



SUPPLIER CODE OF CONDUCT

Rev. : 08/2025

A MEMBER OF
L¹ PORT OF LÜBECK

 **LHG**
LÜBECKER
HAFEN-GESELLSCHAFT

Preamble

Lübecker Hafengesellschaft mbH is committed to ecologically and socially responsible corporate management. **We expect the same behaviour from all our suppliers.** We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into our corporate culture. We also strive to continuously optimise our business activities and services in terms of sustainability and ask our suppliers to contribute to this in the sense of a holistic approach.

The Code of Conduct is based on national laws and regulations as well as international conventions such as the UN Civil Pact and the UN Social Pact, the Guidelines on the Rights of the Child and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, the International Labour Standards of the International Labour Organization and the United Nations Global Compact.



Social Responsibility

- › We expect the following aspects of social responsibility from our suppliers:
 - › Elimination of forced labour
 - › Prohibition of child labour
 - › Fair wages and equal pay
 - › Fair working hours
 - › Freedom of assembly for employees
 - › Occupational health and safety management
 - › Prohibition of discrimination
 - › Preservation of the natural basis of life



Social Responsibility

› Elimination of forced labour

No forced labour, slave labour or similar form of labour may be used. All work must be done by choice, and employees must be able to end the work or the employment relationship at any time.

Furthermore, no worker may be subjected to unacceptable treatment such as psychological cruelty or sexual or other personal harassment. The hiring or use of security guards must be refrained from if, during their use, persons are treated or injured in an inhumane or degrading manner or if freedom of association is impaired.



Social Responsibility

› Prohibition of child labour

Child labour is forbidden at any stage of order fulfilment. The suppliers are called upon to adhere to the ILO conventions recommended minimum age for the employment of children. According to these recommendations, the age should not be lower than the age at which compulsory school attendance ends and should in no case be lower than 15.

If children are discovered to be working, the supplier is to document the measures that are to be taken to remedy the situation and enable the children to attend school.

The rights of young workers under the age of 18 must not be used for labour deemed damaging to the health, safety or morality of children. Special protective regulations shall be observed.



Social Responsibility

› Fair wages and equal pay

The wage for regular working hours and overtime must comply with at least the statutory national minimum wage or the customary minimum wage for the industry, whichever is higher.

In any case, the wage for overtime hours must be higher than the wage for regular hours. If the wage is not sufficient to cover the usual cost of living while allowing the worker to accumulate a minimum amount of savings, the supplier is obligated to increase the worker's pay to reach a sufficient level for this. All legally mandated benefits are to be provided to employees. Wage deductions as a punitive measure are not permitted.

The supplier must ensure that the employees receive clear, detailed and regular written information about the composition of their pay.



Social Responsibility

› Fair working hours

The working hours must comply with the applicable laws and industry standards. Overtime is only permitted if it is performed on a voluntary basis and does not exceed a total of 12 overtime hours per week.

After six consecutive working days, an employee is to be provided with at least one day off.

The total weekly working hours must not regularly exceed 48 hours.



Social Responsibility

› Freedom of assembly for employees

The right of employees to form and join organisations of their own choosing and to engage in collective bargaining and strikes is to be respected. In cases in which freedom of association and the right to hold collective meetings are legally restricted, alternative possibilities for an independent association of employees for the purpose of collective bargaining are to be permitted.

Employees shall not be discriminated against on the basis of forming, joining or being a member of this kind of organisation. Employee representatives are to be granted free access to their colleagues' workplaces to ensure that they are able to exercise their rights in a lawful and peaceful manner.



Social Responsibility

› Prohibition of discrimination

Discrimination against employees in any form is prohibited unless justified on the grounds of the job requirements.

This applies, for example, to discrimination on the basis of gender, national, ethnic or social background, skin colour, disability, health status, political convictions, world view, religion, age, pregnancy or sexual orientation.

The personal dignity, privacy and personal rights of every individual shall be respected.



Social Responsibility

› Occupational health and safety management

The supplier is responsible for a safe and healthy working environment. Through the construction and use of suitable workplace safety systems, the necessary preventive measures must be taken to prevent accidents and injuries to health that could occur in connection with workplace activities.

Excessive physical or mental fatigue must be prevented through suitable measures. Employees must also be regularly informed and trained about the applicable health protection and safety norms and measures.

Employees must be provided access to adequate quantities of drinking water and clean sanitary facilities.



Social Responsibility

› Preservation of the natural basis of life

The supplier shall not extract resources from land, forests or waters, the use of which secures the natural basis of life for people, in violation of legitimate rights.

It must refrain from harmful soil alterations, water and air pollution, noise emissions as well as excessive water consumption if this harms the health of people, significantly impairs the natural basis for the production of food or prevents the access of people to safe drinking water or sanitary facilities.



Ethical Responsibility

- › We expect the following aspects of ethical responsibility from our suppliers:
 - › Fair competition
 - › Confidentiality and data protection
 - › Respect for intellectual property
 - › Compliance with integrity standards
 - › Prohibition of bribery and corruption



Ethical Responsibility

› Fair competition

The standards of fair business, fair advertising and fair competition must be observed. Beyond this, the relevant antitrust laws, which particularly prohibit agreements and other activities to influence prices or conditions, are to be applied.

These regulations further prohibit agreements between customers and suppliers that are intended to limit customers' freedom to autonomously determine the prices and conditions for their resale of goods.



Ethical Responsibility

› Privacy/data protection

The supplier commits to fulfil the reasonable expectations of its client, subcontractors, customers, consumers and employees concerning the protection of private information.

In the collection, storage, processing, transmission and transfer of personal information, the supplier is to observe the laws on data protection and information security as well as the regulatory requirements.



Ethical Responsibility

› Intellectual property

Intellectual property rights are to be respected; transfers of technology and expertise are to be carried out in such a way that intellectual property rights and customer information are protected.



Ethical Responsibility

- › Compliance with standards of integrity
bribery / anti-corruption

The highest standards of integrity are to be applied to all business activities.

The supplier must pursue a zero-tolerance policy regarding the prohibition of all forms of bribery, corruption, extortion and embezzlement. Processes for monitoring and implementing standards are to be applied in order to ensure compliance with anticorruption laws.



Ecological Responsibility

- › We expect the following aspects of ecological responsibility from our suppliers:
 - › Protection of the environment and climate
 - › Responsible use of material resources
 - › Responsible use of energy resources
 - › Treatment and discharge of waste



Ecological Responsibility

› Protection of the environment and climate

Suppliers must comply with the applicable environmental and climate protection regulations.

Suppliers shall work to avoid or minimise the negative impact of their business activities on the environment, ecosystems and biodiversity.

Greenhouse gas emissions and general emissions from operating procedures (air and noise emissions) are, before they are released, to be typed, routinely monitored, and treated as needed. It is also the supplier's responsibility to monitor their emissions treatment systems and find cost-effective solutions to minimise all emissions.



Ecological Responsibility

› Responsible use of material resources

The use and consumption of resources during the production process and the generation of waste of any sort, including water and energy, are to be reduced and avoided.

This takes place either directly at the place where the waste is generated or through processes and measures – for example, through changing production or maintenance procedures or processes in the company, through the use of alternative materials, through economising, through recycling or through the reuse of materials.



Ecological Responsibility

› Responsible use of energy resources

Careful use of the energy required to carry out business activities is an essential part of ecological responsibility.

Energy consumption must be monitored and documented. Cost-saving solutions need to be found to improve energy efficiency and minimise energy consumption.



Ecological Responsibility

› Treatment and discharge of waste

The supplier shall pursue a systematic approach in order to identify solid waste, manage it, reduce it, and responsibly dispose of or recycle it.

Chemicals and other materials that pose a danger when they are released into the environment are to be identified and managed in such a way that safety is ensured when people interact with these materials, as well as when they are transported, stored, used, recycled.

Wastewater from operating procedures, production processes and sanitation facilities is to be typed, monitored, tested and treated as needed before it is introduced or disposed of. Beyond this, measures should be introduced to reduce the generation of wastewater.



Enforcement

- › In accordance with internal company guidelines we evaluate our suppliers at regular intervals. The selection of suppliers to be evaluated by us is based on criteria we have defined internally .
- › If supplier fall into the group of companies to be assessed by us in the current calendar year, the supplier will receive a letter requesting your comments.
- › Suppliers response forms the basis for a final assessment.



YOUR TRANSPORT.

A MEMBER OF

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