



CODE OF CONDUCT

Edition : 07/2025

A MEMBER OF
L¹ PORT OF LÜBECK

 **LHG**
LÜBECKER
HAFEN-GESELLSCHAFT

Preamble / Scope

The LHG Group's actions are based on compliance with the law, fairness, sustainability, responsibility, integrity and ethical behaviour. These principles correspond to the convictions of all of us, the employees and the management.

With this basic attitude, we support the achievement of the company's goals. These behavioural guidelines not only shape our external dealings with our customers and business partners, but also our internal behaviour towards each other.

All employees, in particular the management and executives acting as role models, adopt the corporate objectives and fulfil their responsibility for the image of the LHG Group, in particular by observing the rules laid down here and only acting in accordance with the law and the company's internal guidelines..

This code of conduct applies to the LHG, SG, NRS, GIG and ECL.



Governance

› Compliance with the law

For our company and our employees, compliance with the law is our top priority. Every employee must comply with the applicable legal regulations at all times. The primary duty of management and our employees is to comply with the company's legal regulations, guidelines and agreements.

Every employee including the management board must expect the general legal or contractual consequences in the event of a violation. We also reserve the right to take measures under labour law.



Governance

› Value-orientated leadership

The management board bears responsibility for leadership, action, initiative and results in their areas and departments and must delegate the tasks and activities involved to the employees entrusted to them. Delegation includes proper guidance, information, control, motivation and the duty of supervision. Managers must distinguish themselves through exemplary personal behaviour, performance and social competence. Our managers clearly communicate to our employees that the LHG Group disapproves of compliance violations in any form and that all legal consequences will be drawn from them.

Every manager is responsible for ensuring that no compliance violations occur in their area of responsibility that could have been prevented or made more difficult by appropriate supervision. Even in the case of delegation, the manager must ensure that employees are able to adhere to the compliance rules.

These compliance rules take precedence over any conflicting instructions from a manager/executive.

Every manager is also obliged to :

- comply with the management principles of the LHG Group
- to assess employees only on the basis of their performance
- ensure compliance with this code of conduct guideline in his/her area of responsibility



Governance

› Human rights, equal treatment, diversity

We respect the relevant requirements for compliance with human rights.

Discrimination due to race or ethnic origin, gender, religion or belief, disability, age or sexual identity is strictly prohibited.

This applies in particular to dealings with colleagues, employees, customers or third parties as well as when hiring, promoting, assessing or dismissing employees. Managers also have an obligatory role model function here.



Partnership

› Conflict of interest

As a matter of principle, employees place their full labour power and loyalty at the disposal of the LHG Group. Each employee must strictly separate his/her private interests from the interests of the LHG Group.

Even the appearance of a conflict of interest must be avoided. Possible conflicts of interest must be disclosed immediately. Decisions are made on the basis of objective considerations and are not influenced by personal motives or private interests.

In particular, the following issues are strictly prohibited:

- Contracts/procurement of benefits for related parties (e.g. spouses, family, relatives, friends, private business partners)
- Contracts/procurement of benefits for companies in which related parties work or are involved Secondary employment for/with competitor companies
- Secondary employment for/with business partners/customers. Only in very special cases exceptions can be granted exclusively by the management by written agreement.



Partnership

› Benefits

Our employees and the management board are requested not to accept or grant business favours. There are situations in which the granting or acceptance of business favours cannot be avoided. Low-value promotional gifts, hospitality and other invitations are common in business transactions and are not necessarily a sign of corruption.

Occasional gestures that are customary, polite, appropriate to the occasion and socially acceptable are tolerated by the LHG if the principle of transparency is observed.

However, if there is a certain regularity here or if they do not represent an appropriate value, there is a risk of increasing dependency. A sense of proportion and appropriate restraint are always required. In cases of doubt, caution should always be exercised rather than generosity.



Partnership

› Anti-corruption

Corrupt behaviour is committed by persons who grant an advantage in return for unfair preferential treatment in business transactions. Unfairly favouring a particular party in the procurement of goods or services is the most common form of corruption. The advantage obtained or sought in corrupt behaviour is not necessarily in the form of money or gifts; it can also be of an immaterial nature, e.g. in the form of personal advancement, promotion or similar. Corrupt behaviour does not necessarily have to take place between two parties; the advantage can also benefit a third party (nepotism). Even the mere promise of benefits or being promised benefits can be a criminal offence.

Our management board and employees must avoid even the appearance or suspicion that an official/business decision may have been made on the basis of irrelevant considerations, personal interests or relationships. The manager/executive must be notified immediately of any personal interest of employees that may exist in the context of a business relationship.



Partnership

› Competitive Fairness

The LHG Group is fully and unconditionally committed to the principles of fair competition. Based on our corporate policy to comply with all laws and regulations to avoid unfair competition, we compete in the market with the high quality of our services at a competitive price-performance ratio.

In our endeavours to ensure fairness in all business transactions with customers, suppliers and competitors, we strive to comply with all statutory competition rules. Behaviour agreed in advance, unlawfully obtained knowledge, informal discussions, deliberate obstruction of competitors or unlawful informal agreements contradict our principles of fair competition and are prohibited and must be consistently refrained from.

Any appearance or indication of involvement in unlawful competitive behaviour will be investigated and punished.



› Protection of environment

Protection of the environment, conservation of natural resources and Protecting of health are among the LHG Group's corporate objectives.

As part of our services, we take environmental protection concerns into account and use resources and energy appropriately and sparingly.

Every manager and every employee is jointly responsible for environmental protection in their area of work and is obliged to comply with the laws, regulations, standards and internal instructions on environmental protection.



Privacy / IP

› Security and protection of data, information, knowledge and intellectual property

Every manager and employee must respect and protect the business and trade secrets of the LHG Group. This includes, among other things, customer prices, customer lists, cost, pricing, marketing and service strategies. All information that could cause damage to the LHG Group through publication or disclosure to third parties must be treated confidentially and protected. The requirement of confidentiality and the prohibition to disclose data-specific information to the outside world applies.

Personal data may only be collected, processed, utilised and stored on the basis of the General Data Protection Regulation (GDPR). Every member of the LHG group of companies must ensure that the data collected is protected.

Data must be treated confidentially. Access, processing, etc. may only take place and be used within the scope of the respective task/area of activity. Managers and employees have assured the legally correct handling of personal data in accordance with the applicable data protection laws and the confidential handling of our company data on corresponding security policies with their respective signatures.



Society

› Public officials and elected representatives

A fundamental distinction must be made between business partners and office holders and elected officials. Officials and elected representatives generally only receive low-value gifts, provided they are authorised to accept them.

Invitations are only issued within narrow limits. Gratuities and invitations may only be given if the occasion and value are appropriate, socially acceptable and customary, and do not give the impression of unfair influence.

When offering or granting benefits, advantages or gifts in connection with public officials, the management and the Compliance Officer (Dr. Engelhoven, see page 15) must always be informed.

Public officials are :

- civil servants, municipal elected officials
- Persons who are appointed to perform public administration tasks at a public authority or other body (e.g. board members, managing directors or supervisory board members of companies organised under private law that are controlled by the public sector), etc.



Well-Being

› Occupational Safety & Health

An important goal of the LHG Group is the best possible protection of the health of all employees, customers, visitors and third parties in our company.

For this reason, great importance is attached to occupational safety. All managers and employees are jointly responsible for occupational safety in their area.

In order to achieve the best possible workplace safety and avoid accidents in the LHG Group, all employees identify themselves with the dangers in their work area, assess risks, take part in appropriate training in accordance with legal regulations, comply with the operating instructions on occupational safety and legal regulations and inform our occupational safety specialists if necessary. They then initiate the measures to be taken to make any necessary corrective actions.



Compliance

› Whistleblower system

In the LHG Group, we abide by the law. Employees who suspect that this is being violated can report this at any time. This can be done (also anonymously) by telephone, letter or e-mail.

The LHG Group company concerned will investigate every report and take appropriate measures if necessary. In doing so, it will ensure that the whistleblower is not disadvantaged by your report. You will also receive feedback on your report at short notice.

In the event that your report (also) concerns you, we will check whether we will waive a sanction under labour law. This depends on the individual case and the degree of your involvement.



Compliance

› Whistleblower-Hotline

Information can be given directly to the respective company of the LHG Group, to the superior or to the external ombudsman:

Ombudsman

Rechtsanwalt Dr. Philipp Engelhoven

Kanzlei Esche Schümann Commichau

Am Sandtorkai 44, 20457 Hamburg

E-Mail: hinweisgeber@esche.de

Telefon: 040/36805-119

This procedure ensures that your information is handled with absolute confidentiality.



YOUR TRANSPORT.

A MEMBER OF

 **PORT OF LÜBECK**