects an impact-oriented understanding of responsibility.

Acting on a risk-based basis does not mean ignoring risks or diluting responsibility. On the contrary, it means taking responsibility focusing particularly on potential adverse impacts on people may be most severe. Human rights risks differ not only in their likelihood, but above all in the severity of their potential impact on affected individuals. An effective due diligence system must reflect these differences.

These criteria form the basis for prioritization. They help us allocate resources in a targeted manner and focus our measures where they can make the greatest difference.

The risk-based approach shapes not only the risk analysis, but the entire CSDD system at Hapag-Lloyd. It influences which topics we examine in greater depth, where we strengthen preventive measures, which suppliers we engage with on a priority basis, and how insights from grievances or interactions with internal and external stakeholders are fed back into our systems. In this way, it serves as the connecting element between analysis, action, and learning.

As such, the risk-based approach is more than a methodological choice. It reflects our values and strategic priorities and enables us to link quality and sustainability – through clear priorities, transparent decisions, and measures with measurable impact.

### We therefore base our approach on three guiding questions:

How severe could the potential impacts on affected individuals be?	How likely is the risk to occur?	What level of leverage does Hapag-Lloyd have?
In assessing severity, we consider factors such as the extent of potential harm, the number of people who could be affected, and whether the harm would be reversible.	This assessment takes into account country- and sector-specific factors as well as information on specific activities or business partners.	We analyze the extent to which we cause, contribute to, or are directly linked to risks – and the options available to us to influence prevention or remediation.



## RISK ANALYSIS

### HOW WE IDENTIFY AND PRIORITIZE RISKS

The annual risk analysis forms the analytical foundation of our CSDD process. It serves to systematically identify, assess, and prioritize human rights and selected environmental risks (see graphic) – both within our operations and along our value chain.

In line with our risk-based approach, the analysis considers areas where potential impacts may be most severe and where we have the greatest ability to exercise leverage, without losing sight of other relevant risks.

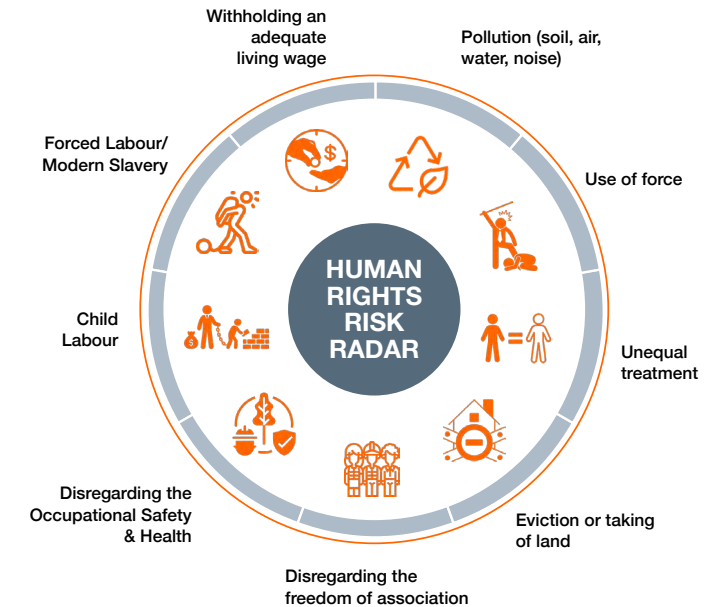
Hapag-Lloyd applies a two-step approach to risk analysis. In the first step, an **abstract risk analysis** is conducted. This involves assessing country- and sector-specific risks that are typically associated with our operations and procurement categories. The abstract analysis is based on internationally recognized indices and studies and aims to provide a structured overall picture of potential risk areas and to identify initial priorities.

Building on this, the second step consists of a **concrete risk analysis**. This focuses on locations, activities, or suppliers with an elevated risk profile. At this stage, risks are assessed in significantly greater detail and evaluated in their specific context.

The **risk analysis for our own operations** is carried out at 100 per cent of our locations and is strongly geared toward firmly embedding social sustainability into business processes. We therefore build on existing structures and expand them to include a corporate sustainability due diligence dimension.

Following a standalone survey of all locations worldwide for the initial risk analysis in 2023, the Human Rights Office has increasingly aligned its activities with those of other functions. For example, the annual data collection at locations is synchronized with the data request for the reporting according to the Corporate Sustainability Reporting Directive (CSRD). In addition, data from the annual Employee Engagement Survey conducted by Human Resources and from the QEM system feed into the risk analysis. A dedicated employee survey on Diversity, Equity, and Inclusion – also conducted by Human Resources – was supplemented by the Human Rights Office with questions relevant to the risk assessment. Employees perspectives are also integrated through dialogue with the Group Works Council and the Seafarers' Works Council. This is a standard component of the annual risk analysis, which includes identifying risks and exchanging ideas on how to address prioritized concerns. Additionally, we maintain dialogue with the International Transport Federation (ITF) as representative of seafarers' interests. The Corporate Audit department has expanded its audit catalogue to include criteria relevant to the implementation of corporate sustainability due diligence.

### HUMAN RIGHTS RISK RADAR



### ENVIRONMENTAL RISKS

Prohibited handling of



Persistent organic pollutants



Mercury



Hazardous substances and waste

The Human Rights Office's risk analysis covers human rights risks as well as selected environmental risks. The selection of these risk categories follows the requirements set out, among others, in the German Act on Due Diligence in Supply Chains.





In addition, the Human Rights Office conducts *ad hoc risk analyses* whenever there are actual indications that suggest the existence of an actual or potential risk to a corporate sustainability due diligence obligation and when the risk situation is expected to change or expand – for example in relevant M&A activities, or in connection with major projects such as the ordering of new vessels.

### Risk-based prioritization for in-depth analysis

Since the first risk analysis conducted in 2023, we have refined and improved our approach each year. While the initial focus was on gaining the broadest possible overview of potential risks, we now have a clearer understanding of which geographical regions, value chains, and areas of our operations are most relevant based on the criteria described in the previous chapter – namely severity, likelihood, and our level of leverage. As a result, we apply targeted priorities in our risk analysis.

This pre-selection allows us to use resources more efficiently and to analyze the data collected in far greater depth than would be possible if we were to include all our more than 10,000 suppliers.

Our risk-based approach offers additional advantages and makes a significant contribution to a low-bureaucracy, impact-oriented implementation of due diligence at Hapag-Lloyd. For example, it helps us avoid repeatedly burdening suppliers with questionnaires that are

time-consuming to complete and often yield only superficial insights. Instead, we have developed self-assessment surveys that specifically address relevant risks in the respective business area (see box). As a rule, suppliers who have completed the due diligence process are invited to participate again only four years later, unless any risk is identified in the meanwhile.

Looking ahead, we will continue to refine our surveys. Our aim is to improve not only the quality of the risk analysis results, but also response rates.

The *risk analysis in the value chain* always covers, among other aspects, labour law topics (with reference to applicable legislation), existing occupational safety and health measures, the composition of the workforce, and existing prevention and remediation measures. Deliberately, it also includes open-ended questions, for example on specific challenges in implementing social standards. As a result, the analysis of responses is largely carried out manually.

Rather than using a scoring system – such as a traffic-light classification – we have developed a methodology that assigns “red flags” to conspicuous response patterns. These red flags automatically trigger mandatory follow-up actions, such as written inquiries or video conferences with the supplier.

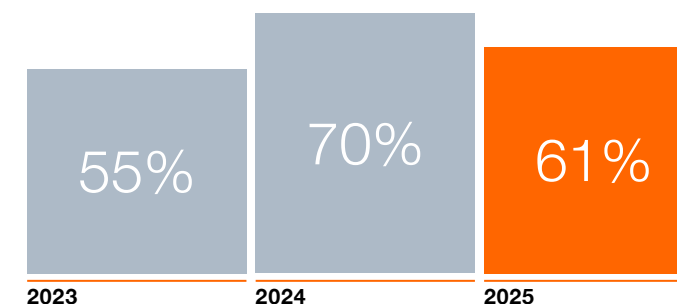
### CATEGORY-SPECIFIC SUPPLIER SURVEYS

Since 2024, we have used sector-specific questionnaires for our value chain risk analysis instead of a “one-size-fits-all” approach. These questionnaires were developed in-house and are continuously refined.

For example, in the trucking sector, we ask service providers how they monitor compliance with legally required rest periods and whether they provide the necessary facilities for their drivers. The questionnaire for container depots addresses other industry-specific risks, such as land acquisition risks related to depot operations. For charter vessels, we focus on topics that relate specifically to the situation of seafarers such as the access to drinking water.

In the first year of applying these sector-specific questionnaires, the response rate increased significantly to 70 percent. In 2025, the response rate declined again but remained clearly above the level recorded in 2023. We attribute this decrease primarily to the fact that we again contacted suppliers who had already not responded in the previous year and requested their participation.

### SUPPLIER SURVEY: RESPONSE RATE SINCE 2023





**Results of the risk analysis**

We conduct a risk analysis every year. Its results therefore do not represent a static snapshot. Insights from grievances, audits, supplier dialogue, and other activities in the area of social sustainability are continuously incorporated and contribute to the regular review, adjustment, and further development of our approach. In this way, the risk analysis becomes the foundation of an impact-oriented, learning

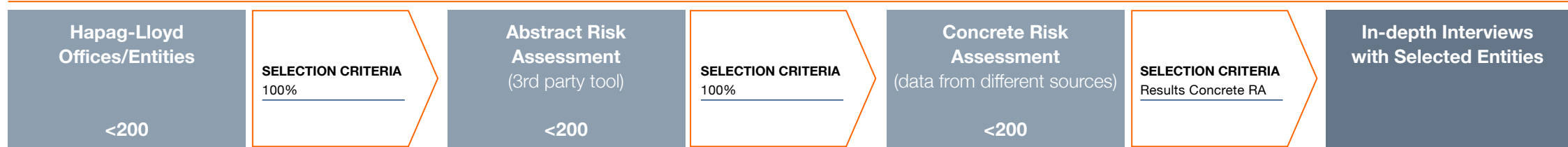
system for human rights due diligence – linking strategic oversight with operational action.

Although risk assessments can change relatively quickly at a local or regional level, for example due to political dynamics, the overall picture tends to remain consistent over a longer period. Within our own operations, the analyses show that two risks emerge as particularly relevant onshore, at sea, and in our terminals – even though the nature

of their work differs significantly. In the area of occupational safety and health, risks arise in particular from working time models, how work is organized (e.g. task allocation, staffing levels, and shift patterns), and both physical and psychological strain. The risk analysis indicates that these topics are relevant worldwide and therefore require systematic attention. The risks to equal treatment in the workplace entail risk dimensions connected to equal opportunity, equal pay, and protection against discrimination and harassment.

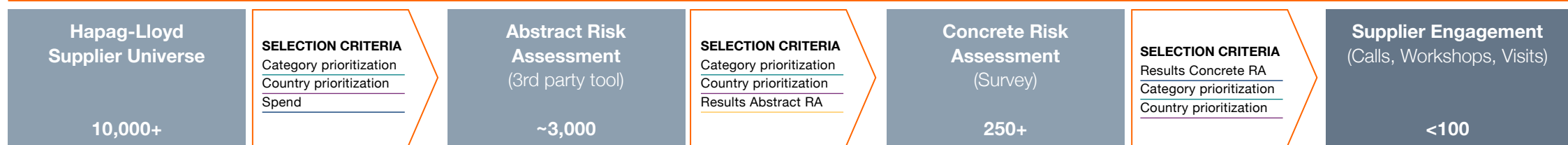
**RISK ASSESSMENT IN OWN OPERATIONS (A) AND THE VALUE CHAIN (B)**

**A**



Methodology of Hapag-Lloyd’s 2025 Risk Assessment (Own Operations): All locations were first subject to an abstract risk assessment and subsequently to a concrete risk assessment. For this purpose, data from various sources were analyzed, including data collected for CSR reporting as well as internal employee surveys (Employee Engagement Survey, Diversity, Equity & Inclusion Survey), exchanges with the Group Works Council and the Seafaring Works Council, and information from the grievance mechanism. Based on the results, follow-up discussions were arranged with selected locations to further assess identified risks and, where necessary, implement preventive measures.

**B**



Methodology of Hapag-Lloyd’s 2025 Value Chain Risk Assessment: Based on spend volume, approximately 3,000 suppliers were selected for the abstract risk assessment. Based on the results of this assessment, around 250 suppliers were subsequently selected for the concrete risk assessment, which was conducted through a category-specific self-assessment questionnaire. Suppliers with notable responses were then nominated for follow-up measures and targeted supplier engagement. At each stage of the selection process, a weighting methodology was applied to prioritize countries and industries with a generally higher inherent risk profile.



Based on the results of the risk analysis, Hapag-Lloyd has prioritized risks related to Occupational Safety and Health and equal treatment based on gender within its own operations, and to Occupational Safety and Health and overall working conditions at sea within the value chain. This prioritization enables the company to work more intensively on strengthening preventive measures in these areas – both within Hapag-Lloyd and in collaboration with its suppliers – without neglecting other risks. In this way, the risk analysis serves as a bridge between abstract responsibility and concrete action. The following chapters describe how these priorities are translated into specific measures and projects.

Within the value chain, the risk analysis presents a differentiated picture. Given the wide range of business partners, regions, and services involved, not every supplier relationship carries the same level of risk. However, the risk-based approach enables us to clearly identify

specific areas of focus. Elevated risk exposure varies significantly by region but is generally most apparent in the procurement categories of trucking, depots, and chartering. In these areas, risks related to occupational safety and health, working hours, adequate compensation, and – in certain contexts – the risk disposition of forced labour is higher (see also [🌐 Hapag-Lloyd's Modern Slavery Statement](#)).

These risks often do not occur in an isolated manner but are frequently structural. National labour markets, regulatory frameworks, and economic competitive pressures can directly affect working conditions within the value chain. In some regions, inadequate infrastructure such as roads is a key factor influencing the risk assessment. The risk analysis takes these contextual factors into account and provides the basis for a differentiated and proportionate approach to supplier engagement.



### PRIORITIZED RISKS AND MAIN RISK CATEGORIES

#### Prioritized risks to (own operations)



Occupational Safety & Health



Equal Treatment

Based on the risk analysis, Hapag-Lloyd has prioritized risks to Occupational Safety & Health within its business operations, including the risk of excessive overtime, as well as risks to equal treatment based on gender, in order to focus improvement efforts primarily on these areas.

The risks related to Occupational Safety & Health are also treated as a priority within the value chain, as the nature of the activities as well as external factors (such as infrastructure in port areas and road networks) pose challenges. This applies in particular to the trucking, container depot, and chartering sectors.

#### Main risk categories (value chain)



Truck



Depot



Chartering



## PREVENTIVE AND REMEDIAL MEASURES

### HOW WE PREVENT AND ADDRESS HUMAN RIGHTS RISKS IN PRACTICE

Our measures derive from the results of the risk analysis and from corporate efforts that materialize the company's commitment to fostering diversity and ensuring good working conditions for all employees. They follow the principle that prevention takes precedence over remediation, without losing sight of the need for clear and appropriate responses where violations are identified. At the same time, they reflect our risk-based approach: measures are not applied uniformly, but are tailored to context, risk exposure, and our level of leverage.

#### Prevention in our own operations

Within our own operations, Hapag-Lloyd relies on a combination of clear policies, awareness-building, and risk-based prioritization. The objective is to identify risks at an early stage and reduce them structurally.

Key elements include binding policies – in particular the Global Code of Ethics and relevant processes and Company Guidelines – as well as clearly defined expectations for managers and employees. These are complemented by regular training programs that foster general awareness of human rights issues while also providing practical guidance for day-to-day decision-making. The mandatory Human Rights Basic

Training, introduced in 2024, has been completed by 99.2 percent of employees (as of December 31, 2025).

A particular focus is placed on preventing the prioritized risks to Occupational Safety and Health and equal treatment in the workplace. Training and communication measures are designed to strengthen a corporate culture in which risks can be addressed openly and concerns are taken seriously. They also promote respectful conduct, equal treatment, and the appropriate handling of potential conflict situations. The risk analysis has shown that a range of relevant measures are already in place to support managers and employees. The Human Rights Office supports the responsible functions, where needed, in adapting existing measures and developing new concepts.

The working environments in our company differ between our two segments. The Liner Shipping segment has three main working environments which are offices, vessels and trucks, while the Terminal & Infrastructure segment has offices, terminals and container depots. There are targeted measures for each working environment and activity that derive from the risks to Occupational Safety and Health. For example, in order to address the various risks that are present when working on the open sea, a certified Fleet Management's occupational safety management system is in place (ISO 45001:2018).

In the Terminal & Infrastructure segment, for example at HGT LATAM, existing safety measures were further enhanced in 2025 to mitigate

risks related to working at height in terminals. Continuous improvement efforts focused on strengthening operational processes, refining hazard identification and control mechanisms, providing targeted training, and upgrading safety equipment to ensure the safe execution of working-at-height activities. In addition, comparable operations were reviewed to identify further improvement potential, and regional sites assessed and reinforced their practices in line with the Global HSSE Alert on Working at Height. These enhancement measures were initiated in 2025 and continue to be implemented and strengthened throughout 2026.

Certain locations and functions are more exposed to the risk of excessive overtime. Therefore, systematic working time recording remains a key preventive measure to mitigate this risk. In 2025, training initiatives addressed risks related to equal treatment and workplace conduct. These included programmes on (sexual) harassment prevention, diversity, equity and inclusion (DEI) and unconscious bias and its impact on decision-making.

#### Prevention in our value chain

As foundation of our business relationship with suppliers, our Supplier Code of Conduct sets joint commitments towards people, the planet and ethical business conduct. Additionally, the inclusion of contractual assurances from direct suppliers that they will comply with our expectations regarding people, the planet and ethical business conduct has been systematically developed in several procurement categories, including trucking and depot as prioritized categories. A specific project to enhance social sustainability in the selection and onboarding process of charter vessels as well as the adaptation of contractual assurances has started in 2025 and will be concluded





in 2026. This process includes, for example, requiring shipowners to have collective bargaining agreements in place, ITF agreements or their equivalent, which establish legally binding minimum standards for wages, working conditions, safety, and access to medical care. In addition, Hapag-Lloyd initiated direct dialogue with shipowners in the charter fleet on broader social sustainability topics – including working time arrangements, routes affected by piracy or terrorism, access to drinking water and internet connectivity, and the prevention of (sexual) harassment and violence – and will continue this engagement in 2026.

Our experience shows that sustainable improvements can be more effectively achieved through dialogue, transparency, and collaboration. The communication about our Supplier Code of Conduct – as well as

the results of the annual risk analysis – serves as a starting point for joint efforts to end or mitigate social risks at suppliers. The objective is to better understand the often highly diverse risks that vary by industry and country, and to work jointly toward appropriate solutions.

### Project initiatives and supplier dialogues

Building on the results and prioritization of the risk analysis, Hapag-Lloyd implements targeted project and dialogue formats. Structured discussions with selected suppliers are designed to further specify identified risks, gain a deeper understanding of existing measures, develop action plans in cases of violations, and identify opportunities for improvement.

These discussions pursue a clear objective: to create transparency, clarify expectations, define responsibilities, and agree on concrete next steps. At the same time, they provide space to openly address structural challenges – for example with regard to working hours, compensation, or local operating conditions.

In addition, in 2025, we developed workshops and visits aimed at strengthening capacity within the value chain. The focus is not only on communicating social requirements, but also on facilitating the exchange of experiences and best practices. These project-based approaches are a key component of our preventive strategy and are continuously refined and expanded.

### SUPPLIER ENGAGEMENT IN PRACTICE: DIALOGUE AND JOINT SOLUTIONS



**130 supplier  
engagement  
calls**  
since 2024



In 2025,  
**40 representatives** from  
**22 suppliers** participated in  
peer-exchange workshops  
in **3 countries**

In implementing human rights due diligence in its value chain, Hapag-Lloyd pursues a cooperative approach that places collaboration with suppliers at its core. This approach also applies when potential breaches of due diligence obligations or of Hapag-Lloyd's Supplier Code of Conduct are identified. In many cases, the development and implementation of remedial measures require time, for example when dependencies on third parties exist. In other cases, such as when a company unlawfully withholds workers' passports, swift action is possible (and strongly necessary).

To achieve medium- to long-term improvements in the area of social sustainability, we have been engaging in dialogue with our suppliers in various formats since 2024. The Supplier Engagement Calls, conducted as a follow-up measure to the annual risk analysis, aim to address identified findings and to gain deeper insights into

local challenges. This open dialogue also enables us to collect best practices, and evaluate ways to support our suppliers, for example with regard to our purchasing practices.

In 2025, we additionally invited suppliers at three locations in Europe and Asia to participate in peer-exchange workshops as part of a pilot project, with the aim of fostering dialogue on local challenges and discussing joint solution approaches. 100% of the workshop participants stated having improved their understanding of social sustainability in their sector. Participants also stated that they hope to improve internal measures for social sustainability based on the workshop. Based on the very positive experience, this format will be continued in Africa and Latin America in 2026. In this context, the Human Rights Office works closely with local colleagues from the Procurement and Operations departments.





## GRIEVANCE MECHANISMS AND REMEDIATION

### HOW WE RESPOND WHEN CONCERNS ARE RAISED

Even with a strong focus on prevention, the occurrence of actual or potential human rights incidents cannot be entirely ruled out. For Hapag-Lloyd, it is therefore essential that potentially affected individuals and communities have access to effective grievance mechanisms\*,



\* For the purpose of this report, the term “grievance mechanism” is used in line with internationally recognized human rights frameworks (e.g., the UN Guiding Principles on Business and Human Rights). It refers to formalized processes that enable individuals or groups to raise concerns about potential or actual human rights impacts and to seek remedy. Hapag-Lloyd AG relies on several reporting channels that employees may use, depending on their level of comfort, such as their supervisor, a local or regional compliance officer, the Global Compliance team, the Designated Person Ashore, or the Speak Up Line. The latter can also be used by external stakeholders and is as “grievance mechanism” the main channel for human rights-related concerns.

and that reports are handled in a structured, fair, and consistent manner.

Remediation measures are closely linked to prevention. Insights gained from specific cases are systematically fed back into training programs, policies, and risk analyses. In this way, remediation efforts also contribute to the ongoing development of the system and strengthen its overall effectiveness.

### Grievance mechanism (“Speak Up Line”)

Hapag-Lloyd operates the Speak Up Line as a globally accessible grievance mechanism. It is available to internal and external rightsholders as well as stakeholders. Reports can be submitted confidentially and, if desired, anonymously.

The grievance mechanism is designed to ensure that it:

- is easily accessible
- guarantees confidentiality and protection against retaliation
- enables an independent review of reported concerns
- ensures appropriate handling and documentation

The Speak Up Line is an integral part of our CSDD system. It complements preventive measures and serves as an important early warning system.

### Handling of reports and remediation measures

Incoming reports are reviewed in accordance with established procedures. This includes assessing whether the report constitutes an actual or potential human rights issue and providing advice for involved functions to design appropriate and effective measures in order to prevent or remediate risks for people or the environment. In 2025, 37 cases were assessed, 28 of which were initially identified as potentially related to human rights or the environment. By the end of the reporting year, 22 of these 28 cases had been closed. Following investigations, four cases were partially or fully substantiated. These cases identified risks and, in some instances, negative impacts on employees, primarily regarding (sexual) harassment. Immediate corrective actions were implemented, ranging from targeted training to dismissal.

Where incidents related to human rights or the environment are identified, Hapag-Lloyd takes appropriate remedial action. Such measures take into account the nature and severity of the incident. They may range from specific corrective actions within our own operations, e.g., disciplinary consequences for employees involved in discriminatory conduct, to developing corrective action plans with our suppliers to address identified deficiencies. For example, where risk analyses or supplier engagement activities (□ see page 12) revealed that suppliers were unlawfully retaining passports or other government-issued identity documents, we agreed on immediate action plans to ensure the return of these documents and to revise the respective company policies in order to prevent such practices in the future.

The objective of remediation measures is not only to bring a specific human rights negative impact to an end, but also to prevent similar cases from occurring in the future.



## EFFECTIVENESS AND CONTINUOUS IMPROVEMENT

### HOW WE REVIEW AND IMPROVE OUR APPROACH

The effectiveness of our human rights due diligence is not measured by the number of measures implemented, but by whether risks are effectively reduced and adverse impacts are prevented and remedied. Accordingly, the regular review of effectiveness is an integral part of our approach – even though assessing the impact of specific measures can be challenging. For example, the number of participants in a training program does not in itself indicate whether the content leads to meaningful behavioural change. Evaluating the grievance mechanism as a preventive tool is even more complex: Is a high number of reports a positive sign, reflecting awareness and trust in the system? Or does it indicate a higher number of underlying potential adverse impacts?

The effectiveness evaluation has three key aspects in scope: our management system for human rights and environment related risks (CSDD system), our grievance mechanism, and our measures to address prioritized risks.

Our CSDD system is evaluated in light of its capability to fulfill due diligence obligations, including the consideration of potentially affected rightsholders and the ability to identify and address risks. As a result of the assessment, the opportunity to integrate subsidiaries into the CSDD system was identified and a project was started (□ as described on page 7).

We assess the effectiveness of our grievance mechanism according to the guidance of the Accountability and Remedy Project of the Office of the United Nations High Commissioner for Human Rights: Meeting the UNGPs' Effectiveness Criteria. The criteria cover several elements to establish effectiveness from a user-friendly design of the grievance mechanism to a case handling that addresses grievances without undue delay and meaningfully consults rights-holders. As a result of our effectiveness evaluation, we have identified opportunities, e.g., related to the further dissemination of the Speak Up Line, including our suppliers.

We also conduct an annual structured effectiveness evaluation of existing measures in close collaboration with the responsible functions. For our operations, several measures that intend to address prioritized risks are annually assessed in their effectiveness in light of their ability to effectively mitigate a risk. This process supports the identification of opportunities to enhance or create measures. For example, responsible functions determined the effectiveness of captain-led awareness meetings on sexual harassment during crew meetings to prevent sexual harassment on vessels. Therefore, standardized communication to ensure the consistent delivery of essential information on identifying sexual harassment or violence and accessing available support was identified as an opportunity.

During the effectiveness evaluation of measures in the upstream value chain early in 2025, the opportunity to enhance working conditions on charter vessels was identified. A project for implementation of due diligence measures was started (□ see pages 14 and 15). Engaging rights-holders across the value chain was identified as a key area for improvement. This remains a challenge due to the inherent mobility of logistics operations and the fact that active rights-holder involvement is not yet an industry standard. Nevertheless, there are efforts planned for 2026 to embed rights-holder involvement, including continuing the dialogue with ITF in their role as seafarers' representatives.

Hapag-Lloyd views human rights due diligence as an ongoing learning process. Risks evolve, business models develop, and new insights emerge. It is therefore essential to regularly reassess assumptions and adapt our approach where necessary. Many challenges cannot be resolved quickly or by one party alone. This makes it all the more important to set realistic objectives, measure progress, and maintain dialogue with relevant stakeholders.





## OUTLOOK

### ADVANCING CORPORATE SUSTAINABILITY DUE DILIGENCE UNDER STRATEGY 2030

Looking ahead, Hapag-Lloyd will continue developing its human rights due diligence, taking the risk-based approach into account. A key focus will be on enhancing the effectiveness of preventive and remedial measures within our own operations.

Another priority will be the continued expansion of supplier engagement and rights-holder involvement. Dialogue and project-based approaches will be further systematized, evaluated, and – where appropriate – expanded. The objective is to enhance sustainable outcomes along the value chain.

At the same time, we will continue to deepen the integration of corporate sustainability due diligence into group-wide processes and governance structures.

This report is therefore part of an ongoing process. It outlines where Hapag-Lloyd stands today, why we act – and how we assume responsibility along global value chains in a long-term and effective manner.

In line with Strategy 2030, we will continue to use Human Rights Due Diligence as a strategic management tool. Our ambition to be the Undisputed Number One for Quality and to act as a Sustainability Driver requires that human rights risks are managed systematically and that improvements along the value chain are actively advanced.



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