

## Annex D – Supplier Code of Conduct

In its relationships with employees, customers, suppliers, competitors and other stakeholders, HHLA PLT Italy and affiliated companies (hereinafter collectively referred to as HHLA PLT Italy) strives for a relationship characterized by integrity, fairness, responsibility and sustainability and expects its suppliers to follow these principles described in more detail below in their own business relationships.

### 1. Area of Application

This Supplier Code of Conduct applies to all natural and legal persons who sell or provide goods or other services - either directly or via third parties, e.g. affiliated companies, distribution partners, subcontractors or agents (hereinafter referred to as “suppliers”) - to HHLA PLT Italy.

The suppliers of HHLA PLT Italy are required to act in accordance with the legal and ethical principles described in this Supplier Code of Conduct. The supplier should also pass on these requirements in his supply chain.

### 2. Basic Requirements of Conduct

#### 2.1 Human Rights

HHLA PLT Italy respects and adheres to human rights as expressed in the United Nations’ Universal Declaration of Human Rights. HHLA PLT Italy also bases its actions on the principles of the United Nations Global Compact (UNGC) which are also a prime concern in the European Union. The suppliers are expected to comply with human rights and the core labour standards of the International Labour Organisation (ILO).

#### *Child labour*

HHLA PLT Italy rejects any form of child labour, defined by the core labour standards of the ILO and the principles of the UNGC. It is expected that the suppliers prohibit the work of children and, when hiring young employees, observe the local laws for the respective legal minimum age.

#### *Forced labour*

HHLA PLT Italy rejects any form of forced labour or human trafficking. It is expected that the suppliers do not tolerate or benefit from any forced labour, such as through indentured servitude, threats of violence to discipline or similar measures.

#### *Discrimination*

HHLA PLT Italy expects its suppliers to promote equal treatment of employees. No employee should be discriminated, irrespective of his cultural background, skin colour, nationality, HHLA PLT Italy S.r.l.

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gender, sexual orientation, religion, political views, age, physical characteristics or appearance.

#### *Freedom of association*

HHLA PLT Italy actively promotes the organisation of employee participation. Therefore, suppliers are expected to respect the rights of their employees in accordance with national law, e.g. to associate freely, to join unions, to form a workers council and to exercise the right of collective bargaining.

#### *Security forces*

We expect that our suppliers employ no private or public security forces to protect the company if their activities violate human rights, private freedoms or labour laws.

#### *Forced eviction*

HHLA PLT rejects all forms of illegal forced eviction and expropriation for the acquisition, development or other use of land, forests and water bodies, and also expects this from its suppliers.

#### *Other human rights*

Suppliers are expected to respect and support the observance of all other national human rights that apply at the place of employment as well as all internationally applicable human rights.

## 2.2 Occupational health and safety

HHLA PLT Italy guarantees safe and humane working conditions and promotes health-conscious behaviour. HHLA PLT Italy expects its suppliers to take care of the protection and health of their employees and to comply with the applicable national legislation.

#### *Working environment*

HHLA PLT Italy expects its suppliers to create fair, safe and healthy working conditions. It is expected that health hazards are excluded or minimized and, in accordance with the applicable national regulations, the adherence of working hours and breaks, rest and vacation periods, remuneration and maternity/paternity leave is ensured.

#### *Emergency preparedness*

HHLA PLT Italy expects its suppliers to take precautionary measures for first aid, fire protection, rescuing people from danger areas and effective alarms within the company.

## 2.3 Environmental protection/Sustainability

HHLA PLT Italy accelerates the development and propagation of sustainable, environmentally friendly technologies and promotes sustainability and environmental awareness.

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Suppliers are expected to observe all applicable environmental protection regulations and requirements and to ensure careful stewardship of natural resources to the extent possible, by using climate friendly products, reducing emissions and consuming less energy in order to protect the environment. This also applies to the prevention of the degradation of the quality of life, for example through harmful soil contamination, pollution of the air and water bodies, harmful noise emissions and the denial of access to drinking water and sanitary installations.

#### *Waste and effluents management*

Suppliers ensure that the disposal of all waste and effluents is initiated or carried out in a safe and environmentally friendly manner according to the applicable regulations.

#### *Chemicals*

Our suppliers deliver no products to HHLA PLT Italy that contain any chemical listed in Article 3 paragraph 1 (a) and Annex A of the Stockholm Convention on Persistent Organic Pollutants of 23 May 2001.

Our suppliers ensure that the products delivered to HHLA PLT Italy either are not produced using mercury or mercury compounds, or that mercury waste have been properly handled.

## 2.4 Behaviour in business environment

HHLA PLT Italy attaches great importance to the fair treatment of all business partners, which is one of the basic requirements for entrepreneurial cooperation. HHLA PLT Italy expects its suppliers to ensure a corporate policy based on fairness and responsibility and to comply with all relevant legal requirements.

#### *Free competition*

HHLA PLT Italy expects its suppliers to comply with the applicable competition and antitrust laws and to neither participate in illegal agreements with competitors, nor to pass on information without authorisation or to make unlawful agreements restricting competition.

#### *Prevention of corruption*

HHLA PLT Italy expects its suppliers to ensure compliance with anti-corruption laws and to ensure that their employees do not accept, demand or grant any unjustified benefits. Suppliers are expected to act against and prohibit any form of corruption.

#### *Preventing conflicts of interest*

HHLA PLT Italy expect its suppliers to make decisions in their business relationship with HHLA PLT Italy exclusively based on objective, factual criteria and to avoid conflicts of interest through private interests or other activities, including those of relatives or other related persons.

#### *Risk management*

We expect suppliers to identify human rights and environmental risks along their supply chains and, if applicable, to immediately implement the appropriate measure.

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#### *Protection of confidential information/data protection*

HHLA PLT Italy expects its suppliers to protect the confidential information entrusted by HHLA PLT Italy, its customers or other suppliers or business partners. Confidential information may only be used and disclosed in a manner authorized by HHLA PLT Italy. The special protection, the processing for legitimate purposes and the use of personal data of employees and business partners must also be ensured by the implementation of appropriate measures based on applicable laws.

#### *Information and reports on violations*

Information concerning weak points of other circumstances that can lead to legal infringements can particularly be provided – also anonymously – via our whistleblower system ([www.hhla.de/en/compliance](http://www.hhla.de/en/compliance)). Reports will be handled confidentially. Should the whistleblower's identity be known, it will be kept secret upon request. HHLA PLT Italy assures whistle-blower that, in the event that they have made anonymous reports, no steps will be taken to identify them. Excluded from this are cases of misuse.

### **3. Compliance with the Supplier Code of Conduct**

HHLA PLT Italy can review the compliance with the aforementioned principles and requirements through self-declarations by suppliers, or, if there is a justified reason, e.g. if fines or criminal proceedings are initiated against suppliers that are relevant to the business relationship, also through supplier-audits or in another suitable manner.

If applicable statutory provisions are more restrictive than the regulations applicable at HHLA PLT Italy, these provisions precede.

In the event of a material violation of the principles and requirements of this Supplier Code of Conduct, HHLA PLT Italy is entitled to terminate the contractual agreements entered into within the framework of the business relationship immediately, in full or in part.

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#### 4. Agreement with the Supplier Code of Conduct

As supplier to HHLA PLT Italy, we will support the HHLA PLT Italy Supplier Code of Conduct by committing our company and all affiliated companies to fulfil the relevant requirements. We will also urge our suppliers to ensure this.

- We hereby acknowledge the HHLA PLT Italy Supplier Code of Conduct within the framework of our business relationship and the contracts concluded with HHLA PLT Italy in this context.
- We hereby acknowledge that we comply with the aforementioned principles and requirements by applying an equivalent Code of Conduct (included as attachment hereto) within our company.

(Please mark as appropriate)

We are bound to this declaration until further notice. This declaration will expire if we replace it with an updated version/declaration submitted by HHLA PLT Italy. If we want to refrain from this declaration, we will inform HHLA PLT Italy in writing, with the result that HHLA PLT Italy has the rights provided under 3. for terminating the contractual agreements in the context of the business relationship.

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Date, supplier signature and stamp/seal

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