

## PROCEDURAL RULES FOR THE COMPLAINTS PROCEDURE OF HAPAG-LLOYD ("SPEAK UP LINE")

### Introduction

It is Hapag-Lloyd's stated policy to comply with internal and external rules and regulations such as, Hapag-Lloyd's Global Code of Ethics, anti-bribery and corruption legislation; competition law; embargo and sanctions regulations. At Hapag-Lloyd we also recognize our responsibility to respect human rights and fulfil our social and environmental obligations and to prevent any kind of human rights violations both within our Group and along our supply chains.

Hapag-Lloyd nurtures a 'Speak Up' culture and encourages its employees, suppliers and anyone within or outside Hapag-Lloyd to support this approach by reporting any actual or potential non-compliant or illegal behavior. Hapag-Lloyd has an internal Whistleblower and Non-Retaliation Policy in place to create a trusted system with adequate protection for anyone who wants to share a Compliance-Related Concern, which ensures that all reported concerns are being addressed in an objective, fair, timely and confidential manner.

In these Procedural Rules we describe Hapag-Lloyd's complaint procedure, the processes after a report has been made and the protection of whistleblowers.

### Scope

The Complaints Procedure is available to all employees of Hapag-Lloyd, all business partners and all other third parties. Hapag-Lloyd strongly encourages employees and external persons to report any compliance-related concerns involving the Hapag-Lloyd Group and its direct or indirect suppliers.

The Speak Up Line is a confidential channel through which actual or potential compliance-related concerns can be reported. 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.

The Speak Up Line is only for reporting possible violations made in good faith of laws or regulations (including human rights and environmental related risks or violations within the meaning of section 2 German Act on Corporate Due Dilligence in Supply Chains (LkSG) as well as violations of EU laws and regulations as stipulated in EU Directive 2019/1937), or issues that may expose Hapag-Lloyd to serious legal risks. The system is not for commercial inquires or disputes, ordinary HR complaints and grievances, or general questions. Such should rather be directed to the relevant commercial teams or respective functions in Hapag-Lloyd.

### Complaints channel

As Hapag-Lloyd's complaints channel, the online complaints procedure ("Speak Up Line") is available worldwide and around the clock at <https://hlag.integrityline.app/>, which is provided by an independent service provider. The processing of the reports is exclusively carried out by Hapag-Lloyd.

Hapag-Lloyd's employees are encouraged to report concerns through the channel they are most comfortable with, such as the respective supervisor, local or regional compliance officer, Global Compliance Team or the Speak Up Line.

## **Procedure after reporting a complaint**

### *Confidential treatment of the report*

All reported concerns are taken seriously and are reviewed in an objective, fair, timely and confidential manner. All personal data and information received through the Speak Up Line will be treated confidentially and will be accessible to a limited number of persons in Hapag-Lloyd, on a need-to-know basis. Both the technical operator of the Speak Up Line and Hapag-Lloyd itself ensure compliance with the General Data Protection Regulation (GDPR).

### *Anonymity of the whistleblower*

One can always choose to remain anonymous when reporting. The online portal offers whistleblowers the opportunity to contact Hapag-Lloyd's Compliance Department, while maintaining anonymity, in order to clarify further questions after submitting the complaint or report and to receive feedback on the status of the reported concerns. For this purpose, a secure mailbox is set up within the Speak Up Line, which is only accessible to the person making the report.

### *Processing of the complaint and feedback*

After you reported a compliance-related concern, it will be processed by the Compliance department in accordance with a standard, defined process. Other relevant functions will be involved to ensure professional, confidential and timely investigation and to decide on the measures to be taken. If you provide your contact information or through an anonymous mailbox within the online complaint channel, you will receive a confirmation of receipt within seven days. The responsible department will also contact you, if necessary and possible, to clarify the facts and your expectations regarding possible remedial and preventive measures. No later than three months after confirmation of a receipt of a report you will receive feedback on the status of your report. Once an investigation is completed, the outcome that is directly related to the reported compliance-related concern is communicated to the Whistleblower, subject to the requirements under applicable laws such as data protection legislation.

### *Protection of whistleblowers*

Any form of Retaliation against a Whistleblower is strictly prohibited at Hapag-Lloyd. Individuals who report in good faith will not be retaliated for doing so. Anyone who suspects that reprisals have been taken against them, or another person should notify Hapag-Lloyd immediately.