

SUSTAINABILITY STATEMENT

1. GENERAL INFORMATION (ESRS 2)

This section represents the consolidated sustainability statement of the Hapag-Lloyd AG (hereinafter also referred to as "Sustainability Statement" or "consolidated non-financial statement"). It has been prepared to meet the requirements of Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December, 2022 (Corporate Sustainability Reporting Directive, CSRD) and Article 8 of Regulation (EU) 2020/852 (hereinafter the "EU Taxonomy") as well as Sections 315b and 315c in conjunction with 289b to 289e of the German Commercial Code (HGB) for a non-financial statement of the Hapag-Lloyd Group and Hapag-Lloyd AG.

In accordance with Sections 289b and 315b HGB, Hapag-Lloyd AG as the parent company has to prepare a (group) non-financial statement for the Hapag-Lloyd AG and the Hapag-Lloyd Group. The following contents represent the consolidated non-financial statement for Hapag-Lloyd AG and the Hapag-Lloyd Group (hereinafter "Hapag-Lloyd"). In accordance with Section 289d of the German Commercial Code (HGB), the consolidated non-financial statement was prepared on the basis of and in alignment with the European Sustainability Reporting Standards (ESRS) as framework. As all the aspects described apply equally to Hapag-Lloyd AG and the group, there was no separate application of a framework with regards to Section 289d HGB for the parent company. This consolidated non-financial statement relates to the period from 1 January to 31 December 2024.

The CSRD represents one of the European Union's (EU) principal instruments for implementing the "European Green Deal" programme, which as a whole is designed to achieve net-zero greenhouse gas (GHG) emissions in the EU by 2050. It was implemented in 2023 by the European parliament aiming to provide greater transparency and comparability for stakeholders of the sustainable reporting of companies within the EU. The precise form and implementation of the law are set out in the European Sustainability Reporting Standards (ESRS), which this Sustainability Statement follows.

To ensure an accurate comprehension of the following report, it is deemed relevant to emphasise that the ESRS employ specific terminology that differ from the conventional usage in the field of corporate governance. This applies in particular to the terms policy, action and target. While policies should address the management of identified material impacts, risks and opportunities (IROs), the declaration of actions and targets as such is conditional upon companies meeting the defined requirements or providing information regarding measurability, interim targets or financial resources.

1.1. General basis for preparation of sustainability statements (BP-1)

(ESRS 2 BP-1 5 a, b i) Hapag-Lloyd's Sustainability Statement has been created on a consolidated basis, with a scope of consolidation identical to that applied to the financial statements. It includes all significant subsidiaries and equity accounted investments. Specifically:

- Hapag-Lloyd AG and its subsidiaries included
- Investments accounted for using the equity method are reflected as part of Scope 3 GHG emissions in category 15

Scope of consolidation comprises besides the Hapag-Lloyd AG 132 fully consolidated companies and 21 companies accounted for using the equity method.

Subsidiaries are considered significant and fully consolidated, if Hapag-Lloyd exercises control, which is defined as having the power to direct strategic decisions through voting rights or other privileges, being exposed to variable returns, and being able to shape these returns. Conversely, when control is relinquished, these companies are deconsolidated from Hapag-Lloyd's financial reporting. A detailed overview of all consolidated and non-consolidated Group companies is provided within the Notes to the consolidated financial statements, the list of shareholdings in accordance with section 315e of the HGB.

(ESRS 2 BP-1 5 b ii) No subsidiaries of Hapag-Lloyd AG included in the consolidated sustainability statement were exempted from individual or consolidated sustainability reporting pursuant to Articles 19a(9) or 29a(8) of Directive 2013/34/EU because no subsidiaries were subject to the disclosure obligation.

(ESRS 2 BP-1.5 c AR 1) This Sustainability Statement is based on a comprehensive double materiality assessment (DMA), which identifies the most significant IROs that shape Hapag-Lloyd's material topics. This assessment encompasses the entire value chain, from upstream to downstream, and incorporates insights gained through stakeholder engagement. Wherever necessary, this statement makes distinctions between the Liner Shipping segment and the Terminal & Infrastructure segment, and, if relevant, provides further granularity at the individual company level. For the Terminal & Infrastructure segment, given the economic materiality, the statements relate primarily to SAAM Terminals.

The Terminal & Infrastructure segment is currently being built up including corresponding governance structures under the brand Hanseatic Global Terminals (HGT), which was launched in July 2024. Significant progress in this regard is expected in 2025. Against this background, most of the identified material IROs relate to the Liner Shipping segment. The Sustainability Statement provides a comprehensive analysis of the material sustainability matters by examining the entire value chain; however, the policies, actions, and targets generally apply only to the own operations of the Liner Shipping segment.

Whenever the scope of metrics extends to the upstream and downstream value chain data, this is indicated under the minimum disclosure requirements for metrics (MDR-M) of the respective metric. Basically, there are no quantitative data points that are subject to an external validation.

(ESRS 2 BP-1.5 d) In accordance with the ESRS phase-in regulations, Hapag-Lloyd has utilised the transitional provisions available to gradually integrate comprehensive sustainability metrics into Hapag-Lloyd's reporting framework. As this is Hapag-Lloyd's first CSRD aligned Sustainability Statement, it generally does not include previous year's data, the only exception is the Climate change chapter, where the 2023 GHG emission data has been included to ensure transparency about the development of Hapag-Lloyd's GHG emissions over time. Additionally, value chain data has not been included in this report, as allowed under the phase-in provisions. For chapter "Own workforce" although phase-ins were available, Hapag-Lloyd opted to disclose selected data points voluntarily where it was already available and was considered helpful for reading comprehension in the overall context. (ESRS 2 BP-1.5 e) The Company also does not use the exemption from disclosures of impending developments or matters in the course of negotiation, as provided for in articles 19a(3) and 29a(3) of Directive 2013/34/EU.

1.2. Disclosures in relation to specific circumstances (BP-2)

(ESRS 2 BP-2.9 a) (ESRS 2 SBM-3 48 c iii AR 18) Hapag-Lloyd uses the short, medium, and long-term time horizons defined by ESRS accordingly:

- Short-term (<1 year): Material impacts with a probability of occurrence higher than 0 within the next reporting period.
- Medium-term (1–5 years): Material impacts with a probability of occurrence higher than 0 during the four years following the next reporting period.
- Long-term (>5 years): Material impacts with a probability of occurrence higher than 0 over a long-term horizon of more than five years.

The Company deviates from this definition for its physical climate risk assessment, the short-term horizon is defined as the period from 2015 until 2044. The medium-term horizon encompasses 2035 until 2064, while the long-term horizon extends until 2099. Further, Hapag-Lloyd deviates from short, medium and long-term time horizons as defined by the ESRS for its resilience analysis, applying a time horizon until 2030.

(ESRS 2 BP-2.9 b) For the purpose of its climate risk assessment, Hapag-Lloyd deviated from standard medium- or long-term time horizons to accurately reflect its exposure to climate-related hazards. The time horizons selected are based on the authoritative guidance of the Intergovernmental Panel on Climate Change (IPCC) and represent the most recent understanding of climate science. The time horizon applied for the resilience analysis reflects the current strategic horizon at Hapag-Lloyd.

(ESRS 2 BP-2 10 a) Metrics displayed in the following that include upstream and/or downstream value chain data are estimated by Hapag-Lloyd using indirect sources, described under “Basis for preparation”:

Relevant metrics	Basis for preparation	Level of accuracy	Planned actions to improve accuracy (if applicable)
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources	Based on available consumption data and corresponding square meters of locations, data is extrapolated segment specifically.	Medium	Currently not planned
Scope 3.1 Purchased goods and services	Based on available financial spend data and corresponding square meters of locations, data is extrapolated segment specifically.	Medium	Currently not planned
Scope 3.4 Upstream transportation and distribution	Relevant data encompasses e.g. origin and destination of transport, transport mode, transport volume and container type. All transports are calculated with EcoTransIT. Ocean transports based on Clean Cargo emission factors. Part of the input data originates from the 2023 reporting period.	High	Currently not planned
Scope 3.5 Waste generated in operations	Based on available waste data and corresponding square meters of locations, data is extrapolated segment specifically.	Medium	Currently not planned
Scope 3.6 Business travelling	Based on available financial spend data, distance and corresponding square meters of locations, data is extrapolated segment specifically.	Medium	Currently not planned
Scope 3.7 Commuting	Based on available distance, transport modes and corresponding headcount, data is extrapolated segment specifically.	Low	Currently not planned
Scope 3.11 Use of sold products	Based on berthing time of vessels and assumed fuel consumption per hour, data is extrapolated.	Medium	Currently not planned
Scope 3.13 Downstream leased assets	Based on the actual fuel consumption for the previous year and the time chartered out during the reporting year, data is extrapolated.	Medium	Currently not planned
Scope 3.15 Emissions from investments	Based on available emission data, industry-specific emission factors and respective revenues data is extrapolated.	Low	Currently not planned

(ESRS 2 BP-2 11 a) The following quantitative metrics and monetary amounts are subject to a high level of measurement uncertainty:

Relevant metrics/ monetary amounts	Sources of measurement uncertainty	Assumptions, approximations, and judgements made by Hapag-Lloyd
Fuel consumption from natural gas	Based on limited available consumption data for heating and corresponding square meters of locations, data is extrapolated segment specifically.	Activities at the different locations within each segment are similar and therefore suitable for extrapolation.
Fuel consumption other fossil sources	Based on limited available consumption data and corresponding square meters of locations, data is extrapolated segment specifically.	Activities at the different locations within each segment are similar and therefore suitable for extrapolation.
Emissions to air	Pollutants to air from ships have been calculated based on the amount of fuel consumed. HCFC amounts are based on reported consumption.	Emission factors per energy unit have been applied.
Emissions to water	Pollutants to water from ships have been calculated based on emission factors for scrubber-fitted ships and for a standard hull paint.	Emission factors per energy unit have been applied for scrubbers. Estimated wetted surface area and a paint loss rate per year have been estimated and literature-based emission factors have been applied to the amount of paint lost.
Number of total hours worked by own workers	When actual working hours are not available, contractual working hours are used. For sea personnel working hours were extrapolated for the whole year based on actual working hours including overtime for October to December 2024.	Working hours for October to December 2024 can be applied for the whole reporting period.
Share of payments aligned with payment terms	The current value refers to the Hapag-Lloyd AG. It cannot be verified whether the Hapag-Lloyd AG is representative for the entire group. Group-wide performance may vary accordingly.	Hapag-Lloyd's systems are currently not yet designed to trigger a subsequent reconciliation against contractual payment targets. The payment parameters of various purchasing categories are collected from a large number of systems. In the current system, this data is not harmonized across all global subsidiaries of Hapag-Lloyd.

(ESRS 2 BP-2 15) Hapag-Lloyd includes information from Article 8 of Regulation 2020/852 (EU Taxonomy) in this sustainability statement. The Company previously reported sustainability information in accordance with the Global Reporting Initiative (GRI) framework but has discontinued this practice due to the substantial overlap with the ESRS. Nevertheless, a transition document is included in the Appendix, providing a comparison between GRI and CSRD. This transition document is unaudited. (ESRS 2 BP-2 15) Disclosures related to Article 8 of Regulation 2020/852 (EU Taxonomy) are disclosed at the beginning of the environmental information chapter of this Sustainability Statement.

(ESRS 2 BP-2.16) Please note that no reference is made to any other sections of the annual report in response to the ESRS datapoints. Cross references to statements beyond the scope of the annual integrated report represent further information and are not part of the report.

1.3. The role of the administrative, management and supervisory bodies (GOV-1)

(ESRS 2 GOV-1 21 a) Hapag-Lloyd has five members in its Executive Board and 16 members in its Supervisory Board. The Company has no other administrative bodies. The Company's Executive Board has no non-executive members and its Supervisory Board includes 16 non-executive members.

(ESRS 2 GOV-1 21 b) The Supervisory Board of Hapag-Lloyd comprises eight members who represent the employees and workers, providing the employee perspective in the Company's governance structure. These are regarded as independent Supervisory Board members.

(ESRS 2 GOV-1 21 c AR 5) In order to provide information regarding the competencies of the Supervisory Board, the Company refers to its competence profile. For further information on the competencies of the Supervisory Board, reference is made to the competence profile in the declaration on corporate governance:

- At least four Supervisory Board seats for individuals with in-depth knowledge of regions outside of Germany in which the Hapag-Lloyd Group conducts a substantial volume of business, due to their background and/or professional experience with an international relevance;
- At least one Supervisory Board seat for an individual who has expert knowledge within the field of accounting and at least one Supervisory Board seat for an individual who has expert knowledge within the field of auditing, each of which is therefore regarded as a financial expert in accordance with Section 100 (5) of the German Stock Corporation Act (AktG), whereas accounting and auditing also include sustainability reporting and its audit;
- At least two Supervisory Board seats for individuals with in-depth knowledge of and experience in the fields of risk management and controlling;
- At least two Supervisory Board seats for individuals with knowledge of the shipping sector, including the sustainability issues associated with this area and relevant to the Company;
- At least two Supervisory Board seats for individuals with sector knowledge in the area of port terminals and infrastructure, including the sustainability issues associated with this area and relevant to the Company;
- At least two Supervisory Board seats for individuals with experience in managing or controlling a major company;
- At least two Supervisory Board seats for individuals with knowledge and experience in the areas of corporate strategy development and implementation;
- At least two Supervisory Board seats for individuals with particular knowledge in the fields of corporate governance and compliance, including social and environmental corporate governance;
- At least two Supervisory Board seats for individuals with particular knowledge of human resources;
- At least one Supervisory Board seat for an individual with particular knowledge of information technology (IT) or digitalisation (including IT security).

(ESRS 2 GOV-1 21 d) Board gender diversity ratio

	31.12.2024
Share of female Executive Board members	20.0%
Share of male Executive Board members	80.0%
Share of Executive Board members identified as diverse	–
Share of female Supervisory Board members	37.5%
Share of male Supervisory Board members	62.5%
Share of Supervisory Board members identified as diverse	–

(ESRS 2 GOV-1 21 e) Percentage of independent board members**31.12.2024**

Share of independent Executive Board members	–
Share of independent Supervisory Board members	68.8%

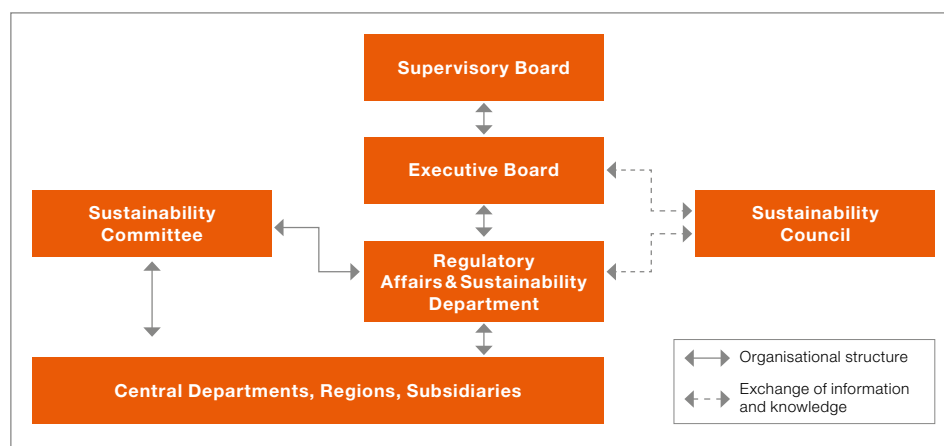
(ESRS 2 GOV-1 22 a) (ESRS 2 GOV-1 22 b AR 3) Each Member of the Executive Board is accountable for the administration and management of IROs within their respective spheres of influence and expertise. The areas of responsibility are structured along the following departmental lines:

- CEO: Corporate Communications, Corporate Secretary/Compliance, Strategy Office, Regulatory Affairs & Sustainability, Region Asia, Region Middle East, Region North Europe, Region South Europe, Region North America, Region Latin America, Global Sales, Global Commercial Development.
- COO: Trade Management, Network, Fleet, Cargo Service/Dangerous Goods, Vessel Portfolio Management.
- CIO/CHRO: IT, Data Insights & AI, Chief Information Security Office, Global Human Resources, Hapag-Lloyd Academy, Global Capability Center.
- CFO/CPO: Digital Transformation Finance, Mergers & Acquisitions, Accounting, Tax, Corporate Audit, Treasury & Finance, Controlling, Legal, Global Procurement.
- CTIO: Terminal & Infrastructure segment.

Governance of material impacts, risks and opportunities

(ESRS 2 GOV-1 22 c AR 4), (ESRS 2 GOV-1 22 c i) Hapag-Lloyd's Sustainability department coordinates the Company's sustainability activities. For the Liner Shipping segment, this also includes environmental management for sea and land-based operation as part of the Hapag-Lloyd Quality and Environmental Management (QEM) system.

The Sustainability Committee (SC) is chaired by the Sustainability department and is the key governance body overseeing and informing about material sustainability topics for both segments of Hapag-Lloyd. The committee comprises, among others, the most senior management level responsible for a material topic, defined through the DMA, and convenes normally at least twice a year, though in 2024 only one meeting was held. The Sustainability department informs the Committee's members about the results of the annual DMA validation and promotes the information across the organisation. The members of the SC are furthermore informed about the effectiveness of policies, actions and targets that had been set in relation to the material topic-related IROs.



Each department is responsible for reviewing the adequacy and effectiveness of the policies upfront. In case of deviations for reported Key Performance Indicators (KPIs), the respective departments are asked to present a brief explanation to the committee members. For all material topics where no numeric datapoints are reported, the progress is alternatively examined through the results of the annual materiality assessment. This progress is summarised by the Sustainability department and shared for the respective SC meeting. In case no targets or actions for material topics have been set so far, the respective department evaluates if implementing suitable actions and/or measurable outcome-oriented targets is necessary.

(ESRS 2 GOV-1 22 c ii) All Senior Management members who are responsible for a material topic report directly to the respective Executive Board member. Furthermore, all results discussed within the SC meetings are summarised and communicated to the Executive Board by the Sustainability department. *(ESRS 2 GOV-1 22c iii)* Hapag-Lloyd's specific controls and procedures for managing IROs were already explained at the beginning of this section in the context of the activities of the Sustainability Committee and the respective department.

(ESRS 2 GOV-1 22 d) In principle, the Executive Board and respective specialist departments are responsible for setting targets related to the material IROs and the latter for monitoring the progress. Additionally, the progress of targets is also reflected in the annual validation of the DMA.

(ESRS 2 GOV-1 23 AR 5) (ESRS 2 GOV-1 23 a) (ESRS 2 GOV-1 23 b) Most of the material topics and underlying material IROs are closely tied to Hapag-Lloyd's core business operations, meaning for such, a significant degree of expertise already exists within the Company. This does not just include the Executive Board and their individual areas of responsibility but also includes expertise among operational management. The Executive Board of Hapag-Lloyd is responsible for determining whether the necessary skills and expertise are in place or need to be developed to effectively oversee sustainability matters. The fields of accounting and auditing as well as governance and compliance are understood to include sustainability issues related to the areas disclosed below and relevant to the company.

(G1.GOV-1.5a) The Executive Board is responsible for designing, implementing, and reviewing procedures and controls. Although operational procedures with respect to business conduct are delegated through the Hapag-Lloyd organisation, overall responsibility remains with the Executive Board. The Chief Compliance Officer (CCO), appointed by the Executive Board, is responsible for ensuring a functioning Group-wide compliance organisation and a compliance management system. The CCO reports quarterly to the Executive Board. Additionally, the CCO informs the Executive Board on an ad-hoc basis about serious compliance violations. The role of the supervisory bodies related to business conduct includes the issuance of rules of procedure for the Executive Board, evaluating how effectively the Executive Board and its committees fulfil tasks and review financial statements as well as verify the independence of the external auditors.

(G1.GOV-1.5b) The Executive Board members are expected to have long-standing managerial experience, and if possible, experience from a range of different professions, with at least two members having international managerial experience. The Executive Board collectively possesses extensive experience in the fields of finance and personnel management.

The Supervisory Board has established a comprehensive competence profile to ensure it possesses the necessary expertise to effectively oversee the Company on business conduct matters. The profile includes individuals with financial expertise in accordance with Section 100 (5) of the AktG, expertise in risk management and controlling as well as individuals with particular knowledge or experience in the shipping sector, port terminals and infrastructure, human resources, IT or digitalisation and corporate governance and compliance. Additionally, at least four Supervisory Board seats are reserved for individuals with in-depth knowledge of regions outside of Germany in which the Hapag-Lloyd Group conducts a substantial volume of business, due to their background and/or professional experience with an international relevance.

1.4. Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies (GOV-2)

[\(ESRS 2 GOV-2 26 a\)](#) Hapag-Lloyd's Executive Board is informed about material topics resulting from the yearly review and validation or new execution of a DMA. Information about the implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address such are communicated to the Executive Board by responsible departments. Sustainability-related risks and opportunities are also part of Hapag-Lloyd's integrated risk management and are thereby included in the quarterly risk reporting process. In accordance with the requirements of the German Supply Chain Act (GSCA), the Human Rights Officer reports at least once per year to the Executive Board. [\(ESRS 2 GOV-2 26 b\)](#) Sustainability topics are integrated into strategic oversight, major transaction decisions and risk management. This exemplifies the Company's ambition to drive sustainability and its commitment to decarbonising its fleet operations, where climate-related considerations are a key factor in strategic decision-making. Furthermore, the establishment of the Human Rights Office in 2023 demonstrates the Company's dedication to responsible business practices.

1.5. Integration of sustainability-related performance in incentive schemes (GOV-3)

[\(ESRS 2 GOV-3 29 a\)](#) The remuneration system for the Executive Board comprises both fixed and variable components, designed to equally promote short- and long-term development. The fixed component consists of an annual salary, disbursed in twelve equal instalments. The short-term variable remuneration is linked to Hapag-Lloyd's annual EBIT, while the currently effective long-term incentive plan since 2023 equally considers ROIC, EBITDA, EBIT and an environment, social and governance (ESG) component. Additionally, executive remuneration includes fringe benefits and pension provisions. Given the limited free float of Hapag-Lloyd shares, remuneration is not share-based at present. Instead, performance criteria pertinent to the intrinsic value of Hapag-Lloyd shares are utilised.

The remuneration system for the Supervisory Board only includes fixed components. Members of the Supervisory Board receive a fixed annual remuneration, including basic remuneration, supplements for specific functions, an attendance fee, and reimbursement of expenses. Members are also included in the directors' and officers' insurance maintained by Hapag-Lloyd.

(ESRS 2 GOV-3 29 AR 7) The incentive schemes and remuneration policies for the Executive Board of Hapag-Lloyd are linked to KPIs and a sustainability indicator, ensuring that executive compensation is directly linked to the Company's sustainability goals and outcomes. (ESRS 2 GOV-3 29 b) Their performance is measured against a specific sustainability KPI, namely the reduction of the annual efficiency ratio (AER) of Hapag-Lloyd's vessel fleet. Meanwhile, the Supervisory Board's performance is not currently evaluated based on specific sustainability targets or their impact on the Company's sustainability performance.

(ESRS 2 GOV-3 29 c) (ESRS 2 GOV-3 29 d) While the Executive Board's short-term variable remuneration is not directly tied to sustainability-related targets, the Company's currently effective long-term variable remuneration plan incorporates for them a significant sustainability component, with a weight of 25% allocated to ESG performance-related metrics. For this performance criterion, the Supervisory Board establishes a target value for each financial year that corresponds to a 100% achievement rate. These values are derived from the framework conditions of the Hapag-Lloyd AG's sustainability bond programme (Sustainability Linked Bond Framework), dated 17 March 2021. The target achievement for each year of the measurement period can be seen on the basis of the target achievement curve.

The payment amount of the ESG component is calculated by multiplying the 25% of the allocation amount by the arithmetic average of the calculated percentages. 100% of the target is achieved when a certain AER value is met. However, a maximum achievement value of 200% is set. AER quantifies the carbon intensity of vessels, measured based on the vessel's designed deadweight capacity and the distance covered.

(E1 GOV-3 13) In the 2024 financial year, 17% of the variable remuneration of the total remuneration is linked to the AER reduction goal. Consequently, climate-related considerations are factored as an ESG component into the remuneration of the Executive Board, but not of the Supervisory Board members.

(ESRS 2 GOV-3 29 e) The Supervisory Board of Hapag-Lloyd holds the responsibility for proposing updates of remuneration systems. The proposals on the remuneration system are approved ultimately by the annual shareholders' meeting. Further information on the remuneration of the Executive Board can be found in the remuneration system and the remuneration report, which are publicly available on Hapag-Lloyd's website.

1.6. Statement on due diligence (GOV-4)

(ESRS 2 GOV-4 30; 32 AR 8 - AR 10) The following table provides an overview of Hapag-Lloyd's due diligence process regarding sustainability matters, which will help to facilitate a better understanding of this process:

Core elements of due diligence	Paragraphs in the sustainability statement
a) Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-2, G1-1
b) Engaging with affected stakeholders in all key steps of the due diligence process	ESRS 2 IRO-1 53b ii-iii, ESRS 2 SBM-2, S1-2, S2-2, S3-2
c) Identifying and assessing adverse impacts	ESRS 2 IRO-1, E1 IRO-1, E2 IRO-1, E4 IRO-1, E5 IRO-1
d) Taking actions to address those adverse impacts	E1-3, E4-3, S1-4, S2-4, S3-4, Entity-Specific Chapter on Data Protection, G1-4
e) Tracking the effectiveness of these efforts and communicating them	ESRS 2 GOV-2, E1-4, S1-5

1.7. Risk management and internal controls over sustainability reporting (GOV-5)

(ESRS 2 GOV-5 36 a AR 11) To manage risks and ensure accuracy in the sustainability reporting, Hapag-Lloyd uses the existing Risk Management and Internal Control Systems. Further information on both systems is described in more detail in the respective chapters of this combined management report. Since the risks associated with the sustainability reporting are largely related to the operational reporting process, they are managed mainly in Hapag-Lloyd's Internal Control System (ICS).

(ESRS 2 GOV-5 36 b AR 11) A dedicated cross-departmental project team was formed to meet the reporting requirements defined by the CSRD and the respective ESRS. Embedded in the overall context of the sustainability-reporting project, the risks regarding the sustainability reporting have been identified and discussed via process workshops. In these, the general process-related risk components were analysed within the framework of the overall sustainability reporting process and linked to associated overarching key controls, which are established within the sustainability reporting process.

(ESRS 2 GOV-5 36 c AR 11) Not ensuring the reliability, the timeliness and the transparency of Hapag-Lloyd's sustainability reporting including the non-conformity with regulations and standards have been identified in this context as relevant process-related risk components. Especially, establishing a CSRD handbook, implementing a central IT system, conducting a double materiality analysis and the corresponding catalogues including all material datapoints, embedding four-eyes-principle checks during the data collection and reporting process were leveraged as measures to reduce the identified process-related risks.

(ESRS 2 GOV-5 36 d AR 11) The key controls defined and implemented by the functions responsible for sustainability reporting are documented together with the other key controls of the ICS in the central ICS platform and assigned to the respective control owners. In addition, the control owners for the risks and controls relating to sustainability reporting are integrated into Hapag-Lloyd's regular ICS processes and formally assess and confirm the appropriateness and implementation of their controls together with the other control owners as part of the general annual ICS assessment. However, due to the first-time application in 2024, some of the controls were only carried out at an advanced stage of the reporting process.

(ESRS 2 GOV-5 36 e AR 11) The evaluation of the key controls over the sustainability reporting is an integral part of the overall, regular, consolidated annual ICS reporting to the Executive and Supervisory Board. The Executive Board is informed of the results of the double materiality analysis within the framework of a board meeting.

1.8. Strategy, business model and value chain (SBM-1)

(ESRS 2 SBM-1 40 a i AR 12-13) (ESRS 2 SBM-1 42 AR 14) Hapag-Lloyd is one of the world's leading container liner shipping companies and is divided into two main business units: Liner Shipping and Terminal & Infrastructure.

The Liner Shipping segment incorporates the transport of containers from port to port using own and chartered vessels as well as the management of the associated door-to-door hinterland transport. Revenues are generated from container transportation services, demurrage and detention charges and other related services.

The Terminal & Infrastructure segment focuses on the operation of port terminals, container handling and the provision of other related logistics services. It was established following the acquisition of SAAM Terminals in August 2023, and comprises all activities related to terminal and depot businesses. This segment runs as a fully owned but independent stand-alone business, providing streamlined terminal operations for all shipping lines.

(ESRS 2 SBM-1 40 a ii AR 12-13) The Liner Shipping segment operates a global network that covers over 600 ports across all continents, with 113 services in place, resulting in a well-balanced geographical exposure with sizeable market shares in all major deep sea trades.

The Terminal & Infrastructure segment has equity stakes in eleven countries across Europe, Americas, Asia and Africa. The largest entity of the segment, SAAM Terminals, offers port terminal and logistics services in North, Central and Latin America and operates ten container, multipurpose or bulk terminals. SAAM Logistics offers multiple freight services, such as cargo storage, reefer container services, value-added cargo services, inspections or customs clearances in ten different operating facilities located in Chile.

The Liner Shipping operations strive to maintain a diversified customer base comprising both direct customers and freight forwarders, ensuring a stable flow of cargo volumes. The customer portfolio remains well-balanced, with its 50 largest customers accounting for less than 50% of total cargo volume. In 2024, the Company completed transports for around 29,200 customers, compared to approximately 30,900 customers in the prior year. The cargo composition is diversified, with no product category representing more than 14% of the total share within the financial year.

(ESRS 2 SBM-1 40 d i AR 12-13) (ESRS 2 SBM-1 40 d ii-iii AR 12-13) The Company's strategy and business model is dedicated to liner shipping and terminal and infrastructure operations, with no involvement in the fossil fuel industry, resulting in zero revenue from fossil fuel-related activities. Additionally, there are no activities in chemical production, tobacco or controversial weapons, and consequently, also no related revenues from these industries.

(ESRS 2 SBM-1 40 e AR 12-13) One of the Company's main sustainability objectives is to offer climate-neutral transportation solutions to customers, responding to growing market demand for decarbonised supply chains. (ESRS 2 SBM-1 40 f) In 2023, Ship Green was launched, offering a low-emission transportation option. It allows customers to order shipments with reduced emissions, thereby supporting the use of alternative fuels. In 2024, Hapag-Lloyd won the Zero Emission Maritime Buyers Alliance (ZEMBA) tender for the years 2025 and 2026. ZEMBA is a collaboration between the Aspen Institute and several cargo owners who aggregated their demand for decarbonised transport solutions. As part of this tender Hapag-Lloyd will generate low-emission transports using biomethane.

(ESRS 2 SBM-1 40 g) In 2021, Hapag-Lloyd implemented its Sustainability Strategy, tailored to address global challenges and lead the shipping industry towards a cleaner future. It is divided into three main areas: “Clean Shipping and Sustainable Propulsion”, “Diversity and Society” and “Compliance and Responsibility”, focusing on eight key topics, which are also among the material topics identified in the DMA according to the ESRS. Since then, a significant number of the defined measures for these previously eight topics have been implemented. Consequently, Sustainability is one of the key pillars of the corporate Strategy 2030, published in 2024. The ambition is to become the “Sustainability Driver” within the shipping industry by reducing the carbon emissions of the container fleet in line with the 1.5 °C target of the Paris Agreement by one-third by 2030 compared to the base year 2022. The objective of achieving net-zero greenhouse gas emissions by 2045 underlines this plan. Within the Terminal&Infrastructure segment, SAAM Terminals stands out with an existing sustainability programme that encompasses environmental targets and social commitments in education and social development. A final analysis of the sustainability program with regards to the IROs identified in the CSRD reporting and corresponding policies, actions and targets to address the IROs adequately is still pending. A comprehensive segment sustainability strategy will be also developed in due course.

The value chain

(ESRS 2 SBM-1 42 c) Hapag-Lloyd's position in the value chain is multifaceted. (ESRS 2 SBM-1 42 b) As a business-to-business logistics service provider, Hapag-Lloyd's key output is of non-physical nature. The offered services benefit customers directly and other stakeholders indirectly. Hapag-Lloyd's current benefits for customers include a global network, a modern fleet, customer-centric approach, and supply chain visibility, while expected benefits include further digitalisation of service products, increased efficiency, enhanced supply chain resilience, and new services and products. (ESRS 2 SBM-1 42 c) Hapag-Lloyd's upstream value chain is characterised by a range of key suppliers required for securing inputs to maintain the business model.



- **Upstream supply chain:** Actors upstream from the undertaking (for example suppliers) provide products or services that are used in the development of the undertaking's products or services. The upstream supply chain includes direct suppliers of goods and services to Hapag-Lloyd AG and all global affiliates where the Company has a controlling interest (> 50% of shareholding or voting interest). Key suppliers are vessel owners, terminals, container maintenance and repair companies, fuel suppliers, shortsea and inland transport service providers as well as transport service providers for rail and truck.
- **Downstream supply chain:** Entities downstream from the undertaking (for example contract partners, customers) receive products or services from the undertaking. Hapag-Lloyd's downstream supply chain furthermore includes third parties offering vessel recycling services to Hapag-Lloyd.

(ESRS 2 SBM-1 42 a) Operational requirements impacting the business activity include container vessels, containers, retrofitting supplies, fuels, technical equipment, and upstream logistics services. A comprehensive ESG questionnaire is the basis for considering sustainability issues when awarding contracts. This questionnaire covers environmental, social, and compliance issues and aims to provide a structured overview of the status of its suppliers. Suppliers are evaluated using various processes and tools. Results are recorded in the annually updated Approved Supplier List. The Company maintains direct communication with suppliers to address any compliance issues and to jointly pursue ESG goals. High-risk suppliers, particularly those in sensitive locations or sectors, are subject to increased scrutiny to ensure human rights compliance. The supplier audits and risk management practices cover both operational and sustainability dimensions. These audits, supported by eProcurement software, supplement supplier self-disclosures with comprehensive internal assessments of various ESG factors. The approach to gathering, developing and securing inputs is based on long-term relationships and contracts with direct suppliers.

As for SAAM Terminals, the main categories in the upstream value chain managed by the Procurement Department include among others port equipment and main operational consumables such as tyres, wires and cables for cranes. Once a vendor is selected and awarded, a robust contractual process follows under the advisory of their Corporate Legal Department. After the contract is agreed upon, each terminal executes the respective procure-to-pay process under the contractual conditions negotiated by the Corporate Procurement Team.

(ESRS 2 SBM-1 40 a iv AR 12-13) Hapag-Lloyd's product and service offers are generally permitted. However, Hapag-Lloyd reserves the right to impose restrictions on its transportation services to specific regions, including war risk areas.

(ESRS 2 SBM-1 40 a iii) The total number of Hapag-Lloyd employees within the reporting period was 16,905, thereof 5,637 within the European Economic Area (EEA) and 11,268 outside of the EEA.

(ESRS 2 SBM-1 40 b AR 12-13) The total revenue in the reporting period was EUR 19,111.8 million.

1.9. Interests and views of stakeholders (SBM-2)

(ESRS 2 SBM-2 45 a AR 16) Hapag-Lloyd engages with stakeholders through multiple formats to ensure their perspectives are thoroughly considered.

Key stakeholders	Stakeholder type (internal/ external)	Stakeholder engagement occurred	Engagement formats
Customers	External	Yes	<ul style="list-style-type: none"> Engagement through DMA stakeholder interview Dialogues such as the "Customer Connect Calls", which are quarterly virtual live conversations with Hapag-Lloyd's CEO and annual end-of-year meeting with selected customers Engagement through Customer Experience Survey
Suppliers	External	Yes	<ul style="list-style-type: none"> Engagement through DMA stakeholder interview Sustainability workshops focusing on decarbonisation and human rights Regional supplier days organised by Procurement
Investors and banks	External	Yes	<ul style="list-style-type: none"> One-to-one discussions and events such as Annual General Meeting, Investor Conferences and Capital Markets Days
Business partners	External	Yes	<ul style="list-style-type: none"> Singular engagement through DMA stakeholder interview Sustainability workshops focusing on decarbonisation and human rights Dialogues such as the "Customer Connect Calls", which are quarterly virtual live conversations with Hapag-Lloyd's CEO and annual end-of-year meeting with select customers
Industry initiatives/ partners	External	Yes	<ul style="list-style-type: none"> Member of various associations, working groups and institutions Hapag-Lloyd participates in the meeting of the Responsible Sourcing Council and the Corporate Responsibility & Sustainability Council (The Conference Board)
Classification society	External	Yes	<ul style="list-style-type: none"> Singular engagement through DMA stakeholder interview
Local community	External	Yes	<ul style="list-style-type: none"> Dialogue with local community during Heritage Day (Tag des offenen Denkmals)
Sustainability Council	External	Yes	<ul style="list-style-type: none"> The Hapag-Lloyd Sustainability Council consists of members from science, politics, media, UN organisations and non-governmental organisations as well as a climate activist. They convene twice a year and act as a sounding board on the progress of Hapag-Lloyd sustainability activities.
Policymakers	External	Yes	<ul style="list-style-type: none"> As an international container liner shipping company, Hapag-Lloyd is actively involved in the political decision-making process at the EU level Collaborate in the "Sustainable Alternative Power and Ship Efficiency" sub-group of the ESSF (European Sustainable Shipping Forum)
Employees and other workers	Internal	Yes	<ul style="list-style-type: none"> Annual Employee Engagement Survey Engagement through DMA stakeholder interview Annual employee reviews (for example Global Staff Dialogue (GSD)) Regular (virtual) townhalls and CEO updates Mid-year reviews between employees and management The Executive Board keeps in contact with all employees worldwide directly via email and video message and is also engaged in regular dialogue with the Works Council
Top management (Level 1–3)	Internal	Yes	<ul style="list-style-type: none"> Engagement through DMA stakeholder interview
Supervisory Board	Internal	Yes	<ul style="list-style-type: none"> Engagement through DMA stakeholder interview Regular Supervisory Board meetings at least four times a year as well as meetings of the respective sub-committees (for example Audit & Financial Committee)

(ESRS 2 SBM-2 45 a iv AR 16) One of the purposes of these stakeholder engagement formats is to gain insights and inspiration regarding Hapag-Lloyd's improvement potential with respect to sustainability matters. Furthermore, additional engagement processes with different objectives are applied, such as the Company's capital markets day.

(ESRS 2 SBM-2 45 a v AR 16) Outcomes of stakeholder engagements are taken up individually by the responsible departments. In the context of the DMA, the outcomes were used to identify and evaluate potential and actual IROs as defined by the ESRS.

(ESRS 2 SBM-2 45 c ii) (ESRS 2 SBM-2 45 c iii) The stakeholder engagement formats shall continue and are currently considered as sufficient making modifications not necessary. At the moment, Hapag-Lloyd does not plan to implement further steps that are likely to modify relationships with and views of stakeholders.

(ESRS 2 SBM-2 45 b AR 16) The Company's compliance with contractual agreements and provision of services lies in the interests of the stakeholders, including employees, customers, and suppliers, depending on their respective roles. Through stakeholder engagement, the Company identifies individual needs, such as customers' demand for low-carbon transportation options, which can lead to the development of new products and services addressing these requirements, for example ShipGreen.

(ESRS 2 SBM-2 45 c) In 2024, Hapag-Lloyd launched its updated corporate strategy Strategy 2030, which has been developed based on insights from a variety of stakeholders including customers, employees, investors as well as employer and employee representatives of the Supervisory Board. (ESRS 2 SBM-2 45 c i) (S2 ESRS 2 SBM-2 9) There are currently no plans in place aiming at amending the strategy or the business model specifically based on interests and views of certain stakeholders. (ESRS 2 SBM-2 45 d) Stakeholder feedback is considered in strategic decision-making by the Executive and Supervisory Board if necessary. The Executive Board receives and discusses specific stakeholder feedback through direct reporting lines. Additionally, the results of stakeholder engagement in the materiality assessment were reviewed and recognised by the Executive Board.

1.10. Description of the processes to identify and assess material impacts, risks and opportunities (IRO-1)

(ESRS 2 IRO-1 53 a) (ESRS 2 IRO-1 53 b) According to the ESRS, companies are required to adopt two key perspectives when identifying material risks: their actual and potential impact on sustainability related matters, namely the impact materiality, and the potential financial consequences for their own operations, namely the financial materiality. The methodology to identify IROs includes the following steps:

a) Gap analysis and benchmark

Benchmark: Industry peers and terminal providers were reviewed for their published material topics to identify potential additions to the sustainable topics to be assessed.

Gap analysis: A gap analysis of the last materiality assessment with the ESRS requirements was conducted.

b) ESG topic list and development of procedure

The topics to be considered under defined ESRS were used as a basis for the ESG topic long list of potentially material sustainable topics. Additionally, those arising from the 2022 materiality analysis were reviewed and adapted to the ESRS requirements. The topics identified in the industry benchmark were added subsequently.

In the next step, the assessment methodology for impact and financial materiality in accordance with ESRS requirements was defined. It includes the assessment of impacts based on severity, consisting of scope, scale, reversibility and likelihood.

c) Stakeholder interaction

To identify IROs, Hapag-Lloyd's key approach was to engage with both internal and external stakeholders, including affected stakeholders and users of the sustainability statement, to gain multiple perspectives. Interviews of 30–60 minutes were conducted with affected stakeholders and users of the sustainability statement, following a standardised questionnaire to identify IROs for the ESG topics included in the long list. The topics for the interviews were selected based on the responses received from a short pre-survey, assessing the relevance and performance on each defined ESG topic from the long list. This approach enabled an optimal use of the limited time available for the interview and underlined the need to only discuss the topics on which stakeholders could provide informed comments. The stakeholder engagement process led to the compilation of a comprehensive set of potentially relevant IROs. IROs from the 2022 materiality analysis were integrated into the final set of IROs.

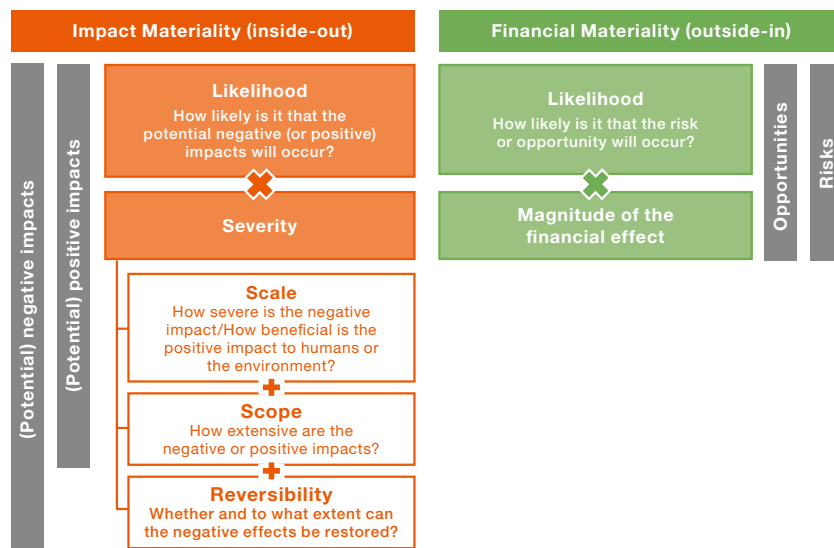
Hapag-Lloyd's assumptions in the process were:

- Industry peers and terminal providers have already identified relevant and material ESG topics and reviewing these can highlight potential gaps and areas of improvement for Hapag-Lloyd.
- Engaging both internal and external stakeholders reveals valuable insights into the Company's ESG IROs, and their input is crucial for a holistic view.
- The use of a standardised questionnaire and a pre-survey result in structured and systematic data collection methods, yielding reliable and comparable insights from stakeholders.
- Prioritising topics based on pre-survey responses ensures efficient use of stakeholder and company resources while focusing on high relevance issues.
- Findings from the 2022 materiality analysis remain relevant, and incorporating these IROs provides continuity and builds on past work rather than starting from scratch.

(ESRS 2 IRO-1 53 b) (ESRS 2 IRO-1 53 c)

Assessment: Hapag-Lloyd's process to assess potential and actual impacts as well as risks and opportunities was developed in cooperation with Risk Management. The assessment methodology was based on the ESRS requirements, including the assessment of risks and opportunities based on financial magnitude and likelihood. Additionally, the assessment methodology was aligned with the current relevance classes to categorise risks and opportunities under the Risk Management System (RMS). Furthermore, Hapag-Lloyd took into account other risk analyses,

such as the Climate Risk & Vulnerability Assessment (CRVA) and the risk analysis in connection with the Supply Chain Act, in order to identify and assess IROs. Each impact, risk and opportunity was assessed individually. The assessment methodologies are displayed in the graphics below:



Prioritisation: To prioritise the assessed ESG topics and IROs, a threshold for materiality was set. The IROs above the materiality threshold are prioritised.

Monitoring: A validation of Hapag-Lloyd's actual and potential impacts as part of an update of the materiality assessment has been carried out for the first time. Risks and opportunities are monitored in regular updates of the materiality assessment.

(ESRS 2 IRO-1 53 b i) The assessment adopted a comprehensive approach, reviewing the Hapag-Lloyd groups overall performance and issues rather than targeting specific high-risk areas, such as certain activities, business relationships, or geographic regions. (ESRS 2 IRO-1.53b ii) To consider the impacts Hapag-Lloyd is involved in through its own operations or as a result of its business relationships, the stakeholder engagement process included interviews with representatives from the following stakeholder groups:

- Employees and other workers
- Customers
- Suppliers
- Industry initiatives/partners
- Classification society
- Science & academia

The selection of internal and external stakeholders was precisely defined in advance in order to illuminate as many different facets of the business of the Hapag-Lloyd group as possible, including business conduct matters.

(ESRS 2 IRO-1 53b iii) The process included consultation with stakeholders to understand potential consequences through engagement with representatives of employees and other workers. External experts were included through stakeholder engagement with industry initiatives and partners, classification societies, science and academia as well as customers and suppliers.

(ESRS 2 IRO-1 53 b iv) The individual aspects of likelihood, scope, scale and reversibility were evaluated separately along scales of one to four. Reversibility was only considered for negative impacts. For negative impacts related to human rights, reversibility was always evaluated with the highest score, assuming that human rights impacts are always non-reversible.

An impact materiality score was calculated based on the combined evaluation of the individual aspects. Enabling a differentiation between material and non-material impacts, Hapag-Lloyd determined a threshold for the impact materiality score of two, out of a maximum score of four. Impacts with a total score below two are thereby considered not material.

(ESRS 2 IRO-1 53 c i) Hapag-Lloyd considered the connections of its impacts and dependencies with the risks and opportunities that may arise from those by considering interconnections between the IROs as part of the individual assessments and the topic evaluation once the assessment had been finalised. *(ESRS 2 IRO-1 53c ii)* The likelihood (as frequency within a year) of risks and opportunities was evaluated using the following scales:

- 4 – High (> 50%, ≤ 100% \triangle More than 1 time in 2 years)
- 3 – Medium (>25%, ≤50% \triangle More than 1 time in 4 years)
- 2 – Low (> 10%, ≤25% \triangle More than or exactly 1 time in 10 years)
- 1 – Remote (≤ 10% \triangle Less than 1 time in 10 years)

The Company assessed the magnitude and nature of risks and opportunities using the following scales:

- 4 – Critical (>USD 250 million)
- 3 – Severe (≤USD 250 million, >USD 100 million)
- 2 – Bearable (≤USD 100 million, >USD 1 million for risks/>USD 5 million for opportunities)
- 1 – Negligible (≤USD 1 million/≤USD 5 million for opportunities)

(ESRS 2 IRO-1 53 c iii) Sustainability-related risks are considered and evaluated alongside other types of risks. Prioritisation of risks happens independently of the sustainability relation of individual risks. *(ESRS 2 IRO-1 53 d)* The results of the materiality assessment were validated by the risk management function as well as by functional experts from Hapag-Lloyd and the subsidiaries in a top-down approach.

(ESRS 2 IRO-1 53 e) (ESRS 2 IRO-1 53 f) The assessment approach for risks and opportunities under the RMS considers both the financial as well as the sustainability-related impact categories environment, social and human rights, and governance. The assessment ranges for the sustainability-related impacts are an aggregate of the severity assessment categories applied in the DMA.

In addition, the ESRS topics are integrated with event categories to which risks and opportunities are assigned, enabling the structured identification of such risks and opportunities. Insights from collections of risks and opportunities on particular topics such as data protection or compliance are shared with the governance entities, which are dedicated to overseeing or managing said topics.

[\(ESRS 2 IRO-1 53 g\)](#) Beside from stakeholder engagement, additional parameters such as the results of the previous materiality analysis, the risk inventory as well as the CRVA were taken into account for the identification of IROs. For the remaining steps of the materiality assessment, financial and non-financial data available to the functional departments was considered, but no separate data collection explicitly for the materiality assessment took place.

[\(ESRS 2 IRO-1 53 h\)](#) The previous materiality assessments at Hapag-Lloyd did not include the newly required double materiality perspective, using financial or impact materiality. As a result, the scope of material topics and IROs increased after the process has been changed accordingly. In the upcoming reporting periods, potential changes in severity and likelihood of all IROs will be reviewed and in case the assessment requires a repetition, it will be carried out accordingly.

[\(E3.IRO-1 8 b\)](#) Apart from the DMA, further specific consultations regularly take place with key groups of interest such as the International Maritime Organization (IMO). [\(ESRS 2 GOV-2 26 c\)](#) As part of the preparatory activities for this sustainability statement the Executive Board of Hapag-Lloyd was informed of the results of the materiality analysis.

1.11. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

[\(ESRS 2 SBM-3 48 a AR 17-18\)](#) In 2023, the Sustainability team conducted a materiality assessment which was validated in 2024, initially following the DMA requirements of the ESRS. Most of the topics identified align with the topics outlined in the ESRS. There are, however, two exceptions: water and marine resources (E3) and consumers and end-users (S4) were identified as not material. Due to the specific business operations, four additional topics were identified as material in addition to those covered by the ESRS: the entity-specific topics Transport of Dangerous Goods, Corporate Citizenship, Data Protection and Information & Cyber Security. Furthermore, only SAAM Terminals has identified material impacts related to the sustainability matter of affected communities (S3) and as a result, this topic is only considered by the respective part of the Company. [\(ESRS 2 SBM-3 48 h AR 18\)](#) Details on the identified material IROs are provided at the beginning of each topical chapter of this Sustainability Statement.

[\(E3.IRO-1 8 a\)](#) As a container liner shipping company, water and marine resources represent an important element of Hapag-Lloyd's business model. Its materiality assessment process included engagement with key stakeholders to discuss potential IROs on water and marine resources. Thereby, Hapag-Lloyd has not identified any material IROs directly related to the specific disclosure requirements covered by E3 of the ESRS. Hapag-Lloyd's container vessels and its liner shipping activities are the obvious key assets and activities considered for potential related IROs in this process. Nevertheless, Hapag-Lloyd has identified material marine IROs, which are covered in detail in its disclosures on pollution and marine ecosystems. These can be found in the respective chapters.

(ESRS 2 SBM-3 48 b AR 18) Some of the material topics such as Dangerous Goods, Information & Cyber Security, Data Protection are already reported within the corporate RMS. For all other outstanding IROs the Company is assessing plans to respond to those applying the ESRS requirements, with a focus on establishing concrete policies, actions and targets. Nevertheless, the governance process delineated above clarifies that all material IROs are already incorporated into the general management process for sustainability issues. This task is driven by the Sustainability department, in conjunction with relevant departments and the SC, aiming to deliver a thorough and effective response.

(ESRS 2 SBM-3 48 c i AR 18) The identified material impacts on the environment mainly stem from Hapag-Lloyd's liner shipping business activities, particularly through the burning of fossil fuels which contributes to climate change and pollution. The identified material impacts on people mainly relate to Hapag-Lloyd's employees and workers in the value chain, as both positive and negative impacts can be caused through the respective working conditions of these groups. Near certain SAAM Terminals locations, impacts on people can potentially result from noise pollution. Furthermore, impacts on people and society are relevant in the context of potential corruption incidents.

(ESRS 2 SBM-3 48 c ii AR 18) The activities in relation to the identified material impacts are an inherent part of Hapag-Lloyd's business activities. Only the material impact related to the entity-specific topic corporate citizenship has no immediate connection to the business activities but has a mediate relation to the company values. As business activities are derived from the strategy and contribute to achieving its strategic targets, the material impacts are directly and indirectly connected to the Company's strategy. This connection is especially significant between the strategic core pillar of Hapag-Lloyd becoming a Sustainability Driver and the sustainability topic of climate change. *(ESRS 2 SBM-3 48 c iii AR 18)* Considering the time horizons of the impacts, the defined proposals of the ESRS have been adopted.

(ESRS 2 SBM-3 48 c iv AR 18) Hapag-Lloyd is involved in material impacts mainly by its own business activities in the Liner Shipping segment, but also through its business relationships.

(ESRS 2 SBM-3 48 d AR 18) The aggregated short-term financial effects of material opportunities on financial position, performance, and cash flows are classified as low, considering their probability of occurrence. The aggregated short-term financial effects of material risks on financial position, financial performance and cash flows are, considering their probability of occurrence, classified in the severe to critical range. Material risks and opportunities in the area of pollution and the transport of dangerous goods that is in case of accidents and incidents, could potentially cause material adjustment within the next reporting period to carrying amounts of assets or liabilities. However, significant impacts from such events are less likely than more likely.

(ESRS 2 SBM-3 48 f AR 18) Hapag-Lloyd considers the resilience of its strategy and business model to be robust. For the strategic time horizon until 2030, a change of its business model is not required to address material impacts and risks or to take advantage of material opportunities. The Company commits in its Strategy 2023 to its decarbonisation focus to keep global warming within the 1.5 °C target of the Paris Agreement, and pledges to reduce GHG emissions from its fleet operations by around one third by 2030 as well as achieving net-zero fleet operations by 2045.

1.12. Disclosure requirements in ESRS covered by the undertaking's sustainability statement (IRO-2)

(ESRS 2 IRO-2 56) No specific datapoints listed in this sustainability statement are derived from other EU legislations. However, disclosures related to Article 8 of Regulation 2020/852 (EU Taxonomy) are disclosed in chapter "2.1 Consolidated disclosures pursuant to Article. 8 of the taxonomy regulation" of this Sustainability Statement.

(ESRS 2 IRO-2 56 AR 19) Hapag-Lloyd compiled a list of ESRS disclosure requirements based on the outcome of the materiality assessment. The chapter for individual disclosure requirements in this Sustainability Statement can be found in the Content Index located in the annex. The list of material disclosure requirements comprises the following:

- All non-voluntary disclosure requirements from E1, except the specific datapoints on biogenic emissions (E1-6 AR 43 c, E1-6 AR 45 e, E1-6 AR 46 j)
- All non-voluntary disclosure requirements from E2, except the specific datapoints related to substances of concern and microplastics (E2-1 15 b AR 11, E2-3 23 d, E2-4 28b AR 20, E2-5 34, E2-5 35, E2-6 40 a)
- All non-voluntary disclosure requirements from E4, except the specific datapoints related to deforestation (E4-2 24 d), land/agriculture practices (E4-2 24 b) and land degradation, desertification and soil sealing (E4 SBM-3 16 b)
- All non-voluntary disclosure requirements from E5, except the specific datapoints related to waste (E5-3 24 e, E5-3 25, E5-5 35, E5-5 36 a, E5-5 36 b, E5-5 36 c, E5-5 37 a, E5-5 37 b AR 31, E5-5 37 c AR 32, E5-5 37 d, E5-5 38, E5-5 38 a, E5-5 38 b, E5-5 39, E5-5 40, E5-5 40 AR 33)
- All non-voluntary disclosure requirements from S1
- All non-voluntary disclosure requirements from S2
- All non-voluntary disclosure requirements from S3, except the specific datapoints related to rights of indigenous people (S3-1 15, S3-2 23)
- All non-voluntary disclosure requirements from G1, except the specific datapoints related to animal welfare (G1-1 10 f)

(ESRS 2 IRO-2 59) All material IROs were mapped to the ESRS sub-topics. Single IROs could relate to multiple ESRS sub-topics, and in case where no mapping to ESRS sub-topic was possible, an entity-specific topic was assigned. All sub-topics covered by any material IROs of Hapag-Lloyd are considered material information.

Individual data points from material subtopics can be categorised as immaterial. This is the case when they cover an aspect that is more detailed than the ESRS subtopic classification and when this aspect does not contain any material IROs for Hapag-Lloyd.

ESRS Chapters	IRO Title	Value Chain			Time horizon			Number of single IROs that have been consolidated into this IRO Title
		Upstream	Own Operations	Downstream	Short-term	Medium-term	Long-term	
E Transport of dangerous goods	[Potential negative impact] Improper handling of dangerous goods could lead to negative impacts on environment and people	X	X	X	X	X	X	1
E Transport of dangerous goods	[Risk] Accidents regarding transport of dangerous goods	X	X	X	X	X	X	1
E Transport of dangerous goods	[Opportunity] Ensuring the safe and reliable transportation of dangerous goods		X		X	X		1
E1	[Actual negative impact] Contribution to global warming through direct and indirect GHG emissions	X	X	X	X	X	X	7
E1	[Actual negative impact] Continued reliance on fossil fuel-based technologies	X	X	X	X	X	X	3
E1	[Potential positive impact] Researching alternative methods of fuel, propulsion and efficiency technologies		X		X	X	X	4
E1	[Risk] Decreased profitability as a consequence of non-achieved decarbonisation targets		X		X	X	X	3
E1	[Risk] Allocating research and investment resources improperly	X	X	X	X	X	X	2
E1	[Risk] Rising volatility in customer demand for environmentally friendly/sustainable transport solutions		X	X	X	X	X	1
E1	[Risk] Rising costs for environmentally friendly logistics services of suppliers	X	X	X		X	X	1
E1	[Risk] Increasing pressure through climate-related regulations		X		X	X	X	1
E1	[Risk] Rising costs due to higher energy prices		X	X	X	X		1
E1	[Opportunity] Contributing to a successful climate-neutral transformation of the shipping industry through partnerships	X	X	X	X	X	X	2
E1	[Opportunity] Researching alternative methods of fuel, propulsion and efficiency technologies	X	X	X	X	X	X	4
E1	[Risk] Increasing occurrence of extreme weather events	X	X	X	X	X	X	1
E2	[Actual negative impact] Contributing to air and water pollution on transport routes	X	X	X	X	X	X	5
E2	[Risk] Legal fines due to contribution to air and water pollution		X		X	X	X	1
E4	[Potential negative impact] Impact on the marine ecosystem due to the operations of Hapag-Lloyd's vessel fleet	X	X	X	X	X	X	1

ESRS Chapters	IRO Title	Value Chain			Time horizon			Number of single IROs that have been consolidated into this IRO Title
		Upstream	Own Operations	Downstream	Short-term	Medium-term	Long-term	
E4	[Opportunity] Building trust through responsible practices regarding marine ecosystems, enhancing reputation and fostering strong stakeholder relationships	X	X	X	X	X	X	1
E5	[Potential negative impact] Environmental impacts due to recycling procedures of the vessels in the downstream value chain		X	X	X	X	X	1
E5	[Opportunity] Evaluating the use of circular economy principles		X		X	X	X	1
G	[Potential negative impact] Breaching corruption or bribery legislation	X	X	X	X	X	X	1
G	[Actual positive impact] Creating trusted relationships with suppliers	X			X	X	X	1
G	[Potential positive impact] Enforcing sustainable and ethical mindset in corporate culture	X	X	X	X	X	X	3
G	[Actual positive impact] Promoting whistleblower protection	X	X	X	X			1
G	[Risk] Impairing business success through improper governance		X	X	X	X	X	3
G	[Opportunity] Considering ESG requirements in supplier relationships	X	X	X	X	X	X	1
G	[Opportunity] Supporting business success through good governance		X		X	X	X	1
G	[Opportunity] Incorporating sustainability in business decisions		X		X	X	X	1
S Corporate Citizenship	[Actual positive impact] Facilitating volunteering and sponsorship activities	X	X		X	X		1
S Corporate Citizenship	[Opportunity] Strengthening employee affiliation with the company through corporate citizenship		X		X	X	X	1
S Data Protection	[Potential negative impact] Occurence of data breaches	X	X	X	X	X	X	1
S Data Protection	[Actual positive impact] Ensuring high data protection standards	X	X	X	X	X	X	1
S Data Protection	[Risk] Occurence of data breaches		X	X	X	X	X	1
S Data Protection	[Opportunity] Preventing data breaches		X	X	X	X	X	1
S Information & Cyber Security	[Potential negative impact] Occurence of IT security hazards	X	X	X	X	X	X	1
S Information & Cyber Security	[Actual positive impact] Ensuring high IT security standards	X	X	X	X	X	X	1

ESRS Chapters	IRO Title	Value Chain		Time horizon			Number of single IROs that have been consolidated into this IRO Title	
		Upstream	Own Operations	Downstream	Short-term	Medium-term		Long-term
S Information & Cyber Security	[Risk] Occurrence of cyber attacks		X	X	X	X	X	1
S Information & Cyber Security	[Opportunity] Preventing cyber attacks		X	X	X	X	X	1
S1	[Potential negative impact] Contributing to dissatisfaction through missing opportunities for employees		X		X	X		2
S1	[Actual negative impact] Occurrence of health and safety incidents		X		X	X	X	4
S1	[Potential positive impact] Leading by example with a diverse management team		X			X	X	2
S1	[Potential positive impact] Maintaining high health and safety standards		X		X	X	X	2
S1	[Potential positive impact] Maintaining high quality of work-life balance among own workforce		X		X	X		2
S1	[Actual positive impact] Promoting development of employees		X		X	X		2
S1	[Risk] Potentially losing talent where equal opportunities are not ensured		X			X		1
S1	[Opportunity] Attracting and retaining talents through diverse teams		X			X		1
S1	[Opportunity] Minimising turnover through high labour and safety standards		X	X	X		X	5
S1	[Opportunity] Ensuring continuous improvement through training of workforce		X			X		1
S1; S2	[Potential negative impact] Non-compliance with labour standards or unfair working conditions		X	X	X	X	X	5
S1; S2	[Actual positive impact] Contributing to well-being of workers in the value chain through fair working conditions		X	X	X	X	X	6
S2	[Opportunity] Improve reputation through high labour and safety standards		X		X	X		1
S3	[Actual negative impact] Impairing quality of life in affected local communities near terminals		X		X	X	X	1
S3	[Actual positive impact] Supporting affected local communities near terminals		X	X		X	X	2

2. ENVIRONMENTAL INFORMATION

2.1. Consolidated disclosures pursuant to Article 8 of the taxonomy regulation

2.1.1. Background

The Taxonomy Regulation (Regulation (EU) 2020/852) is a core element of the European Commission's action plan to redirect capital flows to more sustainable economic activities. It represents an important step towards achieving climate neutrality by the year 2050 in line with the EU's targets.

The EU Taxonomy is a standardised classification system for environmentally sustainable economic activities and generally comprises the following six environmental objectives, which are governed by Article 9 of the Taxonomy Regulation:

- (1) Climate change mitigation (CCM)
- (2) Climate change adaptation (CCA)
- (3) The sustainable use and protection of water and marine resources (WTR)
- (4) The transition to a circular economy (CE)
- (5) Pollution prevention and control (PPC)
- (6) The protection and restoration of biodiversity and ecosystems (BIO)

An initial delegated act on sustainable climate change adaptation and mitigation measures (Delegated Act (EU) 2021/2139, hereinafter "Climate Delegated Act"), complements the Taxonomy Regulation and has been in effect since January 2022. A second delegated act for the remaining, non-climate related environmental objectives (Delegated Act (EU) 2023/2486, hereinafter "Environmental Delegated Act"), was published in November 2023 and has been applicable since January 2024.

In the following, Hapag-Lloyd as a non-financial parent company pursuant to Article 8 of the Taxonomy Regulation and the Delegated Act supplementing Article 8 of the Taxonomy Regulation (Delegated Act (EU) 2021/2178, hereinafter "Art. 8 Delegated Act"), presents the proportions of the Group revenue (The term 'turnover' in accordance with the EU Taxonomy includes only "revenue" at Hapag-Lloyd. Consequently, the term 'revenue' will be applied in the following sections), capital expenditure (CapEx) and operating expenses (OpEx) for the 2024 reporting period.

2.1.2. Definitions

According to Article 1, nos. 5 and 6 of the Art. 8 Delegated Act, a taxonomy-eligible economic activity is an economic activity that is described in the adopted delegated acts pursuant to the Taxonomy Regulation, irrespective of whether that economic activity meets any or all of the technical screening criteria set out in these delegated acts.

A non-taxonomy-eligible economic activity is any economic activity that is not described in the adopted delegated acts pursuant to the Taxonomy Regulation.

A taxonomy-aligned economic activity is an economic activity that meets all of the following requirements:

- a) The economic activity contributes substantially to one or more of the environmental objectives (Substantial Contribution);
- b) it does not significantly harm any of the environmental objectives pursuant to Article 17 of the Taxonomy Regulation (Do No Significant Harm);

c) it is carried out in compliance with the minimum safeguards as per Article 18 of the Taxonomy Regulation, which are intended to ensure that an economic activity can only be considered sustainable if it also meets international human rights standards. In addition to respect for human rights (including labour rights), the minimum safeguards also cover bribery and corruption, taxation and fair competition.

2.1.3. Own Economic activities

Hapag-Lloyd examined the relevant taxonomy-eligible economic activities under the Delegated Acts on the basis of the activities carried out and attributed the activities relevant to revenue to the following economic activities. The following table shows the environmental objective to which the activities are relevant:

Economic activity	Description	NACE Code	Climate change mitigation	Climate change	Water and marine resources	Circular economy	Environmental pollution	Biodiversity
CCM 6.6								
Freight transport services by road	Road container transport by truck	H.49.4.1, N.77.12	✓	X	X	X	X	X
CCM 6.10								
Sea and coastal freight water transport, vessels for port operations and auxiliary activities	Transport of containers by sea using own and chartered vessels	H50.2, N77.34	✓	X	X	X	X	X
CCM 6.16								
Infrastructure enabling low carbon water transport	Building, upgrading, operation and maintenance of port structure	F52.22.2, F52.24.0	✓	X	X	X	X	X

Hapag-Lloyd's core business is primarily the shipping of containers by sea using its own vessels and chartered vessels (Liner Shipping segment, economic activity CCM 6.10 "Sea and coastal freight water transport, vessels for port operations and auxiliary activities"). The business activities of the fully consolidated seaport terminals in the Terminal & Infrastructure segment in the USA and Latin America need to be assigned to economic activity CCM 6.16 "Infrastructure enabling low carbon water transport".

Through the acquisition of the freight forwarding company ATL Haulage Contractors Limited (ATL), Stanford-Le-Hope, United Kingdom (UK) in the 2024 financial year, Hapag-Lloyd provides road transportation services that can be carried out independently of vessel transport, among other things. The economic activity is included under economic activity CCM 6.6 "Freight transport services by road" and is part of the Liner Shipping segment.

Based on the analysis of economic activities under the EU taxonomy, Hapag-Lloyd does not identify any activities that specifically address the environmental goal of climate change adaptation and are thus to be considered taxonomy-aligned for this environmental objective. In order to avoid double counting, the activities are also not considered taxonomy-eligible for this environmental objective.

No relevant Hapag-Lloyd activities were identified in relation to non-climate-related environmental objectives.

As no key application has been identified for the economic activities described in the EU Commission's Delegated Act 2022/1214 and in Annex XII, the reporting pursuant to Annex XII of the Art. 8 Delegated Act also does not apply.

Group definition

The analysis of economic activities was based on Hapag-Lloyd Group's revenue. Therefore, only economic activities of fully consolidated Group companies were taken into account.

Supply chain coverage in economic activity CCM 6.10

As part of economic activity CCM 6.10, Hapag-Lloyd offers, in particular, not only the transport of containers by sea but also door-to-door transport. The service offered by Hapag-Lloyd always involves the performance of a transport contract and comprises a number of different sub-components. In addition to transportation by sea, these include transportation of the empty container from the depot to the customer or from the customer to the depot, transportation of the container from the customer to the port/terminal (pre-carriage) or transportation of the container from the port/terminal to the recipient (on-carriage).

In the context of external accounting in accordance with IFRS 15, the handling of a transport within the Hapag-Lloyd Group as a whole is treated as an integrated performance obligation. No distinction is therefore made between pre-carriage, on-carriage and sea transport when recording revenue. This assessment is also used for EU Taxonomy-related purposes. As most of this process of transporting containers is performed by sea, Hapag-Lloyd assigns the entire transport of the container from A to B to economic activity CCM 6.10. This is irrespective of the fact that parts of the transportation process are performed by road, rail and inland waterway under certain circumstances.

Acquisition of production

In addition to the economic activities identified for Hapag-Lloyd's own activities, economic activities related to the acquisition of production from taxonomy-eligible economic activities of Hapag-Lloyd's suppliers have also been taken into account in the determination of the KPIs for taxonomy eligibility.

This includes the efficiency-enhancing retrofitting of ships, which is included under economic activity CCM 6.12 "Retrofitting of sea and coastal freight and passenger water transport" and is not considered a separate economic activity of Hapag-Lloyd. Reference is made to the explanations regarding the KPIs and accounting principles for further information.

The other economic activities summarised under "Acquisition of production" are:

- CCM 6.5 "Transportation by motorbikes, passenger cars and light commercial vehicles"
- CCM 7.2 "Renovation of existing buildings"
- CCM 7.7 "Acquisition and ownership of buildings"
- CCM 8.1 "Data processing, hosting and related activities"

2.1.4. Substantial contribution to climate change mitigation

Annex 1 to the Climate Delegated Act describes the technical screening criteria for determining the conditions under which an economic activity is considered to make a substantial contribution to climate change mitigation.

CCM 6.6 Freight transport services by road

For economic activity CCM 6.6 “Freight transport services by road”, one of currently four substantial contribution criteria must be met with regard to the vehicles so that this economic activity can make a substantial contribution to climate change mitigation. The criteria relate to the direct carbon exhaust emissions per vehicle class in connection with the technically permissible maximum laden mass. Additionally, the vehicles must not be dedicated to the transport of fossil fuels. If vehicles produce direct carbon exhaust emissions but fulfil the remaining technical assessment criteria, the economic activity CCM 6.6 is generally classified as a transitional activity according to Article 10(2) of Regulation (EU) 2020/852.

For the assessment of compliance with the DNSH criteria of economic activity 6.6 at Hapag-Lloyd, please refer to the chapter “Do no significant harm (DNSH) – 6.6 Freight transport services by road”.

CCM 6.10 Sea and coastal freight water transport, vessels for port operations and auxiliary activities

For economic activity CCM 6.10 “Sea and coastal freight water transport, vessels for port operations and auxiliary activities”, which is relevant to Hapag-Lloyd, currently at least one of four technical criteria must be met in regard to the vessels used.

Additionally, the vessels must not be dedicated to the transport of fossil fuels. The criteria take into account direct emissions at the funnel and do not evaluate the climate neutrality of a vessel's propulsion concept as a whole. However, propulsion systems operating on this basis are currently not market-ready or available for widespread practical use. There is currently no generation and supply infrastructure. If vessels produce direct carbon exhaust emissions but fulfil one of the other criteria, this is classified as a transitional activity according to Article 10(2) of the Taxonomy Regulation.

Against this backdrop, the vessels used within the Hapag-Lloyd Group fulfil the substantial contribution criteria if they achieve an Energy Efficiency Design Index (EEDI) that is 10% below the EEDI requirements that were applicable on 1 April 2022 and can be powered using fuels from renewable sources. From Hapag-Lloyd's perspective, the Energy Efficiency Existing Ship Index (EEXI) can be considered a screening criterion that is equivalent to the EEDI. In practice, both indices measure the same thing, but the EEDI is used for new vessels while the EEXI applies to existing ones. The EEDI and EEXI have the same metric and reference values. Fuels from renewable sources mean hydrogen or hydrogen-based synthetic fuels as per section 3.10 and biogas or biofuels as per section 4.13 of Annex 1 of the Climate Delegated Act. The screening criteria only require that vessels can be powered using the appropriate fuels. Evidence that the vessels are actually powered using the appropriate fuels does not need to be provided.

For the assessment of compliance with the DNSH criteria of economic activity 6.10 at Hapag-Lloyd, please refer to the chapter “Do no significant harm (DNSH) – 6.10 Sea and coastal freight water transport, vessels for port operations and auxiliary activities”, as well as the explanations in the chapters “Revenue KPI”, “CapEx KPI” and “OpEx KPI”.

CCM 6.16 Infrastructure enabling low carbon water transport

For economic activity CCM 6.16, at least one of five substantial contribution criteria must be met with regard to the seaport terminal so that this economic activity can make a substantial contribution to climate change mitigation. Additionally, the infrastructure must not be dedicated

to the transport or storage of fossil fuels. The criteria refer, firstly, to infrastructure for vessel operation without direct carbon exhaust emissions and, secondly, to infrastructure for onshore power supply to vessels at their berths. Hapag-Lloyd's fully consolidated terminals currently do not feature any infrastructure for operating vessels without direct carbon exhaust emissions or any onshore power solutions. However, the Hapag-Lloyd terminals do have infrastructure and equipment designed for loading and unloading freight or transferring it between different modes of transport. This makes economic activity CCM 6.16 fundamentally an enabling operation in accordance with Article 10(1)(i) of the Taxonomy Regulation.

For the assessment of compliance with the DNSH criteria of economic activity 6.16 at Hapag-Lloyd, please refer to the chapter "Do no significant harm (DNSH) – 6.16 Infrastructure enabling low carbon water transport".

2.1.5. Do no significant harm (DNSH)

An economic activity can only be considered environmentally sustainable if it does not significantly harm any environmental objective (DNSH criteria). An economic activity significantly harms an environmental objective or several environmental objectives if it endangers the achievement of these objectives.

6.6 Freight transport services by road

Although this economic activity is taxonomy-eligible, it is not considered essential to Hapag-Lloyd's business activities in the current financial year; hence, no additional assessment was conducted regarding taxonomy-alignment.

6.10 Sea and coastal freight water transport, vessels for port operations and auxiliary activities

In the reporting year, the DNSH criteria for economic activity CCM 6.10 were analysed with the support of cloud-based software that enables vessel owners and charterers to exchange vessel performance data. The analysis was carried out at the level of the individual vessels or at the level of the (external) shipowners or vessel managers. To obtain the relevant information, the shipowners or managers were asked to complete an online questionnaire using the software. The answers provided by the external shipowners or managers were only verified by obtaining suitable documentary evidence if the vessel concerned had been taken into account when determining taxonomy-alignment. In the following, Hapag-Lloyd presents its interpretation and the key analyses used to determine whether there was significant harm to the other environmental objectives.

Climate change adaptation

Hapag-Lloyd has conducted a climate risk and vulnerability assessment to determine the materiality of physical climate risks that may impact the performance of the Groups activities. The economic activities were considered separately when identifying and evaluating physical climate risks. The analysis was conducted on a regional level. If high risks to Hapag-Lloyd's economic activities have been identified based on assessments of severity and probability of occurrence, adaptation solutions will be appraised.

Sustainable use and protection of water and marine resources

With respect to the environmental objective of sustainable water use, activities that damage the condition or potential of water resources are considered to have a significant negative impact.

Hapag-Lloyd's economic activities were assessed with respect to sustainable use and protection of water and marine resources by carrying out the water risk analysis (maintaining water quality, preventing water stress). Potential impacts on the marine environment from maritime shipping may arise especially due to chemicals in vessel coatings, the introduction of non-native organisms through biofouling or ballast water, the discharge of wastewater and waste into the sea, pollutants from exhaust gases, and vessel noise. The possible adverse effects are already covered by the DNSH criteria of other environmental objectives.

Transition to a circular economy

Activities involving significant inefficiencies in the use of natural resources, including in regard to the durability of products and their ability to be repaired, retrofitted, reused or recycled, cause significant harm to the environmental objective of achieving a circular economy. Waste management measures based on the waste hierarchy must therefore be in place during both the vessel's use phase and at the end of its service life.

The requirements for Hapag-Lloyd's economic activities in regard to the transition to a circular economy are to some extent monitored during the regular inspections carried out by flag states and port states (e.g. the review of oil and garbage record book). Analyses are also based on waste management plans, inventory of hazardous materials (IHM) and the shipboard management system, to name but a few examples. Furthermore, the Hapag-Lloyd vessel recycling policy was also taken into consideration. Hapag-Lloyd is one of the first major shipping companies in the world to recycle its own vessels in accordance with strict EU environmental standards.

Pollution prevention and control

With respect to the environmental objective of pollution prevention and control, activities that result in a significant increase in pollutant emissions are considered to cause significant harm. In particular, the respective requirements define specifications with regard to sulphur oxide and nitrogen oxide emissions and particulate matter, discharges of black and grey water, and minimising the toxicity of anti-fouling paints and biocides.

The pollutant emission requirements that apply in regard to the pollution prevention and control environmental objective are also to some extent monitored during the regular checks carried out as part of the flag state or port state inspections or documented by the shipyard. Moreover, checks are performed, in particular, on the IMO requirements for nitrogen oxide emissions from vessel engines and the use of reliable fouling protection systems.

Protection and restoration of biodiversity and ecosystems

Activities that damage biodiversity and ecosystems significantly harm the environmental objective of protecting and restoring biodiversity and ecosystems. The respective criteria therefore include the release of ballast water containing non-indigenous species, the introduction of non-indigenous species through the biofouling of hulls and niche areas, and noise and vibrations caused by shipping.

The respective vessels' ballast water management systems and plans, as well as biofouling prevention plans, noise reduction measures, measures to preserve the integrity of the seabed and point pressure measurements (change in the water pressure in relation to underwater noise) were analysed to ensure compliance with requirements in regard to biodiversity and ecosystems.

6.16 Infrastructure enabling low carbon water transport

Although this economic activity is taxonomy-eligible, it is not considered essential to Hapag-Lloyd's business activities in the current financial year; hence, no additional assessment was conducted regarding taxonomy-alignment.

2.1.6. Minimum Safeguards

Minimum safeguards are procedures designed to ensure that the requirements of specific frameworks for international human rights standards are met.

Minimum safeguard frameworks include the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights (UNGP), the International Labour Organisation (ILO) Core Labour Standards and the International Bill of Human Rights. The contents that are to be covered concern, in particular

- Human rights (including labour and consumer rights);
- efforts to combat bribery, demands for bribes and extortion of bribes;
- taxation and
- fair competition.

The principles in the frameworks mentioned above call for the creation of due diligence processes to ensure compliance with the UNGP. The minimum safeguard requirements cover the entire value chain.

As one of the world's leading container liner shipping companies, responsible corporate governance and respect for human rights are key concerns for Hapag-Lloyd. Hapag-Lloyd published a Policy Statement on Social Responsibility and Human Rights in 2023. The Executive Board of Hapag-Lloyd reaffirms its commitment to respecting human rights through the policy statement. In order to ensure adequate protection of human rights within its own business operations, Hapag-Lloyd has defined the necessary processes in corporate principles, guidelines and procedural instructions.

The overall responsibility for human rights due diligence lies with the Chief Executive Officer and Chief Human Resources Officer of Hapag-Lloyd. It includes the control and monitoring of the measures implemented to protect human rights at Hapag-Lloyd. The Executive Board is supported in monitoring the measures and making decisions regarding high-risk issues by Hapag-Lloyd's Human Rights Officer. The responsibility for coordinating the implementation of the human rights strategy lies with the Human Rights Office, which is part of the Global Procurement department. A key component of the human rights due diligence processes at Hapag-Lloyd is the performance of annual and ad hoc internal and external risk analyses. Hapag-Lloyd has comprehensive preventive measures to ensure respect for human rights and fair working conditions. For the risks prioritised based on the results of the risk analysis, specific measures for prevention and remedy have been taken.

In order to be able to react to potential and actual human rights violations at an early stage, the Speak Up Line was set up as a central complaints channel. Hapag-Lloyd fosters a "Speak Up" culture and encourages all internal and external stakeholders to report unethical

and illegal behavior. The Speak Up Line is available at all times. Hapag-Lloyd aims to ensure that all reported concerns are dealt with quickly, objectively, fairly and confidentially and does not tolerate any form of retaliation or reprisal against whistleblowers. Hapag-Lloyd regularly reviews the implementation of its human rights due diligence obligations and pursues to continuously improve its commitment.

These statements currently apply primarily to the Hapag-Lloyd Group's Liner Shipping segment. In the Terminal & Infrastructure segment, various processes are already in place, such as a whistleblower channel and a suppliers' code of conduct, which must be signed by terminal suppliers. The status quo in the segment is currently being analysed as part of a project to develop a target governance structure and implement the resulting requirements across the Group.

The review of the above-mentioned criteria for minimum safeguards did not lead to any non-conformities in relation to the relevant economic activity throughout the 2024 financial year. The implemented management and prevention systems ensure compliance with Article 18 and thus fulfill the minimum safeguard criteria of the EU taxonomy.

2.1.7. Key performance indicators and accounting principles

The most important indicators that are to be reported include the revenue KPI, CapEx KPI and OpEx KPI. The KPIs are calculated in accordance with Annex I of the Art. 8 Delegated Act.

The KPIs for the 2024 financial year are as follows:

	2024			2023		
	Denominator in EUR billion	Taxonomy- eligible in %	Taxonomy- aligned in %	Denominator in EUR billion	Taxonomy- eligible in %	Taxonomy- aligned in %
Revenues	19	99.0	14.0	18	99.6	–
Activity CCM 6.6		0.1	–		–	–
Activity CCM 6.10		98.0	14.0		99.0	–
Activity CCM 6.16		1.0	–		0.6	–
CapEx	5	98.9	36.0	3	97.2	6.5
Activity CCM 6.6		0.2	–		–	–
Activity CCM 6.10		96.6	36.0		72.1	6.5
Activity CCM 6.16		1.3	–		17.2	–
Acquisition of production		0.7	–		7.9	–
OpEx	1	88.0	22.1	1	85.9	–
Activity CCM 6.10		75.2	22.1		73.5	–
Activity CCM 6.16		1.8	–		0.8	–
Acquisition of production		11.0	–		11.6	–

Below, Hapag-Lloyd sets out its accounting policies with respect to the relevant KPIs.

2.1.8. Revenue KPI

Definition

The proportion of taxonomy-eligible or taxonomy-aligned economic activities in the total revenue was calculated as the portion of net revenue that is generated from products and services related to taxonomy-eligible or taxonomy-aligned economic activities (numerator) divided by the net revenue (denominator), in each case for the financial year from 1 January 2024 to 31 December 2024.

The denominator of the revenue KPI is based on the consolidated net revenue pursuant to IAS 1.82(a). Further details on the accounting principles for the consolidated net revenue can be found in Section "Fundamental accounting principles/Realisation of revenue and contract liabilities" within the Notes to the consolidated financial statements of the Annual Report 2024. The numerator of the revenue KPI is defined as the net revenue generated from products and services related to taxonomy-eligible or taxonomy-aligned economic activities.

Reporting

The consolidated net revenue is EUR 19,111.8 million (previous year: EUR 17,929.5 million) and can be compared with the consolidated financial statements; see income statement in Section "Revenue" of the Annual Report 2024 ("Revenue").

The taxonomy-eligible revenue amounted to EUR 18,928.7 million or 99.0% of Group revenue. Economic activity CCM 6.10 "Sea and coastal freight water transport, vessels for port operations and auxiliary activities" accounts for EUR 18,726.0 million or 98.0% (previous year: EUR 17,758.1 or 99.0%) of Group revenue. This includes revenue from net freight revenues, revenue from the occasional chartering of vessels and the chartering of slots under slot charter agreements as well as demurrage and detention fees. Economic activity CCM 6.6 "Freight transport services by road", which was newly added during the reporting year, accounts for EUR 18.3 million or 0.1% of Group revenue. Economic activity CCM 6.16 "Infrastructure enabling low carbon water transport" accounts for EUR 184.4 million or 1.0% of Group revenue.

Of the taxonomy-eligible revenues, EUR 2,682.0 million, which corresponds to 14.0% of Group revenue, can be allocated to vessels that meet the technical screening criteria for economic activity CCM 6.10. In particular, container demurrage and detention fees and revenue from pending voyages cannot be allocated to individual vessels.

As already explained, no assessment was conducted regarding taxonomy alignment for economic activity CCM 6.6 and CCM 6.16.

As Hapag-Lloyd is able to demonstrate compliance with the minimum safeguards since 2024, the actual taxonomy-aligned revenue is EUR 2,682.0 million or 14.0% (previous year: EUR 0.0 million or 0.0%) of Group revenue.

Hapag-Lloyd not only transports containers using its own or chartered vessels, but also using third-party vessels obtained through alliance, vessel-sharing or slot charter agreements in a substantial number of cases. As reviewing the criteria for taxonomy alignment for these vessels is not feasible due to the large number of external vessel managers involved with whom no contractual relationship exists, these revenues are treated as non-taxonomy-aligned in their entirety. For the template for the "Revenue" KPI refer to section Overview of Revenue, CapEx and OpEx in accordance with the Taxonomy Regulation.

2.1.9. CapEx KPI

Definition

The CapEx KPI is defined as taxonomy-eligible or taxonomy-aligned CapEx (numerator) divided by total CapEx (denominator). Total CapEx comprises additions to property, plant and equipment and intangible assets during the financial year under review before depreciation, amortisation, impairments and remeasurements, including those which result from remeasurements and impairments for the financial year in question and without changes in the fair value. This comprises the acquisition of intangible assets (IAS 38), property, plant and equipment (IAS 16) and right-of-use assets (IFRS 16). Additions to intangible assets, property, plant and equipment and right-of-use assets that result from business combinations must be included in the numerator as well as the denominator. Goodwill is not included in the CapEx, as it is not defined as an intangible asset under IAS 38. Further details on the accounting principles with regard to the CapEx can be found in Section “Fundamental accounting principles/Property, plant and equipment” within the Notes to the consolidated financial statements of the Annual Report 2024. The numerator consists of the following categories of taxonomy-eligible or taxonomy-aligned CapEx:

- a) CapEx related to assets or processes that are associated with taxonomy-eligible or taxonomy-aligned economic activities (“category a”)
- b) Investments which form part of a plan to expand taxonomy-aligned economic activities or convert taxonomy-eligible into taxonomy-aligned economic activities (“CapEx plan”) (“category b”)
- c) Investments related to the acquisition of production from taxonomy-aligned economic activities and individual measures through which certain target activities are performed on a low-carbon basis or the emission of greenhouse gases is reduced (“category c”)

Reporting

In the financial year 2024, total CapEx in the Hapag-Lloyd Group amounted to

- EUR 32.6 million (previous year: EUR 466.8 million) on intangible assets
- EUR 4,639.2 million (previous year: EUR 2,834.4 million) on property, plant and equipment, including right-of-use.

The additions resulting from changes in the group of consolidated companies, which amounted to EUR 9.9 million in the financial year 2024 (previous year: EUR 737.8 million), are also included. The total CapEx therefore amounted to EUR 4,671.9 million (previous year: EUR 3,315.4 million). The total CapEx can be reconciled with the consolidated financial statements. See additions to intangible assets and property, plant and equipment in notes (10) and (11) of the Annual Report 2024.

Assets and processes are associated with taxonomy-eligible economic activities if they are essential components that are necessary for performing an economic activity. Consequently, CapEx with regard to vessels and containers, including right-of-use assets for chartered ships and leased containers from economic activity CCM 6.10 “Sea and coastal freight water transport, vessels for port operations and auxiliary activities”, is included in the CapEx KPI numerator.

Economic activity CCM 6.16 “Infrastructure enabling low carbon water transport” also considers investments in port terminals, including concessions and customer base (for company acquisitions) and land, infrastructure and equipment for the loading, unloading and handling of goods (gantry cranes, portal cranes, straddle carriers or reach stackers, as well as forklifts and heavy goods vehicles). Economic activity CCM 6.6 includes all investments in property, plant and equipment and right-of-use assets, mainly trucks and chassis.

The taxonomy-eligible CapEx amounted to EUR 4,619.5 million or 98.9% (previous year: EUR 3,221.5 million or 97.2%) of Group CapEx. These are mainly (EUR 4,517.1 million or 96.7% of Group capital expenditure) related to economic activity CCM 6.10 (category a and b). In addition, EUR 10.5 million or 0.2% of Group CapEx relates to the economic activity CCM 6.6, which was newly added during the reporting year, and EUR 59.0 million or 1.3% of Group capital expenditure relates to economic activity CCM 6.16 (category a). CapEx amounting to EUR 32.9 million or 0.7% (previous year: EUR 261.5 million or 7.9%) of Group CapEx associated with the acquisition of production from various taxonomy-eligible economic activities, particularly the acquisition or leasing of buildings and vehicles (economic activities CCM 6.5, 7.2 and 7.7 (category c)), is also included.

To prevent double counting, CapEx with regard to vessels was not taken into account again for economic activity CCM 6.12 “Retrofitting of sea and coastal freight and passenger water transport”.

Within economic activity CCM 6.10, CapEx can always be directly attributed to an individual vessel. CapEx on containers cannot be clearly allocated to individual vessels and is therefore always taken into account on a proportionate basis using a distribution key based on the quantities actually transported per vessel.

CapEx with regard to vessels that meet the technical screening criteria for economic activity CCM 6.10 and the proportionate capital expenditure on containers amounted to EUR 1,425.4 million or 30.5% (previous year: EUR 639.0 million or 19.3%) of Group CapEx. As already explained, no assessment was conducted regarding taxonomy alignment for economic activity CCM 6.6 and CCM 6.16.

Plans to expand taxonomy-aligned economic activities include investing in the construction and acquisition of twelve 23,664 Twenty-Foot Equivalent Unit (TEU) dual-fuel container vessels. Three of these vessels were already completed and delivered in the 2023 financial year and a further seven in the 2024 financial year. The rest of the vessels will be delivered 2025 and are to be subsequently used for economic activity CCM 6.10. Investments in 24 further highly efficient dual-fuel and ammonia-powered container ships ordered in the 2024 financial year, are also included. This involves the construction of 12 newbuilds with a capacity of 16,800 TEU each and further 12 vessels with a capacity of 9,200 TEU each. The vessels will be delivered in the years 2027 to 2029. In addition, a contract was signed in 2024 for the conversion of five 10,100 TEU vessels to methanol propulsion and the installation of new propellers. This measure is scheduled to begin in 2026.

CapEx in 2024 for vessels that are expected to make a substantial contribution to “Climate change mitigation” and meet the relevant DNSH criteria when they enter service amounts to EUR 258.4 million or 5.5% (previous year: EUR 214.8 million or 6.5%) of Group CapEx, which are considered as taxonomy-aligned. The expected total CapEx throughout the term of the two CapEx plans is around EUR 6.0 billion.

CapEx on the acquisition of production from economic activity CCM 6.12 which complies with the technical screening criteria of this economic activity amounted to EUR 0.0 million or 0.0% (previous year: EUR 43.6 million or 1.3%) of Group CapEx. To avoid double counting, only CapEx on vessels that do not meet the technical screening criteria for economic activity CCM 6.10 was taken into account.

As Hapag-Lloyd meets the minimum safeguards since 2024 the taxonomy-aligned CapEx amounts to EUR 1,683.8 million or 36.0% (previous year: EUR 214.8 million or 6.5%) of Group CapEx.

For the template for the "CapEx" KPI refer to section Overview of Revenue, CapEx and OpEx in accordance with the Taxonomy Regulation.

2.1.10. OpEx KPI

Definition and reconciliation

The OpEx KPI is defined as taxonomy-eligible or taxonomy-aligned OpEx (numerator) divided by total taxonomy OpEx (denominator).

Total taxonomy OpEx consists of direct, non-capitalised costs related to research and development, building renovation measures, short-term leasing, maintenance and repair and all other direct expenses associated with the day-to-day maintenance of property, plant and equipment. This includes:

- Expenses for research and development which were recognised as expenses on the income statement in the reporting period. In accordance with the consolidated financial statements (IAS 38.126), these comprise all non-capitalised expenses that are directly assigned to research and development activities.
- The volume of non-capitalised leases was calculated in accordance with IFRS 16 and includes expenses for short-term leases and low-value leases (see Section "Other Notes/(29) Leasing" of the Annual Report 2024). Even though low-value leases are not explicitly mentioned in the Art. 8 Delegated Act, the legislation was interpreted in such a way that these leases are to be included.
- Maintenance and repair costs and other direct expenses associated with the day-to-day maintenance of property, plant and equipment were calculated on the basis of the nominal accounts as per the general ledger. The corresponding expenses can be found in the income statement both in transport expenses and in the other operating result. The maintenance and repair costs also include expenses for building renovation measures.

The OpEx taken into account usually include costs for services and material costs for day-to-day maintenance as well as for regular and unplanned maintenance and repair measures. These costs are directly allocated to property, plant and equipment.

The OpEx taken into account do not include expenses for the day-to-day operation of property, plant and equipment, such as expenses for fuel, handling & haulage and personnel expenses. Direct costs for training and other adaptation requirements for employees are not included in either the denominator or the numerator. The reason for this is that Annex I of the Art. 8 Delegated Act only lists these costs in the numerator, which does not allow for a mathematically reasonable calculation of the OpEx KPI.

Like the CapEX KPI numerator, the OpEx KPI numerator is comprised of categories a) to c) of taxonomy-eligible or taxonomy-aligned OpEx. The relevant explanations regarding the categories of taxonomy-eligible or taxonomy-aligned CapEx apply accordingly in regard to OpEx.

Reporting

In the 2024 financial year, total taxonomy OpEx in the Hapag-Lloyd Group amounted to EUR 1,182.7 million (previous year: EUR 1,065.3 million).

The taxonomy-eligible OpEx amounted to EUR 1,041.1 million or 88.0% (previous year: EUR 915.4 million or 85.9%) of Group taxonomy OpEx. These are mainly (EUR 889.2 million or 75.2%) related to economic activity CCM 6.10 "Sea and coastal freight water transport, vessels for port operations and auxiliary activities" (category a). In addition, EUR 21.4 million or 1.8% of Group OpEx relates to economic activity CCM 6.16 (category a). OpEx amounting to EUR 130.5 million or 11.0% (previous year: EUR 124.1 million or 11.6%) of Group OpEx associated with the acquisition of production from various taxonomy-eligible economic activities, particularly upgrading, the acquisition or leasing of buildings and vehicles, and data hosting and related activities (economic activities CCM 6.5, 7.2, 7.7 and 8.1) (category c), are also included. Of this, EUR 116.7 million or 9.9% was generated by the economic activity CCM 8.1 Data processing, hosting and related activities' (previous year: EUR 110.2 million or 10.3%).

To avoid double counting, operating expenses with regard to vessels were not taken into account again for economic activity CCM 6.12 "Retrofitting of sea and coastal freight and passenger water transport".

OpEx with regard to vessels that meet the technical screening criteria for economic activity CCM 6.10 amounted to EUR 261.2 million or 22.1% of Group OpEx.

As already explained, no assessment was conducted regarding taxonomy alignment for economic activity CCM 6.6 and CCM 6.16.

As Hapag-Lloyd is able to demonstrate compliance with the minimum safeguards since 2024, the actual taxonomy-aligned OpEx are EUR 261.2 million or 22.1% (previous year: EUR 0.0 million or 0.0%) of the Group OpEx.

For the template for the "OpEx" KPI refer to section Overview of Revenue, CapEx and OpEx in accordance with the Taxonomy Regulation.

2.1.11. Overview of Revenue, CapEx and OpEx in accordance with the Taxonomy Regulation

Revenue

Financial year 2024	2024			Substantial contribution criteria		
Economic Activities	Code (a)	Turnover	Proportion of Turnover, year 2024	Climate Change Mitigation	Climate Change Adaptation	Water
(1)	(2)	(3)	(4)	(5)	(6)	(7)
		EUR million	%	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)
A. TAXONOMY-ELIGIBLE ACTIVITIES						
A.1. Environmentally sustainable activities (Taxonomy-aligned)						
Sea and coastal freight water transport, vessels for port operations and auxiliary activities	CCM 6.10	2,682.0	14.0%	Y	N/EL	N/EL
Environmentally sustainable activities (Taxonomy-aligned)		2,682.0	14.0%	14.0%	–	–
Of which enabling		–	–	–	–	–
Of which transitional		2,682.0	14.0%	14.0%		
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)
Transport of goods by road	CCM 6.6	18.3	0.1%	EL	N/EL	N/EL
Sea and coastal freight water transport, vessels for port operations and auxiliary activities	CCM 6.10	16,044.0	83.9%	EL	N/EL	N/EL
Infrastructure enabling low carbon water transport	CCM 6.16	184.4	1.0%	EL	N/EL	N/EL
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)		16,246.7	85.0%	85.0%	–	–
A. Turnover of Taxonomy-eligible activities (A.1. + A.2.)		18,928.7	99.0%	99.0%	–	–
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES						
Turnover of Taxonomy non-eligible activities (B)		183.1	1.0%			
Total		19,111.8	100.0%			

Substantial contribution criteria			DNSH criteria ("Does Not Significantly Harm") (h)										Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) turnover, year 2023	Category enabling activity	Category transitional activity
Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum Safeguards						
(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)			
Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T			
N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	-	T			
-	-	-	Y	Y	Y	Y	Y	Y	Y	Y	-				
-	-	-									-	E			
			Y	Y	Y	Y	Y	Y	Y	Y	-		T		
EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%				
N/EL	N/EL	N/EL	N	N	N	N	N	N	N	Y	-				
N/EL	N/EL	N/EL	N	N	N	N	N	N	N	Y	99.0%				
N/EL	N/EL	N/EL	N	N	N	N	N	N	N	N	0.6%				
-	-	-									99.6%				
-	-	-									99.6%				

CapEx

Financial year 2024	2024			Substantial contribution criteria		
	Code (a)	CapEx	Proportion of CapEx, year 2024	Climate Change Mitigation	Climate Change Adaptation	Water
(1)	(2)	(3)	(4)	(5)	(6)	(7)
		EUR million	%	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)
A. TAXONOMY-ELIGIBLE ACTIVITIES						
A.1. Environmentally sustainable activities (Taxonomy-aligned)						
Sea and coastal freight water transport, vessels for port operations and auxiliary activities	CCM 6.10	1,683.8	36.0%	Y	N/EL	N/EL
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1.)		1,683.8	36.0%	36.0%	–	–
Of which enabling		–	–	–	–	–
Of which transitional		1,683.8	36.0%	36.0%		
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	0.5	–	EL	N/EL	N/EL
Transport of goods by road	CCM 6.6	10.5	0.2%	EL	N/EL	N/EL
Sea and coastal freight water transport, vessels for port operations and auxiliary activities	CCM 6.10	2,833.2	60.6%	EL	N/EL	N/EL
Retrofitting of ships for the transport of passengers and goods in maritime and coastal shipping	CCM 6.12	–	–	EL	N/EL	N/EL
Infrastructure enabling low carbon water transport CCM	CCM 6.16	59.0	1.3%	EL	N/EL	N/EL
Renovation of existing buildings	CCM 7.2	8.1	0.2%	EL	N/EL	N/EL
Acquisition and ownership of buildings	CCM 7.7	24.3	0.5%	EL	N/EL	N/EL
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)		2,935.7	62.8%	62.8%	–	–
A. CapEx of Taxonomy-eligible activities (A.1. + A.2.)		4,619.5	98.9%	98.8%	–	–
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES						
CapEx of Taxonomy non-eligible activities (B)		52.3	1.1%			
Total		4,671.9	100.0%			

Substantial contribution criteria			DNSH criteria ("Does Not Significantly Harm") (h)								Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) CapEx, year 2023	Category enabling activity	Category transitional activity
Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum Safeguards				
(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	
Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T	
N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	6.5%		T	
–	–	–	Y	Y	Y	Y	Y	Y	Y	6.5%			
–	–	–								–	E		
			Y	Y	Y	Y	Y	Y	Y	6.5%		T	
EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	Y	0.1%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	Y	–			
N/EL	N/EL	N/EL	N	N	N	N	N	N	Y	65.7%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	Y	1.3%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	N	17.2%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	Y	0.3%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	Y	6.2%			
–	–	–								90.7%			
–	–	–								97.2%			

OpEx

Financial year 2024	2024			Substantial contribution criteria		
	Code (a)	OpEx	Proportion of OpEx, year 2024	Climate Change Mitigation	Climate Change Adaptation	Water
(1)	(2)	(3)	(4)	(5)	(6)	(7)
		EUR million	%	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)
A. TAXONOMY-ELIGIBLE ACTIVITIES						
A.1. Environmentally sustainable activities (Taxonomy-aligned)						
Sea and coastal freight water transport, vessels for port operations and auxiliary activities	CCM 6.10	261.2	22.1%	Y	N/EL	N/EL
OpEx of environmentally sustainable activities (Taxonomy-aligned)		261.2	22.1%	22.1%	–	–
Of which enabling		–	–	–	–	–
Of which transitional		261.2	22.1%	22.1%		
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)				EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	4.2	0.4%	EL	N/EL	N/EL
Sea and coastal freight water transport, vessels for port operations and auxiliary activities	CCM 6.10	628.1	53.1%	EL	N/EL	N/EL
Infrastructure enabling low carbon water transport	CCM 6.16	21.4	1.8%	EL	N/EL	N/EL
Renovation of existing buildings	CCM 7.2	7.7	0.6%	EL	N/EL	N/EL
Acquisition and ownership of buildings	CCM 7.7	1.9	0.2%	EL	N/EL	N/EL
Data processing, hosting and related activities	CCM 8.1	116.7	9.9%	EL	N/EL	N/EL
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)		780.0	65.9%	65.9%	–	–
A. OpEx of Taxonomy-eligible activities (A.1. + A.2.)		1,041.1	88.0%	88.0%	–	–
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES						
OpEx of Taxonomy non-eligible activities (B)		141.5	12.0%			
Total		1,182.7	100.0%			

Substantial contribution criteria			DNSH criteria ("Does Not Significantly Harm") (h)								Proportion of Taxonomy-aligned (A.1.) or -eligible (A.2.) OpEx, year 2023	Category enabling activity	Category transitional activity
Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate Change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Minimum Safeguards				
(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)	
Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y; N; N/EL (b) (c)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T	
N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	–		T	
–	–	–	Y	Y	Y	Y	Y	Y	Y	–			
–	–	–								–	E		
			Y	Y	Y	Y	Y	Y	Y	–		T	
EL; N/EL (f)	EL; N/EL (f)	EL; N/EL (f)	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	Y	0.6%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	Y	73.5%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	N	0.8%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	Y	0.6%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	Y	0.1%			
N/EL	N/EL	N/EL	N	N	N	N	N	N	Y	10.3%			
–	–	–								85.9%			
–	–	–								85.9%			

2.1.12. Nuclear and fossil gas related activities

Nuclear energy related activities		
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

2.2. Climate change (E1)

The increasing frequency of extreme meteorological events, which affect millions of people around the globe, as well as the record temperatures observed in 2024 and previous years highlight the importance of addressing climate change.

In 2024, Hapag-Lloyd took a notable step forward in its commitment to climate change mitigation launching its updated decarbonisation strategy as part of the updated corporate “Strategy 2030”, aiming to become a Sustainability Driver and that the operation of the vessel fleet in the Liner Shipping segment is compatible with limiting global warming.

The Company has defined a target to reduce absolute GHG emissions of its fleet operations to 10 million metric tons of carbon dioxide equivalent (t CO₂e) by 2030. This represents a reduction of approximately one third or 5.6 million t CO₂e compared to 2022. Furthermore, a relative target had been established to decrease the AER by more than 50% against the same base year, with the goal of achieving a target AER of 4.3g CO₂e/DWTnm. According to the independent technical assessment of Det Norske Veritas (DNV), this strategy is aligned with the 1.5 °C global warming limit and underscores the commitment to reaching net-zero GHG emissions by 2045. According to DNV the targets are consistent with the 1.5 °C global warming limit at medium confidence level and the identified decarbonisation levers are suitable and sufficient to achieve the targets.

In 2024, the fleet-related GHG emissions reached 17.7 million t CO₂e, representing an increase of 2.1 million t CO₂e compared to 2022. This increase can be primarily attributed to the significant growth of the fleet, with a 31% expansion in standing capacity as of 31 December 2024, compared to 31 December 2022. Combined with re-routings to avoid the Suez Canal during the Red Sea crisis this resulted in a 30% increase in transport work in 2024 compared to 2022.

Notwithstanding these challenges, progress had been made in improving the vessels' efficiency, as reflected in the AER, which decreased by 13% to 7.96 in 2024 compared to 9.13 in 2022. This translates into an equivalent GHG reduction of 2.6 million t CO₂e assuming a constant level of transport work. This positive trend is also evident when compared to 2023, with a 2% reduction from 8.14. These developments demonstrate the Company's commitment to reducing its environmental footprint and achieving the ambitious climate goals. In order to meet the Company's 2030 targets, an additional reduction of approximately 3.7 in AER is necessary to attain the target level of 4.3, as well as a GHG emission reduction of 7.7 million t CO₂e, which will enable Hapag-Lloyd to reach the goal of 10 million t CO₂e by 2030, excluding the impact of potential future growth due to the inherent uncertainty associated with such projections.

2.2.1. Material impacts, risks and opportunities (E1 IROs)

For Hapag-Lloyd, the highest number of environmental risks, identified through its materiality analysis, relate to the topic of climate change and the implications of the Company's corporate mitigation and climate change adaptation. It is a material topic, part of the corporate strategy agenda and the Company conducted a thorough examination of the impacts, risks and opportunities identified, as well as those risks and opportunities that may result from the implementation of corresponding measures.

[\(E1-1 17\)](#) The Company is actively advancing the development of a comprehensive transition plan, which shall provide a detailed roadmap for the climate change mitigation strategy, outlining both current initiatives and future ambitions. The document is expected to be published in 2026, marking an important step forward in the pursuit to achieving a decarbonised business model.

[\(E1 IRO-1 20 a, AR 9 AR 10\)](#) Through the process of identifying material impacts on climate change, Hapag-Lloyd identified both actual and potential impacts in its own operations as well as across the upstream and downstream value chain. No additional screening for a specific site or asset was conducted, as the location-specific CRVA has been carried out. In the DMA, it was deemed essential to screen the potential impacts for business activities related to climate change on a broader level.

Material IROs related to energy, climate change mitigation and climate change adaptation

- **[Actual negative impact] Contribution to global warming through direct and indirect GHG emissions**
Activities in Hapag-Lloyd's own operations as well as upstream and downstream value chain have an adverse impact on climate change mitigation by causing direct and indirect emissions.
- **[Actual negative impact] Continued reliance on fossil fuel-based technologies**
The continued reliance on fossil fuel-based technologies due to the lack of technologically and economically feasible alternatives adversely affects the transition to a climate neutral society.
- **[Potential positive impact] Researching alternative methods of fuel, propulsion and efficiency technologies**
By adopting innovations and investing in research for sustainable transportation, Hapag-Lloyd drives the technological status quo forward and can accelerate the industry-wide decarbonisation.
- **[Risk] Decreased profitability as a consequence of non-achieved decarbonisation targets**
The failure to meet decarbonisation targets and regulatory requirements can result in reputation losses, the inability to address the rising demand for green shipping as well as increased capital costs and legislative fines – ultimately resulting in a lowered profitability.
- **[Risk] Allocating research and investments resources improperly**
Investments into new vessels can carry a financial risk due to the high investment costs and long delivery period of several years posing the risk of not meeting regulatory requirements for GHG emission reductions in time.

Material IROs related to energy, climate change mitigation and climate change adaptation

- **[Risk] Rising volatility in customer demand for environmentally friendly/sustainable transport solutions**
 Hapag-Lloyd faces a potential risk if customer demand for sustainable products is limited, which may hinder the Company's ability to invest into reducing greenhouse gas emissions, if customers are not willing to pay a premium for decarbonization efforts.
- **[Risk] Rising costs for environmentally friendly logistics services of suppliers**
 Hapag-Lloyd is exposed to a risk of increased costs for pre-carriage and on-carriage services due to potential price hikes from business partners for environmentally friendly transportation options (for example electric vehicles) which may be passed on to Hapag-Lloyd.
- **[Risk] Increasing pressure through climate-related regulations**
 Increasing pressure through climate-related regulations poses a risk to Hapag-Lloyd, as stricter legal liabilities such as emissions certificate trading requirements can cause rising costs and increased bureaucratic effort.
- **[Risk] Rising costs due to higher energy prices**
 Higher cost of logistics, caused by higher energy and fuel prices, might lead to lower customer demand of products.
- **[Opportunity] Contributing to a successful climate-neutral transformation of the shipping industry through partnerships**
 By leveraging strategic partnerships and collaborations within the industry, Hapag-Lloyd can support the development of innovative solutions for decarbonization, thereby enabling the Company to offer competitive low-carbon transport solutions and enhancing brand value.
- **[Opportunity] Researching alternative methods of fuel, propulsion and efficiency technologies**
 Investing in energy efficiency, digitalized route optimization, and alternative fuels can yield cost savings, boost operations, and enhance brand value.
- **[Risk] Increasing occurrence of extreme weather events**
 Hapag-Lloyd may face the risk of extreme weather events as a consequence of climate change, potentially leading to disruptions of business operations.

2.2.2. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

(E1 SBM-3 18) In light of the potential risks associated with this material topic, Hapag-Lloyd has identified specific climate-related risks, which further demonstrate the importance of a proactive approach to risk management and mitigation. (E1 SBM-3 19 b AR 7a, AR 13) Based on these risks identified in the DMA, Hapag-Lloyd conducted a CRVA in 2024. Building on the results from the CRVA, a resilience analysis was carried out to examine the resilience of the Company's business model and strategy. Material physical risks resulting from the following climate hazards were identified for certain locations: Coastal erosion, sea level rise, heavy rainfall, storms and forest and wildfires, all referring to certain locations of the Company's business sites. On the regional level, potential overarching physical risks were highlighted. No material transition risks were identified from the 17 transition events that have been considered.

Material risks on specific locations (Physical risks)

- Coastal erosion for 9 locations
- Sea level rise for 1 location
- Heavy rain for 4 locations
- Storm for 5 locations
- Wildfire for 1 location

Material risks on regions (Physical risks)

- Drought within 6 regions
- Heat wave within 1 region
- Changing precipitation patterns and types within one region
- Heavy precipitation within 1 region
- Cold/wave frost within 1 region
- Precipitation or hydrological variability within one region
- Wildfire within 1 region
- Glacial lake outburst within 1 region
- Flood within 2 regions

(E1 SBM-3 19 b AR 7a, AR 13) Implications of identified risks were assessed from a financial, regulatory and market perspective. While no material transition risks have been identified throughout the climate risk assessment, implications of transition events are considered in the overall context. Hapag-Lloyd is organised internally to deal with transitory challenges that do not represent a risk at the present time. (E1 SBM-3 19 a AR 6, AR 1) The completed CRVA was followed by the resilience analysis, which was conducted in the same scope, considering the identified risks in order to examine the resilience of the Company's business model and strategy. (E1 SBM-3 19b AR 7 b) In alignment with Hapag-Lloyd's Strategy 2030 and its intermediate decarbonisation target, 2030 has been chosen as the time horizon applied in the resilience analysis. The baseline applied is the 1.5 degree scenario.

Results of resilience analysis and adaptation measures

(E1 SBM-3 19 c AR 8a, AR 13) Hapag-Lloyd's conclusion from the resilience analysis is that its strategy and business model demonstrate adaptability and resistance to climate-related risks, enabling the Company to navigate potential disruptions. Material physical risks are primarily associated with office locations and terminals, which are being proactively addressed through climate change adaptation initiatives within the specific area. As key assets, Hapag-Lloyd's vessels and containers demonstrate substantial resilience against climate-related hazards, meaning the company is relatively unaffected by potential physical climate risks. Exemplary actions include Hapag-Lloyd's active development of green shipping solutions to meet the future demand for low-carbon products.

Solutions like Ship Green offer Hapag-Lloyd's customers low-emission transports via usage of alternative/low carbon fuels in the Company's fleet operations. By using these low carbon fuels the GHG emission savings compared to operations on fuel-oil can be allocated to the customers transports.

Challenges are anticipated in matching the demand for green shipping with supply of alternative fuels. These challenges circumvent competition for alternative fuels and their technical deployment. Yet, measures are already in place to address these concerns and establish flexibility in the adoption of alternative fuel sources.

(E1 SBM-3 AR 8b) Moreover, the vessels possess the ability to adjust in light of climate change, as they undergo regular retrofits through the Fleet Upgrade Program (FUP) to enhance energy efficiency and meet decarbonisation targets. All fossil-fuel-powered vessels can in principle operate on specific alternative fuels or can be retrofitted to run on alternative fuels, allowing flexibility to

adapt to regulatory or market changes. Additionally, the Company's newbuild vessels comply with the EEDI of the IMO and alternative fuels such as liquefied gas, methanol or ammonia are actively being explored for future use in Hapag-Lloyd's fuel mix.

The Company can issue financial instruments such as sustainability-linked bonds under the Poseidon Principles framework. These instruments enable sustainable investments in the maritime shipping sector, facilitating access to financing. Hapag-Lloyd actively communicates its decarbonisation targets to the investment community and key stakeholders, ensuring transparency and alignment with its strategic goals.

Looking ahead, Hapag-Lloyd plans to increase the share of alternative fuels in their fleet operations in order to meet regulatory requirements, customer demand and reach its strategic targets. Long-term contracts can support a secure supply of alternative fuels necessary to meet this demand. The Company engages in proactive dialogue with its major customers, keeping them informed about the range of sustainable shipping solutions available, and supporting their own sustainability goals.

Process description of CRVA

(E1 IRO-1 20 b AR 13-AR 14) When assessing climate-related physical risks, the Company's key locations, including terminals, shipping lanes, and offices, were prioritised based on their economic significance to the company. Using the Commission Delegated Regulation (EU) 2021/2139 hazard classification, Hapag-Lloyd's exposure to climate-related hazards was evaluated under three scenarios (Shared Socioeconomic Pathway (SSP) 1-2.6, SSP2-4.5, SSP5-8.5) and three time horizons using 20 climate models. Climate scenarios used comply with information provided by the IPCC. The analysis included a differentiation in acute and chronic climate-related hazards. 60 specific locations were tested against their exposure to climate-related hazards. The climate risk assessment is limited due to the absence of evaluations for cyclone exposure, glacial lake outbursts, and ocean acidity resulting from a limited scope offered by the service provider used. Additionally, data availability gaps were identified for landslides, coastal erosion, and subsidence. Due to the mobility of vessels, such assets were not part of the location-based risk assessment. It was therefore expanded by an analysis on a regional level to identify implications for Hapag-Lloyd's transport routes. The following geographical regions were considered in the assessment: Africa, Asia, Australasia, Central & South America, Europe and North America. For climate-related hazards, risk potential was determined along the dimensions of health, environment, and finance. In the regional assessment, climate-related hazards were evaluated based on the scenario Representative Concentration Pathway (RCP) 8.5, corresponding to SSP5-8.5.

(E1 IRO-1 AR 11 a AR 13-AR 14) For offices, own terminals and major shipping lanes, the Company identified climate-related hazards over short, medium and long-term time horizons. For vessels and upstream and downstream value chain activities no differentiation in short, medium and long-term time horizons was made. *(E1 IRO-1 AR 11 a AR 13-AR 14)* By assessing locations and their corresponding assets, Hapag-Lloyd screened for an exposure of its business activities towards climate-related hazards.

[\(E1 IRO-1 AR 11 b AR 13-AR 14\)](#) For the context of the physical climate risk assessment, the short-term horizon is defined as the period from 2015 until 2044. The medium-term horizon encompasses 2035 until 2064, while the long-term horizon extends until 2099. The overlap from the short-term and medium-term horizon originates from the methodological approach selected by the external service provider, aiming to deliver accurate results. The time horizons used in the assessment constitute a deviation from standard time horizons as defined in ESRS 1 paragraph 77. This deviation is deemed necessary to reflect the risk exposure to climate hazards impacting the shipping industry in the long term as well, leading to an improved risk awareness and the possibility to adapt in time.

[\(E1 IRO-1 AR 11 c AR 13-AR 14\)](#) The assessment of locations considered basic vulnerabilities such as building type and elevation level, while additional precautionary measures such as flood walls were also taken into consideration at a later stage. Exposure of physical locations was assessed using a risk scale ranging from zero to three. While a risk rating of zero constitutes a negligible exposure, a rating of three indicates a material exposure to climate-related hazards. Locations were specified by geospatial coordinates using longitude and latitude information. As described, the exposure of vessels as well as of inland transport carriers as part of the supply chain was covered in the regional assessment due to their mobility. Major shipping lanes like the Suez Canal and Panama Canal were included due to their significant economic relevance. Since Hapag-Lloyd operates globally, all regions were in scope of this analysis. [\(E1 IRO-1 AR 11 d AR 13-AR 14\)](#) Ensuring a well-founded assessment reflecting challenging developments in climate change, the high-emission scenario SSP5-8.5 (corresponding to RCP-8.5) was included in the climate risk assessment, assuming a fossil-fuelled development.

[\(E1 IRO-1 21 AR 13-AR 14\)](#) For each of the 60 locations analysed in the location-specific assessment, a screening identified whether material climate-related hazards exist. In case a significant hazard is found under any climate scenario and in any of the time horizons, the location is deemed at risk. This conservative approach ensures that physical risks are thoroughly accounted for. [\(E1 IRO-1 20 c AR 13-AR 14\)](#) During the process of identifying climate-related transition risks, Hapag-Lloyd assessed its exposure against transition events across its own operations and along its entire value chain. Climate-related transition risks were assessed based on a list of transition events, tailored for Hapag-Lloyd and the maritime shipping sector.

[\(E1 IRO-1 AR 12 b AR 13-AR 14\)](#) A pre-assessment compiled a shortlist of transition events covering the four dimensions Policy & Legal, Market, Technology, and Reputation dimensions provided by the Task Force on Climate-Related Financial Disclosures (TCFD). These events were selected based on their relevance for Hapag-Lloyd and the maritime shipping industry.

[\(E1 IRO-1 AR 12 a AR 13-AR 14\)](#) Interviews with internal experts from five distinct departments were conducted to examine key transition events. These discussions focused on time horizons, both current and anticipated impacts on the Company's operations, existing mitigation strategies, and the exposure of various asset types. The identified events were categorised across short, medium, and long-term timeframes, reflecting a comprehensive assessment of their potential influence on the organisation's strategic objectives. [\(E1 IRO-1 AR 12 c AR 13-AR 14\)](#) The identification of

transition events was informed by a scenario consistent with the Paris Agreement and limiting climate change to 1.5°C, as all transition events were discussed under the premise of Hapag-Lloyd's commitment to its 1.5°C aligned decarbonisation activities. By aiming to achieve net-zero GHG emissions by 2045, the future transition plan intends to cover emissions from vessel operations from Hapag-Lloyd's Liner Shipping segment that are consistent with the objective in Regulation (EU) 2021/1119 (European Climate Law) of achieving climate neutrality by 2050 with no or limited overshoot established.

(E1 IRO-1 21 AR 13-AR 14) Based on expert interviews, potential transition risks and opportunities were identified under a scenario consistent with a 1.5 degree target in line with the Paris Agreement. Apart from that, different scenarios were not considered while identifying transition risks. If a significant exposure to a transition event is found in any of the time horizons, the transition risk is considered material. *(E1 IRO-1 AR 15 AR 13-AR 14)* Further information on financial information can be found in section E1-3.

2.2.3. Policies related to climate change mitigation and adaptation (E1-2)

(E1-2 24) All the IROs, which are directly related to the decarbonisation efforts and target of the fleet, are managed through Hapag-Lloyd's implemented Strategy 2030. Besides, Hapag-Lloyd has not established a particular climate change policy that encompasses all material indirect risks and opportunities IROs identified. *(E1-2 25 AR 16-AR 18)* Climate change mitigation is one of the focus topics of Hapag-Lloyd's Strategy 2030, while climate change adaptation, energy efficiency beyond vessel optimisation, renewable energy deployment and other related areas are not explicitly addressed within the strategy's scope.

IRO	Policy: Strategy 2030
[Actual negative impact] Contribution to global warming through direct and indirect GHG emissions	X
[Actual negative impact] Continued reliance on fossil fuel-based technologies	
[Potential positive impact] Researching alternative methods of fuel, propulsion and efficiency technologies	X
[Risk] Decreased profitability as a consequence of non-achieved decarbonisation targets	X
[Risk] Allocating research and investments resources improperly	
[Risk] Rising volatility in customer demand for environmentally friendly/sustainable transport solutions	X
[Risk] Rising costs for environmentally friendly logistics services of suppliers	
[Risk] Increasing pressure through climate-related regulations	X
[Risk] Rising costs due to higher energy prices	
[Opportunity] Contributing to a successful climate-neutral transformation of the shipping industry through partnerships	X
[Opportunity] Researching alternative methods of fuel, propulsion and efficiency technologies	X
[Risk] Increasing occurrence of extreme weather events	

(E1 MDR-P 65 a) As one of the five key pillars within the Strategy 2030, Hapag-Lloyd sets out its approach to addressing IROs in relation to decarbonisation of the fleet operations, which is a key strategic goal. It sets a GHG reduction target for 2030 and for achieving net-zero GHG emissions

for the container vessel fleet by 2045. In particular, IROs related to effective GHG emission reduction are effectively managed through the implementation of the strategy that is carried out by multiple departments.

Strategy 2030	Description of policy
(E1 MDR-P 65 a) Process for monitoring	The progress of the decarbonisation strategy is monitored by the Executive Board on a quarterly basis. The actual performance against the target is reported based on absolute CO ₂ e emissions and AER as part of the Strategy 2030 dashboard on a monthly basis. The KPIs are derived from live vessel performance data. Furthermore the expected performance is continuously being reviewed as part of the corporate budget and forecast processes.
(E1 MDR-P 65 b) Scope	The provisions of the Strategy 2030 apply to all of Hapag-Lloyd, with the climate change commitment currently covering the liner shipping activities of Hapag-Lloyd's own fleet.
(E1 MDR-P 65 c) Most senior level in organisation that is accountable for implementation of policy	Senior Managing Director Regulatory Affairs & Sustainability
(E1 MDR-P 65 d) Third-party standards or initiatives that are respected through implementation of policy	<ul style="list-style-type: none"> • 1.5 Degree Paris Agreement • DNV 1.5 °C Initiative – Decarbonization Trajectories for the Shipping Industry
(E1 MDR-P 65 e) Description of consideration given to interests of key stakeholders in setting policy	A Global Strategy Summit was conducted to achieve an alignment of the most relevant stakeholders of the Company Prior to this meeting Challenger Sessions with respective senior management were held which included their view on customers' perspectives. Development of the strategy was furthermore based on customer insights, stakeholder interviews and user experience research.
(E1 MDR-P 65 f) Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it	Summaries of the Strategy 2030 and relevant elements are also available on both the Hapag-Lloyd Intranet and publicly on the website.

(E1 MDR-P ESRS 2 62) Hapag-Lloyd is actively working on expanding its policies to also cover IROs beyond its Strategy 2030. The Company plans to introduce a dedicated policy for these IROs in due course, further strengthening its commitment to responsible and sustainable operations. Nevertheless, many of the identified risks are managed as part of its general business risks through established risk management processes. With respect to the general adherence of quality and environmental standards within the business operations, the QEM includes an established manual within the Liner Shipping segment.

2.2.4. Actions and resources in relation to climate change policies (E1-3)

(E1-3 28) As explained at the beginning of this chapter, Hapag-Lloyd has defined a decarbonisation target for its fleet operations. In order to achieve the set target, a comprehensive set of measures have been formulated and implemented. (E1 ESRS 2 62) Currently, the emission reduction target and its corresponding actions are focusing on the Liner Shipping segment. The possibilities and opportunities for implementing additional actions that extend beyond the current scope, as well as addressing other climate-change related IROs are intended to be evaluated annually by the relevant departments as part of the governance process.

Decarbonisation action plan

(MDR-A 68a) As part of the comprehensive action plan on efficiency levers, different measures to improve efficiency of individual vessels are conducted. All retrofitting actions are bundled in its **FUP** which ensures that existing container vessels are contributing to the achievement of Hapag-Lloyd's climate change mitigation target. Hapag-Lloyd expects the measures listed to limit Scope 1 and Scope 3.3 GHG emissions associated with its core business activity of container shipping. The installation of new propellers, improved coatings, new flow-optimised, bulbous bows and engine optimisation all increase the fuel efficiency of the vessels. By extending the lashing bridge system, the loadability of the vessels increases the utilisation of the deadweight tonnage (DWT) as well as the transport options for empty containers. As of 31 December 2024, 109 vessels have undergone fleet upgrades since the inception of FUP in 2022 – thereof, 43 vessels in 2024. Inter alia, Hapag-Lloyd celebrated the completion of the 50th propeller retrofit in Q3 2024.

The “**Fleet Growth & Renewal**” initiative also contributes to the efficiency levers by proactively addressing the potential emission impacts from the expansion of Hapag-Lloyd's fleet. By replacing comparatively inefficient vessels with larger and more efficient vessels, including newbuilds and strategic charter tonnage, significant efficiency gains can be achieved.

The third initiative relating to efficiency levers, which is already being practised, is **network efficiency**, which makes it possible to decrease the average speed of the Company's container vessels significantly while still ensuring competitive transit times for customers. Such a so-called slow steaming leads to a reduction of fuel consumption and respectively GHG emissions.

Hapag-Lloyd is actively pursuing the adoption of **alternative fuels** to reduce the carbon footprint. Thus, the Company is preparing its vessels accordingly through investments in dual fuel newbuilds as well as propulsion retrofits of existing ships. In 2024, five dual-fuelled liquefied natural gas (LNG) vessels with a capacity of 23,664 TEU each were delivered, and another 24 dual fuel LNG newbuilds are on order for delivery in 2027–2029. Furthermore, Hapag-Lloyd marked a significant milestone by entering into an agreement with Seaspan, a Canadian vessel owner, to convert five conventionally fuelled vessels to run on sustainable green methanol. This retrofitting endeavor shall enable these vessels to seamlessly integrate into the Company's service network, further solidifying the commitment to a positive climate transition.

At the same time, Hapag-Lloyd is actively using available biofuels already today and securing future supply of alternative fuels. All biofuel that is being used for Ship Green is sourced from certified supply chains and produced from waste- or residue-based feedstock. Thus, approximately 195,000 metric tons of biofuel blends were utilised, while a project bunkering for bio-methane in Rotterdam was successfully conducted, with a total volume of 2,200 metric tons, which has been the largest ship-to-ship bunkering to date. Furthermore, a long-term supply agreement for biomethanol has been secured, with deliveries scheduled to commence in 2026 and reach full production capacity of 250,000 metric tons per annum by the fourth quarter of 2027, pending a final investment decision.

(MDR-A 68 b-e, 69a-c) Further Action Details: Decarbonisation Levers

MDR	Disclosure
(MDR-A 68b) Scope	Within the own fleet operations of Hapag-Lloyd Liner Shipping segment, the decarbonisation levers are applicable to the whole vessel fleet including charter vessels.
(MDR-A 68c) Time Horizon of completion	As part of Strategy 2030 the action is to be completed in 2030. For slow steaming and efficiency levers, individual measures in scope of this action started in 2022 and will be continuously conducted until 2030. A continuation as part of similar or additional actions beyond 2030 will be evaluated over the next years. The bunkering and burning of alternative fuels is planned as an ongoing action that reaches until 2045 and beyond.
(MDR-A 68d) Key Action for Harm Mitigation	No significant harm is caused by this action, therefore a description of key actions taken, and their results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts is not applicable.
(MDR-A 68e) Progress	In 2024, eight newbuild vessels, five of 23.7 TTEU and three (including one long-term charter vessel) of 13.3 TTEU, have entered the fleet allowing Hapag-Lloyd to upgrade services to larger and more efficient vessels in the Far East and Latin America trades. Furthermore, Hapag-Lloyd has secured approx. 500 TTEU of newbuild and strategic charter tonnage that will be delivered in the next years until 2029. Further opportunities are actively reviewed. 109 vessels have already been retrofitted as of the end of the reporting period. Fuel efficiency and loadability push measures are continuously applied across Hapag-Lloyd's whole fleet. Compared to the 2022 baseline, Hapag-Lloyd has reduced the average service speed in fleet operations in 2024. However, due to the unexpected Red Sea crisis there was a slight increase compared to 2023. Among others, approximately 195,000 metric tons of biofuel blends in 2024 were utilised, leading to a CO ₂ e reduction of approximately 158,000 metric tons.
(MDR-A 69a-c) Significant Financial Resources	<ul style="list-style-type: none"> The specified investments are reported as taxonomy-aligned CapEx for business activity 6.10 as required by Commission Delegated Regulation (EU) 2021/2178 <ul style="list-style-type: none"> Current CapEx (2024): EUR 0.83 bn Future CapEx: EUR 4.14 bn Currently, no significant OpEx are allocated to the action.
(E1-3-29a) Decarbonisation Lever Type	<ul style="list-style-type: none"> Fleet growth & renewal – invest in new, larger & more fuel efficient vessels Fleet upgrade – technical levers to reduce fuel consumption of existing fleet Network efficiency – reduce service speeds while maintaining competitive transit times Alternative fuels – optimal mix of alternative fuels
(E1-3-29b) GHG emission reduction	<ul style="list-style-type: none"> Achieved GHG emission reduction: 2.6m t CO₂e Expected GHG emission reduction: 7.7m t CO₂e <p><i>(excluding the impact of potential future growth due to the inherent uncertainty associated with such projections)</i></p>
(E1-3 AR21) Resource dependency	Continued implementation of the action is partly dependent on continued availability and allocation of resources, such as the availability of alternative fuels and capacities in the shipyards. It is a strategic element to meet market and stakeholder demand on decarbonisation efforts.
(E1-3 29 c i-iii) Financial Line Item & EU Taxonomy Relation	<ul style="list-style-type: none"> There is no relation to any other notes or line items apart from the financial resource relation described above. Part of the specified CapEx amount is reported as Taxonomy-aligned CapEx for business activity 6.10 or 6.12 as required by Commission Delegated Regulation (EU) 2021/2178.

2.2.5. Targets related to climate change mitigation and adaptation (E1-4)

(E1-4 32) It is the overall ambition of Hapag-Lloyd to achieve net-zero GHG emissions by 2045. The precise roadmap and specific actions necessary to achieve net-zero GHG emissions by 2045 remain to be determined over time and may be refined as needed. Meanwhile, the Company has set clear and ambitious targets to significantly reduce the absolute GHG emissions on a well-to-wake basis by approximately one third compared to 2022 to 10 million t CO₂e by 2030, and a relative target to decrease the AER from 9.13 in 2022 to 4.3g CO₂e/DWTnm. The tracking of the effectiveness of the policy and action to achieve these targets is carried out by the respective department and Sustainability. (E1 - MDR-T 80 a AR 24 - AR 26) It aims to support Hapag-Lloyd's ambition to become a sustainability driver in the shipping industry. The defined target within Hapag-Lloyd's climate change transition is designed to contribute to this objective.

(MDR-T 80b-j) Further target details: GHG reduction targets

MDR	2030 GHG reduction target
(MDR-T 80b) Measurable/ nature of target	Absolute target of 10 million t CO ₂ e Relative target of an AER of 4.3g CO ₂ e/DWTnm
(MDR-T 80c) Scope	Well-to-wake emissions of globally operated fleet
(MDR-T 80d) Baseline value/ year	15.6 million t CO ₂ e 9.13g CO ₂ e/DWTnm (Base year 2022)
(MDR-T 80e) Period	By 2030
(MDR-T 80f) Methodologies and assumptions	The underlying target trajectories have been developed together with DNV based on the DNV 1.5 °C model for the maritime industry. Further details are described under E1-4 33.
(MDR-T 80g) Scientific evidence	The framework is based on the growth assumptions for maritime transport used in the SSP2 climate change scenario. For the carbon budget, a medium confidence level is applied, which according to DNV serves as conclusive scientific evidence based on the IPCC Sixth Assessment Report.
(MDR-T 80h) Stakeholder involvement	Both GHG reduction targets have been discussed and developed with the involvement of the Sustainability Council, which covers the stakeholder groups of governmental agencies, NGOs as well as academia, among others.
(MDR-T 80i) Changes and limitations	Both GHG reduction targets are limited to Scope 1 and Scope 3.3 emissions of Hapag-Lloyd's fleet operations. Apart from this, no limitations are relevant and no changes in methodology have been conducted since the introduction of the GHG reduction targets.
(MDR-T 80j) Performance	The fleet-related GHG emissions in 2024 reached 17.7 million t CO ₂ e (that is, +2.1 million t CO ₂ e vs. 2022), which is largely attributable to the significant fleet growth (+31% standing capacity as per 31 December 2024 vs. 31 December 2022) and re-routings via the Cape of Good Hope due to Red Sea crisis leading to a total increase of transport work by ~30% in 2024 (vs. 2022). Further performance measured are explained within the section E1-3. At the same time, Hapag-Lloyd could significantly increase its efficiency and, thus, the relative emissions measured as AER reached 7.96 (–13% vs. 2022), which also shows a positive development compared to 2023 (–2%; 8.14).

(E1-4 33 AR 27-AR 29) The decarbonisation target is defined by using DNV's 1.5 °C initiative for carbon reduction pathways, which is a bottom-up concept, originally developed in cooperation with the Net-Zero Banking Alliance for the maritime industry. The framework is based on the growth assumption for maritime transport used in the SSP2 climate change scenario. For the carbon

budget, a medium confidence level is applied, which according to DNV serves as conclusive scientific evidence based on the IPCC Sixth Assessment Report. (E1-4 34 b) The target encompasses the well-to-wake emissions of the marine fuels used by the operated fleet, covering Scope 1 and Scope 3 Category 3 emissions. Publicly available emission factors are used, accounting for CO₂, methane and nitrous oxides. The share of the absolute target's Scope 1 emissions in total emissions was above 90% in the base year 2022, as the most accurate figure which could be referred to at that time. The share of the absolute target's Scope 3 emissions in total Scope 3 emissions in the base year is not known as no complete environmental balance for 2022 is available. (E1-4 AR 25 a,b) The base year of 2022 was chosen as it was the latest available year at the time of strategy development, without extreme covid effects, and 2023 was not yet completed during the Strategy 2030 development. The base year has not been changed since implementing the target.

(E1-4 34 e, 16 a AR 26) The alignment of Hapag-Lloyd's GHG reduction target in comparison to the "1.5°C Initiative – Decarbonisation Trajectories for the Shipping Industry" was verified by DNV. The target reference values in 2030 for the container shipping industry are 178.8 million t CO₂e for Scope 1 and 31.5 million t CO₂e for Scope 3.3. The related baseline values in 2022 are 251.2 million t CO₂e for Scope 1 and 44.3 million t CO₂e for Scope 3.3. (E1-4 AR 30 c) According to DNV, the GHG reduction targets are in line with the 1.5°C, Paris-aligned scenario, thereby eliminating the need to explore alternative climate scenarios.

(E1-4 34 f, 16 b AR 30) The individual decarbonisation levers and their overall contributions to achieving GHG emission reduction targets are outlined as part of the action disclosures in chapter E1-3.

(E1-4.34a,b,AR 23, AR 24) GHG reduction targets for Scope 1, 2 and 3 based on decarbonisation action plan

kt CO ₂ e	2030			Total
	Scope 1	Scope 2	Scope 3	
GHG emission reduction target	6,554	–	1,150	7,704

(E1-4 81, E1 ESRS 2 MDR-T 81 b i) Apart from the previously described targets Hapag-Lloyd did not set additional targets related to Scope 2 emissions or other Scope 3 emissions categories apart from category 3. Up until now, there is no target set in relation to energy efficiency related to Scope 2 or climate change adaptation. However, as described before, it is planned that the need to set expanded targets and respective actions will be regularly monitored, as well as the effectiveness of the policies set for the material IROs.

(E1 ESRS 2 MDR-T 81 b ii) In addition to the specified targets on GHG emission reduction by 2030, Hapag-Lloyd follows the ambition for net-zero GHG emissions of its container vessel fleet for the year 2045. (E1 ESRS 2 MDR-T 81 b ii 80 d) The progress in reaching the net-zero ambition for the fleet of Hapag-Lloyd's container vessels in 2045 is measured from the base year 2022.

2.2.6. Energy consumption and mix (E1-5)

The Company uses a mix of different energy sources as part of its business activities.

These are listed in the following table:

(E1-5 AR 34) Energy consumption and mix

MWh	2024
(1) Fuel consumption from coal and coal products	–
(2) Fuel consumption from crude oil and petroleum	53,040,316.4
(3) Fuel consumption from natural gas	1,058,186.9
(4) Fuel consumption other fossil sources	1,008.5
(5) Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources	4,919.7
(6) Total fossil energy consumption (calculated as the sum of lines 1 to 5)	54,104,431.5
Share of fossil sources in total energy consumption	98.8%
(7) Consumption from nuclear sources	–
Share of energy consumption from nuclear sources in total energy consumption	–
(8) Fuel consumption for renewable sources including biomass (also comprising industrial and municipal waste of biologic origin, biomass, renewable hydrogen, etc.)	579,652.5
(9) Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources ¹	76,202.7
(10) The consumption of self-generated non-fuel renewable energy	3.3
(11) Total renewable energy consumption (calculated as the sum of lines 8 to 10)	655,858.5
Share of renewable sources in total energy consumption	1.2%
Total energy consumption related to own operations (calculated as the sum of lines 6 and 11)	54,760,290.0

¹ Following the guidance of the RE100 initiative, EACs from the beginning of 2025 were used to cover retrospectively for 31.1% of 2024 own electricity consumption, as vintages of renewable electricity from the six months before the reporting period, the 12 months of the reporting period, or the three months after the reporting period can be applied.

(E1-5.39) Energy production

	2024
Non-renewable energy production (MWh)	–
Renewable energy production (MWh)	4.4

(E1-5.41) Total energy consumption from activities in high climate impact sectors

MWh	2024
Total energy consumption from activities in high climate impact sectors	54,760,290.0

(E1-5.AR 37) Energy intensity per net revenue

MWh/kEUR	2024
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors	2.9

(E1-5 42) Hapag-Lloyd operates within the high climate impact sector of water transport (NACE Code H50). (E1-5 43 AR 38) Since Hapag-Lloyd operates solely in a high climate impact sector, 100% of the net revenue disclosed in its financial statements is relevant in this context.

2.2.7. Gross Scopes 1, 2, 3 and total GHG emissions (E1-6)

(E1-6.44.AR 39, AR 46d, AR 48) **Gross Scopes 1, 2, 3; total GHG emissions; GHG emissions per scope; Scope 3 economic activities; total GHG emissions value chain (GHG Protocol)**

t CO ₂ e	Group	2024	
		Liner Shipping Segment	Terminal & Infrastructure Segment
Scope 1 GHG emissions			
Gross Scope 1 GHG emissions	15,300,306.1	15,262,925.1	37,381.0
Share of Scope 1 GHG emissions from regulated emission trading schemes	20.3%		
Scope 2 GHG emissions			
Gross location-based Scope 2 GHG emissions	20,111.7	10,991.6	9,120.0
Gross market-based Scope 2 GHG emissions ¹	1,023.0	1,023.0	–
Significant Scope 3 GHG emissions			
Gross Scope 3 greenhouse gas emissions	21,030,667.9	20,841,739.0	188,928.9
3.1 Purchased goods and services	129,272.0		
3.2 Capital goods	7,712,974.0		
3.3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	2,677,278.4		
3.4 Upstream transportation and distribution	10,225,450.4		
3.5 Waste generated in operations	5,577.2		
3.6 Business traveling	20,558.4		
3.7 Employee commuting	18,275.6		
3.11 Use of sold products	56,986.2		
3.13 Downstream leased assets	88,437.6		
3.15 Investments	95,858.0		
Total GHG emissions			
Total GHG emissions (location-based)	36,351,085.7	36,115,655.7	235,429.9
Total GHG emissions (market-based)	36,331,997.0	36,105,687.0	226,309.9

* For computational reasons, rounding differences may occur in the table.

¹ Following the guidance of RE100 initiative, EACs from the beginning of 2025 were used to cover retrospectively portions of 2024 own electricity consumption, as vintages of renewable from the six months before the reporting period, the 12 months of the reporting period, or the three months after the reporting period can be applied.

Fleet-specific measures that relate to a significant portion of the greenhouse gas emissions and fleet-related figures from the previous year are reported in section 2.2.5. There are currently no Group-wide milestones and targets. Due to the first-time application of the CSRD, no prior-year figures are reported.

(E1-6 AR 39 b) Hapag-Lloyd's methodology used to calculate or measure GHG emissions covers Scope 1, Scope 2 and Scope 3 emissions:

Scope 1: The Scope 1 emissions caused by burning fuels are based on the direct consumption. The data for leakage of refrigerants is calculated based on the amount of purchased/refilled refrigerants.

Scope 2: The location-based Scope 2 emissions are calculated via country specific grid-mix data and the consumption of the sites located in the countries. The market-based emissions are calculated based on the information in the individual energy contracts or the residual mix if available. The purchase of Energy Attribute Certificates is also considered in this calculation. In case of missing data availability segment-specific extrapolations are applied by utilising available data in proportion to the respective corresponding surface.

Scope 3: Within Scope 3, calculation methodologies are based on data availability. In instances where detailed data was available, such as product units, weights, or distances, the metrics were chosen to ensure a more accurate calculation. In cases where preferred data was unavailable, the financial spend was used instead. In case of missing data availability segment-specific extrapolations are applied by utilising available data in proportion to the respective corresponding surface. For some instances related to Hapag-Lloyd's own fleet, assumptions are made. For example, when calculating emissions for procured spare parts the emissions were extrapolated for third-party managed vessels based on the data from vessels under Hapag-Lloyd's own management. This happens based on the premise that the amount of required spare parts is independent of the vessel manager. Individual approaches applied for extrapolations are described under MDR-M for the KPI Total energy consumption related to own operations and furthermore under ESRS 2 BP-2 10 a.

Sources of emission factors are DEFRA/BEIS, EPA USEEIO, Fuel EU Maritime and GLEC. These sources are selected as they are considered the reliable data sets available. The main tools used are UL360 and for transportation emissions EcoTransIT.

(E1-6 47) The methodology and assumptions for reporting of GHG emissions have been disclosed for the first time, and therefore no changes relevant to comparability are relevant in this first reporting year. (E1-6 AR 42 c) Furthermore, no effects of significant events and changes in circumstances occurred in the reporting period.

(E1-6 AR 45 d) Hapag-Lloyd made use of contractual instruments in relations to its Scope 2 GHG emissions in the reporting period. The percentage of contractual instruments with regards to its respective energy consumption is 93.7%. The following contractual instruments were used by Hapag-Lloyd:

- Bundled direct contracts with suppliers relating to 50.9% of the energy consumption with regards to all Scope 2 GHG emissions
- Unbundled Energy Attribute Certificates (EACs), relating to 31.1% of the energy consumption with regards to all Scope 2 GHG emissions (Following the guidance of RE100 initiative, EACs from the beginning of 2025 were used to cover retrospectively portions of 2024 own electricity consumption, as vintages of renewable electricity from the six months before the reporting period, the twelve months of the reporting period, or the three months after the reporting period can be applied)
- Unbundled direct contracts with suppliers relating to 6.0% of the energy consumption with regards to all Scope 2 GHG emissions
- Unbundled International Renewable Energy Certificates (IRECs), relating to 5.8% of the energy consumption with regards to all Scope 2 GHG emissions

(E1-6 AR 46 g) Hapag-Lloyd conducted a comprehensive calculation of its Scope 3 GHG emissions footprint for the first time in the reporting period. 49.4% of the GHG Scope 3 emissions of Hapag-Lloyd are calculated using primary data.

(E1-6 AR 46 i) Within this reporting, all relevant Scope 3 GHG emissions category have been included. The following categories are excluded for the listed reasons:

- Category 8 covers emissions from upstream leased equipment, which are deemed insignificant and are therefore not disclosed. The energy consumption and resulting GHG emissions caused by leased buildings and vehicles are allocated under Scope 1 and Scope 2.
- Category 9 covers the transportation (of products) for which the reporting company does not pay, and which take place after the point of sale. Hapag-Lloyd only offers services, and by definition these services cannot be further transported after the point of sale. Accordingly, this category is excluded. Transport services that Hapag-Lloyd procured are included in category 4.
- Categories 10 and 12 cover the processing of sold products and the end-of-life treatment of sold products. Hapag-Lloyd does not sell products, but only provides services. These services can neither be further processed nor is an end-of-life treatment applicable. Accordingly, these categories have been excluded.
- Category 14 covers franchise activities, which are not relevant to Hapag-Lloyd.

(E1-6 AR 46 i) Apart from these categories mentioned, all others are consequently included, namely Scope 3 GHG emissions categories 1-7, 11, 13 and 15. (E1-6 AR 46 h) In general, the reporting boundary is based on financial control for all significant GHG categories except for category 3.15 (see below). For specific Scope 3 categories, the following methods were used:

- **Scope 3.1:** Calculated via ESG reporting tool (UL360) with emission factors from established sources like DEFRA/BEIS and EPA. Emissions that are calculated based on financial spend are adjusted for inflation. For categories where weight data is available, weight-based emission factors are applied.
- **Scope 3.2:** For newbuild vessels the emissions are calculated by using a weight-based emission factor and multiplying this factor by the lightship weight. The emission factor includes the emissions from the production of steel as well as EcolInvent data for the emissions caused in the shipyard. The emissions from the production of new containers are calculated using EcolInvent factors for different types of containers that are multiplied by the number of new containers per type. For vehicles and machinery/equipment a spend based approach was chosen. For office new buildings it is based on an emission factor per square metre.
- **Scope 3.3:** This category covers emissions from the supply chain of the fuels mainly consumed on Hapag-Lloyd's vessels. The emissions cover the well-to-tank stages including production, processing, transportation and delivery. The emission factors for marine fossil fuel are based on the EU Regulation (EU) 2023/1805 – Fuel EU Maritime. Emission factors for renewable vessel fuels are based on either literature values from EU Red II (EU) 2018/2001 or the dedicated fuel certificates (Proof of Sustainability), which are accepted under RED II. For other fuels used in cars etc., upstream emission factors from DEFRA/BEIS are used. For electricity, upstream emission factors from DEFRA/BEIS as well as transmission and distribution loss factors from the International Energy Agency are used, whenever available with country-specific values.

- **Scope 3.4:** This category covers emissions from pre- and on-carriages with truck rail, barge and feeder as well as emissions caused by Hapag-Lloyd operated containers on partner vessels. It also covers emissions that occur by the transport of spare parts. For all cases relevant data is "from", "to", "transport mode", "No. of TEU" ("weight" for spare parts), "container type" (dry/reefer), "container usage" (full/empty) only for rail and truck, "Clean Cargo trade lane" for vessel transports. In all cases, this raw data is sent to the EcoTransIT tool for calculation. In the case of pre- and on-carriage the final data preparation is done by the EcoTransIT team itself. In the other cases the CSV mass upload is used. Emission factors are used as per the EcoTransIT methodology while for vessel emissions Clean Cargo emission factors are used which are also stored within the EcoTransIT tool. Vessel related emissions are calculated with 70% vessel utilisation and 15% distance correction factor as recommended by Clean Cargo.
- **Scope 3.5:** Calculated by collection of data on the amount of waste for different types of waste and applying suitable emission factors. Emission factors are based on weight. Where weight measures for waste are not available, a conversion factor is applied.
- **Scope 3.6:** Emissions from plane travel are calculated based on the travelled distance with a differentiation between short and long-haul flights. Other modes of transportation for business travel are calculated via financial spend and application of spend-based emission factors that are adjusted for inflation.
- **Scope 3.7:** Calculation based on modes of transport and commuting distances, including assumption of how many days employees are working in the office.
- **Scope 3.11:** The emissions from third-party vessels during berthing in Hapag-Lloyd's terminals are included based on assumed fuel consumption per hour.
- **Scope 3.13:** The GHG emissions are primarily caused by chartered out vessels as well as generators leased out to third parties based on the fuel consumption. In case of the chartered out vessels emissions are based on the actual fuel consumption of the previous year and extrapolated to account for the time chartered out in the reporting year.
- **Scope 3.15:** Emissions from at-equity investment corporations are calculated by using data from the companies if available. The emissions are subsequently scaled down to account for the share that Hapag-Lloyd holds. If no reported or primary data is available, data from previous years is used. Missing data is extrapolated based on available data, industry-specific emission factors and respective revenues.

For further details with regards to applied extrapolation approaches please see ESRS 2 BP-2 10 a.

(E1-6 53) GHG emissions intensity

t CO ₂ e/kEUR	2024
GHG emissions intensity (Location-based)	1.9
GHG emissions intensity (Market-based)	1.9
Net Revenue (EUR million)	19,111.8

(E1-6 55) The net revenue used for calculation of GHG emissions intensity is the same as the revenue disclosed in the financial statements.

2.2.8. GHG removals and GHG mitigation projects financed through carbon credits (E1-7)

(E1-7 56 a AR 56 - AR 57) When considering climate-related topics, Hapag-Lloyd is currently focusing on minimising and avoiding GHG emissions. As such, the Company has not yet explored or invested in internal projects or value chain collaborations centred on GHG removals and storage. (E1-7 56b AR 56) Nevertheless, the Company has financed climate change mitigation projects outside its value chain by purchasing carbon credits aimed exclusively at reducing GHG emissions in 2024. (E1-7 58 AR 56) These offsetting activities through carbon credits for its GHG emissions covered business flights and other sources directly related to Hapag-Lloyd offices, such as company cars, oil, district heating and natural gas. (E1-7 AR 61) Hapag-Lloyd only bought carbon credits that adhere to the “Gold Standard” classification. They were purchased centrally, representative for all parts of the organisation.

(E1-7.58a) GHG removals and storage activity by Scope and by removal and storage activity

t CO ₂ e	2024
GHG removals from own operations	–
GHG removals in the upstream value chain	–
GHG removals in the downstream value chain	–
Total GHG removals and storage	–
Reversals	–
GHG emissions associated with removal activity	–

(E1-7.AR64) Information on carbon credits cancelled in the reporting year

	2024
Total amount of carbon credits outside value chain that are verified against recognised quality standards and cancelled (t CO ₂ e)	29,100.0
Share of removal projects	–
Share of reduction projects	100.0%
Gold Standard	100.0%
Share issued from projects in European Union	–
Share that qualifies as corresponding adjustment	–

(E1-7 58b) The carbon credits are calculated based on the precise amount purchased in 2024 for the purpose of offsetting business travel through flights and other sources directly related to Hapag-Lloyd offices. The relevant actual data collection is conducted solely by the responsible department. In addition to the case mentioned, no further carbon credits are bought in other parts of the organisation and no other assumptions are used.

(E1-7 AR 58e) Hapag-Lloyd has not converted any removal activities into carbon credits and sold on to other parties on voluntary market. (E1-7 59a) The total amount of carbon credits outside the value chain that are verified against recognised quality standards and cancelled amounts to 29,100t CO₂e. (E1-7 59b) The total amount of carbon credits outside the value chain planned to be cancelled in future is 0t CO₂e. (E1-7 AR 62b) No carbon credits that intend to finance removal projects have been purchased.

(E1-7 60) For reaching Hapag-Lloyd's net-zero fleet ambition in 2045, neutralising activities for residual GHG emissions are likely required. No assessment of the required scope of these neutralising activities has been developed yet, as currently many uncertainties, such as future fuel usage, impede any detailed planning. (E1-7 61 a-c) Hapag-Lloyd does not have public claims on GHG neutrality that involve the use of carbon credits.

2.2.9. Internal carbon pricing (E1-8)

(E1-8 63 a, b) Hapag-Lloyd has an internal carbon pricing scheme in place covering Scope 1 and Scope 3.3 (Fuel- and energy-related activities) to steer the strategic decisions on asset investments (CapEx shadow price). The scheme is applied to all investments into new vessels (newbuilds and charter vessels) and vessel retrofits for the economic evaluation of those investments and reflects scenarios regarding future carbon pricing schemes. For the reporting period, Hapag-Lloyd has applied a base case carbon price of EUR 82 per metric ton of CO₂e that is marginally higher than the current levels of the EU's Emissions Trading System (ETS) but is applied to the entire expected CO₂e emissions assuming a global coverage. The operational controlling of Hapag-Lloyd's business considers currently applicable CO₂ pricing schemes in Europe (EU ETS). (E1-8 63 c) The carbon price has been determined in reference to the pricing scheme of the EU-ETS and is regularly monitored. In addition, Hapag-Lloyd is following the developments of a potential carbon pricing scheme introduced at the discretion of IMO.

(E1-8 63 d) In 2024, the percentage of gross Scope 1, Scope 2 and Scope 3 emissions covered by internal carbon pricing schemes at Hapag-Lloyd is 0% as it is solely applied to future investments in vessels. (E1-8 AR 65) There is no connection to carbon prices in financial statements, as such they are not part of the financial statements.

(E1-8.63a) Carbon pricing scheme by type

	Prices applied (EUR/t CO ₂ e)
CapEx shadow price	82
Carbon prices for impairment testing	78

2.2.10. Minimum disclosure requirements – metrics (E1 MDR-M)

(E1-1) Transition plan for climate change mitigation

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic: Climate change adaptation (MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Percentage of remuneration recognised that is linked to climate related considerations	The ESG component is based on the achievement of a reduction of the AER value in the reporting year which quantifies the carbon intensity of vessels, measured based on the vessel's designed deadweight capacity. The details are described in chapter "1.5. Integration of sustainability-related performance in incentive schemes (GOV-3)".

Financial resources allocated to action plan (OpEx)	No significant OpEx were allocated. OpEx reported under the EU Taxonomy relate to costs without connection to the action, as stated in the chapter EU Taxonomy.
Financial resources allocated to action plan (CapEx)	Financial resources are as per EU Taxonomy CapEx Plan and include ordered newbuilds & retrofits contractually agreed on from 2024–2029.

(E1-3) Actions and resources in relation to climate change policies

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity
Related material sustainability topic: Climate change mitigation

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Achieved GHG emission reductions	For the vessels the achieved GHG emission reductions is the delta between the base year emissions (2022) adjusted with the reporting year workload (DWTnm) and the reporting year.
Expected GHG emission reductions	For the vessels the expected GHG emissions reductions are the emission delta between relevant emissions in the reporting year covered by the expected actions and the emissions in the target year (2030).

(E1-4) Targets related to climate change mitigation and adaptation

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity
Related material sustainability topic: Climate change adaptation

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Absolute value of total GHG emissions reduction	The change in relative emission intensity (AER) between base year and reporting year multiplied with the reporting year workload (in DWT*nm).
Intensity value of total GHG emissions reduction	The intensity value of total GHG emission reduction is the AER. The methodology is described in the entity-specific MDR-M disclosures.
Absolute value of Scope 1 GHG emissions reduction	Share of Scope 1 emissions within fleet related emissions (Scope 1 + Scope 3.3) in base year multiplied with absolute value of emission reductions.
Absolute value of Scope 3 GHG emissions reduction	Share of Scope 3.3 emissions within fleet related emissions (Scope 1 + Scope 3.3) in base year multiplied with absolute value of emission reductions.

(E1-5) Energy consumption and mix

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic: Energy

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Total energy consumption related to own operations	The total energy consumption related to own operations is primarily based on actual data from fuel consumption of vessels, vehicles and equipment based on system reports. Furthermore it includes the energy consumption from electricity, heat and cooling used in buildings. Extrapolations were done for office related activities. The extrapolations are based on actual available data, that has been provided as per invoice data or reading of meters. Segment-specific averages have been calculated based on the available consumption data and the corresponding square meters of locations. It has been assumed that activities at the different locations within each segment are similar and therefore suitable for extrapolation. Data for missing time periods (for example last three months of the year) were extrapolated to cover the entire year.
Total energy consumption from fossil sources	The total energy consumption related from fossil sources is primarily based on actual data from fossil fuel consumption of vessels, vehicles and equipment based on system reports. Furthermore it includes the energy consumption from fossil heat and cooling used in buildings which have been partly extrapolated. The methodology for the extrapolations is described in the MDR-M for the KPI Total energy consumption related to own operations.
Total energy consumption from nuclear sources	For Hapag-Lloyd the energy consumption from nuclear sources is only relevant as part of the electricity mix in certain countries. The information of the share of electricity from nuclear sources is either based on contract information or invoice data. If that is not available, the share is based on the publicly available grid mix data from the International Energy Agency (IEA). The share is then multiplied with the respective electricity consumption.
Fuel consumption from renewable sources	Fuel consumption from renewable sources is based on the actual consumption of certified renewable fuels provided via system reports.
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	For Hapag-Lloyd only electricity is relevant for this KPI. The consumption is primarily based on actual data from invoices of the energy provider, meter readings or by EAC certificates. Energy is counted as renewable if proof, for example in terms of certificates, is available. Partly extrapolations were performed. The methodology for the extrapolations is described in the MDR-M for the KPI Total energy consumption related to own operations.
Consumption of self-generated non-fuel renewable energy	Consumption of self-generated non-fuel renewable energy data is based on actual data from meter readings of solar panels.
Fuel consumption from crude oil and petroleum products	Fuel consumption from crude oil and petroleum products is based on the actual consumption of oil-based bunker fuels and cylinder oils for owned and chartered vessels as well as the consumption of oil-based fuels from vehicles. Also included and based on actual data from system reports is the consumption of diesel- or petrol-powered generators and heating oil for buildings. For office related activities extrapolations were carried out for this KPI. The methodology for the extrapolations is described in the MDR-M for the KPI Total energy consumption related to own operations.

Fuel consumption from natural gas	Consumption of natural gas is primarily based on the actual consumption of LNG the dual-fuel vessels provided by system reports. Natural gas used for heating is based on actuals but in certain cases extrapolated if data was not available for some offices at the time of reporting. The methodology for the extrapolations is described in the MDR-M for the KPI Total energy consumption related to own operations.
Fuel consumption from other fossil sources	Fuel consumption from other fossil sources is based on the travelled distance of plug-in hybrid electric cars and battery-electric cars in the reporting year. It is counted as fossil energy because no verifiable data is available with regards to the electricity mix used for charging the battery when it is charged outside of the office. In addition, for plug-in hybrid electric cars there is no verifiable information how much it is used in electric mode. For this KPI extrapolations were carried out. The methodology for the extrapolations is described in the MDR-M for the KPI Total energy consumption related to own operations.
Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	Consumption is reported based on actual values derived from invoices or system reports and extrapolations to estimate the full year consumption in case the data was not available at the time of reporting. The methodology for the extrapolations is described in the MDR-M for the KPI Total energy consumption related to own operations.
Renewable energy production	Self-produced renewable energy derive from solar panels. The data is based on system reports, for example meter readings.

(E1-6) Gross Scopes 1, 2, 3 and total GHG emissions

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic:

Climate change adaptation

Climate change mitigation

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	The percentage of Scope 1 GHG emissions from regulated emission trading schemes is based on the Scope 1 (tank to wake) emissions that fall under the current EU ETS regulation and includes owned as well as charter vessels.
Percentage of contractual instruments, Scope 2 GHG emissions	The percentage of contractual instruments was calculated based on the energy consumption associated with the different contractual instruments.
Disclosure of types of contractual instruments, Scope 2 GHG emissions	The types of contractual instruments are based on country-specific contract information from the energy provider as well as on the purchase of EACs.

(E1-8) Internal carbon pricing

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic: Climate change adaptation

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Carbon pricing scheme by type	Carbon shadow price for WTW emissions assumed on global geo-scope with a carbon price equal to current ETS rates.
Carbon price applied for each metric tonne of GHG emission	Carbon price in the range of current ETS rates on a WTW basis.

(E1) Entity-specific

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic: Climate change adaptation; Climate change mitigation; Energy

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Avoided emissions	Combination of fuel consumption based on actual data from fleet data lake and Proof of Sustainability documents from fuel suppliers which provide the value for the avoided emissions per batch.
Scope 1 CO ₂ e emissions entire fleet of container vessels	Fuel consumption based on actual data per vessel from fleet data lake. Emission factors are based on Fuel EU Maritime emission factors and GWP factors from IPCC AR 6. Emission factors for renewable fuels are based on weighted average Proof of Sustainability documents.
AER value (WTW, whole fleet incl. own & charter vessels)	AER value is based on Scope 1 and Scope 3.3 fleet related emissions and DWT workload from fleet data lake (distance travelled and DWT).

2.3. Pollution (E2)**2.3.1. Material impacts, risks and opportunities (E2 IROs)**

Hapag-Lloyd is aware that its global operations across the world's oceans have negative environmental implications. The company strives to minimise its impact through GHG emissions and pollution. The pollutant assessment process has been carried out, without consulting potentially affected communities. Instead, the assessment was based on the point of origin targeting potential pollution sources such as ships, logistics terminals, container depots, trucks and company facilities. The values determined were compared with the respective threshold values. Within the DMA one negative impact and one risk had been identified related to pollution, resulting from the operation of container vessels.

Material IROs

- **[Actual negative impact] Contributing to air and water pollution on transport routes**
Air and water pollution caused by the vessels engines and scrubbers affecting the environment.
- **[Risk] Legal fines due to contribution to air and water pollution**
Potential non-compliance with local restrictions that could result in claims or lawsuits.

The use of the engines of the vessels primarily causes the release of pollutants into the air, especially through sulfur oxides (SO_x) and nitrogen oxides (NO_x). The results of studies indicate that these can have a negative impact on human health and the ecosystem. This challenge is already addressed by environmental regulations, such as the Emission Control Areas for shipping. With these zones, the IMO defines geographical areas, where the emissions are limited to a certain threshold. In the event of non-compliance with the specified limits in these regions, the possibility of incurring fines against Hapag-Lloyd exists.

2.3.2. Description of the processes to identify and assess material pollution-related impacts, risks and opportunities (IRO-1)

[\(E2.IRO-1 11 a AR 1- AR 8\)](#) [\(E2.IRO-1 AR 9\)](#) During the process of assessing material IROs in relation to pollution, Hapag-Lloyd identified one actual impact and risk within its own operations. Hapag-Lloyd's process included an environmental impact assessment, for example at vessel level, to identify potential risks and impacts associated with environmental pollution.

[\(E2.IRO-1 11b\)](#) Hapag-Lloyd acknowledges the significance of this subject and has dedicated resources to enhance its insights in 2024. A classification society was commissioned to assist in the analysis of the exact pollutants and their amounts emitted. Hapag-Lloyd has not conducted consultation with potentially affected communities to identify and assess material pollution-related IROs.

2.3.3. Policies related to pollution (E2-1)

[\(E2-1 14 AR 10, ESRS 2 62\)](#) As previously explained, Hapag-Lloyd is currently expanding its knowledge about pollutants that are emitted apart from SO_x and NO_x and intends to subsequently assess a suitable way to address and manage these IROs within a designated policy as the Company moves forward. Independently of this, the relevant international regulations on the prevention of pollution are applied, like those for the Emission Control Areas from the IMO. Besides, through Hapag-Lloyd's ongoing development towards decarbonisation using alternative fuels, a reduction of pollutants is already being pursued indirectly.

2.3.4. Actions and resources related to pollution (E2-2)

[\(E2-2 18: ESRS 2 MDR-A 62\)](#) Hapag-Lloyd has not adopted specific actions yet to reduce the pollutants that are suitable to approach to the identified material IROs. The development of a comprehensive understanding of the substances and quantities involved is still underway. At this stage, it would be premature to consider implementing measures. Nevertheless, the Company is implementing

measures such as the increased use of shore power in accordance with legal requirements, which also contribute to the continuous reduction of air pollutants such as SO_x and NO_x. The implementation of additional actions specifically aimed at pollution reduction will be considered in the future.

2.3.5. Targets related to pollution (E2-3)

(E2-3 22 AR 19, ESRS 2 MDR-T 81b, i, ii, 80d) Hapag-Lloyd is still in the process of defining the precise scope of its material risks and impacts related to pollution, and as such, has not yet established a specific target to address these issues. The Sustainability department will assess the need to develop and implement measurable outcome-oriented targets in line with ESRS requirements.

2.3.6. Pollution of air, water and soil (E2-4)

(E2-4 28 a AR 21-22) Emissions to air, water and soil by pollutant

Pollutant t/year	to air 31.12.2024	to water 31.12.2024	to soil 31.12.2024
Nitrogen oxides (NO _x)	394,684	–	–
Sulphur dioxide (SO ₂)	16,148	–	–
Particulate matter <10µm (PM10)	10,756	–	–
Polycyclic aromatic hydrocarbon (PAH)	–	1	–
Copper	–	31	–
Lead	–	4	–
Mercury	–	0.03	–
Nickel	6	23	–
Hydrochlorofluorocarbon (HCFC)	0.07	–	–

(E2-4 30b AR 26-AR 27) (E2-4 31) The measurement of pollutants can be considered complex and, as there is still a lack of clear guidelines and, in some cases, raw data, the calculations are simplified. The following examples should be viewed with this background knowledge. To derive and estimate the amounts of pollutants emitted, different measurement methodologies have been identified depending on the sources, as the examples indicate. The results were then compared with the applicable thresholds. Covered were vessels, terminals, depots, offices, company cars and trucks operated by Hapag-Lloyd. All of them were treated as individual facilities:

- Pollutants from ships to air have been calculated via emission factors, including those from the International Council on Clean Transportation (ICCT), based on the amount of fuel consumed.
- Pollutants from hull paints have been calculated based on the chemical composition of a standard paint, the estimated wetted surface area and a paint loss rate per year.
- Pollutants from trucks to air have been calculated based on emission factors from a lifecycle data base and operational data like transport distances.

The monitoring process is currently not aligned with EU Best Available Techniques Reference Document Standards or other relevant reference benchmarks. Calibration tests of the Automated Measuring System were not conducted. However, the laboratory tests commissioned for each bunker purchase serve to verify compliance with the relevant limit values.

(E2-4 30c AR 27) For the vessels, pollutants are derived from two sources: firstly, from the consumption of fuels, and secondly, from ship-specific parameters. In the case of the other sources, such as repair depots, both operational data and standard data were used in equal measure. Fuel consumption data is tracked via daily reports in the vessel log system. The fleet data system aggregates the total fuel consumption within the relevant timeframe. For non-vessel-based pollution, terminals or other facilities, data collection focuses on fuel consumption, heating oil and natural gas usage as well as refrigerants. For all consumption data, appropriate emission factors are applied to derive the amounts of pollutants. The methodology to derive water and soil pollution data is also based on the consumption data and follows the same process as outlined above. Regarding the accidental release of pollutants through spills or leakages a two-step approach was used. First it was evaluated if there were any relevant spills or leakages in the reporting period. In case of a spill or leakage the released pollutants would be assessed. There were no relevant spills or leakages in 2024.

2.3.7. Minimum disclosure requirements – metrics (E2 MDR-M)

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity
Related material sustainability topic:

Pollution of air;
Pollution of soil;
Pollution of water

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Number of leakages	Leakages are counted if the leaked amount is above 10 litres and if the leakage had a negative impact on soil or water ecosystems. The scope includes owned vessels as well as land-based sites.
Emitted to soil pollutants	Oil or chemical spills are identified as possible source of soil pollution. If a spill were to happen on an area where soil is contaminated the individual pollutants would be calculated based on specific emission factors.

2.4. Biodiversity and ecosystems (E4)

2.4.1. Material impacts, risks and opportunities (E4 IROs)

As one of the leading global shipping companies, Hapag-Lloyd's operations are deeply connected to the world's oceans. In this pivotal context, the Company has identified material IROs that are closely tied to the health and preservation of marine ecosystems, recognising the importance of responsible stewardship in these vital environments. Some of the IROs relate directly to the pollution of water, which can potentially be caused by improper transport of dangerous goods. These are discussed within the designated chapters. By acknowledging the significance of responsible stewardship in marine ecosystems, Hapag-Lloyd demonstrates its commitment to protecting these vital environments, which are closely linked to its operations.

Material IROs

- **[Potential negative impact] Impact on the marine ecosystem due to the operations of Hapag-Lloyd's vessel fleet**

Vessels operating on global marine trading routes can impact the ecosystem through potential operational discharges or the spread of invasive species.

- **[Opportunity] Building trust through responsible practices regarding marine ecosystems, enhancing reputation and fostering strong stakeholder relationships**

Through Hapag-Lloyd's efforts to protect and preserve marine ecosystems, the Company can establish a positive reputation as a responsible and sustainable liner shipping company, earning the trust and loyalty of customers and stakeholders and distinguish itself in the market.

2.4.2. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

(E4 SBM-3 16a) Within the process of the DMA for identifying material IROs in relation to biodiversity and ecosystems, Hapag-Lloyd did not compile a list of material sites within its own operations, which have potential or actual impacts, as the DMA was conducted on a broader level. The IROs identified are not tied to specific locations, but to impacts and opportunities related to maritime ecosystems in general.

Although no location-based analysis approach was chosen in the DMA, criteria were defined to identify potentially relevant locations subsequently. (E4 SBM-3 16a-ii) Hapag-Lloyd's activities that can negatively affect biodiversity-sensitive areas include the operation of vessels on the world's oceans and waterways. The identification of biodiversity-sensitive areas is based on two sources: the "Key Biodiversity Areas" (KBA) and the list of "Particularly Sensitive Sea Areas (PSSA)" which are defined by the IMO. Additionally, three sites in the Company's own operations were identified, where biodiversity and ecosystems are potentially impacted.

(E4 SBM-3 16a-ii) Disclosure of list of material sites in own operations based on results of identification and assessment of actual and potential impacts on biodiversity and ecosystems

Site	Specific impacts and dependencies	Biodiversity-sensitive areas potentially impacted negatively
ATL Haulage Contractors Ltd, Stanford-le-Hope, United Kingdom	Only minor and potential impact through surface soiling near, not within impacted areas	Thames Estuary and marshes
Hapag-Lloyd AG, Leipzig, Deutschland	Only minor and potential impact through typical office activities near, not within impacted areas	Leipziger Auwald
Terminal Portuario de Guayaquil Guayaquil, Ecuador	Only minor and potential impact through surface soiling near, not within impacted areas	Mangroves, Estuaries, Wetlands and forests of the Gulf of Guayaquil

The identification of sites owned, leased or managed is contingent upon the distance to protected areas or key biodiversity areas that the undertaking is negatively affecting, with the threshold for identification set at 1 km.

(E4 SBM-3 16c) While previously explained, how potential impacts sites are identified, Hapag-Lloyd's vessels have an actual impact operating through the Santa Barbara Channel. It is a crucial corridor for several whale species, including blue whales, which are listed as endangered under the Endangered Species Act and protected under the Marine Mammal Protection Act. Thus, the captains of the vessels are encouraged to comply with the voluntary speed reduction.

2.4.3. Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities (IRO-1)

(E4 IRO-1 17a,b) Within the process of identifying material IROs in relation to biodiversity and ecosystems, Hapag-Lloyd discovered a negative impact and dependencies in its own operations and in the upstream and downstream value chain. Business activities have been screened on a broader level for potential IROs related to biodiversity and ecosystems. The screening process on the site-level was conducted separately and through a decentralised data request directly from site locations within Hapag-Lloyd's own operations.

(E4 IRO-1 17c) When detecting material IROs, no transition and physical risks and opportunities related to biological diversity and ecosystems were identified and assessed. (E4 IRO-1 17d, AR 9) The identification process of the IROs did not include systemic risks (such as ecosystem collapse risks, aggregated risk linked to fundamental impacts of biodiversity loss, financial risks). (E4 IRO-1 17e) (E4 IRO-1 17e ii) While conducting a biodiversity resilience assessment of shared biological resources and ecosystems, Hapag-Lloyd did not engage in targeted consultations with affected communities, recognising the relevance of future stakeholder engagement in this field.

(E4 IRO-1 19 a, b AR 7d) The Company does operate sites located in or near biodiversity-sensitive areas. The identified locations are within one kilometre of KBAs, but not located in the areas themselves. The business activities of Hapag-Lloyd in these locations do not negatively impact the environment, and a necessity to implement biodiversity mitigation measures has not been concluded.

2.4.4. Transition plan and consideration of biodiversity and ecosystems in strategy and business model (E4-1)

(E4-1 13a) Hapag-Lloyd considers its business model of container shipping and terminal operations to be resilient in relation to biodiversity- and ecosystem-related implications.

(E4-1 13b) The scope of the resilience assessment covers the Company's own operations and its upstream value chain, and both business segments of Hapag-Lloyd. (E4-1 13d) The time horizon applied to the evaluation covers the horizon year 2030. (E4-1 13f) The assessment was conducted with the involvement of several internal stakeholders, including experts from Risk Management, Sustainability, and Regulatory Affairs.

(E4-1 13c) The resilience assessment followed the approach of a scenario analysis, covering implications in two contrasting potential future scenarios. In Scenario A, ecological damage is moderate, but there is substantial pressure from regulations and stakeholders concerning biodiversity, whereas in Scenario B, ecosystem degradation is severe with only moderate regulatory and stakeholder pressures. These scenarios are aligned with biodiversity-related

scenarios proposed by the Taskforce on Nature-related Financial Disclosures. In both scenarios, possible implications for Hapag-Lloyd's business model and strategy in relation to biodiversity and ecosystems were analysed and the specific action needs of Hapag-Lloyd were evaluated. The discussed implications cover impacts and dependencies on biodiversity and ecosystems, which have, according to the ENCORE nature database, at least a medium materiality rating for the industries applicable to Hapag-Lloyd (cargo handling, services incidental to water transportation, sea and coastal water transport).

(E4-1 13e) Biodiversity-related implications and specific action needs with respect to each implication were substantially examined: Notably, the implication discussed with closer scrutiny was the establishment of new protected marine and coastal areas where no shipping must occur in the future. Establishing alternative shipping routes that bypass protected zones does not necessitate significant actions. Hapag-Lloyd has signed and is adhering to the Arctic Corporate Shipping Pledge, a voluntary commitment to abstain from Arctic shipping. As such, the Company is familiar with restrictions associated with route planning, as also outlined by the PSSA defined by the IMO. Hapag-Lloyd's vessel operations are sufficiently adaptable to enact measures such as speed reduction, devising new shipping routes or adjusting tonnage immediately. Therefore, action required for Hapag-Lloyd considering this implication was assessed as very low.

Similarly, the action need for the implication from degraded flood mitigation services was assessed as very low. Should the occurrence, frequency, and severity of natural disasters (such as low water levels or storm damage) increase in the future, shipping routes may naturally be affected. In case specific terminals are impacted by natural disasters, overall business operations of Hapag-Lloyd are not expected to be substantially disrupted, as there are existing contingency plans (for example for hurricane response) already in place.

Further implications that were assessed include potential regulations with respect to speed reduction, light pollution, or solid waste management. For all implications, Hapag-Lloyd considers the action need compared to the status quo as very low.

Overall, the biodiversity resilience assessment indicates robustness in Hapag-Lloyd's business model and strategy. The assessment shows that the Company already considers measures aimed at minimising the impact on biodiversity and ecosystems. Even increased regulatory requirements and potentially increased ecosystem damages in the horizon year 2030 are not expected to require major action needs for Hapag-Lloyd adding to already established routines in the reporting year.

2.4.5. Policies related to biodiversity and ecosystems (E4-2)

(E4-2.2, ESRS 2 MDR-P 62) While Hapag-Lloyd acknowledges the great importance of this material topic, a dedicated policy for managing IROs related to biodiversity and marine ecosystems is currently not implemented. Although Hapag-Lloyd conducts activities aimed at prioritising responsible marine resource management, a dedicated biodiversity and ecosystems policy is currently not considered necessary. However, compliance with existing regulations such as the International Convention for the Prevention of Pollution from Ships (MARPOL) that are aimed at securing marine ecosystems is ensured irrespective of the existence of a dedicated policy through ongoing external audits like the Port State Controls.

2.4.6. Actions and resources related to biodiversity and ecosystems (E4-3)

(E4-3 27, E4 MDR-A 68) Many of the world's busiest shipping lanes intersect with routes frequently used by whales as they travel between their feeding and breeding grounds. So far, the best option to avoid collisions with marine mammals is to reduce the vessels' speed to 10 knots, which additionally reduces air pollution and limits underwater noise. Hapag-Lloyd is taking action to reduce the speed of vessels to 10 knots in the Santa Barbara Channel. The vessels' speed is controlled via the engine order telegraph, while the vessel monitors its speed using the global positioning system or a speed log. The National Oceanic Atmospheric Administration (NOAA) conducts external measurements of vessel speed. For several years, Hapag-Lloyd has been involved in the "Protecting Blue Whales and Blue Skies" program to protect marine life and reduce air pollution in the San Francisco Bay Area and the Santa Barbara Channel region. Protecting Blue Whales and Blue Skies is a voluntary vessel speed reduction programme along the California coast, initiated by several non-profit organisations such as the NOAA's National Marine Sanctuaries, California air pollution control districts, and the California Marine Sanctuary Foundation. All vessels above 300 gross tonnes or larger are asked to slow down to a speed of 10 knots or less when transiting within this zone to reduce the risk of a collision. The programme is timed to coincide with peak whale feeding and migration periods in these areas each year from mid-May to approximately mid-November and can make a significant contribution to the stress reduction for marine mammals in this environment. The implementation of this action does not support a specific policy or target related to biodiversity and ecosystems, as Hapag-Lloyd has currently not adopted those.

Apart from this action, Hapag-Lloyd conducts additional activities that aim to ensure no significant harm is caused to biodiversity and ecosystems Hapag-Lloyd is operating on. Those activities score on the DNSH set out by the EU Taxonomy for business activity 6.10 Sea and coastal freight water transport, vessels for port operations and auxiliary activities.

(MDR-A 68 b-e, 69a-c) Further action details: Whale protection in Santa Barbara

MDR	Disclosure
(MDR-A 68b) Scope	The action is implemented in Santa Barbara for all Hapag-Lloyd vessels that cross the Santa Barbara channel.
(MDR-A 68c) Time horizon	The action was first implemented in 2012 as an ongoing action.
(MDR-A 68d) Key action for harm mitigation	No significant harm is caused by this action, therefore a description of key actions taken, and their results, to provide for and cooperate in or support provision of remedy for those harmed by actual material impacts is not applicable for this specific action.
(MDR-A 68e) Progress	Hapag-Lloyd was over 80% compliant with the maximum speed of 10 knots in the designated area during the reporting year.
(MDR-A 69a-c) Financial resources	Current CapEx allocated: not significant Current OpEx allocated: not significant Future CapEx allocated: not significant Future OpEx allocated: not significant

(E4-3 28b) Hapag-Lloyd does currently not use biodiversity offsets in its actions and action plans.

(E4-3 28c AR 21) Also, the incorporation of nature-based solutions into biodiversity and ecosystems-related actions was not yet conducted.

2.4.7. Targets related to biodiversity and ecosystems (E4-4)

(E4-4 31 AR 23-AR 26, ESRS 2 MDR-T 81 b, b ii) The responsibility of examining the effectiveness of a target and defining such in precise terms lies with the respective specialist departments. The Sustainability department is supporting this process regarding the development and implementation of measurable outcome-oriented targets in line with ESRS requirements. (ESRS 2 81b i, ii, ii 80 d) In the year under review, sustainability matters related to biodiversity and ecosystems were explored, setting the stage for future ambitions. The progress was effectively tracked through regular reviews with the Port of Los Angeles ensuring ongoing improvement, as described under E4-3. Hapag-Lloyd is still in the process of determining an effective course of further actions to drive positive change in biodiversity and marine ecosystems, and as such, has not yet established a specific target in this area.

2.4.8. Impact metrics related to biodiversity and ecosystems change (E4-5)

(E4-5 35) Within the process of the DMA and the CRVA, the Company has not identified any sites located in a biodiversity area that is negatively affected by the business operations.

2.5. Resource use and circular economy (E5)

2.5.1. Material impacts, risks and opportunities (E5 IROs)

Hapag-Lloyd identified one material impact, and one material opportunity related to the topic of resource use and circular economy. While the negative impact on the environment due to recycling procedures is related to Hapag-Lloyd's container shipping vessels, the opportunity is connected to the broader topic of potential use of further circular economy principles. To address these IROs appropriately, entity-specific KPIs have been established. Specifically, the share and stock of containers with steel flooring have been designated as key metrics to measure progress and development.

Material IROs

-
- **[Potential negative impact] Environmental impacts due to recycling procedures of the vessels in the downstream value chain**
Decommissioning procedures during the recycling of ships can lead to significant waste generation and serious environmental impacts if not done responsibly.
 - **[Opportunity] Evaluating the use of circular economy principles**
Embracing circular economy principles can lead to a more resilient supply chain, reduced dependence on finite resources, reduced waste and lower costs.
-

2.5.2. Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities (IRO-1)

(ESRS E5 IRO-1 11 a, AR 1 - AR 8) During the process of identifying material IROs related to resource use and circular economy, the identified IROs are within Hapag-Lloyds own operations and across the upstream and downstream value chain. The process, which is described within the general information, did include screening of activities in the Company's own operations and in the upstream and downstream value chain, but did not include a review on individual asset level as part of the materiality analysis. (ESRS E5 IRO-1 11 b) Also, no consultations have been conducted.

2.5.3. Policies related to resource use and circular economy (E5-1)

(ESRS E5-1 14) Hapag-Lloyd addresses the negative impact of recycling of vessels with its dedicated Hapag-Lloyd Ship Recycling Policy, which applies to all Hapag-Lloyd owned vessels.

(E5 ESRS 2 MDR-P 65 a) It covers two objectives, both assuring that the management of the identified material positive impact is adequately addressed:

- Ensure that vessels are recycled in a safe and environmentally sound way: All Hapag-Lloyd owned vessels which are planned to be recycled are equipped with an IHM. The IHM is a certified document which details all the materials built into a vessel which may pose a threat to health or the environment during the recycling process.
- Ensure the recycling process adheres to Hapag-Lloyd principles: To ensure that the recycling process meets Hapag-Lloyd's principles, a suitable recycling shipyard must have International Organisation for Standardisation (ISO) 14001 certification and adhere to the guidelines of an EU-certified ship recycling facility, as per Regulation (EU) No 1257/2013.

(E5-1 16) The Company thereby also addresses the identified material opportunity of evaluating the use of circular economy principles. (E5-1 15a) Still, Hapag-Lloyd's Ship Recycling Policy does currently not encompass strategies for transitioning towards the use of recycled materials or increasing the utilisation of secondary resources. (E5-1 15b) This policy does not explicitly address sustainable sourcing and use of renewable resources. However, the Company is proactively addressing environmental concerns through initiatives focused on minimising the ecological footprint of its operations. For instance, the adoption of containers with steel floors is expected to enhance container recyclability, thereby extending their life cycle and ultimately reducing the Company's environmental impact.

Hapag-Lloyd Ship Recycling Policy	Description of policy
(MDR-P 65 a) Process for monitoring	The effectiveness of this policy is monitored by Vessel Portfolio Management as the responsible department. According to the EU ship recycling regulation (Regulation (EU) No 1257/2013), Hapag-Lloyd chooses only shipyards that are listed in the European list of ship recycling facilities
(MDR-P 65 b) Scope	The policy covers all vessels in ownership of Hapag-Lloyd.
(MDR-P 65 c) Most senior level in organisation that is accountable for implementation of policy	Senior Director Vessel Portfolio Management. The commitment to the Ship Recycling Policy is given by the Executive Board of Hapag-Lloyd
(MDR-P 65 d) Third-party standards or initiatives that are respected through implementation of policy	<ul style="list-style-type: none"> • The policy covers certification of ISO 14001 • It also aims to ensure compliance with the standards for an EU-certified ship recycling facility (Regulation (EU) No 1257/2013)
(MDR-P 65 e) Description of consideration given to interests of key stakeholders in setting policy	The interests of key stakeholders are indirectly reflected in the Hapag-Lloyd Ship Recycling Policy. Specifically, the workers at recycling shipyards have an interest to be well-informed about potential safety hazards during the recycling process. Particularly, this interest is addressed by the policy with the objective to implement an IHM for all Hapag-Lloyd vessels.
(MDR-P 65 f) Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it	The Ship Recycling Policy itself is available on Hapag-Lloyd's publicly accessible website and Intranet. Vessel Portfolio Management contacts and steers all necessary departments (such as Fleet and Legal) for implementation of the policy directly, for example on collection of relevant documents (such as the IHM) or the initiation of end-of-life processes for vessels.

(E5-3 23, ESRS 2 MDR-T 81 b, b i) In order to reliably monitor the effectiveness of the Ship Recycling Policy, it is validated annually by Vessel Portfolio Management as the responsible department.

(E5 ESRS 2 MDR-P 62) Hapag-Lloyd does currently not have a dedicated policy in place to explore the application of circular economy principles. While the Company recognises the potential relevance of circular economy concepts, the investigation of use cases for a non-producing company like Hapag-Lloyd is a topic for the future agenda, and therefore no immediate development of policies is planned.

2.5.4. Actions and resources related to resource use and circular economy (E5-2)

(E5-2 19, E5-2 ESRS 2 MDR-A 62 a) Although Hapag-Lloyd has adopted a policy ensuring safe and responsible ship recycling which addresses the environmental impact identified, the company has not outlined specific plans for additional actions related to resource use and circular economy at this time, despite recognising the potential benefits of investigating these areas in the future.

2.5.5. Targets related to resource use and circular economy (E5-3)

(E5-3 23, ESRS 2 MDR-T 81 b, b i) The responsibility of examining the effectiveness of a target and defining such in precise terms lies with the respective specialist departments. The Sustainability department is supporting this process regarding the development and implementation of measurable outcome-oriented targets in line with ESRS requirements.

(ESRS 2 81b i, ii, ii 80 d) Hapag-Lloyd has presently not set an ambition level or quantitative targets explicitly addressing the matters related to resource use and circular economy in the year under review, the metrics tracked are currently deemed sufficient. In consideration of potential future shifts of the IROs, the specialist departments evaluate the viability of establishing a targeted objective and securing guidance from the Sustainability department.

2.5.6. Resource inflows (E5-4)

(E5-4 30 AR 21) The material resource inflows for Hapag-Lloyd mainly relate to the Liner Shipping segment in the form of containers and container vessels. Hapag-Lloyd's vessels are designed and constructed in accordance with all respective regulations, with steel being the main resource component. No other material resource inflows in Hapag-Lloyd's own operations and along its upstream value chain were identified. As for SAAM Terminals, the focus was on ship-to-shore container cranes, reach stackers and terminal tractors.

(E5-4 31a) Resource inflows materials

t	2024
Overall total weight of products and technical and biological materials used during the reporting period	1,654,523.9
Total weight of biological materials (and biofuels used for non-energy purposes)	–
Share of biological materials (and biofuels used for non-energy purposes)	0.0
Absolute weight of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture the undertaking's products and services (including packaging)	–
Share of secondary reused or recycled components, secondary intermediary products and secondary materials	0.0

E5-4 32 AR 24 The relevant metrics are based on a decentralised data collection incorporating both estimated and actual data, which was assessed across all relevant organisational units. The data collection was conducted both for the Liner Shipping segment and the Terminal and Infrastructure segment.

The following key assumptions and estimations were applied to calculate the metrics:

- The key assumption applied to newly built vessels is that steel is the primary component of the vessel in terms of weight. The material inflow considered is the actual lightship weight of the specific vessel, measured in metric tonnes. Furthermore, the total weight of materials used also includes the overall weight of the containers procured in the reporting period, which is calculated by multiplying the purchased amount of containers by the specific weight of the different container types.
- Biological materials are considered “immaterial”, as their proportion, if any, is comparatively minimal.
- The exact quantity of recycled materials for vessels cannot be quantified, as the recycling process takes place at the steel mill, which is not a direct partner of Hapag-Lloyd. The shipyard acting as a business partner for the Company does not possess precise information on the percentage of materials recycled. The same is the case for the purchased containers. Hapag-Lloyd therefore estimates the weight of recycled materials to be zero for vessels and containers in a conservative approach. The value is calculated based on information supplied by the equipment manufacturer.

2.5.7. Entity-specific metrics related to resource use and circular economy

(E5) Entity-specific metrics

	2024
Number of recycled ships	1
Share of containers with steel flooring (in Percent)	6.2%
Stock of containers with steel flooring (in TEU)	122,277

2.5.8. Minimum disclosure requirements – metrics (E5 MDR-M)

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic:

Resources inflows including resource use

Resource outflows related to products and services

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
The absolute weight of secondary reused or recycled components, secondary intermediary products and secondary materials used to manufacture the undertaking's products and services (including packaging)	Data collection was limited to significant materials, for example vessels and containers within the Liner Shipping segment and for equipment and materials within the Terminal & Infrastructure segment.
Overall total weight of products and technical and biological materials used during the reporting period	Data collection was limited to significant materials, for example vessels and containers within the Liner Shipping segment and for equipment and materials within the Terminal & Infrastructure segment.

Total weight of biological materials (and biofuels used for non-energy purposes)	Data collection was limited to significant materials, for example vessels and containers within the Liner Shipping segment and for equipment and materials within the Terminal & Infrastructure segment. Only biological materials that are proven to be sustainably sourced by certificates are reported.
Number of recycled ships	All Hapag-Lloyd owned vessels that are transferred to a recycling company within the reporting year.

2.6. Transport of dangerous goods (entity-specific)

2.6.1. Material impacts, risks and opportunities (transport of dangerous goods IROs)

The transportation of goods is an integral part of Hapag-Lloyd's Liner Shipping business activities. In handling dangerous goods, Hapag-Lloyd's customers rightly expect the organisation to uphold the highest standards of cargo transportation safety. To ensure consistent adherence to rigorous safety standards across its entire fleet, Hapag-Lloyd's processes for managing dangerous goods strive to stringently comply with international, national, and local regulations. Three key material IROs related to the transportation of dangerous goods were identified in the materiality analysis, as detailed in this chapter.

Material IROs

- **[Potential negative impact] Improper handling of dangerous goods could lead to negative impacts on environment and people**
Improper handling of dangerous goods can have a negative impact for the environment and people due to the potential exposure to harmful substances or explosions and fires in case of accidents.
- **[Risk] Accidents regarding transport of dangerous goods**
Accidents involving dangerous goods such as fires and explosions on board can result in negative environmental and social impacts due to potential accumulation of pollutants, crew injuries, loss of cargo and environmental damage which lead to reputational damage as well as financial losses.
- **[Opportunity] Ensuring the safe and reliable transportation of dangerous goods**
The responsible and safe transportation of dangerous goods can enable Hapag-Lloyd to be perceived as a reliable service provider.

2.6.2. Minimum disclosure requirements – policies (MDR-P) related to the transport of dangerous goods.

(ESRS 2 MDR-P 65 a) The Dangerous Goods Manual is Hapag-Lloyd's established policy to manage material IROs related to the transport of dangerous goods:

Policy/IRO	[Positive impact] Ensuring proper handling of dangerous goods	[Risk] Accidents regarding transport of dangerous goods	[Opportunity] Ensuring the safe and reliable transportation of dangerous goods
Dangerous Goods Manual	X	X	X

Hapag-Lloyd's primary objective in adhering to its Dangerous Goods Manual is to uniformly uphold an exceptional standard of safety across its entire vessel fleet. The manual is designed to ensure the organisation's compliance with international, national, and local laws and regulations, particularly the International Maritime Dangerous Goods (IMDG) Code, governing the transportation

of dangerous goods. The policy itself as well as the explicitly stated mandatory incident reporting contribute to the identified positive impact and are applicable to the Liner Shipping segment. According to the German Dangerous Goods Advisor Ordinance, all incidents involving dangerous goods must be reported. A global procedure has been developed, enabling a structured coordination of the response to such incidents. As part of this procedure, incidents are required to be reported to the Dangerous Goods Safety Advisor.

The manual also outlines measures to ensure the safe transport of materials, prioritising the safety of employees, vessels, cargo and the environment. Training programmes are essential to maintaining a high standard of safety. Employees, particularly those working onboard vessels, receive specialised training in transporting dangerous goods and safety procedures under the guidance of the Dangerous Goods Safety Advisor. Responsible managers additionally receive special training and instructions to ensure compliance with the Dangerous Goods Manual throughout the Hapag-Lloyd fleet, including chartered vessels. A key element of the manual is an exclusion list of all goods that Hapag-Lloyd refuses to transport for safety and ethical reasons, even when legally permitted. The risk assessments are updated on a daily basis. In case the risk assessment changes due to current events or developments, the manual and/or the exclusion list should be revised, and all relevant offices immediately informed, ensuring that the identified risk of mishandling dangerous goods can be effectively avoided. This approach underlines the identified opportunity to ensure the safe and reliable transportation of dangerous goods.

Dangerous Goods Manual	Description of policy
(MDR-P 65 b) Process for monitoring	There is no dedicated monitoring process, but all dangerous goods documentation is centralised through the Freight Information System with the goal to ensure accuracy and traceability.
(MDR-P 65 b) Scope	The manual applies to owned or operated Hapag-Lloyd vessels and vessels chartered into Hapag-Lloyd services. Other vessels that are owned by Hapag-Lloyd, but chartered out to the operators are not covered under the scope of this manual. The manual is not applicable to the Terminal & Infrastructure segment.
(MDR-P 65 c) Most senior level in organisation that is accountable for implementation of policy	Senior Director Dangerous Goods
(MDR-P 65 d) Third-party standards or initiatives that are respected through implementation of policy	<ul style="list-style-type: none"> • Protocol I to MARPOL 73/78 • Dangerous Goods Advisor Ordinance • German Gefahrgutverordnung See (GGvSee) • USA 49 CFR • IMDG Code Supplement
(MDR-P 65 e) Description of consideration given to interests of key stakeholders in setting policy	There have been no considerations given to interest of key stakeholders in setting the policy.
(MDR-P 65 f) Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it	Available in Hapag-Lloyd's Intranet. Globally unified DG validation mailbox ensures systematic and centralised handling of queries. To ensure 24/7 availability of dangerous goods experts, a list of global DG contacts is maintained for different regions (Europe, North America, Asia, Latin America, Middle East).

2.6.3. Entity-specific metrics related to the transportation of dangerous goods

Transport of dangerous goods

	2024
Share of dangerous goods among overall transport volume (End of Voyage)	3.9%
Overall volume of transportation liner shipping (TTEU)	12,467
Volume of dangerous goods transported (End of Voyage) (TTEU)	491
Number of misdeclarations among dangerous goods	4,256.0
Number of reportable incidents in relation to dangerous goods	–

(ESRS 2 MDR-M 75) The metrics outlined connect to the positive impact of ensuring proper handling of dangerous goods, the reduction of the risk of accidents related to dangerous goods, and the opportunity to ensure safe and reliable transport of dangerous goods at Hapag-Lloyd. By monitoring the transport volume of dangerous goods, the Company can put the number of misdeclarations and reportable incidents into context. Thereby, Hapag-Lloyd is enabled to identify areas for the optimisation of handling dangerous goods, striving for a further reduction in the risk of accidents and ensuring safe transport, highlighting potential vulnerabilities in the handling process and allowing for targeted interventions to prevent accidents. By tracking and analysing these metrics, Hapag-Lloyd can minimise the risks associated with transporting dangerous goods, reduce the likelihood of accidents, and provide a safe and reliable service.

2.6.4. Minimum disclosure requirements – targets (MDR-T) related to the transport of dangerous goods

(ESRS 2 MDR-T 81 b, b i) To monitor the effectiveness of the policy in terms of material IROs related to the transport of dangerous goods, it is validated annually by the respective department and reviewed by the SC. The responsible department assesses the need to develop and implement measurable outcome-oriented targets in line with ESRS requirements. (ESRS 2 81b i, ii, ii 80 D) The department is dedicated to facilitating safe transport and preventing accidents in the first place. As a result, no ambition level or quantitative targets in line with ESRS requirements related to the transport of dangerous goods were set in the year under review. Although the Company has established ambitions regarding the transport of dangerous goods as outlined in this chapter, these ambitions do not meet the requirements for measurable, outcome-oriented, and time-bound targets as stipulated by the ESRS.

2.6.5. Minimum disclosure requirements – actions (MDR-A) related to the transport of dangerous goods

(ESRS 2 MDR-A 62) At Hapag-Lloyd, the safe handling and transport of dangerous goods are considered a priority, which is why several key actions outlined in the Dangerous Goods Manual are followed:

The Dangerous Goods and Restricted Cargoes Booking Guideline and the Guideline for Communication amongst Customer Service and DG Validation Team serve as guidance in managing the booking and validation process for dangerous goods. Additionally, a Restricted List is maintained to exclude certain commodities from transport services due to their high risk. Special guidelines

such as the Dangerous Goods Reefer Guideline are in place for temperature-sensitive dangerous goods, and the Stowage and Segregation Guideline ensures proper placement and separation of these goods on vessels to minimize risks. The Cargo Operation Guideline and the detailed Check of Shipper's Final Dangerous Goods Declaration ensure that goods are properly documented and compliant with valid regulations. Additional measures include thorough container inspections as per the Container Inspection Guideline and specific handling procedures for fumigated containers. Moreover, continuous training is provided to employees to handle dangerous goods safely and efficiently. The company also has a Radiation Protection Program in place to safeguard against radiation hazards. Lastly, the Cargo Patrol Procedure is utilized to detect and manage potential risks, and Global Dangerous Goods contacts are established for immediate assistance. These guidelines and programs underscore the Company's dedication to safety, compliance, and responsible transport of dangerous goods.

As the current measures relating to the handling of dangerous goods are considered successful and sufficient, Hapag-Lloyd has not adopted any additional ESRS-compliant actions relating to the transport of dangerous goods and does not currently plan to do so. The measures mentioned address the IROs successfully. In particular, the identified negative impact remains potential due to the implemented measures and therefore does not constitute an actual impact. Within Hapag-Lloyd's rigorous safety protocols, specialised validation teams are responsible for carefully reviewing and processing applications related to the transportation of dangerous goods. Notably, during the reporting period, no further measures were deemed necessary to enhance this process, underscoring the organisation's continued commitment to ensuring the safe and efficient handling of sensitive cargo.

2.6.6. Minimum disclosure requirements – metrics (MDR-M) related to the transport of dangerous goods

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic:
Transport of dangerous goods

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Volume of dangerous goods transported EoV (end of voyage)	Volume is measured in transported TEU of dangerous goods in the reporting year. Data source is based on a system report.
Number of misdeclarations among dangerous goods	Bookings are scanned to detect any potential misdeclared or undeclared dangerous goods as well as sensitive cargo. The number reported is the total number of cases for the reporting year based on a system report.
Number of reportable incidents in relation to dangerous goods	Reportable incidents encompass accidents with dangerous goods containers on board of owned vessels, where persons, assets or the environment have been harmed or damaged in the reporting year.

3. SOCIAL INFORMATION

3.1. Own workforce (S1)

3.1.1. Material impacts, risks and opportunities (S1 IROs)

In this section, an overview of the material IROs related to Hapag-Lloyd's own workforce is provided, followed by an allocation of the material IROs to the relevant material topics. This summary aims to highlight the significant effects that the Company's strategy and operations have on its employees.

Material IROs related to diversity and equal opportunities

- **[Actual positive impact] Contributing to well-being of workforce through fair working conditions**
Equal treatment of all employees regardless of gender, disabilities and other factors can lead to increased diversity and well-being in the workplace.
- **[Potential positive impact] Leading by example with a diverse management team**
A diverse top management and the establishment and provision of equal career opportunities for all employees can lead to increased diversity in the overall workforce.
- **[Risk] Potentially losing talent where equal opportunities are not ensured**
Reputational damage and reduced attractiveness to current employees and potential talents can arise if Hapag-Lloyd is not perceived as a company that embraces diversity and equal opportunities.
- **[Opportunity] Attracting and retaining talents through diverse teams**
Fostering diversity can lead to raising employee retention, attracting talent, and utilize the potential of diverse teams.

Material IROs related to fair remuneration

- **[Potential negative impact] Non-compliance with labour standards or unfair working conditions**
Unequal salaries between employees can lead to employee dissatisfaction and the risk of employee fluctuation.
- **[Actual positive impact] Contributing to well-being of workforce through fair working conditions**
Fair remuneration covering base salary as well as further compensation packages for employees can have positive impacts on mental/physical health.
- **[Opportunity] Minimising turnover through high labour and safety standards**
Paying a fair salary, including incentive and bonus schemes can lead to increased employee satisfaction, thereby increasing the retention rate.

Material IROs related to training and further education

- **[Potential negative impact] Contributing to dissatisfaction through missing opportunities for employees**
Lack of offering training and further education can lead to low employee satisfaction and thus to faster staff turnover.
- **[Actual positive impact] Promoting development of employees**
Promoting the development of employees through trainings can lead to a higher level of education and increased career opportunities.
- **[Opportunity] Ensuring continuous improvement through training of workforce**
Providing training and development can result in lower staff turnover and improved business processes.

Material IROs related to human rights in own operations

- **[Actual positive impact] Contributing to well-being of workforce through fair working conditions**
Supporting and promoting human rights and decent work standards in own operations and actively monitoring these rights, can positively contribute to employees physical and mental well-being.
- **[Opportunity] Minimising turnover through high labour and safety standards**
An enduring commitment to employee rights and welfare can not only increase the attraction of skilled and dedicated professionals, but also minimise turnover.

Material IROs related to work-life balance

- **[Potential positive impact] Maintaining high quality of work-life balance among own workforce**
Fewer stress-related cases of illness can result from maintaining high quality of work-life balance.
- **[Opportunity] Minimising turnover through high labour and safety standards**
By increasing the work-life balance there is an opportunity for Hapag-Lloyd to raise employer attractiveness, thereby enabling better recruiting, raising employee motivation and retention.

Material IROs related to health and safety

- **[Actual negative impact] Occurrence of health and safety incidents**
Mental and physical health and safety risks can occur due to various reasons.
- **[Potential positive impact] Maintaining high health and safety standards**
Clear work instructions and safety trainings as well as offering and implementing preventive measures can improve in the general health of employees.
- **[Opportunity] Minimising turnover through high labour and safety standards**
Improving occupational health and safety measures can enable smoother operations, higher productivity and raise employer attractiveness and thereby minimizing employee turnover.

3.1.2. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

This section delves into the specific material IROs that arise from Hapag-Lloyd's strategy and business model and explains how they are identified, assessed and managed.

(S1.SBM-3 14 AR 6 - AR7) Hapag-Lloyd includes all workers in its own workforce who are likely to be materially affected by the company in the scope of its disclosure under ESRS 2. This includes impacts that relate to Hapag-Lloyd's own operations and value chain including a connection through the Company's products or services as well as through the Company's business relationships. (S1.SBM-3 14 a) Hapag-Lloyd's types of employees and non-employees in its own workforce subject to material impacts by its operations are briefly described as follows:

Worker type specification S1.SBM-3 14 a	Description
Employees	<ul style="list-style-type: none"> • Active land-based personnel under limited or unlimited Hapag-Lloyd contract • Land-based personnel on paid leave of absence • Land-based and marine apprentices • Seafarers employed under Hapag-Lloyd Fleet management under German flag • Seafarers from crewing agencies working on Hapag-Lloyd managed vessels under German flag • Non-guaranteed hours employees are employed by the undertaking without a guarantee of a minimum or fixed number of working hours
Non-employees: self-employed persons	<ul style="list-style-type: none"> • Leased land-based personnel: self-employed persons
Non-employees: people provided by third party undertakings primarily engaged in employment activities	<ul style="list-style-type: none"> • Temporary third-party employees • Third party personnel employed by suppliers of maintenance and other services

(S1.SBM-3 14 b) The material negative impacts for Hapag-Lloyd's own workforce do not occur widespread or systemically but are related to individual incidents only.

(S1.SBM-3 14 c) Hapag-Lloyd has established a range of activities that have a positive impact on its workforce, cultivating employees' well-being.

Activities with positive impact on Liner Shipping segment employees (see section 3.1.6):

- Facilitating training access for all Liner Shipping segment employees results in the positive impact of promoting development of employees.

Activities with positive impact on land-based Liner Shipping segment employees (see section 3.1.6):

- Our Way of Working@Hapag-Lloyd results in the positive impact of maintaining high quality of work-life balance.
- Promoting equal opportunities for women results in the positive impact of leading by example with a diverse management team.
- Promoting human rights in own operations results in the positive impact of contributing to well-being of workforce through fair working conditions.

Activities with positive impact on marine personnel:

- Providing comprehensive training for seafarers, including specialised LNG training results in a positive impact by maintaining high safety standards for those working at sea.
- Conducting harassment prevention and diversity workshops for seafarers as part of social awareness initiatives results in a positive impact by increasing the well-being of the seafarers.

(S1.SBM-3 14 d AR 44) The identified material risk for Hapag-Lloyd arising from impacts and dependencies on the Company's own workforce is:

- Potentially losing talent where equal opportunities are not ensured

Material opportunities for Hapag-Lloyd arising from impacts and dependencies on the Company's own workforce are:

- Attracting and retaining talents through diverse teams
- Minimising turnover through high labour and safety standards
- Ensuring continuous improvement through training of workforce

(S1.SBM-3 16 AR 9) There are material risks and opportunities arising from impacts and dependencies on people in Hapag-Lloyd's own workforce that relate to sea-based personnel only, rather than to all of its own workforce.

- [Opportunity] Minimising turnover through high labour and safety standards

(S1.SBM-3 14 e) The company has not yet established a transition plan (see section 2.2.1).

Thus, no material impacts on Hapag-Lloyd's own workforce that arise from transition plans for reducing negative impacts on the environment can be identified.

(S1.SBM-3 14 f ii, g ii) Based on the risk concept of the GSCA, in which entities from the Terminal & Infrastructure segment of Hapag-Lloyd were considered as suppliers, the risk analysis identified potential country specific risks for forced or compulsory labour and child labour in the following geographic areas:

- Africa, Latin America, Middle East, India, Bangladesh, East Asia

As Hapag-Lloyd has business activities within these geographic areas, the organisation is generally exposed to those risks that were classified as medium to high in these geographic areas. However, the risk analysis of Hapag-Lloyd's own operations has not identified forced or compulsory labour as a significant risk. Hapag-Lloyd rejects any form of forced or child labour and is committed to the prohibition of modern slavery and human trafficking. Hapag-Lloyd follows the definition of child labour included in the ILO's Minimum Age Convention (No. 138), which stipulates that the minimum age for admission to employment must not be below the age at which compulsory schooling is complete – but in any case, not below 15 years old or, for work at sea, 16 years old. (S1-1 22) Additionally, the Global Code of Ethics and the Policy Statement on Social Responsibility and Human Rights (see section 3.1.3) explicitly address the trafficking in human beings, forced labour or compulsory labour and child labour.

(S1.SBM-3 15 AR 8) Hapag-Lloyd has developed the understanding that within its own workforce, employees working in the particular context of seafaring may be at greater risk of harm.

The working conditions of marine personnel are characterised by long absences, separation from families, irregular working hours, seven-day working weeks and limited leisure options. People working in terminals and port operators are naturally exposed to higher risks than office workers.

Apart from these specific groups, no people in Hapag-Lloyd's own workforce with particular characteristics or undertaking particular activities have been identified that may be at greater risk of harm.

3.1.3. Policies related to own workforce (S1-1)

The policies that Hapag-Lloyd has adopted to manage its material impacts related to its own workforce are outlined in the following section.

(S1-1 19) At Hapag-Lloyd, four different policies and guidelines are in place to address the identified IROs:

Policy/IRO	[Negative impact] Non-compliance with labour standards or unfair working conditions	[Negative impact] Contributing to dissatisfaction through missing opportunities for employees	[Negative impact] Occurrence of health and safety incidents	[Positive impact] Contributing to well-being of workforce through fair working conditions
ISM Main Manual		X	X	X
Academy Playbook		X		
Policy Statement on Social Responsibility and Human Rights	X		X	X
Global Code of Ethics	X			X

Policy/IRO	[Positive impact] Leading by example with a diverse management team	[Positive impact] Promoting development of employees	[Positive impact] Maintaining high quality of work-life balance among own workforce	[Positive impact] Maintaining high health and safety standards
ISM Main Manual		X	X	X
Academy Playbook		X		
Policy Statement on Social Responsibility and Human Rights	X			X
Global Code of Ethics	X		X	

Policy/IRO	[Risk] Potentially losing talent where equal opportunities are not ensured	[Opportunity] Attracting and retaining talents through diverse teams	[Opportunity] Minimising turnover through high labour and safety standards	[Opportunity] Ensuring continuous improvement through training of workforce
ISM Main Manual			X	X
Academy Playbook				X
Policy Statement on Social Responsibility and Human Rights	X	X		
Global Code of Ethics	X	X	X	

(S1 ESRS 2 MDR-P 65 a) The policies and their respective relation to the identified IROs are described in detail in the following:

International Safety Management (ISM) Main Manual

The ISM Main Manual is based on the ISM Code, which is mandatory for each vessel manager to provide to the crew. It is a legally binding and audited Safety Management System (SMS). The manual outlines a comprehensive system through Hapag-Lloyd's Safety Management (and Environmental Protection) System, which is designed to manage incidents and embed preventive measures together with contingency plans. The main objective of the system is to enhance safety at sea through preventive measures that protect people, vessels, cargo and the environment from accidents and emergencies. It emphasises occupational health and safety by minimising risks to human life or health from disease or injury and preventing any impact on human welfare through appropriate means and protective measures. Thus, the ISM Main Manual addresses the impact of maintaining high health and safety standards. The manual does not explicitly mention the impact of contributing to dissatisfaction through lack of opportunities for employees. However, it does emphasise the Company's commitment to safety, health and environmental standards, which indirectly promote employee satisfaction. The manual addresses the impact of health and safety incidents in detail by describing various measures and regulations for safe working practices that are established to lower the risks of accidents, injuries or health risks. It also supports the maintenance of a high-quality work-life balance among the workforce by

focusing on employee motivation, training and well-being. Finally, the manual indirectly addresses the possibility of minimising turnover through high standards of work and safety by discussing the importance of high motivation and excellent training standards to retain personnel, outlining specific procedures for training, familiarisation, and crew motivation, and emphasising the reporting of incidents and the establishment of corrective and preventive measures to maintain a positive working environment. Hence, the manual addresses the opportunity of ensuring continuous improvement through training of workforce.

Academy Playbook

The Academy Playbook describes how Hapag-Lloyd creates a learning institution within the organisation that invests in people and strengthens both personal and organisational capabilities, as well as providing customised and relevant learning journeys that help develop a future-ready organisation. The Academy Playbook outlines the learning and development framework of the Hapag-Lloyd Academy. To mitigate the risk of contributing to employee dissatisfaction through missed opportunities, Hapag-Lloyd's Academy Playbook includes a comprehensive feedback and improvement cycle. Participants complete evaluations in the Learning Campus following an analysis of such by the Academy team using a dedicated data analytics platform. Quantitative surveys on learning impact in the sense of behavioural changes are conducted about three months after the training, facilitating a continuous improvement loop aiming to keep the learning programmes relevant. KPIs are used to monitor key metrics. For web-based training (WBT), examples of KPIs include course Net Promoter Score (NPS), clarity of training, content quality in terms of design and format, relevance, and technical difficulties. The Hapag-Lloyd Academy promotes continuous learning and employee development through customised learning paths. These paths focus on personal and functional competencies and are structured into four competency levels: Basic, Professional, Advanced, and Master, enabling education on a broad level. Participants are encouraged to adopt and apply a growth mindset, fostering a culture of continuous learning and appropriate risk-taking. Encouraging employee development is a key element. Structured learning programmes are designed to enhance personal and functional competencies. A variety of training modalities are used, such as blending online self-service, face-to-face sessions, and workshops to accommodate different learning styles. Thereby, the impact of promoting development of employees and the opportunity of ensuring continuous improvement through training of the workforce are addressed.

Policy Statement on Social Responsibility and Human Rights

The Policy Statement on Social Responsibility and Human Rights outlines Hapag-Lloyd's commitment to human rights and environmental protection throughout its operations and value chains. Regular risk assessments and due diligence audits are conducted to identify potential violations and implement preventive and corrective measures. Hapag-Lloyd complies with global occupational health and safety legislation by implementing safety standards both at land and at sea. Despite these measures, health and safety incidents may occur and are thoroughly analysed subsequently. Preventive measures are taken to mitigate future risks, supported by regular reviews of safety measures. To contribute to the well-being of its employees, Hapag-Lloyd

emphasises fair working conditions, adequate wages and benefits in line with international and national regulations. To mitigate the risk of potentially losing talent where equal opportunities might not be ensured, Hapag-Lloyd implements measures to promote equal opportunities and prevent discrimination. By emphasising diversity and creating an inclusive work environment, the Company aims to attract and retain talent. Additionally, Hapag-Lloyd aims to enhance its reputation through adherence to high labour and safety standards. The core elements which enable Hapag-Lloyd to fulfil its due diligence obligations are risk analyses, preventive measures, remedial actions, a complaints procedure, documentation and reporting. Ultimately, Hapag-Lloyd not only mitigates risks and addresses negative impacts, but also seizes opportunities to strengthen its position as a responsible and attractive employer.

Global Code of Ethics

The objective of the Global Code of Ethics is to set the Company's expectations for its employees' relationships with customers, suppliers, governments, authorities and competitors as well as the expectations regarding the behaviour of employees towards each other. It sets out the principles and guidelines that Hapag-Lloyd has established to govern the conduct and actions of its employees and stakeholders across locations and jurisdictions. Hapag-Lloyd's Global Code of Ethics emphasises the importance of fair working conditions, human rights, diversity and inclusion, occupational health and safety, freedom of association, collective bargaining, and fair remuneration, and describes the Company's commitment to upholding these principles. By fostering an inclusive work environment where differences are welcomed and embraced, Hapag-Lloyd harnesses the collaborative potential of its diverse workforce and encourages professional development and innovation. Managers play a key role in setting high standards and demonstrating integrity to foster an inclusive work environment where diversity is valued. Diversity is a core value, and managers aim to evaluate employees fairly and encourage professional development regardless of origin and identity. Health and safety are of high importance, with measures in place to prevent work-related injuries and promote well-being. Employees are encouraged to take an active role in maintaining their health and safety and to report any potential risks. In addition, a commitment to health and safety, promoting a feedback culture and discouraging unacceptable behaviour supports a positive work environment. This commitment helps mitigate the risk of potentially losing talent where equal opportunities might not be ensured, while providing opportunities to attract and retain talents through diverse teams. Additionally, adherence to high labour and safety standards also helps minimise turnover. The ethical framework therefore not only supports high performance and innovation, but also contributes to the Company's overall growth and sustainability.

The process for monitoring the policies is as follows:

Policy	Process for monitoring
ISM Main Manual	Hapag-Lloyd's shore organisation constantly monitors national and international environmental regulations. New regulations are implemented into the system as quickly as possible in order to maximise environmental benefits while taking into account the Company's interests.
Academy Playbook	The support structure is maintained through a network of functional sponsors, subject matter experts, and a dedicated team focused on delivery and performance excellence. Programme delivery, logistics, and technical support requests are directed through dedicated channels such as email and the OneSupport ticketing system. A systematic feedback and improvement mechanism is in place that includes a feedback cycle where participants complete the training, receive evaluation links via email, complete the evaluation on the Learning Campus, and connect with functional Subject Matter Experts to identify potential improvements.
Policy Statement on Social Responsibility and Human Rights	Hapag-Lloyd regularly conducts risk analyses in its own sphere of business and in its upstream value chain at the level of direct suppliers. If Hapag-Lloyd identifies risks, it takes measures to prevent and remedy them and then examine the effectiveness of these measures. The Policy Statement on Social Responsibility and Human Rights is reviewed on an ongoing basis and updated if there are any significant changes related to risks, processes and/or measures.
Global Code of Ethics	The Global Code of Ethics is reviewed annually and, if necessary, updated as a standard part of Hapag-Lloyd's Internal Control System procedure in order to keep it current and adequate. Regular monitoring and assessment of compliance with laws and regulations is performed as part of the annual review of the Global Code of Ethics. As part of this process all relevant internal stakeholders are annually requested to confirm the validity of the Code of Ethics. This includes changes of law and regulations.

Policy	(S1 ESRS 2 MDR-P 65 b) Scope
ISM Main Manual	Shipboard Management and shore-based organisation to transfer and implement the SMS. The SMS applies to all personnel under the responsibility of the ship's management and the shore-based operations managed by Hapag-Lloyd Fleet Management. On board these vessels, it covers all individuals involved in safety management and environmental protection activities, not just crew members. This includes crew members, external persons or third-party personnel trading with the vessel or performing service jobs in the port. Every crew member of Hapag-Lloyd must observe and comply with the SMS and all relevant procedures, rules, regulations, and Company standards within their area of responsibility and authority.
Academy Playbook	The Hapag-Lloyd Academy Playbook is a comprehensive guide that applies to all Hapag-Lloyd Liner Shipping segment employees, (excluding ATL) outlining a curriculum roadmap designed to aid in professional career development through integrated learning journeys at various levels. The document addresses different cohorts of employees, for each group to receive appropriate training and development opportunities.
Policy Statement on Social Responsibility and Human Rights	The scope of this policy covers the Liner Shipping segment.
Global Code of Ethics	The scope of this policy covers the Liner Shipping segment.

(S1 ESRS 2 MDR-P 65 c) Most senior level in organisation that is accountable for implementation of policy	
Policy	
ISM Main Manual	Senior Director Fleet Management. Hapag-Lloyd's Fleet Management Department is responsible for the development, implementation, and maintenance of the ISM Main Manual, including procedures and systems aimed at safe practices, emergency preparedness, communication, training and continuous system review.
Academy Playbook	Dean of the Hapag-Lloyd Academy
Policy Statement on Social Responsibility and Human Rights	The Senior Managing Director Global Procurement is appointed as the Human Rights Officer and is required to report to the Executive Board on a regular basis.
Global Code of Ethics	Managing Director Global Human Resources

(S1 ESRS 2 MDR-P 65 d) Third-party standards or initiatives that are respected through implementation of policy	
Policy	
ISM Main Manual	<ul style="list-style-type: none"> • ISM Code • Environmental Ship Index • Ship Energy Efficiency Management Plan
Academy Playbook	<ul style="list-style-type: none"> • No specific third-party standards or initiatives are respected through implementation of this policy.
Policy Statement on Social Responsibility and Human Rights	<ul style="list-style-type: none"> • International Bill of Human Rights • ILO Declaration on Fundamental Principles and Rights and the ILO core conventions • ILO Maritime Labour Convention (MLC) • International Convention for the Safety of Life at Sea • UNGP • Guidelines for Multinational Enterprises of the OECD • Minamata Convention on Mercury • Stockholm Convention on Persistent Organic Pollutants • Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal • MARPOL
Global Code of Ethics	<ul style="list-style-type: none"> • ILO core labour standards • United Nations' Universal Declaration on Human Rights

(S1 ESRS 2 MDR-P 65 e) Description of consideration given to interests of key stakeholders in setting policy	
Policy	
ISM Main Manual	There have been no considerations given to interest of key stakeholders in setting the policy.
Academy Playbook	The process of setting the policy was informed by the interests of various internal stakeholders.
Policy Statement on Social Responsibility and Human Rights	Different internal stakeholders were involved in creating the policy. Thus, it was ensured that interests were considered of identified key stakeholders.
Global Code of Ethics	Different internal stakeholders were involved in creating the policy. Thus, it was ensured that interests were considered of identified key stakeholders.

Policy	(S1 ESRS 2 MDR-P 65 f) Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it
ISM Main Manual	Every crew member is entitled to have direct access to the SMS, which is part of the ISM Main Manual and accompanying publications, as appropriate and applicable according to their field of duties and responsibilities. All crew members are familiarised with the safety system on the specific vessel by working with and according to the SMS as well as additional shipboard controlled documents.
Academy Playbook	The mandatory onboarding includes comprehensive WBT that covers core topics and explains the learning journey for the learners as well as the Learning Campus as the interface. The Academy Playbook is an Hapag-Lloyd internal document and available on the intranet. For each WBT a Training Concept is developed in cooperation with the main stakeholders and subject matter experts, which is also presented to the Workers Council.
Policy Statement on Social Responsibility and Human Rights	The Policy Statement on Social Responsibility and Human Rights is available on Hapag-Lloyd's website. Affiliated companies in which Hapag-Lloyd does not hold the majority of voting rights are informed of the Policy Statement and must adhere to its contents. The Policy Statement is also referenced in Hapag-Lloyd's Supplier Code of Conduct (SCoC).
Global Code of Ethics	The Global Code of Ethics is available on Hapag-Lloyd's website. New employees are familiarised with the Global Code of Ethics as part of their onboarding process. Marine Personnel on board Hapag-Lloyd's ships and external managers are further informed about the Global Code of Ethics via the electronically distributed fleet circular. The Global Code of Ethics is included as an annex to the Owner's Manual, which is provided in written form to vessels under third-party management.

(S1-1 20) (S1-1 20 a) Hapag-Lloyd has established several human rights policy commitments relevant to its own workforce. These include adherence to the Global Code of Ethics, which defines Hapag-Lloyd's basic values, and the standards of conduct expected of managers and employees. The Global Code of Ethics emphasises the observance of human rights as defined in the United Nations' Universal Declaration of Human Rights, and the ILO core labour standards. Hapag-Lloyd applies monitoring mechanisms aiming to uphold adherence to human rights policies through compliance monitoring and risk management. Furthermore, Hapag-Lloyd has designed due diligence processes to promote ongoing improvements within its workforce and commits to fulfil its due diligence obligation to identify, prevent, mitigate and remedy negative impacts on human rights and the environment. Therefore, Hapag-Lloyd regularly conducts risk analyses in its own sphere of business and in its upstream value chain. In case risks are identified, Hapag-Lloyd takes measures to prevent and remedy such, followed by an examination of their effectiveness.

(S1-1 20 b) Hapag-Lloyd emphasises engagement practices through value-based leadership, where managers are expected to lead by example, foster trust and uphold Hapag-Lloyd's Corporate Values ("We care. We move. We deliver."). The organisation's feedback culture encourages honest and fair feedback and proactively addresses disputes with a commitment to deter unacceptable behaviour. Hapag-Lloyd strives to create an inclusive work environment where diversity is valued, and each employee is encouraged to contribute.

Under the GSD, employees regularly engage in a structured discussion with their supervisor. The entire process has been streamlined so that opportunities for development can be more easily identified, seized and supported.

For seafaring personnel, individual development goals and suitable training measures, which are held in cooperation with external service providers, are established during annual employee reviews.

Information on other relevant engagement channels is outlined under section 3.1.4.

(S1-1 20 c) The Company proceeds as follows to create and facilitate remedies for human rights violations: Hapag-Lloyd's complaint mechanism consists of internal reporting channels and a web-based whistleblowing hotline ("Speak Up Line") available to all Hapag-Lloyd employees as well as external parties. This procedure allows for any concerns about or indications of possible violations of due diligence obligations related to human rights or the environment to be reported anonymously. In all cases, reports are handled in a confidential manner. In case Hapag-Lloyd receives a report or if there is a justified suspicion of a possible or actual violation of their human rights or environmental standards in its own sphere of business, appropriate remedial measures are taken to prevent or halt the violation. Hapag-Lloyd expects the full cooperation of direct suppliers in devising and carrying out the appropriate remedial measures.

When human rights impacts in the Company's own operations are identified, appropriate and suitable disciplinary measures are taken in the event of violations, including termination of employment.

(S1-1 21 AR 12) Hapag-Lloyd has selected policies that are aligned with relevant internationally recognised instruments as described under section 3.1.3. The process of developing and regularly reviewing the policies also includes the alignment with the internationally recognised instruments. For example, the mentioned due diligence processes for ongoing improvements within the Company's own workforce also comprises the compliance with the UNGP.

(S1-1 23) The prevention of accidents with possible implications for people, environment, cargo and assets has high priority. Hapag-Lloyd aims to comply with applicable laws and regulations on occupational health and safety by implementing health and safety standards in accordance with these laws and regulations. This includes the provision of personal protective equipment, machine safety, emergency preparedness, incident and accident management, workplace ergonomics, chemical handling and fire protection – as required and necessary. Corresponding instructions and procedures for safe practices have been developed, trained and documented. Several components of Hapag-Lloyd's QEM, which is certified under ISO 9001 for quality management and ISO 14001 for environmental management, promote a safe and healthy work environment. This includes training and awareness creation on health and safety practices as well as communication and documentation on health and safety procedures. Moreover, Hapag-Lloyd conducts annual QEM audits in all Regions including Quality Service Centers, Areas, the Global Capability Centers, and several headquarters departments, that include the topics of emergency preparedness, evacuation procedures, and first aid. A mandatory QEM WBT was established which every employee in the Liner Shipping segment is required to complete every two years. As part of the QEM, respective roles and responsibilities are documented.

For marine personnel, Hapag-Lloyd applies the workplace accident prevention management described in its SMS. It is documented in the ISM Main Manual and described in detail in the disclosures under section 3.1.3.

(S1-1 24 a) (S1-1 24b AR 15 - AR 16) The Global Code of Ethics and the Policy Statement on Social Responsibility and Human Rights, also address the elimination of discrimination. The policies cover harassment, promote equal opportunities and other ways to advance diversity and inclusion. These policies aim to ensure equal opportunity and prohibit any form of discrimination based on national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion, or ideology. Similarly, sexual harassment, child labour, forced labour and/or degrading working conditions will not be tolerated.

(S1-1 24 c) Hapag-Lloyd has specific policy commitments relating to inclusion and/or positive action for people from groups at particular risk within its own workforce, which can be found in the Global Code of Ethics. These specific commitments are:

- Promoting inclusion and diversity: Hapag-Lloyd promotes an inclusive workplace that aims to ensure equal opportunity regardless of individual differences. The organisation encourages diverse perspectives and professional development and operates channels such as the Speak Up Line to report human rights violations or discriminatory behaviour.
- Respect for human rights: Hapag-Lloyd is committed to avoiding child and forced labour as well as promoting good working conditions, occupational safety, freedom of association, fair compensation, and community rights. Employees are expected to respect and support these human rights efforts.
- Ethical and legal compliance: Hapag-Lloyd aims to comply with all local, national, and international laws to support ethical and responsible business operations.
- Management and mitigation: A competency model integrates value-based behaviours into the global employee dialogue and promotes a feedback culture.
- Anti-discrimination and complaint handling: Mechanisms such as the Speak Up Line allow for the reporting of discrimination and harassment. The Company addresses these issues promptly with preventive and remedial measures to maintain a respectful workplace.

(S1-1 24 d) Prevention, mitigation and acting on discrimination as well as advancing diversity and inclusion are considered important topics for Hapag-Lloyd. This is substantiated by the initiation of key actions related to diversity, as well as through the coverage of discrimination within Hapag-Lloyd's Global Code of Ethics.

Hapag-Lloyd has implemented policies through specific procedures to ensure discrimination is prevented, mitigated and acted upon once detected.

To advance diversity, equity and inclusion (DEI) in general, Hapag-Lloyd has started the Diversity@Hapag-Lloyd project as part of the corporate strategy. The project has already finalised an analysis phase, including a quarterly DEI Dashboard to track progress on KPIs and a global survey on DEI to identify further opportunities for creating a more inclusive environment that values and respects each individual's unique experiences and contributions. The project has also laid the foundations for a training landscape on DEI and started formulating a DEI Strategy.

3.1.4. Processes for engaging with own workers and workers' representatives about impacts (S1-2)

This section describes Hapag-Lloyd's engagement processes with its own workforce as well as its representatives.

(S1-2 27 AR 21, AR 23-24) Hapag-Lloyd identified no impacts on its own workforce that may arise from reducing carbon emissions and transitioning to greener and climate-neutral operations. Hapag-Lloyd engages with its own workforce through different engagement formats to inform about potential or actual material impacts. Thereby, the company conducts regular virtual town hall meetings to inform the workforce about relevant developments and potential related impacts. During these meetings, employees are invited to provide feedback through moderated question and answer sessions. Furthermore, Hapag-Lloyd conducts various anonymous surveys directed towards its employees such as the employee engagement survey and a survey on diversity. Additionally, annual one-on-one feedback sessions provide a platform for discussion between employees and managers.

The feedback collected through these channels is documented, either during the meetings or through the surveys, and subsequently analysed. Feedback is integrated into decision-making on a case-by-case basis. Employees are then informed about the outcomes of their feedback through various channels, including internal newsletters, intranet updates, and departmental meetings, ensuring that they are aware of how their input has influenced decisions.

(S1-2 27 a) To achieve this, Hapag-Lloyd collaborates with representatives of its own workforce through regular meetings with the worker's council as well as by direct engagement with the personnel. SAAM Terminals holds monthly work tables and an annual meeting with union leaders.

(S1-2 27 b AR 19) The engagement with marine personnel occurs at different stages, for example during the deployment planning phase, embarkation, disembarkation and in the event of sickness. For land-based personnel, engagement takes place at least during all GSD alignments on an individual level as well as through virtual townhall meetings. The marine and land-based personnel are involved through consultation during discussions and direct conversation, to ensure a smooth and clear communication. The frequency of engagement varies but happens at least in the aforementioned stages.

(S1-2 27 c AR 18 - AR 19) The Marine Human Resources department holds operational responsibility for facilitating engagement with marine personnel, led by the Managing Director Fleet. In addition to the Regional Human Resources Heads, the Global Human Resources department holds operational responsibility for facilitating engagement with land-based personnel, led by the Managing Director Global Human Resources.

(S1-2 27 d AR 20) Marine personnel are covered by independent collective bargaining agreements which Hapag-Lloyd concludes through its membership in the German Shipowners' Association collective bargaining association in coordination with the International Transport Workers' Federation (ITF). Hapag-Lloyd also applies the regulations of the MLC. These agreements of Hapag-Lloyd do not directly enable the Company to gain insights into the perspectives of its own workforce, however, they display the organisation's striving for fair employment.

(S1-2 27 e) The effectiveness of the engagements with employees is regularly assessed. For engagement with Liner Shipping segment employees in terms of trainings facilitated by the Hapag-Lloyd Academy, the Hapag-Lloyd Academy is in the process of implementing a Performance Scorecard which is a tool to assess the effectiveness of this engagement. For land-based personnel of the Liner Shipping segment, round table discussions with management (up to Executive Board level) are taking place, which reflect performance and potential of talents and people on the move.

(S1-2 28) To gain insight into the perspectives of marine personnel in its own workforce that may be particularly vulnerable to impacts and/or marginalisation, regular crew meetings are conducted, discussing support and the consequences of discrimination. Open dialogue and support for addressing discrimination and bias are encouraged. Considering land-based personnel, Hapag-Lloyd did not conduct similar steps, as Hapag-Lloyd did not identify land-based personnel to be particularly vulnerable to impacts. Nevertheless, the perspectives of selected groups are also regularly discussed and supported by the organisation through selected internal formats such as “Women at Hapag-Lloyd”.

3.1.5. Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3)

(S1-3 32a AR 27, S1-3 32 c) In case Hapag-Lloyd receives a specific report or a justified suspicion of a possible or actual violation of human rights or environmental standards in Hapag-Lloyd's own workforce arises, the Company takes appropriate remedial measures to prevent or halt the violation.

To assess whether the remedy offered is effective, its suitability for achieving the objective of ending the material negative impact on the Company's own workforce is examined. For this purpose, an objective is formulated for each specific case in which a material negative impact has been identified. The achievement of such objectives, including possible compensation, represents a remedy for the specific situation. The extent to which the remedial measures can contribute to achieving this objective is analysed subsequently.

(S1-3 32 b AR 28) All employees and non-employees can raise their concerns or needs directly with Hapag-Lloyd through the Company's “Speak Up Line”, a confidential channel through which compliance-related concerns can be reported at any time using an online form. It is accessible worldwide and provided by an independent third-party service supplier. The processing of the reports is exclusively carried out by Hapag-Lloyd.

Apart from the channel described above, the following channels are in place:

- Land-based personnel can consult their local or regional Compliance Officer, the Global Compliance Team, or a direct supervisor. Also, they have the opportunity to contact the Ethics Committee directly as well as the local, regional or global Human Resources departments. At a regional level, further initiatives have been launched in many locations around the world, such as the installation of post boxes that employees can use to anonymously express their views on diversity-related topics and experiences.

- Marine personnel can use all the channels described above. In addition, they can report compliance violations, violations of marine labour law, human rights violations, disadvantages, or unfair treatment via a defined complaints procedure. Reports can be made to their direct superiors, the Fleet Management department, the sailor's country of origin or the ship's flag state. The MLC provides the legal framework for this process. Additionally, complaints can be raised to the ITF. As part of the ITF complaint handling procedure, complaints can be handed in directly to the captain or to an external authority of the flag state. Protection against victimisation is guaranteed by the ITF.

(S1-3 32 d) In addition to in-person training, Hapag-Lloyd's comprehensive compliance management training concept includes WBT sessions, which are compulsory within the Company's own workforce. These training sessions brief Liner Shipping segment employees about the whistleblower system, amongst other things. At SAAM Terminals the availability of whistleblower channels to own employees is also supported by trainings.

The list of the Local Compliance Officers and Regional Compliance Officers can be found on Hapag-Lloyd's Intranet. The Compliance department is responsible for overseeing the distribution of the Whistleblower and Non-Retaliation Policy, certification and related training with support from local Human Resources departments and can be contacted via the compliance email inbox for any questions and information requests.

(S1-3 32 e AR 32) All compliance-related concerns can be raised through the "Speak Up Line". Compliance-related concerns raised and addressed are handled in accordance with a standardised procedure according to the Whistleblower and Non-Retaliation Policy. Compliance-related concerns raised are processed by the Compliance department. Other relevant functions are involved to facilitate professional, confidential, and timely investigation and to decide on the measures to be taken. The whistleblower receives a confirmation that their report was received within seven days after submission and receives feedback on the status of the report, provided there is an available communication channel with them. Once an investigation is completed, the outcome that is directly related to the reported compliance-related concern is communicated to the person who raised the issue, subject to the requirements under applicable laws such as data protection legislation. In any case, even if a related concern is found to be unsubstantiated, the person who raised the issue will receive feedback, provided that communication channels are available.

The effectiveness of the whistleblowing procedure is reviewed at least once a year and if deemed necessary, additionally on an ad hoc basis.

(S1-3 33 AR 31) Hapag-Lloyd conducted a survey in the reporting period that includes the assessment of how its own workforce trust structures or processes to raise their concerns or needs and have them addressed.

(S1-3 33) To protect individuals that use channels to raise compliance-related concerns against retaliation, Hapag-Lloyd has a specific "Whistleblower and Non-Retaliation Policy" in place. Details on this policy can be found under section 4.1.2.

3.1.6. Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4)

(S1-4 37) Hapag-Lloyd has taken up actions to manage material IROs related to Hapag-Lloyd's own workforce. The specific actions are:

- Promoting Equal Opportunities for Women
- Facilitating Training Access for all Liner Shipping segment Employees
- Promoting human rights in own operations
- Our Way of Working@Hapag-Lloyd

Action: Promoting equal opportunities for women

(S1 ESRS 2 MDR-A 68a) The global strategic project group around "Diversity@Hapag-Lloyd" developed recommendations for further measures supporting equal opportunities for all employees and provided the impetus needed for their implementation.

Measures include the working group Women@Hapag-Lloyd, which held four networking events for employees at the Company's headquarters in 2024. Furthermore, various training sessions on diverse topics such as self-marketing for women were offered.

Hapag-Lloyd also introduced programmes aimed at promoting diversity and equality in management to ensure women have equal opportunities for promotions and career advancement.

Promoting equal opportunities for women contributes to the achievement of the Global Code of Ethics policy by fostering an inclusive and diverse work environment. It also contributes to the target of equal participation of women in the Talent Development Program (TDP) and the Agile Leadership Program@Hapag-Lloyd (ALPHA) by creating a supportive environment for women, encouraging their participation and thus supporting women in having equal opportunities to develop their careers and take on leadership roles within the Company.

(MDR-A 68 b-e, 69a-c) Further action details: Promoting equal opportunities for women

MDR	Disclosure
(MDR-A 68b) Scope	The provisions of this action apply to all female, land-based Liner Shipping segment employees excluding ATL.
(MDR-A 68c) Time horizon	The TDP was established in 2012. The current management programme ALPHA was established in 2018. There is no specific year for the completion of this action, as it is an ongoing process.
(MDR-A 68d) Key action for harm mitigation	This action was not initiated to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts.
(MDR-A 68e) Progress	Women have been supported in pursuing their individual careers since the establishment of this action.
(MDR-A 69a-c) Financial resources	As the implementation of the action plan does not require (and is not planned to require) any significant Opex and/or Capex current or future financial resources are not significant.

Action: Facilitating training access for all Liner Shipping segment employees

(S1 ESRS 2 MDR-A 68a) The Learning Management System (LMS) launched in 2020 is now firmly established. It gives Hapag-Lloyd's Liner Shipping segment employees direct access to numerous internal training measures. With the Hapag-Lloyd Academy, Hapag-Lloyd has established a structured learning architecture for further education of employees, made up of four components undergoing continuous development: Personal Competency, Functional Capability Building, Core Curriculum and Tools, Products and Processes. In addition to training sessions and workshops, it incorporates coaching and mentoring as well as leadership programmes ("Leadership Academy"). First learning pathways within the individual segments were rolled out in the Learning Campus (Digital, Data, Sustainability). Further learning pathways are under development (IT, Finance, Procurement, Cyber Security and Trade Management). There are also plans to connect various regional on-site training concepts of the individual departments and anchor them under one umbrella in the future. For future reporting periods, a continuation of this action is planned with an increased focus on the following activities:

- Improvement of LMS input data on all globally and locally conducted training via establishing processes with templates and regular communication with local partners.
- Continuous development and roll out of functional curricula on four competency levels (basic, professional, advanced and master) for the following functions: Data, Digital, Sustainability, Cyber Security, Finance, IT, Procurement, Commercial (Customer Service and Sales), Trade Management and Operations.
- Continuous development and roll out of personal competency curricula and programmes for people leaders and non-people leaders.
- Continuous roll out of new and improved web-based and instructor-led training on key tools, products, and process of the Company with the aim to train and enable the workforce.

Facilitating access to training for all Liner Shipping segment employees directly contributes to the policy objective outlined in the Academy Playbook by promoting Hapag-Lloyd's investment in its people and strengthening both personal and organisational capabilities.

(MDR-A 68 b-e, 69a-c) Further action details: Facilitating training access for all Liner Shipping segment employees

MDR	Disclosure
(MDR-A 68b) Scope	The provisions of this action apply to all Liner Shipping segment employees excluding ATL. In principle, course contents are accessible to all (land-based) personnel. The online offerings are also available to all employees at sea.
(MDR-A 68c) Time horizon	There is no specific year for the completion of this action, as it is an ongoing process.
(MDR-A 68d) Key action for harm mitigation	This action was not initiated to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts.
(MDR-A 68e) Progress	The published functional academy learning journeys experience a high adoption rate. The instructor-led training programme called Ignite composed of personal competency and a functional deep dive is scoring a very high average NPS of above 85. In addition, global participation in the TDP and ALPHA programmes is significant.
(MDR-A 69a-c) Financial resources	As the implementation of the action plan does not require (and is not planned to require) any significant Opex and/or Capex current or future financial resources are not significant.

Action: Promoting human rights in own operations

(S1 ESRS 2 MDR-A 68a) Hapag-Lloyd provides comprehensive training programmes designed to enhance the participants' understanding of high-priority risks and equip them with the necessary skills to mitigate risks effectively. Through these training initiatives, participants learn about proactive strategies, including the utilisation of grievance mechanisms, to prevent human rights violations. For future reporting periods, a continuation of this action is planned, aligning with the commitment to fostering a culture of awareness and empowerment as outlined in the Academy Playbook. By doing so, Hapag-Lloyd is taking a step towards creating a workforce that is equipped to take prompt and appropriate action to prevent human rights abuses. As part of the comprehensive onboarding process, all employees undergo mandatory training on the organisation's corporate culture, legal requirements, and Company guidelines, ensuring a solid foundation for their roles. To further prevent human rights violations and promote environmental due diligence, Hapag-Lloyd has implemented targeted training sessions and workshops for relevant departments.

Moreover, a global communication campaign has been launched to raise awareness about Hapag-Lloyd's "Speak Up Line" complaint mechanism, and the organisation's Intranet is utilised to disseminate information on human rights risks.

Additionally, Hapag-Lloyd prioritises compliance with working hours and overtime regulations through collective agreements, contractual provisions, and dedicated training for new employees. Working hours are recorded at locations and on vessels, using electronic systems or manual recording methods.

(MDR-A 68 b-e, 69a-c) Further action details: Promoting human rights in own operations

MDR	Disclosure
(MDR-A 68b) Scope	The provisions of this action apply to all Liner Shipping segment employees excluding ATL.
(MDR-A 68c) Time horizon	There is no specific year for the completion of this action, as it is an ongoing process.
(MDR-A 68d) Key action for harm mitigation	This action was not initiated to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts.
(MDR-A 68e) Progress	No input on progress as no disclosure in previous period.
(MDR-A 69a-c) Financial resources	As the implementation of the action plan does not require (and is not planned to require) any significant Opex and/or Capex current or future financial resources are not significant.

Action: Our Way of Working@Hapag-Lloyd

(S1 ESRS 2 MDR-A 68a) Flexibility and scope for employees to choose their working hours and place of work have become important levers for Hapag-Lloyd. Given such measures are compatible with work processes, they enable Hapag-Lloyd's employees to balance their work and private life. The organisation is actively shaping the working environment with the express intention of enabling an environment that provides a healthy work-life balance. For future reporting periods, a continuation of this action is planned.

The “Our Way of Working@Hapag-Lloyd” initiative contributes to the objectives outlined in the Global Code of Ethics by promoting a supportive and flexible working environment in line with the Company’s commitment to fair working conditions, respect for human rights, diversity, health and safety and the overall well-being of employees.

Hapag-Lloyd’s hybrid working model gives shore-based personnel worldwide the option of working remotely up to twice a week. Globally, there is a positive uptake of this offering. Transition workshops were held at Hapag-Lloyd’s North Europe headquarters to support interested employees to get started and familiarise themselves with remote working. Additionally, a global cloud solution was introduced to further facilitate mobile working.

(MDR-A 68 b-e, 69a-c) Further action details: Our Way of Working@Hapag-Lloyd

MDR	Disclosure
(MDR-A 68b) Scope	The provisions of this action apply to all Liner Shipping segment employees excluding ATL.
(MDR-A 68c) Time horizon	There is no specific year for the completion of this action, as it is an ongoing process.
(MDR-A 68d) Key action for harm mitigation	This action was not initiated to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts.
(MDR-A 68e) Progress	Progress has been made with widespread adoption of remote working, modernisation of office spaces, provision of childcare services and improving working conditions for marine personnel, especially those under the German flag.
(MDR-A 69a-c) Financial resources	As the implementation of the action plan does not require (and is not planned to require) any significant Opex and/or Capex current or future financial resources are not significant.

(S1-4 38 a AR 42) Apart from the specific ESRS-compliant actions taken and described above, Hapag-Lloyd conducted no overarching and global actions to prevent or mitigate impacts on own workforce.

(S1-4 38 b) Hapag-Lloyd identified the following actual material impacts within all impacts related to its own workforce:

- [Negative impact] Occurrence of health and safety incidents
- [Positive impact] Contributing to well-being of workforce through fair working conditions
- [Positive impact] Promoting development of employees

The actions taken are thereby partly related to actual material impacts. The actual negative impact of health and safety incidents occurring is currently not addressed by any specific action, but remediation steps are taken up on an ad hoc basis whenever deemed necessary.

(S1-4 38 c AR 42) Hapag-Lloyd has taken up additional initiatives with the primary purpose of delivering positive impacts for its own workforce that relate to work-life balance. The enhanced internet capabilities provided by Starlink onboard of Hapag-Lloyd’s vessels not only support the seafarers’ mental well-being by keeping them connected to their families and friends but also enables them to stay updated with global events. Part of the Our Way of Working@Hapag-Lloyd

project is providing the appropriate infrastructure. This includes advanced software and hardware such as collaboration systems and video conferencing equipment as well as modern office concepts that are gradually being integrated throughout the Company that aim to further promote employee collaboration and well-being. In 2024, the area office in Hamburg reopened, after extensive modernisation measures.

[\(S1-4 38 d AR 38 - AR 39\)](#) In order to monitor the effectiveness of actions and initiatives in delivering outcomes for the Company's own workforce, they undergo annual validation by the respective departments and are reviewed by the SC.

[\(S1-4 39 AR 34\)](#) Hapag-Lloyd carries out regular surveys at the local, topic-based and department level to monitor employee satisfaction in respect to their job fulfilment, work-life balance, career prospects, and recognition of their work. The gathered information delivers valuable insights, which are used to identify relevant action needs. Furthermore, the identification of necessary actions is carried out by both the SC and the Ethics Committee.

[\(S1-4 40 a AR 44 - AR 45, AR 47\)](#) There are no specific actions planned or underway to mitigate material risks arising from impacts and dependencies on the Company's own workforce apart from the actions outlined above. [\(S1-4 40 b\)](#) There are also no specific actions planned or underway to pursue material opportunities in relation to the Company's own workforce.

[\(S1-4 41 AR 37\)](#) Hapag-Lloyd aims to ensure that its practices do not cause or contribute to material negative impacts on its own workforce through established due diligence processes in the context of the GSCA. The GSCA mandates a risk assessment related to its workforce at least once a year, which encompasses an evaluation of employee satisfaction. Practices that cause or contribute to material negative impacts can thereby be identified, and specific measures can be initiated based on the risk analysis results.

[\(S1-4 43\)](#) Hapag-Lloyd has not allocated significant resources specifically related to the management of material impacts.

[\(S1-4 AR 43\)](#) There are no identified negative impacts on workers that arise specifically from the transition to a greener, climate-neutral economy.

[\(S1.MDR-A 13-14, ESRS 2 MDR-A 62\)](#) The actions outlined above cover the material topics of diversity and equal opportunities, training and further education, human rights in the Company's own workforce and work-life balance. No specific actions are adopted in relation to other material topics.

There are currently no dedicated action plans in place to manage the material IROs related to other material topics. Hapag-Lloyd aims to ensure that the Company can respond to circumstances and developments during the reporting year as flexibly as possible. In line with the above-described steering process Hapag-Lloyd is continuously evaluating if the initiation of specific ESRS compliant actions is required.

3.1.7. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5)

(S1-5 46 AR 50 – AR 52, ESRS 2 MDR-T 80a) Hapag-Lloyd defined one CSRD compliant target to manage material IROs related to its own workforce:

- The equal gender split for TDP and ALPHA is linked to the policy objectives outlined in the Global Code of Ethics by fostering an inclusive and diverse work environment, promoting human rights and encouraging leadership to set a progressive example.

Target on diversity and equal opportunities

(MDR-T 80b-j) Further target details: Equal gender split for TDP and ALPHA

MDR	Disclosure
(MDR-T 80b) Measurable/ nature of target	Defined target level: 50% Nature of target: percentage
(MDR-T 80c) Scope	The target applies to employees included in Hapag-Lloyd's TDP and ALPHA.
(MDR-T 80d) Baseline value/year	Baseline year: 2022 Baseline value: Share of women of 47% in TDP and 37% in ALPHA
(MDR-T 80e) Period	Target year: 2030
(MDR-T 80f) Methodologies and assumptions	The target level is based on the ambition of achieving true gender parity in Hapag-Lloyd's TDP and ALPHA programmes. No specific methodology and assumptions were used.
(MDR-T 80g) Scientific evidence	This datapoint is not applicable here, as it only relates to environmental targets.
(MDR-T 80h) Stakeholder involve- ment	The Company's own workforce or workers' representatives were not involved in the process of setting the target.
(MDR-T 80i) Changes and limitations	There were no changes to the targets and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources, and processes to collect data adopted within the defined time horizon.
(MDR-T 80j) Performance	Performance against target: share of women in TDP was 46% in 2024, and 41% in ALPHA

(S1-5 47a) When setting the targets on equal gender split for TDP and ALPHA, representatives from the workforce were not actively included. (S1-5 47b) Similarly, there was no direct engagement in tracking Hapag-Lloyd's performance against the targets on equal gender split for TDP and ALPHA.

(S1-5 47c) Considering the identification of specific lessons or improvements resulting from the Company's performance against the targets, no direct engagement with its own workforce or workers' representatives has taken place.

(S1 ESRS 2 81) The target outlined under section 3.1.7 covers the material topic of diversity and equal opportunities. Apart from the above-mentioned target Hapag-Lloyd has not set further CSRD-compliant targets in the reporting year for the following matters, as they are covered by existing processes and standards described in the S1 chapter: fair remuneration, human rights in own operations, work-life balance, health and safety, and training and further education.

(S1 ESRS 2 81 b) Hapag-Lloyd tracks the effectiveness of policies and actions in relation to material sustainability-related IROs. (S1 ESRS 2 81 b i) To monitor the effectiveness of the relevant policies and actions in terms of material IROs, they are validated by the respective departments and reviewed by the SC. The SC will assess the need to develop and implement measurable outcome-oriented targets in line with ESRS requirements. (S1 ESRS 2 81 b ii) Hapag-Lloyd has not defined a specific ambition level to be achieved and no additional qualitative and quantitative indicators are used to evaluate the progress in relation to the Company's own workforce, apart from the target disclosed under section 3.1.7. Nevertheless, Hapag-Lloyd strives to minimise the number of violations to any of its policies and has zero tolerance for human rights violations and discrimination in particular.

3.1.8. Characteristics of the undertaking's employees (S1-6)

Detailed demographic information and employment conditions of Hapag-Lloyd's own workforce are provided in this section.

(S1-6 50a) Number of employees by gender

	2024			
Headcount	Male	Female	Diverse	Total
Total	10,513	6,390	2	16,905

(S1-6 50a) Number of employees in countries with 50 or more employees representing at least 10% of total number of employees

Headcount	2024
Germany	3,822
India	2,476
Total	6,298

(S1-6 50b) Information on employees by contract type and gender

	2024			
Headcount	Male	Female	Diverse	Total employees
Number of permanent employees	8,553	6,053	2	14,608
Number of temporary employees	1,091	250	–	1,341
Number of employees without guaranteed working hours	869	87	–	956
Total	10,513	6,390	2	16,905

(S1-6 50c) Employee turnover

	2024
Number of employees who have left the group	1,741
Share of employee turnover	10.3%

(S1-6 50 d AR 60) The following data sources were used when compiling the employee-related data: For its Liner Shipping segment, Hapag-Lloyd employee data is available in centralised systems for all land and marine personnel respectively. The figures were supplemented by the results of the decentralised data collection from all legal entities (mainly from the Terminal & Infrastructure segment), that had not been reflected yet. The count of employees includes apprentices and dual students. No assumptions were used when compiling the data.

(S1-6 50 d i, ii) The numbers of employees are reported in headcount as end of reporting period values.

(S1-6 50 e AR 58) Within the Terminal & Infrastructure segment a proportion of dock workers are counted as non-guaranteed hour workers. In certain locations dock workers are provided by third-party companies and therefore counted as non-employees. Likewise, facility management related services are provided by non-employees from third-party companies. Furthermore, a smaller number of non-employees work as agency drivers for Hapag-Lloyd's trucking services.

(S1-6 50 f) The reported information on employees is linked to the number in the financial statement disclosed in the chapter on basic principles of the Group as part of the management report.

3.1.9. Characteristics of non-employee workers in Hapag-Lloyd's own workforce (S1-7)

(S1-7 55a) The number of non-employees is 2,126. (S1-7 55b) The following data sources were used when compiling the employee-related data: For its Liner Shipping segment, non-employee data is available in centralised systems for all land and marine personnel respectively. The figures were supplemented by the results of the decentralised data collection from all legal entities (mainly from the Terminal & Infrastructure segment), that had not been reflected yet.

The following assumptions are used when compiling the data:

- Leased personnel and self-employed persons are included, external companies providing services etc. are excluded as they are not part of the workforce. Such suppliers are required to sign a SCoC and their employees are regarded as workers in the value chain.

(S1-7 55 b i, ii) The numbers of non-employees are reported in headcount format and as end of reporting period values.

3.1.10. Collective bargaining coverage and social dialogue (S1-8)

This section details the extent of collective bargaining coverage and the state of social dialogue between Hapag-Lloyd and its own workforce.

(S1-8 60 a) In the reporting year, the percentage of total employees covered by collective bargaining agreements in the EEA was 83.5%.

(S1-8 AR 70) Within the EEA, significant employment is relevant in Germany, with over 96% of employees in Germany covered by workplace representation.

(S1-8 AR 70) **Collective bargaining coverage and social dialogue**

Coverage Rate	Collective Bargaining Coverage	Social Dialogue
	Employees – EEA (for countries >50, representing at least 10% of tot. employees)	Workplace representation – EEA only (for countries >50, representing at least 10% of tot. employees)
0–19%		
20–39%		
40–59%		
60–79%		
80–100%	Germany	Germany

The table shows the share of employees in Hapag-Lloyd's own workforce that are covered by workers' representatives in each EEA country in which Hapag-Lloyd has significant employment. (S1-8 63 b) Hapag-Lloyd's workers' council for seafarers is member of the European Works Council and there is an agreement in place between Hapag-Lloyd and the European Works Council.

3.1.11. Diversity metrics (S1-9)

This section provides metrics related to diversity within Hapag-Lloyd, including a breakdown of its own workforce according to different genders.

(S1-9 66a) **Gender distribution at top management level**

Headcount	2024	
	Number of employees at top management level	Share of employees at top management level
Male	127	82.5%
Female	27	17.5%
Diverse	–	–
Total	154	100.0%

(S1-9 AR71) Hapag-Lloyd's top management in the Liner Shipping segment includes the two leadership levels below the executive board. In the Terminal & Infrastructure segment top management is defined as HGT's management board and the leadership level below the board as well as the management board and the senior vice presidents at SAAM Terminals.

(S1-9 66b) **Distribution of employees' age by category**

Headcount	2024	
	Number of employees	Share of the total number of employees
Under 30 years old	4,211	24.9%
30–50 years old	9,861	58.3%
Over 50 years old	2,833	16.8%
Total	16,905	100.0%

3.1.12. Entity-specific metrics related to diversity

Diversity in management programmes

	2024
Share of female employees in TDP	46.1%
Share of female employees in ALPHA	41.2%

The entity-specific metrics are of strategic relevance for Hapag-Lloyd as they relate to the positive impact of leading by example with a diverse management team as well as to the opportunity to attract and retain talents through diverse teams. Furthermore, they address the risk of potentially losing talent where equal opportunities are not ensured. By tracking those metrics Hapag-Lloyd can facilitate the steering of actions contributing to the IROs.

Apprenticeship metric

	2024
Retention rate after completion of apprenticeship	47.4%

This entity-specific metric is of strategic relevance for Hapag-Lloyd as it relates to the opportunity to attract and retain talents through diverse teams, especially regarding age structure, as well as the opportunity to minimize employee turnover through high labour and safety standards. Tracking this metric enables Hapag-Lloyd to facilitate the steering of actions contributing to the mentioned IROs.

3.1.13. Adequate wages (S1-10)

(S1-10 69 AR 72 – AR 74) Hapag-Lloyd defines adequate wages to be in line with minimum wages. All Hapag-Lloyd employees are paid minimum wages according to national law. Therefore, no employees are paid below the adequate wage benchmark.

3.1.14. Health and safety metrics (S1-14)

(S1-14 88a) Percentage of employees covered by own health and safety management system

	2024
Share of people in its own workforce who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines	99.6%

(S1-14 88b) Number of fatalities

	2024
Number of fatalities in own workforce as result of work-related injuries and work-related ill health	–
Number of fatalities as result of work-related injuries and work-related ill health of other workers working on group's sites	–

(S1-14 88c) Recordable work accidents

	2024
Number of recordable work-related accidents for own workforce	121
Number of total hours worked by own workers – own workforce	35,502,152
Rate of recordable work-related accidents for own workforce (per million working hours)	3.4
Rate of recordable work-related accidents – non-employees (per million working hours)	11.8
Rate of recordable work-related accidents – employees (per million working hours)	2.3

(S1-14 88d) Work-related ill health

	2024
Number of cases of recordable work-related ill health for employees	2

3.1.15. Remuneration metrics (S1-16)**(S1-16 97a AR 98–100) Unadjusted gender pay gap**

	2024
Gender pay gap	6%

(S1-16 97 b AR 101) Annual total remuneration ratio

	2024
Annual total remuneration ratio (CEO pay gap)	108
Annual median total compensation for all employees (EUR)	39,105

(S1-16 97 c AR 99, AR 102) The unadjusted gender pay gap is defined as the difference of average pay levels between female and male employees. The disclosed unadjusted gender pay gap is also known as the unadjusted pay gap. In Hapag-Lloyd's view, no substantive conclusions can be drawn from the unadjusted gender pay gap since it does not consider differences in, for example type of work or hierarchy. In 2025, Hapag-Lloyd will conduct a larger project to analyse the unadjusted gender pay gap in detail and assess whether the adjusted pay gap indicates a need for action.

The following data sources were used when compiling the employee-related data: For its Liner Shipping segment, data on annual total remuneration is available in centralised systems for all land and marine personnel respectively. The figures were supplemented by the results of the decentralised data collection from all legal entities (mainly from the Terminal & Infrastructure segment), that had not been reflected yet.

The following assumptions are used when compiling the data:

- Unadjusted gender pay gap is based on average gross hourly earnings of female and male employees.
- In computing the unadjusted gender pay gap Hapag-Lloyd calculates the difference of the gross hourly pay levels of male employees to female employees divided by the gross hourly pay level of male employees as advised by the ESRS Standard S1-16 AR 98 b.
- Annual median total compensation for all employees is based on total compensation data at the individual employee level.
- Compensation includes base salary, benefits in cash as well as direct remuneration

3.1.16. Incidents, complaints and severe human rights impacts (S1-17)

(S1-17 103 a,b,c) Number of complaints, incidents and fines

	2024
Number of incidents of discrimination	14
Number of complaints filed through channels for people in own workforce to raise concerns	214
Number of complaints filed to National Contact Points for OECD Multinational Enterprises	–
Amount of fines, penalties, and compensation for damages as result of incidents of discrimination, including harassment and complaints filed	–

(S1-17 103 c AR 103-AR 106) As there were no fines, penalties, and compensation for damages in the reporting period a reconciliation with the key financial statement figures is not applicable.

(S1-17 103 d AR 103-AR 106) The following assumptions are used when compiling the data:

- A complaint is an indication of potential compliance-related concerns. A compliance-related concern is any non-compliant or illegal conduct which a person may suspect, on reasonable grounds, has occurred or is occurring implicating Hapag-Lloyd and/or its employee(s). 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.
- Incidents of discrimination including confirmed cases that lead to legal proceedings and/or termination of employment or result in disciplinary action are counted. Harassment, including sexual harassment, is defined in accordance with the GSCA.
- The number of complaints is stated excluding those cases already reported under number of incidents of discrimination.
- In case the complaint is classified as a confirmed incident of discrimination in a different reporting year it will be reported in the year the complaint is handed in as complaint and in the year when the case is classified as such. However, there were two cases that were handed in and classified in 2023 that were not reported in 2023 due to reporting errors. Data is based on the channels introduced under section 3.1.5.

(S1-17 104 a,b) **Severe human rights issues**

	2024
Number of severe human rights issues and incidents connected to own workforce	2
Amount of material fines, penalties, and compensation for damages as result of violations regarding social and human rights factors	–

The following definitions and assumptions are used when compiling the data:

Human rights violation is a deliberate act that infringes on or denies an individual or group's fundamental rights, even unintentionally. It is a violation of law and often involves a pattern of abuse. Examples of human rights violations include child labour, forced labour, union-busting, discrimination, harassment, and withholding wages or paying incorrectly.

Human rights incident is a single event or occurrence that may or may not constitute a human rights violation. It is not necessarily a deliberate act and may be the result of negligence, incompetence, or other factors. Incidents can lead to legal consequences if the employer is found to be negligent or in violation of labour laws. Examples of human rights incidents include accidental workplace injuries and an unintended wage calculation error.

A human rights violation or a human rights incident always supposes a negative impact on human rights. A negative human rights impact occurs when an action removes or reduces the ability of an individual to enjoy their human rights.

A negative human rights impact (violation or incident) is severe in virtue of one or more of the following characteristics: its scale, scope, or irremediability.

Scale means the gravity of the impact on the human right(s), it considers the extent to which the impact affects individuals' lives.

Scope means the number of individuals that are or could be affected.

Irremediability means the difficulty or impossibility of restoring those impacted to their prior enjoyment of the rights.

If the human rights impact is grave or affects several individuals or cannot be easily reversed, the severity is given.

In case a confirmed human rights issue or incident is a form of discrimination it will be counted as a severe human rights issue or incident and incident of discrimination.

If a complaint is classified as a confirmed severe human rights issue or incident in a different reporting year it will be reported in the year the complaint is handed in as complaint and in the year when the case is classified as such. Data is based on the following channels: third-party complaint mechanisms, public reports or the media, lawsuits.

The cases reported under the KPI “Number of severe human rights issues and incidents connected to own workforce” are also classified as incidents of discrimination and reported under the KPI “Number of incidents of discrimination”.

(S1-17 104 a AR 103-AR 106) Of the severe human rights issues and incidents connected to the Company’s own workforce, none were cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises.

During the reporting year two cases of severe human rights issues have been reported through the available channels.

There was one case of alleged sexual harassment that has been handled thoroughly and effectively by Hapag-Lloyd’s compliance department, ethics committee and global human rights office. After investigation and substantiation of the allegations, the case was closed following the termination of employment contract with the alleged harasser and implementation of awareness-raising measures within less than two months after the reporting date.

There was one case of alleged harassment that was identified through submitted complaints via the whistleblower channel. An independent investigation was conducted by an external legal firm. Provisional measures were taken to reduce interference risks and ensure a fair investigation. After substantiating the allegations, appropriate corrective actions were taken, including the termination of the individual’s employment contract. The recommendations from the external investigation were implemented, reflecting an effort to strengthen internal processes and prevent similar risks in the future.

The established human rights due diligence processes proved effective in identifying the human rights violation in both cases through existing grievance mechanisms and in providing adequate remedy and prevention of future incidents of harassment and sexual harassment. By taking these steps, Hapag-Lloyd has demonstrated its commitment to upholding human rights standards, such as the UNGPs and OECD Guidelines.

Based on the information available, the prevailing cases can be classified as a human rights violation. However, as these cases were handled in accordance with the human rights approach of the UNGPs and the OECD Guidelines, these standards were not violated.

(S1-17 104 b AR 103-AR 106) As there were no fines, penalties, and compensation for damages in the reporting period a reconciliation with the key financial statement figures is not applicable.

3.1.17. Minimum disclosure requirements – metrics (S1 MDR-M)

Employee data is based on reporting date 31.12.2024 and includes permanent, temporary and non-guaranteed hours employees. Any deviations from this are disclosed under methodology and assumptions.

(S1-6) Characteristics of the undertaking's employees

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity
 Related material sustainability topic: Gender equality and equal pay for work of equal value

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Number of employees (headcount)	This covers all employees who perform work for any of the company's entities included in its sustainability reporting. An employee is an individual who is in an employment relationship with the company according to national law or practice.
Percentage of employee turnover	The KPI is determined by dividing the number of employees who have left during the year—whether due to employer-initiated or employee-initiated departures (excluding contract expirations)—by the total number of employees on the reporting date of 31.12.2024. Exits of non-guaranteed hour employees are excluded, as their contracts are temporary and subject to frequent changes.
Number of employees who have left undertaking	The KPI reflects the number of employees who have left during the year whether due to employer-initiated or employee-initiated departures (excluding contract expirations).

(S1-7) Characteristics of non-employee workers in the undertaking's own workforce

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity
 Related material sustainability topic: Gender equality and equal pay for work of equal value

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Number of non-employees in own workforce	This KPI includes people provided by third-party employers, for example dock workers, facility management related services and agency drivers for trucks.

(S1-8) Collective bargaining coverage and social dialogue

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity
 Related material sustainability topic: Collective bargaining, including rate of workers covered by collective agreements

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Percentage of total employees covered by collective bargaining agreements	This KPI is calculated by dividing the number of employees covered by collective bargaining agreements by the total number of employees inside EEA.

(S1-10) Adequate wages

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic: Adequate wages

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Percentage of employees paid below the applicable adequate wage benchmark	Adequate wages have been defined as the minimum amount of remuneration that an employer is required to pay wage earners for the work performed during a given period, which cannot be reduced by collective agreement or an individual contract, also known as minimum wage. This KPI is calculated by dividing the number of employees paid below adequate wage per country where workers earn below applicable adequate wage benchmarks by the total employees per country where workers earn below applicable adequate wage benchmarks.

(S1-14) Health and safety metrics

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic: Health and safety

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Number of recordable work-related accidents for own workforce	The number of recordable work-related accidents for the own workforce, consisting of employees and non-employees, are based actual data of accidents reported. Accidents count, if they resulted in the employee stopping work for at least one day. A different methodology is used for seafarers in Hapag-Lloyd's own workforce where work-related accidents count if the employee is unfit to duty for at least 72 hours. Accidents are only counted if they happen during a work-related duty.
Number of total hours worked by own workers	The number of total hours worked by the own workforce is based on the actual working hours, including overtime, if available. Otherwise, contractual working hours are used, including calculations for holidays, vacations, and average sick days applicable on a country basis. For non-employees, the hours are based on the billed hours. Due to a mid-year implementation of a new centralised time and attendance software for seafarers, their working hours were extrapolated for the whole year based on the actual working hours including overtime for the months of October to December 2024.

(S1-16) Compensation metrics (pay gap and total compensation)

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic: Adequate wages

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Unadjusted gender pay gap	<p>Hapag-Lloyd calculates the unadjusted gender pay gap of the gross hourly pay levels of male employees to female employees as advised by the ESRS Standard S1-16 AR 98 b. The KPI covers all employees with available compensation data in the source system.</p> <p>Compensation includes base salary, benefits in cash as well as direct remuneration. Due to immateriality within the context of this KPI, company cars and expat expenses were not included.</p> <p>Pension contributions follow fixed company or statutory models. There is therefore no risk of discrimination on the basis of gender or other characteristics. The contributions are based either on salary levels or other objective criteria. Employer pension expenses are therefore not included. All employee contributions to pension schemes, both state and company schemes, are taken into account as part of the remuneration data used to calculate the gender pay gap.</p>
Annual median total compensation for all employees	<p>Data is based on actual figures from Human Resources software.</p> <p>Annual median total compensation for all employees is based on total compensation data on level of individual employees. The KPI covers all employees with available compensation data in the source system.</p> <p>Compensation includes base salary, benefits in cash as well as direct remuneration.</p> <p>Due to immateriality within the context of this KPI, company cars and expat expenses were not included. To ensure consistency, pensions are processed in the same way as for the gender pay gap.</p>
Annual total remuneration ratio	<p>Data is based on actual figures from Human Resources software.</p> <p>Annual median total compensation for all employees is based on total compensation data on level of individual employees. All employees with available compensation data in the source system are included. Compensation includes base salary, benefits in cash as well as direct remuneration. Due to immateriality within the context of this KPI, company cars and expat expenses were not included. To ensure consistency, pensions are processed in the same way as for the gender pay gap.</p> <p>The assessment of the highest-paid individual considers the remuneration of the Executive Board and Supervisory Board. The KPI is calculated by dividing the annual total compensation for Hapag-Lloyd's highest paid individual by the median employee annual total compensation.</p>

(S1-17) Incidents, complaints and severe human rights impacts

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity
 Related material sustainability topic: Measures against violence and harassment in the workplace

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Number of incidents of discrimination	<p>The data sources are the established companies' channels to raise concerns (see section 3.1.5).</p> <p>Incidents of discrimination that include confirmed cases that lead to legal proceedings and/or termination of employment or result in disciplinary action are counted.</p> <p>If the complaint is classified as a confirmed incident of discrimination in a different reporting year it will be reported in the year the complaint is handed in as complaint and in the year when the case is classified as such.</p>
Number of complaints filed through channels for people in own workforce to raise concerns	<p>The data sources are the established companies' channels to raise concerns (see section 3.1.5).</p> <p>A complaint is an indication of potential compliance related concerns. A compliance-related concern is any non-compliant or illegal conduct which a person may suspect, on reasonable grounds, has occurred or is occurring implicating Hapag-Lloyd and/or its employee(s). 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.</p> <p>If the complaint is classified as a confirmed incident of discrimination in a different reporting year it will be reported in the year the complaint is handed in as complaint and in the year when the case is classified as such.</p>
Number of complaints filed to National Contact Points for OECD Multinational Enterprises	Hapag-Lloyd includes officially reported cases from OECD national contact points that are communicated via email and/or letters to the Company.
Amount of fines, penalties, and compensation for damages as result of incidents of discrimination, including harassment and complaints filed	Data is collected in the whistleblower system. Every responsible case examiner has to include information about fines, penalties and compensation for damages in the system.
Number of severe human rights issues and incidents connected to own workforce	<p>Data is based on recorded instances of lawsuits that resulted in a conviction, formal complaints reported through the described complaint mechanism (see section 3.1.5), as well as serious allegations in public reports or the media. The latter is aided by a third-party software.</p> <p>A negative human rights impact that is severe by virtue of one or more of the following characteristics: its scale, scope or irremediability. Scale means the gravity of the impact on the human right(s). Scope means the number of individuals that are or could be affected. Irremediability means the ease or otherwise with which those impacted could be restored to their prior enjoyment of the right(s).</p>
Number of severe human rights issues and incidents connected to own workforce that are cases of non respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises	Responsible data collectors screen all cases of severe human rights issues and analyse whether the case constitutes a case of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises.
Amount of fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce	Data is collected in the whistleblower system. Every responsible case examiner has to include information about fines, penalties and compensation for damages in the system.

(S1) Entity-specific

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic: Gender equality and equal pay for work of equal value; training and skills development

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Share of female employees in TDP Share of female employees in ALPHA	The share is calculated by dividing the number of female participants by the total number of participants enrolled on the reporting date 31.12.2024.
Retention rate after completion of apprenticeship	An apprentice is an individual who is being paid to learn an art or skill and receive on-the-job training from a more experienced person in a company. The apprentice completes the programme with a degree or certification. The retention rate is calculated by dividing the number of apprentices that continue to work for the Company after they completed their apprenticeship by the total number of apprentices that completed their apprenticeship in the reporting year.

3.2. Workers in the value chain (S2)

3.2.1. Material impacts, risks and opportunities (S2 IROs)

In the DMA (see section 1.10) three material IROs in relation to Hapag-Lloyd’s material topic of labour standards and human rights in the supply chain were identified.

(S2 SBM-3 11, AR 6-7) When fulfilling the requirements of ESRS 2 SBM-3 48, Hapag-Lloyd’s disclosure scope includes all workers in the value chain who are likely to be materially impacted by the Company’s operations, products, services, or business relationships. Identified actual and potential impacts on Hapag-Lloyd’s value chain workers do not originate from its strategy and business model.

Material IROs

• [Potential negative impact] Non-compliance with labour standards or unfair working conditions
Non-compliance with human rights along the supply chain can lead to negative social impacts for example mental and physical health.
• [Actual positive impact] Contributing to well-being of workers in the value chain through fair working conditions
Promoting decent work standards for workers in the value chain can help to prevent human rights violations.
• [Opportunity] Improve reputation through high labour and safety standards
Demonstrating a commitment to fair labour practices and human rights can improve the reputation as a socially responsible and trustworthy company.

Definition and groups of workers in the value chain

(S2 SBM-3 11a i-v) A worker in the value chain is defined as an individual performing work in the value chain, regardless of the existence or nature of any contractual relationship with the undertaking. Hapag-Lloyd identified two types of workers in the value chain who could be subject to material impacts by Hapag-Lloyd’s own operations or through its value chain among the five predefined types as per S2 SBM-3 11a. They apply as follows:

Worker type specification from S2 SBM-3 11a	Identified types of workers in the value chain
Workers working on the undertaking site, but who are not part of own workforce	<ul style="list-style-type: none">• Land-based personnel from external companies fulfilling services for example auditors, consultants, photographers, workers in the container handling (container terminals), container maintenance and repair• Seafarers on Hapag-Lloyd owned ships not managed by Hapag-Lloyd (from third-party management) where Hapag-Lloyd has a contract with a third-party management which works with crewing agencies
Workers working for entities in the undertaking’s upstream value chain	<ul style="list-style-type: none">• Land-based personnel from external companies fulfilling services, for example workers in the vessel building & recycling process, workers in the pre- and on-carriage activities, for example truckers• Seafarers from crewing agencies on chartered ships by Hapag-Lloyd
Workers working for entities in the undertaking’s downstream value chain	<ul style="list-style-type: none">• No identified groups subject to material impacts, as worker types not relevant for Hapag-Lloyd’s value chain

Worker type specification from S2 SBM-3 11a	Identified types of workers in the value chain
Workers working in the operations of a joint venture or special purpose vehicle involving the reporting undertaking	• No identified groups subject to material impacts as worker types not relevant for Hapag-Lloyd's value chain
Workers who (within the prior categories or additionally) are particularly vulnerable to negative impacts whether due to their inherent characteristics or to the particular context, such as trade unionists, migrant workers, home workers, women or young workers	• No identified groups subject to material impacts as worker types not relevant for Hapag-Lloyd's value chain

Impacts that relate to Hapag-Lloyd's own operations and value chain, including through its products or services, as well as through its business relationships affect the two identified relevant worker type groups in the same way.

In light of increasing regulatory landscape for a company's value chain, it is worth noting that there are differences in how risks are perceived, particularly in light of the GSCA and the CSRD. Under the CSRD, companies have to report on significant risks which have an impact and/or are financially material, while the GSCA focuses on preventing and mitigating human rights and environmental impacts, even if the financial consequences for the company are not immediately apparent.

Managing labour-related practices and risks in the value chain

(S2 SBM-3 11b) Based on the risk concept of the GSCA, in which entities from the Terminal & Infrastructure segment of Hapag-Lloyd were considered as suppliers, the risk analysis identified potential country specific risks for forced or compulsory labour and child labour in the following geographic areas:

- Africa, Latin America, Middle East, India, Bangladesh, East Asia

As Hapag-Lloyd has business activities within these geographic areas, the organisation is generally exposed to those risks that were classified as medium to high in these geographic areas. However, the risk analysis of Hapag-Lloyd's workers in the value chain has not identified forced or compulsory labour as a significant risk. Hapag-Lloyd rejects any form of forced or child labour and is committed to the prohibition of modern slavery and human trafficking. Hapag-Lloyd follows the definition of child labour included in the ILO's Minimum Age Convention (No. 138), which stipulates that the minimum age for admission to employment must not be below the age at which compulsory schooling is complete – but in any case, not below 15 years old or, for work at sea, 16 years old.

(S2 SBM-3 11c) The material negative impact for workers in the value chain of non-compliance with labour standards or unfair working conditions does not occur widespread or systemically but is related to individual incidents only. Furthermore, this impact is not linked to the efforts of the transition to greener and climate-neutral operations. (S2 SBM-3 11d) Hapag-Lloyd is committed to promoting the well-being of workers in the value chain by stipulating high labour standards as outlined in the Company's SCoC. While specific activities with direct positive impacts have not yet been identified, the Company recognises the potential for its operations to have a beneficial effect on workers through opportunities such as job creation and upskilling, particularly in the context of a 'just transition'.

(S2 SBM-3 11e) With the potential improvement of reputation through high labour and safety standards, Hapag-Lloyd has identified a material opportunity evolving from impacts on and dependencies from workers in the value chain. Demonstrating a commitment to fair labour practices and human rights helps Hapag-Lloyd to maintain high standards, attracting customers and investors who value this commitment.

(S2 SBM-3 12, AR 8) The Minimum Safeguards require a risk analysis for all suppliers, including indirect ones. Hapag-Lloyd's 2023 GSCA report provides insights into risks associated with indirect suppliers. The prioritised risks identified through the occasion-related risk analysis for indirect suppliers include the disregard for occupational safety and work-related health hazards, specifically focusing on occupational safety at sea. This risk is prevalent among indirect suppliers in the global maritime sector, thus occurring worldwide. The results of the risk analysis were evaluated according to Hapag-Lloyd regional locations and depict an increased risk in the regions of Asia, Latin America, and Middle East & Africa.

For SAAM Terminals similar concepts exist to develop an understanding of how workers with particular characteristics, those working in particular contexts, or those undertaking particular activities may be at greater risk of harm. These include quarterly risk reports, compliance reporting channels, and due diligence processes with vendors.

(S2 SBM-3 13, AR 9) The identified material risks and opportunities relate specifically to workers in the value chain in the maritime sector.

3.2.2. Policies related to value chain workers (S2-1)

The policies that Hapag-Lloyd has adopted to manage its material impacts on workers in the value chain are outlined in the following section, aiming to enable an understanding of the measures in place to prevent, mitigate, and remediate actual and potential impacts, as well as to address risks and pursue opportunities.

(S2-1 16, AR 10, AR 13) Hapag-Lloyd manages the current material impacts and opportunities related to workers in the value chain within three established policies and guidelines:

Policy/IRO	[Negative impact] Non-compliance with labour standards or unfair working conditions	[Positive impact] Contributing to well-being of workers in the value chain through fair working conditions	[Opportunity] Improve reputation through high labour and safety standards
Global Code of Ethics	X	X	
Supplier Code of Conduct	X	X	X
Policy Statement on Social Responsibility and Human Rights	X	X	

Global Code of Ethics

(MDR-P 65a) The Global Code of Ethics defines the organisation's expectations for working relationships of its employees with customers, suppliers, governments, authorities, and competitors. It sets principles and guidelines that Hapag-Lloyd established to govern the behaviour and actions of its employees and stakeholders across various locations and jurisdictions. Hapag-Lloyd thereby addresses the identified material IROs related to workers in the value chain by emphasising the importance of health and safety. The ambition is to comply with local occupational health and safety laws, including regulations on maximum working hours. The intention of this commitment as well as regular monitoring and assessment of compliance with laws and regulations is to ensure continuous improvement and prevent the identified negative impacts. Hapag-Lloyd is committed to respecting human rights and treating everyone with dignity and respect, within its own operations as well as along the value chain. The Company particularly commits to the following human rights standards: the effective abolition of child labour, the elimination of all forms of forced labour or modern slavery as well as human trafficking, the promotion of good living and working conditions, occupational health and safety, freedom of association and the right of collective bargaining, diversity, equality and inclusion, adequate remuneration and the rights of local communities. This commitment aims to contribute to the well-being of workers in the value chain. Additionally, Hapag-Lloyd's "Speak Up Line" allows for an immediate reporting of actual or potential human rights violations within the Company and along its value chain.

Supplier Code of Conduct

The objective of the SCoC is to set expectations towards all Hapag-Lloyd's contractors, suppliers and service providers to align with Hapag-Lloyd's standards outlined in the Global Code of Ethics, covering aspect such as fair competition, the environment, employee rights, compliance with human rights and combating corruption and bribery. Hapag-Lloyd's SCoC requires suppliers to adhere to the same high standards of conduct as defined in the Global Code of Ethics, thereby addressing the identified material impacts and the opportunity similarly. The SCoC describes that a common responsibility towards business ethics, human rights, and the environment, has a greater impact as well as a better chance of identifying, preventing, mitigating and remediating adverse human rights and environmental impacts in the Group and the supply chains. This collaborative approach helps mitigate the negative impact of non-compliance with labour standards or unfair working conditions and enhances the well-being of workers in the value chain through fair working conditions. The parties in line with the SCoC commit to act and react constructively, cooperatively, and with due diligence, regarding the principle of cooperation.

Policy Statement on Social Responsibility and Human Rights

The Policy Statement on Social Responsibility and Human Rights confirms Hapag-Lloyd's commitment to fulfilling its due diligence obligations related to human rights and the environment in its business activities and value chain as well as to describe its related activities. The Policy Statement is intended to establish monitoring, due diligence, training, communication and complaint mechanisms to promote and protect human rights and the environment and thereby addresses all identified material IROs. The strict prohibition of child or forced labour, slavery and

human trafficking is explicitly addressed. It further emphasises the commitment to fair working conditions and adequate compensation, noting the need for working hours, wages and employee benefits that comply with applicable national and international regulations thus aiming to prevent the negative impact of non-compliance with labour standards or unfair working conditions.

The process for monitoring the respective policies is described as follows:

Policy	Process for monitoring
Global Code of Ethics	See section 3.1.3.
Supplier Code of Conduct	Suppliers acknowledge that Hapag-Lloyd may decide to include them in monitoring activities, including self-assessments, audits, and documentation reviews. Suppliers commit to maintain records, books, and accounts reasonably detailed, accurately, and completely on the standards established in this SCoC. Suppliers agree to be monitored on-site and off-site by Hapag-Lloyd or its designee, including permitting access to their facilities, at reasonable intervals and with reasonable notice. Within the course of monitoring activities, suppliers agree to effectively cooperate, for example, implementing corrective concepts to prevent, mitigate, and remediate human rights and environment-related risks and impacts.
Policy Statement on Social Responsibility and Human Rights	See section 3.1.3.

[\(ESRS 2 62\)](#) All described policies apply to the Liner Shipping segment of Hapag-Lloyd and all its employees. The newly established Terminal & Infrastructure segment of Hapag-Lloyd is not yet covered, but its inclusion is currently being implemented. In terms of value chain coverage, the policies entail selected elements and target groups only.

Policy	(MDR-P 65b) Scope
Global Code of Ethics	See section 3.1.3.
Supplier Code of Conduct	The scope of the SCoC affects suppliers, subcontractors, and any other third party involved in the fulfilment of Hapag-Lloyd's Liner Shipping segment contracts and orders as well as external Managers of Hapag-Lloyd's ships.
Policy Statement on Social Responsibility and Human Rights	See section 3.1.3.

Policy	(MDR-P 65c) Most senior level in organisation that is accountable for implementation of policy
Global Code of Ethics	See section 3.1.3.
Supplier Code of Conduct	Senior Managing Director Global Procurement
Policy Statement on Social Responsibility and Human Rights	See section 3.1.3.

(MDR-P 65d) Third-party standards or initiatives that are respected through implementation of policy	
Policy	
Global Code of Ethics	See section 3.1.3.
Supplier Code of Conduct	<ul style="list-style-type: none"> • International Bill of Human Rights • ILO • Declaration on Fundamental Principles and Rights • ILO core conventions • ILO MLC • UNGP • OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct • Sustainable Development Goals (SDG)
Policy Statement on Social Responsibility and Human Rights	See section 3.1.3.
(MDR-P 65e) Description of consideration given to interests of key stakeholders in setting policy	
Policy	
Global Code of Ethics	See section 3.1.3.
Supplier Code of Conduct	The process of setting the policy was informed by the interests of various internal stakeholders.
Policy Statement on Social Responsibility and Human Rights	See section 3.1.3.
(MDR-P 65f) Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it	
Policy	
Global Code of Ethics	See section 3.1.3.
Supplier Code of Conduct	<p>The SCoC is available on Hapag-Lloyd's website.</p> <p>Suppliers who participate in tendering processes, submit self-assessment, or conclude framework agreements with Hapag-Lloyd are required to sign the SCoC or provide evidence of their own similar SCoC.</p> <p>Hapag-Lloyd plans to offer training to its suppliers to support the implementation of its due diligence obligations.</p>
Policy Statement on Social Responsibility and Human Rights	See section 3.1.3.

Approach to respecting human rights for workers in the value chain

(S2-1 17) As disclosed, Hapag-Lloyd Liner Shipping has established several human rights policy commitments relevant to workers in the value chain. These include adherence to the Global Code of Ethics, which defines Hapag-Lloyd's basic values, and the standards of conduct expected of managers and employees. The Global Code of Ethics emphasises the observance of human rights as defined in the United Nations' Universal Declaration of Human Rights, and the ILO core labour standards. Hapag-Lloyd also maintains a SCoC that requires contractors, suppliers and service providers to uphold high standards of conduct and commit to, among others, international labour and human rights standards such as effective abolition of child labour, elimination of all forms of forced labour or modern slavery and diversity and inclusion. Similarly, SAAM Terminals' SCoC explicitly addresses the protection of human rights, including the prohibition of child labour and forced labour.

(S2-1 17a) In the Liner Shipping segment Hapag-Lloyd's general approach to respecting human rights relevant to workers in the value chain involves several key commitments, as described in section 3.2.2. Further, Hapag-Lloyd has due diligence processes in place, designed to promote ongoing improvements within their value chain. The organisation is committed to fulfilling its due diligence obligation in order to identify, prevent, mitigate and remedy any negative impacts on human rights and the environment. For that, Hapag-Lloyd regularly conducts risks analyses in its own sphere of business and in its upstream value chain at the level of its direct suppliers. In case risks are identified, Hapag-Lloyd takes measures to prevent and remedy such and subsequently examines the effectiveness of these measures.

SAAM Terminals expects and encourages its suppliers to carry out due diligence processes to identify, prevent, mitigate and remediate adverse human rights impacts. The most relevant action involves the vendor's acceptance of the SCoC before establishing any commercial relationship.

(S2-1 17b) A dedicated process to engage with workers in the value chain at Hapag-Lloyd does currently not exist within the framework of preventive measures that are defined and implemented to address high-risk suppliers.

(S2-1 17c) To provide and enable remedy for human rights impacts Hapag-Lloyd's approach is as follows: Hapag-Lloyd's complaint mechanism consists of internal reporting channels as well as a digital reporting platform ("Speak Up Line") available to all Hapag-Lloyd employees and external parties. This procedure allows for any concerns about or indications of possible violations of due diligence obligations related to human rights or the environment to be reported anonymously. Hapag-Lloyd aims to ensure that all reports are handled in a confidential manner. If Hapag-Lloyd discovers that a violation of a human rights-related or an environment-related legal obligation has already occurred or is imminent in its own business area or at its suppliers, it is committed to take appropriate remedial action to prevent, end or minimise the extent of this violation.

(S2-1 18) Hapag-Lloyd's policies explicitly prohibit the trafficking in human beings, forced labour or compulsory labour and child labour. Furthermore, Hapag-Lloyd has a dedicated SCoC implemented. It is publicly available on the Hapag-Lloyd website.

(S2-1 AR 15) Hapag-Lloyd's SCoC includes provisions relevant to the safety of workers, precarious work, human trafficking, use of forced labour or child labour:

- Effective abolition of child labour
- Elimination of all forms of forced labour or modern slavery
- Occupational safety and health
- Freedom of association and the right to collective bargaining
- Diversity and inclusion
- Adequate remuneration
- Rights of communities and security

The SCoC is in line with ILO Core Conventions and the ILO Maritime Labour Convention.

(S2-1 19, AR 14) Hapag-Lloyd's policies are aligned with relevant internationally recognised instruments as mentioned under section 3.2.2. The scope of the individual policies is also described in the disclosures under section 3.2.2. The policy development and review process includes the alignment with such internationally recognised standards and instruments, ensuring the guidelines remain current, effective, and aligned with globally accepted best practices. For example, the mentioned due diligence processes for ongoing improvements within the value chain also comprise the compliance with the UNGP.

(S2-1 19) No reported cases of non-respect of the UNGP, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involved workers in the value chain in Hapag-Lloyd's defined value chain occurred.

3.2.3. Processes for engaging with value chain workers about impacts (S2-2)

(S2-2 24) A dedicated process to engage with workers in the value chain at Hapag-Lloyd does currently not exist within the framework of preventive measures that are defined and implemented to address high-risk suppliers, but engagement rather takes place on an ad hoc basis.

3.2.4. Processes to remediate negative impacts and channels for value chain workers to raise concerns (S2-3)

(S2-3 27 a, AR 21) If Hapag-Lloyd discovers that a violation of a human rights-related or an environment-related legal obligation has already occurred or is imminent in its own business area or at a direct supplier, it will take appropriate remedial action to prevent, end or minimise the extent of this violation. In addition, Hapag-Lloyd encourages suppliers to implement the standards in their own upstream value chain.

To assess whether the remedy offered is effective, Hapag-Lloyd examines whether it is suitable for achieving the objective of ending the material negative impact on workers in the value chain. For this purpose, an objective is formulated for each specific case in which a material negative impact has been identified. The achievement of such, including possible compensation, represents a remedy for the specific situation. The extent to which the remedial measures can contribute to achieving this objective is analysed subsequently.

For the Terminal & Infrastructure segment, no general or specific guidance to provide or contribute to remedy for human rights impacts is established in the reporting period.

Complaint mechanisms

(S2-3 27 b, AR 22) Workers in the value chain can raise their concerns or needs directly with Hapag-Lloyd through the Company's "Speak Up Line", a confidential channel through which compliance-related concerns can be reported at any time using an online form that is available worldwide. The channel is provided by a third-party independent service provider and the processing of the reports is exclusively carried out by Hapag-Lloyd.

Furthermore, sea personnel can additionally choose to report compliance violations, violations of marine labour law, human rights violations, disadvantages, or unfair treatment via a defined complaints procedure. Reports can be made to their direct superiors, the Fleet Management department, the sailor's country of origin or the ship's flag state. The MLC provides the legal framework for this process. Additionally, complaints can be raised to the ITF.

Similarly, SAAM Terminals has a complaints management procedure and promotes the proper use of the Whistleblower Channel among employees and other stakeholders.

Suppliers and value chain workers have access to this complaints channel and all complaints will be handled regardless, if a complaint is made by a SAAM Terminals employee, value chain worker or third party.

All received reports at SAAM Terminals are centrally administered through the SAAM Terminals Compliance Officer, who carries out the preliminary analysis of the report received, informs the Ethics Committee of the facts, and derives the complaint received. According to the definitions established in the "Complaints Referral Matrix", an internal document is set up that will establish the steps and those responsible for an investigation.

(S2-3 27 c) Upstream suppliers are expected to have a complaints mechanism in place or to communicate to employees and suppliers the existence of and possibility to use Hapag-Lloyd's own complaints mechanism, ensuring that concerns or indications of actual or potential violations can be raised anonymously and without fear of retaliation. To promote transparency and accountability, Hapag-Lloyd takes a proactive approach by informing the owners of its charter vessels about its whistleblower system. It is ensured that a clear notice is prominently displayed on board, further enhancing the Company's commitment to responsible and ethical practices. Any concerns can be reported anonymously via the whistleblower hotline or directly to the Compliance department.

(S2-3 27 d, AR 27) In the Liner Shipping segment compliance-related concerns raised and addressed are handled in accordance with a standardised procedure according to the Whistleblower and Non-Retaliation Policy and are processed by the Compliance department. Other relevant functions are involved to ensure professional, confidential, and timely investigation and to decide on the relevant measures to be taken. Upon submitting a report, whistleblowers receive an acknowledgement of receipt within seven days, followed by a status update no later than three months after the receipt.

Once the investigation is concluded, it is ensured that the outcome directly related to the reported compliance concern is shared with the whistleblower in accordance with applicable laws and regulations, demonstrating Hapag-Lloyd's commitment to transparency and accountability.

Effectiveness of complaints procedure

The effectiveness of the complaints procedure is reviewed at least once a year and in case necessary, on an ad hoc basis. In this review process, the following activities are conducted:

- Collection and evaluation of quantitative data (KPIs) on the use of the grievance mechanism, including among others the number of cases and the number of substantiated cases.
- Development of potential improvements based on the analysis of the data collected.

Stakeholders who are intended users are directly involved in the evaluation of the effectiveness of the complaints procedure through a survey conducted in the reporting period.

Within the Terminal & Infrastructure segment SAAM Terminals tracks and monitors issues raised and addressed through a centralised system, where all received reports are administered by the SAAM Terminals Compliance Officer. The officer conducts a preliminary analysis of the report, informs the Ethics Committee, and derives the complaint according to the company's Complaints Referral Matrix. This matrix establishes the steps and responsible parties for an investigation, depending on the subject matter affected by the report.

In addition to the central administration, complaints can also be made through the corporate website or intranet of subsidiaries or affiliates, which are received and initially analysed by the Compliance Officer of the respective company. The Corporate Compliance Officer is also notified and supervises the investigation to ensure that it is conducted in accordance with the principles of the whistleblowing system.

Complainants have the option to report incidents directly and in person to various designated personnel, including the Corporate Ethics Committee, Legal, Human Resources, Compliance Officer, and local management.

All designated persons are required to centrally report the denounced events, which are then submitted to the standards defined in the company's procedure.

To ensure the effectiveness of the channels, SAAM evaluates improvement measures to prevent irregular situations from occurring again, while ensuring compliance with the law and the company's ethical principles and values. The Ethics Committee keeps a record of complaints received, investigations carried out, sanctions adopted, and reasons for closing and archiving complaints, all under strict confidentiality. The effectiveness of the channels is not explicitly tracked.

(S2-3 28, AR 26) Hapag-Lloyd does not yet assess how workers in the value chain are aware of and trust these structures or processes as way to raise their concerns or needs and have them addressed. (S2-3 28, AR 25) To protect individuals against retaliation that use channels to raise concerns, Hapag-Lloyd has a specific "Whistleblower and Non-Retaliation Policy" in place. The details on this policy can be found under section 4.1.2.

3.2.5. Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of that action (S2-4)

Action: Supplier engagement and support

(S2-4 31, MDR-A 68a) Hapag-Lloyd is committed to engaging with its suppliers in supplier conversations and during regular visits to understand their concerns and raise awareness on the expectations towards social sustainability. Suppliers are required to comply with the expectations set out in the Hapag-Lloyd SCoC, thus mitigating the negative impact of non-compliance with labour standards and unfair working conditions. Cooperation with Hapag-Lloyd includes providing relevant documentation and access to facilities/mobile work settings as well as on the respective employees. Further, suppliers should inform Hapag-Lloyd about potential implementation

challenges related to their obligations under the SCoC. Hapag-Lloyd expects its suppliers to gradually improve and aims to support them during this process and with any challenges faced, contributing ultimately to the well-being of workers in the value chain through fair working conditions. Engagement with the suppliers, including improvement measures discussed, is documented in detail, and is shared with the Human Rights Office for review and discussion of potential follow-ups. In general, this approach aims to potentially improve the risk profile of the suppliers, fulfil the human rights and environmental due diligence of Hapag-Lloyd and offers the opportunity to improve the reputation through high labour and safety standards. Ending the business relationship is the last resort.

Central case management system

Hapag-Lloyd has implemented a new central case management system, along with the associated processes. By using this system, which is a specific part of the web-based supplier monitoring system that Hapag-Lloyd has been using since 2021, Hapag-Lloyd records and documents GSCA-relevant incidents among its direct suppliers as cases in its system. This supplier monitoring system enables Hapag-Lloyd to gain knowledge of possible violations and to contact the affected supplier directly via the integrated case management system, requesting clarification or remedial action and obtaining transparency over the measures taken by the supplier. The Terminal & Infrastructure segment reports no actions planned or underway to prevent, mitigate or remediate material negative impacts on value chain workers for the reporting period.

(MDR-A 68 b-e, 69a-c) Further action details: Supplier engagement and support

MDR	Disclosure
(MDR-A 68b) Scope	The scope of this action is the global upstream and downstream supplier base as well as all procurement teams. Engagement calls and audits are conducted with selected high-risk suppliers identified within the supplier risk assessment especially from the regions Asia, Latin America, and Middle East & Africa. This action applies to the Liner Shipping segment.
(MDR-A 68c) Time Horizon	The action started in 2024 and is expected to be continued on an ongoing basis.
(MDR-A 68d) Key action for harm mitigation	This action was not initiated to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts.
(MDR-A 68e) Progress	This action started in the 2024 reporting year. More than 80 supplier engagement calls have been conducted.
(MDR-A 69a-c) Financial resources	As the implementation of the action plan does not require (and is not planned to require) any significant Opex and/or Capex current or future financial resources are not significant.

(S2-4 32a, AR 38) To prevent and mitigate the potential negative impact “Non-compliance with labour standards or unfair working conditions”, Hapag-Lloyd implemented the action “Supplier engagement and support” described above.

(S2-4 32b) Within the conducted materiality assessment in the reporting period Hapag-Lloyd did not identify any actual negative material impacts. Hence, no actions or initiatives are in place to provide or enable remedy.

(S2-4 32c, AR 39) Hapag-Lloyd has no additional actions and initiatives in place with the primary purpose of delivering positive impacts for workers in the value chain.

Action development and tracking of effectiveness

(S2-4 32d, AR 33-35) To track and assess the effectiveness of actions and initiatives in delivering the intended outcomes for workers in the value chain, Hapag-Lloyd conducts due diligence activities such as audits, self-assessments, and monitoring. These methods support Hapag-Lloyd in ensuring that its actions effectively contribute to positive outcomes for workers in the value chain.

(S2-4 33a, AR 29) To identify what type of action is required and appropriate in response to a particular actual or potential negative impact on workers in the value chain, the Human Rights Office at Hapag-Lloyd has developed a Playbook on Engaging Suppliers on Social Sustainability, which sets out actions to be taken to reduce actual or potential negative impacts on workers in the value chain. Additionally, the new central case management system described under section 3.2.5, along with the associated processes, enables Hapag-Lloyd to gain knowledge of possible violations and to contact the affected supplier directly to request clarification or remedial action and to obtain transparency regarding the measures taken by the supplier. To track and assess the effectiveness of actions and initiatives in delivering the intended outcomes for value chain workers, SAAM Terminals conducts due diligence activities such as monitoring and audits to vendors mainly focused on sub-contractors (labour) to ensure compliance with the labour regulatory laws.

Playbook on Engaging Suppliers on Social Sustainability

(S2-4 33b) Hapag-Lloyd is currently in the process of training procurement users on how to use the Playbook on Engaging Suppliers on Social Sustainability. Hapag-Lloyd's procurement teams are the first and primary contact point with the suppliers. The playbook aims to give them practical tips on how to engage suppliers in conversations and during regular supplier visits to understand their concerns and raise awareness on what Hapag-Lloyd expects from them regarding social sustainability. The playbook is structured in different chapters based on different activities, that is onshore transport activities, offshore transport activities and onshore storage and transfer. Each chapter contains background information about Hapag-Lloyd's expectations, risk factors associated with the different activities as well as potential mitigation measures. The playbook outlines the exact steps that need to be followed to address social sustainability topics with the suppliers. It includes risk-specific questions to ask suppliers and examples for documents to request from them. Further, a standardised documentation process is outlined. The supplier documentation is sent to the Human Rights Office for review and discussion of potential follow-up subsequently. Hapag-Lloyd has not conducted forms of collaborative action with industry peers or other relevant parties to take actions on negative impacts on workers in the value chain.

There is no general approach to taking action in relation to specific material negative impacts on value chain workers for the Terminal & Infrastructure segment. This is done on an ad hoc and case-by-case basis.

Communication with suppliers

(S2-4 33c) Hapag-Lloyd maintains transparent communication with relevant suppliers through a case management system, which enables centralised documentation and evaluation of discussions related to causes, background, and implemented measures, facilitating a data-driven approach to continuous improvement and progress. All case-relevant communication must therefore take place via the case management system following defined steps:

- a) Contacting supplier
- b) Monitoring
- c) Follow-up
- d) Documentation

After creating a case in the supplier monitoring system, the supplier is contacted immediately by email directly through the system. The email includes the information that Hapag-Lloyd has found an actual or potential negative impact and requests the supplier to provide input on the specific topic, on any specific action taken regarding the topic and the timeline to implement potential preventive measures. Furthermore, the supplier is required to provide input on any general policies or directives in place related to the topic, for example a non-discrimination policy. After the supplier is contacted, a reminder shall be sent after no later than two weeks in case no response has been received. Once the supplier responds, their implementation timeline should be analysed. A follow up on the measures that have not yet been implemented is necessary. In case sufficient information from the supplier is available and/or the supplier has confirmed the implementation of all measures according to the timeline, the case is closed. The analysis of the effectiveness of the case management system has not yet been conducted.

(S2-4 34a, AR 40, 41, 43) Within the materiality assessment conducted for the reporting period, Hapag-Lloyd did not identify any material risks arising from impacts and dependencies on workers in the value chain. Therefore, no action is planned or underway and consequently the effectiveness is not tracked. (S2-4 34b) Currently, no actions have been taken or planned by Hapag-Lloyd to pursue significant opportunities related to workers in the value chain, as activities to date have focused on managing risks and negative impacts. Suppliers are encouraged to maintain high standards to avoid risks.

Impact of own business practices & managing material impacts

(S2-4 35, AR 32) Hapag-Lloyd aims to ensure that its own practices do not have a negative impact on workers in the value chain. The SCoC and the contract templates for suppliers (with the support of the Responsible Contracting Project) have been revised. Suppliers have the contractual right to address to Hapag-Lloyd any practices that could have a negative impact on workers in

the value chain. By taking this action, Hapag-Lloyd reaffirms its commitment to upholding the rights and dignity of workers throughout its value chain, thereby minimising the risk of adverse impacts and promoting a more responsible and sustainable business environment. Currently, there is no fixed rule on how Hapag-Lloyd handles tensions between avoiding and mitigating negative impacts, including the approach taken when such tensions arise in relation to other business pressures. Each situation will be assessed on a case-by-case basis.

[\(S2-4 36\)](#) During the reporting year, one severe human rights incident involving gender-based unequal treatment (sexual harassment) occurred within Hapag-Lloyd's upstream value chain in Germany. Hapag-Lloyd immediately implemented remedial measures with the involved suppliers and worked with them to prevent similar incidents in the future.

[\(S2-4 38\)](#) To manage its material impacts, Hapag-Lloyd has appointed certain employees. In global procurement, four employees are responsible for the central coordination of all activities related to social sustainability in the value chain. In the regional procurement teams, individual employees have been nominated as key contacts for coordinating such activities with local organisations and as direct contacts to suppliers.

[\(ESRS 2 62\)](#) All described actions apply to the Liner Shipping segment of Hapag-Lloyd and all its employees. The newly established Terminal & Infrastructure segment of Hapag-Lloyd is not yet covered.

3.2.6. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S2-5)

[\(S2-5.39, S2-5.41, AR 46-AR 48, MDR-T 81, 81b I, ii, 80d\)](#) Hapag-Lloyd has not set dedicated targets for managing material IROs related to workers in the value chain during the reporting year, as they are covered by existing processes and standards described in the S2 chapter. Although the Company has established ambitions regarding labor standards and human rights in the value chain, these ambitions do not meet the requirements for measurable, outcome-oriented, and time-bound targets as stipulated by the ESRS. [\(S2-5 ESRS 2 MDR-T\)](#) To monitor the effectiveness of the policies in terms of material IROs related to workers in the values chain, the policies are annually reviewed and validated by the respective department and the SC is informed about possible adjustments. Thereby, the respective department will assess the need to develop and implement measurable outcome-oriented targets in line with ESRS requirements.

3.3. Affected communities (S3)

3.3.1. Material impacts, risks and opportunities (S3 IROs)

Material IROs related to affected communities were only identified for the Terminal & Infrastructure segment of Hapag-Lloyd.

Positive impacts include the support of affected communities through initiatives which enable valuable effects on the environment and society. Those are created by advocating inclusivity, empowerment, and cultural enhancement, fostering a stronger and more cohesive community.

Negative impacts include potential harm to the quality of life of the community near operation sites through traffic congestion, noise nuisance, and pollutants from vehicles.

Material IROs

- **[Actual positive impact] Supporting affected local communities near terminals**
Supporting affected communities through various projects and initiatives can lead to positive impacts on society.
- **[Actual negative impact] Impairing quality of life in affected local communities near terminals**
Due to noise nuisance and vehicular pollution the quality of life of people living in the vicinity of the terminals may be negatively impacted.

3.3.2. Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)

[\(S3 SBM-3 9 AR 5 - AR 6\)](#) All identified affected communities who can be materially impacted by the Company's Terminal & Infrastructure segment are included in the scope of disclosure under ESRS 2. This includes impacts that relate to SAAM Terminals' operations and value chains, either by its products or services, or by its business relationships.

[\(S3 SBM-3 9 a i-iv AR 7, SBM-3 11 AR 8\)](#) Groups subject to material impacts by SAAM Terminals include communities living or working around the Company's operating sites, facilities, or other physical operations, such as neighbourhood associations, schools, and fishermen. The types of affected communities described do not encompass communities along SAAM Terminals' value chain. Material risks and opportunities relate to the listed groups. Communities of indigenous peoples are not included, as SAAM Terminals has no material impact on this group.

[\(S3 SBM-3 9b\)](#) The material negative impact of impairing quality of life in local communities near SAAM Terminals may be affected due to the nature of logistics business activities in the area. The terminals' operations, such as cargo handling and storage, can generate noise and emissions from machinery and vehicles, contributing to environmental concerns. Additionally, the increased traffic from cargo trucks can lead to congestion and air pollution. While SAAM Terminals takes steps to manage these impacts, the cumulative effect of these factors can still affect the daily lives of nearby residents. This material impact identified is not the result of isolated incidents, but rather a consequence of the ongoing logistics operations.

[\(S3 SBM-3 9c\)](#) Activities that result in positive impacts for affected communities contribute to the prosperity of the communities where SAAM Terminals operates. SAAM Terminals is working together with affected communities to identify the impacts of the business activities and needs of affected groups in order to coordinate local development initiatives and social investments that contribute to the well-being of communities. Activities include engagement with stakeholders such as neighbourhood associations, local authorities, contractors or schools. Additionally, social investment activities are carried out in the form of for example environmental education activities for students, the implementation of improving measures for community infrastructure,

and the allocation of funds to organisations and communities. For example, in 2024, SAAM Terminals donated to a home for elderly people in Puerto Caldera and supported sports programmes for children and young people living near Terminal Portuario de Guayaquil in Ecuador.

(S3 SBM-3 9d) No material risks or opportunities for SAAM Terminals arising from impacts and dependencies on affected communities were identified. (S3 SBM-3 10) SAAM Terminals has not yet developed an understanding of how affected communities with particular characteristics or those living in particular contexts, or those undertaking particular activities may be at greater risk of harm.

3.3.3. Policies related to affected communities (S3-1)

(S3-1 14 ESRS 2 MDR-P 62) Social commitment is one of the pillars of SAAM Terminals' Sustainability Policy, which focuses on transparent relations with stakeholders and the generation of shared value based on the identification of operations' impacts and communities' needs. There is currently no ESRS-compliant policy in place to specifically manage the material IROs related to affected communities, as documentation on commitment and activities within a dedicated policy is presently not considered a priority.

(S3-1 16) The Code of Ethics of SAAM Terminals declares the adherence to the ILO Declaration on Fundamental Principles and Rights at Work. Likewise, the organisation adheres to and respects the UN Global Compact Principles. SAAM Terminals does not uphold a specific human rights policy commitment that is relevant to affected communities. Legal regulations of each operating country as well as the Human Resources and Compliance policies contribute to the adherence of mentioned principles. Training courses are held on the respective subjects, and complaints are investigated periodically. In addition to the mechanisms disclosed, there are currently no further processes in place to monitor compliance with the UNGP, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises.

(S3-1 16a) A general approach that is specifically related to respect for human rights of communities is not available. The same holds for an approach to indigenous people, which is not applicable, as the topic is not material for SAAM Terminals.

(S3-1 16b) The general approach of SAAM Terminals to engage with affected communities is based on creating stakeholder maps for the operations as well as a stakeholder engagement and social investment management plan. According to stakeholder mapping, stakeholder engagement management actions and social investment initiatives are planned and implemented. The stakeholder map corresponds to a stakeholder diagnosis tool based on a methodology used in the relationship between organisations and stakeholders. It corresponds to the variables of interest and capacity to influence:

- The interest factor corresponds to the importance of the operation or company for a stakeholder or actor; it therefore refers to a variable of how the company is perceived by the environment and, in turn, is associated with the effects, risks, or impulses it generates.

- Power is understood as a group or actor's capacity to influence the company's operation. From this point of view, the following components to consider in the influence capacity axis are relevant:
 - the capacity to influence the day-to-day running of the operation,
 - the capacity to deliver or revoke permits,
 - hindering the company's productive capacity or innovation impulses, and affecting its reputation.

The stakeholder mapping tool enables SAAM Terminals to observe these variables from a relational perspective. Findings of the stakeholder map assessment are subsequently used to define specific engagement formats.

[\(S3-1 16c\)](#) A general approach related to measures to provide and/or enable remedy for human rights impacts is not in place.

[\(S3-1 17 AR 10\)](#) SAAM Terminals formally subscribed to the UNGP in the reporting year. No cases of non-respect with the UNGP, the ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises that involve affected communities have been reported. As SAAM Terminals has not adopted dedicated policies with regards to affected communities, consequently there is no alignment of such with internationally recognised standards relevant to affected communities.

3.3.4. Processes for engaging with affected communities about impacts (S3-2)

[\(S3-2 21 AR 16\)](#) Even though the perspectives of affected communities do not extensively shape decisions or activities aimed at managing actual and potential impacts, SAAM Terminals does engage with affected communities. [\(S3-2 21a\)](#) This exchange takes place directly with legitimate representatives, usually with those of neighbourhood associations or neighbouring organisations.

[\(S3-2 21b AR 15\)](#) The stage at which engagement occurs as well as the type and the frequency is based on the specific stakeholder engagement plan. It depends on whether there are specific issues to address or a relationship to maintain for updates on current impacts to be worked on. The types of engagement include participation, consultation and/or information exchange. The engagement occurs voluntarily by SAAM Terminals but can also take place occasionally in response to legal requirements or stakeholder requests.

[\(S3-2 21c AR 14 – AR 15\)](#) The general managers of the respective units at SAAM Terminals are responsible for overseeing the engagement with affected communities and ensure, that the results of the valuable exchanges are incorporated into SAAM Terminal's operating approach.

[\(S3-2 21d\)](#) The effectiveness of engagement with affected communities of SAAM Terminals is currently not assessed. [\(S3-2 22\)](#) Beyond the previously described measures, currently no additional steps are taken to gain further insights into the perspectives of affected communities that may be particularly vulnerable to impacts and/or are marginalised and into the perspective of specific groups within the affected communities.

3.3.5. Processes to remediate negative impacts and channels for affected communities to raise concerns (S3-3)

(S3-3 27a AR 17, AR 22) Apart from the general exchange with the affected communities, SAAM Terminals does not have a fundamental approach to and processes for providing or contributing to remedy where it has identified that it has caused or contributed to a material negative impact on affected communities. Hence, SAAM Terminals does not assess that the remedy provided is effective. (S3-3 27b AR 18) Nonetheless, there are channels in place for affected communities to raise concerns or needs directly with SAAM Terminals. Meetings with neighbourhood associations are held twice a year. Depending on the specific terminal locations and stakeholder engagement plans, monthly meetings also take place. Apart from this channel, affected communities may raise their concerns through the contact information published on the websites of the respective business units of SAAM Terminals website and through the respective Hapag-Lloyd Whistleblower Channel.

(S3-3 27c) Apart from the mentioned measures, SAAM Terminals has no additional processes in place through which the availability of such channels is supported. (S3-3 27d AR 24) The same holds for a process to track and monitor issues raised and addressed, aiming to ensure the effectiveness of the channels. The effectiveness of Hapag-Lloyd's overarching whistleblower channel is tracked, as outlined under 3.1.5. (S3-3 28) An assessment whether the affected communities are aware of structures or processes in place to raise their concerns or needs has not been carried out. Also, it is not assessed whether affected communities trust these structures or processes as a way to raise their concerns or needs and have them addressed. However, the groups have the opportunity to provide feedback on the processes for raising concerns during the communication formats described above.

(S3-3 28) Hapag-Lloyd including SAAM Terminals has policies in place for the protection of individuals that use the described channels to raise concerns or needs against retaliation.

3.3.6. Acting on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions (S3-4)

(S3-4 31, ESRS 2 - MDR-A) Through the Community Engagement and Social Investment Initiatives, SAAM Terminals has taken up an action plan to manage material IROs related to SAAM's commitment to people and affected communities. As there is currently no policy and no targets in place, therefore the action does not contribute to the achievement of such and was hence formulated independently.

Action: Community engagement and social investment initiatives

(MDR-A 68a, S3-4 AR 25) SAAM Terminals has implemented the Community Outreach Management Plan and the Social Investment Plan, tailoring initiatives to meet the specific needs of each community:

- The Community Outreach Management Plan structures actions and initiatives aimed at developing and maintaining permanent relations with stakeholders. The type of action is defined by the relevance of the interest group or actor, based on the respective position on the stakeholder map.

- Social investment considers actions that involve the transfer of resources or capital (financial, knowledge, time) that jointly enable improvement of social aspects of community life and mobilise one or more components of the company’s sustainability strategy.

These comprehensive plans include organising school and university visits to the terminals, providing students with hands-on experience of maritime operations and inspiring future careers in the industry. SAAM Terminals has also established competitive funds to support local projects, encouraging community-led development and innovation. Local entrepreneurship programmes are launched to help budding entrepreneurs grow their businesses through training, resources, and mentorship. Environmental education courses are conducted to raise awareness of sustainability and the preservation of local ecosystems. In addition, beach clean-up days are organised to engage the community in environmental conservation efforts. Sports activities are also organised to promote health, wellness, and social cohesion. Through these initiatives, SAAM Terminals demonstrates its commitment to promoting education, supporting economic growth, encouraging environmental stewardship, and building stronger community ties.

(MDR-A 68 b-e, 69a-c, S3-4 AR 25) **Further action details: Community engagement and social investment initiatives**

MDR	Disclosure
<i>(MDR-A 68b)</i> Scope	The provisions of this action apply to all relevant stakeholders for the respective business unit of SAAM Terminals.
<i>(MDR-A 68c)</i> Time horizon	The activities described as part of this action started in 2023 and are planned to be carried out on an ongoing basis.
<i>(MDR-A 68d)</i> Key action for harm mitigation	This action was not initiated to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts.
<i>(MDR-A 68e)</i> Progress	Because the action is ongoing and no targets have been defined, there is currently no progress to be reported.
<i>(MDR-A 69a-c)</i> Financial resources	As the implementation of the action plan does not require the allocation of significant OpEx and/or CapEx, current or future financial resources are not significant.

(S3-4 32a, S3-4 AR 25) Apart from the key action disclosed under 3.3.6. SAAM Terminals carries out the following actions to prevent, mitigate or remediate material negative impacts on affected communities:

- External environmental compliance audits and action plans: External environmental compliance audits are conducted to identify and address deviations from established standards. For example, in case noise levels exceed the acceptable limits, an action plan is developed immediately, to mitigate the impact. It includes measures such as training operators to improve the handling of equipment and reduce the volume of equipment back-up alarms.
- Collaborative solutions with carriers: SAAM Terminals established working groups with carriers to jointly develop and implement solutions to address congestion issues while minimising potential negative community impacts.

- Driver awareness campaigns: Campaigns are carried out to educate drivers about coexistence on the road and to promote safer and more responsible driving behaviour.
- Community engagement meetings: SAAM Terminals holds regular meetings with local residents to report on actions taken to ensure transparency and build trust within the community.

(S3-4 32b) SAAM Terminals has currently not taken actions to provide or enable remedy in relation to an actual material impact. (S3-4 32c) In addition to the initiatives mentioned in this chapter, there are no further actions or initiatives with the primary purpose of delivering positive impacts for affected communities in place.

(S3-4 32d) The effectiveness of actions or initiatives in delivering the intended outcomes for affected communities is currently not specifically tracked by SAAM Terminals. Nevertheless, tracking for events and initiatives takes place in selected cases, for example by measuring the number of project applications for funding or the number of participants in exchange formats.

(S3-4 33a) SAAM Terminals identifies the required and appropriate action in response to a particular actual or potential negative impact on affected communities by analysing the stakeholder map. Depending on the outcomes of the classification of stakeholders with respect to their interest or power, actions are derived accordingly. (S3-4 33b) No additional approaches to the ones disclosed under 3.3.6. are considered to taking action in relation to specific material negative impacts on communities.

(S3-4 33c) SAAM Terminals does currently not follow a specific approach to ensure that processes to provide or enable remedy in the event of material negative impacts are available and effective in their implementation and outcomes. (S3-4 35) However, the organisation takes action to avoid causing material negative impacts through the actions disclosed under 3.3.6. (S3-4 36) No human rights issues and incidents connected to affected communities have been reported. (S3-4 38) SAAM Terminals allocates no significant resources to the management of material impacts related to affected communities.

3.3.7. Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S3-5)

(S3-5 41 AR 45–AR 47, ESRS 2 - MDR-T) Until now, SAAM Terminals has not adopted targets related to managing negative impacts, advancing positive impacts and managing material risks and opportunities with regards to affected communities. Managing the IROs takes place in the form of the engagement described above.

(S3 ESRS 2) To monitor the effectiveness of the actions in terms of material IROs related to affected communities, an annual validation by SAAM Terminals takes place. No ambition level or quantitative targets in line with ESRS requirements related to affected communities were set in the year under review. Although the Company has established ambitions regarding affected communities as outlined in this chapter, these ambitions do not meet the requirements for measurable, outcome-oriented, and time-bound targets as stipulated by the ESRS.

3.4. Information & cyber security (entity-specific)

3.4.1. Material impacts, risks and opportunities (Information & cyber security IROs)

Hapag-Lloyd strictly adheres to relevant requirements and laws pertaining to IT security, recognising the critical importance of cyber security in protecting operations, customers, and infrastructure. In its DMA, Hapag-Lloyd identified four material IROs in relation to their material topic of information and cyber security as described within this chapter. Hapag-Lloyd has a dedicated policy in place that addresses all identified IROs.

Material IROs

<ul style="list-style-type: none"> • [Actual positive impact] Ensuring high IT security standards By setting high IT security standards Hapag-Lloyd can create a positive impact for stakeholders due to the protection of critical infrastructure as well as personal data.
<ul style="list-style-type: none"> • [Potential negative impact] Occurrence of IT security hazards As Hapag-Lloyd is part of the critical infrastructure, a cyber attack can lead to supply shortages, which can cause reduced access to essential goods and increased prices for end consumers.
<ul style="list-style-type: none"> • [Risk] Occurrence of cyber attacks Hapag-Lloyd can face a risk of cyber attacks, potentially compromising the security of sensitive data and disrupting operations.
<ul style="list-style-type: none"> • [Opportunity] Preventing cyber attacks There is an opportunity for Hapag-Lloyd to elevate cyber security aiming at the protection of sensitive data and thereby ensuring stable business operations.

**3.4.2. Minimum disclosure requirements – policies (MDR-P)
related to information & cyber security**

(ESRS 2MDR-P 65 a) Hapag-Lloyd manages its material IROs related to information & cyber security with an established policy. The identified IROs are addressed through the Corporate Guideline Information Security.

Policy/IRO	[Positive impact] Ensuring high IT security standards	[Negative impact] Occurrence of IT security hazards	[Risk] Occurrence of cyber attacks	[Opportunity] Preventing cyber-attacks
Corporate Guideline Information Security	X	X	X	X

The objective of Hapag-Lloyd's Information Security Guideline is to ensure the systematic and sustainable protection of analogue and digital information against manipulation, unauthorised access, and loss. This objective underscores the need to comply with all relevant laws, legal requirements, regulations and contractual obligations. The guideline outlines the principles and objectives of information security, emphasising the protection of both digital and non-digital information. The identified IROs are comprehensively addressed. Addressing the positive impact of ensuring high IT security standards, the guideline outlines several key actions. These entail implementing an Information Security Management System (ISMS) framework, establishing information classification and protection goals, and defining and assigning specific roles and responsibilities such as the Chief Information Security Officer (CISO) and Chief Information Officer (CIO). The Executive Board's recurring reviews of the ISMS provide assurance of its ongoing effectiveness, underscoring the commitment to continuous improvement in information security governance. Addressing the negative impact identified, the guideline also requires the reporting

of cyber and information security incidents, as well as immediate action protocols to address possible incidents promptly. In recognition of the evolving cyber-risk landscape, the document provides a clear and explicit definition of information security incidents, thereby strengthening the preparedness to proactively respond to and mitigate potential risks. An incident is categorised as any breach of protective objectives, loss of information, or potential unauthorised access to sensitive information. The guideline provides detailed protocols and responses for managing such incidents, including immediate reporting to the Service Desk and subsequent investigation by the Information Security Department. Finally, the opportunity to prevent cyber-attacks is systematically covered through a risk-based approach to information classification and regular protection needs analysis as part of the information security risk management system. The guideline emphasises coordination with the Group-wide RMS to ensure continuous monitoring and improvement. It also includes training and instructions for the Service Desk to promptly address cyber and information security incidents, thereby enhancing overall preventive measures.

Corporate Guideline Information Security	Description of policy
(MDR-P 65 a) Process for monitoring	The management of information security incidents is structured to ensure that appropriate actions are taken in accordance with the ISMS framework should such incidents occur at Hapag-Lloyd.
(MDR-P 65 b) Scope	The scope of this Corporate Guideline covers the Hapag-Lloyd Liner Shipping Segment. Associated companies are to be informed of this guideline, if possible, and encouraged to comply with its provisions.
(MDR-P 65 c) Most senior level in organisation that is accountable for implementation of policy	The Executive Board has overall responsibility for information & cyber security at Hapag-Lloyd. The CIO is responsible for group-wide technology and non-technology-based information processes and infrastructures and delegates relevant information security requirements to the CISO.
(MDR-P 65 d) Third-party standards or initiatives that are respected through implementation of policy	The ISMS is based on: <ul style="list-style-type: none"> • ISO 27001 – International security standard for ISMS • NIST – National Institute of Standards and Technology (United States) • German IT Grundschutz • ISO 22301 – Standard for Business Continuity Management and disaster recovery • MITRE ATT&CK – Adversarial Tactics, Techniques, and Common Knowledge • OWASP – Open Web Application Security Project Hapag-Lloyd aims to adhere to all relevant requirements and laws pertaining to cyber and information security. <ul style="list-style-type: none"> • Directive of the European Commission on Network and Information Security (NIS) • German IT Security Act 1.0 • German IT Security Act 2.0 • Chinese Cybersecurity Act
(MDR-P 65 e) Description of consideration given to interests of key stakeholders in setting policy	No specific considerations have been given to the interests of key stakeholders in the policy-setting process.
(MDR-P 65 f) Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it	The policy is available on Hapag-Lloyd's intranet. Robust reporting mechanisms for managing and responding to security incidents, ensuring that all employees are aware of and involved in maintaining information security standards.

3.4.3. Minimum disclosure requirements – targets (MDR-T)
related to information & cyber security

(ESRS 2 MDR-T 81 b, b i) To monitor the effectiveness of the policy in terms of material IROs related to information & cyber security, it is annually reviewed and validated by the respective department and the SC is informed about possible adjustments. Thereby, the respective department will assess the need to develop and implement measurable outcome-oriented targets in line with ESRS requirements. (ESRS 2 81b i, ii, ii 80 d) In addition, Hapag-Lloyd has defined its general ambition level and targets in its Cyber Security strategy and is audited against the standard ISO 27001 and the NIS and the German umbrella act for critical infrastructure protection (KRITIS) regulations. No ambition level or quantitative targets in line with ESRS requirements related to information & cyber security were set in the year under review. Although the Company has established ambitions regarding information & cyber security as outlined in this chapter, these ambitions do not meet the requirements for measurable, outcome-oriented, and time-bound targets as stipulated by the ESRS.

3.4.4. Minimum disclosure requirements – actions (MDR-A)
related to information & cyber security

(ESRS 2 MDR-A 62) Hapag-Lloyd is driving various initiatives to maintain and further improve its high level of information & cyber security. These initiatives address cyber security risks in general. No actions in the area of information & cyber security specifically targeted to ESRS requirements have been identified in the reporting period.

3.5. Data protection (entity-specific)

3.5.1. Material impacts, risks and opportunities (Data protection IROs)

Hapag-Lloyd aims to maintain a high standard of data protection for its customers, employees and further business partners. The Company is committed to adhering to all relevant laws and regulations. This includes standards such as the EU's General Data Protection Regulation (GDPR) and other data protection laws, in order to ensure the confidentiality and security of personal data.

In its DMA, Hapag-Lloyd identified four material IROs related to its material topic of data protection.

Material IROs

<ul style="list-style-type: none">• [Actual positive impact] Ensuring high data protection standards By setting high data protection standards Hapag-Lloyd can create a positive impact for stakeholders due to the protection of personal data, which prevents employees and customers from possible identity theft or fraud.
<ul style="list-style-type: none">• [Potential negative impact] Occurrence of data breaches As Hapag-Lloyd is part of the critical infrastructure, a data breach can lead to disruptions in global trade causing supply chain delays, which can cause reduced access to essential goods and increased prices for end consumers.
<ul style="list-style-type: none">• [Risk] Occurrence of data breaches Hapag-Lloyd can face a risk of data breaches, potentially compromising sensitive data and disrupting operations.
<ul style="list-style-type: none">• [Opportunity] Preventing data breaches There is an opportunity for Hapag-Lloyd to elevate the protection of sensitive data and thereby ensure stable business operations, which can improve customer loyalty fostering financial stability.

3.5.2. Minimum disclosure requirements – policies (MDR-P) related to data protection

(ESRS 2 MDR-P 65 a) Hapag-Lloyd manages its material IROs related to data protection with an established policy, the Corporate Guideline Corporate Data Protection, that addresses all the identified IROs:

Policy/IRO	[Positive impact] Ensuring high data protection standards	[Negative impact] Occurrence of data breaches	[Risk] Occurrence of data breaches	[Opportunity] Preventing data breaches
Corporate Guideline Corporate Data Protection	X	X	X	X

Corporate Guideline Corporate Data Protection

Hapag-Lloyd's data protection Guideline includes a description on compliant handling of personal data relating to customers and other third-party information. Hapag-Lloyd aims to ensure that any personal data related to its customers, third parties, and employees is managed in compliance with applicable data protection laws, thereby maintaining high data protection standards and reinforcing trust. The personal data of Hapag-Lloyd employees is handled with the utmost care and in strict compliance with data protection regulations to ensure that their rights and freedoms are protected. Adherence to Hapag-Lloyd's Corporate Guideline Corporate Data Protection prioritises the prevention of data breaches and maintaining high data protection standards, as well as managing the risk and negative impact of potential data breaches. Moreover, Hapag-Lloyd has established a robust organisational and legal framework for the global handling of personal data within its entire operations. These measures are designed to protect the rights and freedoms of any personal data entrusted to Hapag-Lloyd and to prevent any form of personal data breach. All identified incidents are assessed through a standardised process to evaluate the risks involved and determine whether they constitute a reportable personal data breach.

Corporate Guideline Corporate Data Protection	Description of policy
(MDR-P 65 a) Process for monitoring	Corporate Data Protection is the central authority for data protection issues and oversees the implementation of data protection regulations. Corporate Data Protection investigates all reported incidents to determine whether a data breach has occurred and which action is required.
(MDR-P 65 b) Scope	The scope of this Corporate Guideline covers the Hapag-Lloyd Liner Shipping Segment. Associated companies are to be informed of this guideline, if possible, and encouraged to comply with its provisions.
(MDR-P 65 c) Most senior level in organisation that is accountable for implementation of policy	Senior Director of Corporate Audit
(MDR-P 65 d) Third-party standards or initiatives that are respected through implementation of policy	Compliance with EU GDPR and other applicable data-protection laws

Corporate Guideline Corporate Data Protection	Description of policy
(MDR-P 65 e) Description of consideration given to interests of key stakeholders in setting policy	No specific consideration has been given to the interests of key stakeholders in the policy-setting process.
(MDR-P 65 f) Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it	The policy is available on Hapag-Lloyd's Intranet. Communication channels, such as an email address, have been established to provide advisory services on data protection issues. Regional and Area Data Protection Officers serve as points of contact for employees and external stakeholders, ensuring compliance at all levels of the organisation.

3.5.3. Entity-specific metrics related to data protection

Data protection incidents

	2024
Number of reportable incidents in relation to data protection	–

(ESRS 2 MDR-T 75) This metric enables the Company to monitor and manage its data protection performance, contributing to the IROs. By closely monitoring the number of reportable incidents in relation to data protection, Hapag-Lloyd can identify areas for improvement and take proactive measures to prevent data breaches, thereby seizing the opportunity to strengthen its commitment regarding data protection while setting high standards.

3.5.4. Minimum disclosure requirements – targets (MDR-T) related to data protection

(ESRS 2 MDR-T 81 b, b i) To monitor the effectiveness of the policy in terms of material IROs related to data protection, it is validated annually by the SC. The SC will assess the need to develop and implement measurable outcome-oriented targets in line with ESRS requirements.

(ESRS 2 81b i, ii, ii 80 d) No ambition level or quantitative targets in line with ESRS requirements related to data protection were set in the year under review. Although the Company has established ambitions regarding data protection security as outlined in this chapter, these ambitions do not meet the requirements for measurable, outcome-oriented, and time-bound targets as stipulated by the ESRS.

3.5.5. Minimum disclosure requirements – actions (MDR-A) related to data protection

The actions taken to manage material IROs related to Hapag-Lloyd's data protection are summarised subsequently.

Action: Fostering data protection globally

(MDR-A 68a) Hapag-Lloyd is committed to establishing a common data protection culture and standardised personal data breach process in focus countries through key actions. Implementation support for the Global Data Protection management system aims to ensure consistency in data protection practices across the organisation.

This includes monitoring the implementation and audits to confirm completion of required actions and proper handling of each identified incident.

In addition, Hapag-Lloyd has implemented the OneTrust IT system to support global, standardised data protection management in focus countries. This system creates transparency in the handling of personal data, facilitates easy access to information in case of incidents and ensures proper documentation. To promote a basic understanding of data protection, the Data Protection WBT at Hapag-Lloyd is mandatory for all employees worldwide.

(MDR-A 68 b-e, 69a-c) **Further action details: Fostering data protection globally**

MDR	Disclosure
<i>(MDR-A 68b)</i> Scope	The scope of these actions encompasses Hapag-Lloyd's Liner Shipping operations on a global scale in the reporting period, but a possible extension to include the Terminal & Infrastructure segment is currently in alignment.
<i>(MDR-A 68c)</i> Time horizon	The overarching goal by 2030 is to increase the compliance level and awareness of data protection. This includes the global use of the Onetrust system and the establishment of the Data Protection Management System.
<i>(MDR-A 68d)</i> Key action for harm mitigation	This action was not initiated to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts.
<i>(MDR-A 68e)</i> Progress	The implementation of the Global Data Protection Management System began in 2023. The Headquarters Register of Processing Activities was updated in 2024 and is part of the developed system. The Intercompany Agreement on Data Protection was created in 2023 and will be updated continuously. Audits of entities' implementation of the data protection management system will be conducted annually to track progress and ensure compliance with data protection standards.
<i>(MDR-A 69a-c)</i> Financial resources	As the implementation of the action plan does not require (and is not planned to require) any significant Opex and/or Capex current or future financial resources are not significant.

**3.5.6. Minimum disclosure requirements – metrics (MDR-M)
related to data protection**

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity

Related material sustainability topic:
Data protection (entity-specific)

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology & assumptions
Number of reportable incidents in relation to data protection	The reported number is based on the actual number of reportable incidents in the area of central IT security. The definition of a reportable incident is based on the guidelines from the EDPB "Guidelines 9/2022 on personal data breach notification under GDPR adopted 10 October 2022" amended by local applicable requirements.

3.6. Corporate citizenship (entity-specific)

3.6.1. Material impacts, risks and opportunities (Corporate citizenship IROs)

Since 2021, corporate citizenship has been part of Hapag-Lloyd’s sustainability strategy for and expressed through Hapag-Lloyd’s corporate value “We Care”. Within this theme, the focus lies on three topics: Education programmes, humanitarian aid and marine preservation. In the DMA, Hapag-Lloyd identified one material positive impact and one material opportunity in relation this entity-specific topic as described within this chapter. In line with the commitment to corporate responsibility and societal impact, Hapag-Lloyd addresses its material IROs with established policies.

Material IROs

- **[Actual positive impact] Facilitating volunteering and sponsorship activities**
Supporting communities and sustainable projects of external partners can have a positive impact on society as well as strengthen employee engagement, motivation and organisational identification.
- **[Opportunity] Strengthening employee affiliation with the company through corporate citizenship**
There is an opportunity for Hapag-Lloyd to positively influence employer attractiveness by engaging in corporate citizenship activities.

3.6.2. Minimum disclosure requirements – policies (MDR-P)
related to corporate citizenship

(ESRS 2 MDR-P 65 a) The Company has implemented two comprehensive internal guidelines to manage the identified IROs related to corporate citizenship, thereby reinforcing the commitment to responsible business practices:

Policy/IRO	[Positive impact]	[Opportunity]
	Facilitating volunteering and sponsorship activities	Strengthening employee affiliation with the company through corporate citizenship
Hapag-Lloyd Cares Guideline	X	X
Corporate Guideline Sponsoring and Donations	X	X

Hapag-Lloyd Cares Guideline

Hapag-Lloyd Cares is an initiative fostering local engagements with a social and/or environmental impact in the Liner Shipping segment. It is a key component of the structured approach for corporate citizenship and, as such, part of Hapag-Lloyd’s Sustainability Strategy. The Hapag-Lloyd Cares Guideline is intended to provide employees with guidance in organising local Hapag-Lloyd Cares initiatives. The initiatives underline Hapag-Lloyd’s voluntary commitment to society beyond its business activities through donations and corporate volunteering, designed to support local communities and thus enhance employee engagement. As part of this engagement, each employee is entitled to use one working day per year for their involvement, demonstrating the Company’s respect for their time. The initiative places great emphasis on social

commitment, with the aim of fostering a stronger bond between employees and the Company. It underlines the Company value “We Care”, which aims to promote the social and environmental commitment of employees. Employees are encouraged to volunteer for local initiatives, with sufficient flexibility to accommodate their involvement.

Corporate Guideline Sponsoring and Donations

The Corporate Guideline Sponsoring and Donations regulates the treatment of requests for approving sponsorships and donations at Hapag-Lloyd. It is designed to ensure consistent handling of requests, a targeted use of available resources without overlaps, and alignment with Hapag-Lloyd’s strategic goals. The guideline addresses the impact and opportunity of facilitating volunteering and sponsorship activities and strengthening employee affiliation with the Company through corporate citizenship.

Notably, Hapag-Lloyd refrains from donating to political parties, as outlined in chapter 4.1.6. *Political influence and lobbying activities.*

Policy	Process for monitoring
Hapag-Lloyd Cares Guideline	The due diligence process in place for reviewing contributions to NGOs includes steps to confirm the alignment of initiatives with the focus areas and compliance checks in the Liner Shipping Segment.
Corporate Guideline Sponsoring and Donations	To avoid redundant or overlapping contributions, all sponsoring and donation activities must be agreed and coordinated with Corporate Communications before any commitment is made. All donations must be statistically recorded by Corporate Communications to avoid duplication and ensure transparency.

Policy	(MDR-P 65 b) Scope
Hapag-Lloyd Cares Guideline	The scope of this guideline covers the Hapag-Lloyd Liner Shipping segment.
Corporate Guideline Sponsoring and Donations	The scope of this corporate guideline covers the Hapag-Lloyd Liner Shipping segment. Associated companies are to be informed of this guideline, if possible, and encouraged to comply with its provisions.

Policy	(MDR-P 65 c) Most senior level in organisation that is accountable for implementation of policy
Hapag-Lloyd Cares Guideline	The most senior level in the organisation that is accountable for the implementation of the Hapag-Lloyd Cares guideline in the Liner Shipping Segment is the Managing Director Regulatory Affairs & Sustainability.
Corporate Guideline Sponsoring and Donations	The annual donation budget is determined by the Senior Director Corporate Communications in coordination with the Executive Board of Hapag-Lloyd AG. All sponsoring activities and donations are to be agreed upon and approved by Corporate Communications to avoid redundant or overlapping contributions.

Policy	(MDR-P 65 d) Third-party standards or initiatives that are respected through implementation of policy
Hapag-Lloyd Cares Guideline	No third-party standards or initiatives are respected through the policy implementation.
Corporate Guideline Sponsoring and Donations	No third-party standards or initiatives are respected through the policy implementation.

Policy	(MDR-P 65 e) Description of consideration given to interests of key stakeholders in setting policy
Hapag-Lloyd Cares Guideline	Hapag-Lloyd employees
Corporate Guideline Sponsoring and Donations	Hapag-Lloyd employees

Policy	(MDR-P 65 f) Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it
Hapag-Lloyd Cares Guideline	The policy is available to all employees in Hapag-Lloyd's Intranet.
Corporate Guideline Sponsoring and Donations	The policy is available to all employees in Hapag-Lloyd's Intranet.

3.6.3. Minimum disclosure requirements – targets (MDR-T) related to corporate citizenship

(ESRS 2 MDR-T 81 b, b i) To monitor the effectiveness of the policies in order to manage the IROs, the policies are annually reviewed and validated by the respective departments and the SC is informed about possible adjustments. Thereby, the respective departments will assess the need to develop and implement measurable outcome-oriented targets in line with ESRS requirements, driving positive impact and progress. (ESRS 2 81b i, ii, ii 80 d) As for now, Hapag-Lloyd has consciously decided to neither set quantitative targets for the 2024 reporting year nor the upcoming years, to ensure it can respond to circumstances and developments that require special attention as flexibly as possible.

3.6.4. Minimum disclosure requirements – actions (MDR-A) related to corporate citizenship

(ESRS 2 MDR-A 62) Following a thorough assessment of the impact and opportunities, Hapag-Lloyd is confident that its existing initiatives displayed in this chapter are effectively addressing the relevant issues. As a result, the Company has not identified a need to introduce additional corporate citizenship programmes at this time and does not anticipate doing so in the near future. In case the IROs will change, this need will be re-assessed.

4. GOVERNANCE INFORMATION

4.1. Business conduct (G1)

The governance structure of Hapag-Lloyd is currently undergoing analysis and refinement to align with its target governance model. The following chapter provides general statements applicable to the entire organisation. However, due to the ongoing integration of the Terminal & Infrastructure segment, some deviations may exist in specific areas, which will be addressed separately.

4.1.1. Material impacts, risks and opportunities (G1 IROs)

Hapag-Lloyd's corporate philosophy is founded on core pillars, including governance, compliance, and responsible supply chain management, which are considered essential elements of the commitment to good corporate practices, legal compliance, and sustainable operations. By upholding these principles, the Company demonstrates its ongoing commitment to responsible business conduct and sustainable success.

During the process of identifying material IROs related to Business Conduct, the identified IROs are within Hapag-Lloyds own operations and across the upstream and downstream value chain. However, the process, which is described within the general information, did not include screening of activities in the Company's own operations and in the upstream and downstream value chain, nor was there any screening on individual asset level during the materiality assessment process. Within the DMA, the following material IROs in relation to the material topics of compliance, governance, and responsible supply chain management are described within this chapter.

Material IROs

- **[Potential negative impact] Breaching corruption or bribery legislation**
Non-compliance with current legislation might lead to corruption or bribery.
- **[Actual positive impact] Creating trusted relationships with suppliers**
Responsible and fair approaches to management of business relationships with suppliers, including payment and contract practices can strengthen business relationships.
- **[Potential positive impact] Enforcing sustainable and ethical mindset in corporate culture**
A good governance structure, which supports and promotes ESG topics through strengthening and implementing corporate guidelines can create potential positive impacts by supporting the effective management of identified IROs.
- **[Actual positive impact] Promoting whistleblower protection**
Enforcing the protection of whistleblowers and creating awareness for whistleblowing possibilities can create an open and honest workspace.
- **[Risk] Impairing business success through improper governance**
Financial performance can be impaired if governance practices are not developed further.
- **[Opportunity] Considering ESG requirements in supplier relationships**
Committing to ESG requirements in the supply chain can create positive reputational effect.
- **[Opportunity] Supporting business success through good governance**
Appropriate governance systems that establish adequate and effective management systems can signal trust to stakeholders and foster the reputation of a responsible company.
- **[Opportunity] Incorporating sustainability in business decisions**
Internalising ESG within the management board can lead to positive perception.

4.1.2. Policies related to business conduct and corporate culture (G1-1)

(G1-1 7, ESRS 2 MDR-P) Hapag-Lloyd has seven policies in place to manage its material IROs related to business conduct and corporate culture.

Policy/IRO	[Negative impact] Breaching corruption or bribery legislation	[Positive impact] Creating trusted relationships with suppliers	[Positive impact] Enforcing sustainable and ethical mindset in corporate culture	[Positive impact] Promoting whistleblower protection
Anti-Bribery and Anti-Corruption Policy	X			
Global Code of Ethics			X	
Whistleblower and Non-Retaliation Policy				X
Procurement Guideline		X	X	
Supplier Code of Conduct		X	X	

Policy/IRO	[Risk] Mitigating business success through improper governance	[Opportunity] Considering ESG requirements in supplier relationships	[Opportunity] Supporting business success through good governance	[Opportunity] Incorporating sustainability in business decisions
Rules of Procedure for the Executive Board of Hapag-Lloyd AG	X		X	
Compliance Organisation	X			
Global Code of Ethics	X			
Procurement Guideline		X		
Supplier Code of Conduct		X		

The following section elucidates the contents and objectives of the policies.

Anti-Bribery and Anti-Corruption Policy

(G1 ESRS 2 MDR-P 65a) The Anti-Bribery and Anti-Corruption Policy shall provide guiding principles of conducting business in the highest ethical standard, which aligns with the Compliance Commitment by the Executive Board and the Global Code of Ethics. The policy is constructed and compiled to educate and provide guidance to all employees and represents a minimum compliance requirement. It should be read with relevant laws of its respective country to mitigate the negative impact of breaching corruption or bribery legislation. In the event of any inconsistency faced between this policy and its local law, the said local law takes precedence. The overarching aim of the Anti-Bribery and Anti-Corruption Policy is to ensure Hapag-Lloyd conducts its business activities ethically and lawfully, in compliance with anti-bribery and anti-corruption legislation, including that of countries where Hapag-Lloyd has business dealings. Hapag-Lloyd employees and third-party agents shall not make, offer to make, offer, promise or authorise to make payments or anything of value directly or indirectly to any party, including but not limited to business

partners, government officials or fellow colleagues with the intent to assist Hapag-Lloyd in obtaining or retaining business advantage, for personal benefit or the benefit of a third party, regardless if any benefit is received.

Rules of Procedure for the Executive Board of Hapag-Lloyd AG

The general principle of the Executive Board's work, role and responsibility are outlined in the Rules of Procedure for the Executive Board of Hapag-Lloyd AG set out by the Supervisory Board in accordance with the AktG. The Executive Board shall work together with the other bodies of the Company and the employee representatives in a spirit of trust for the benefit of the Company, aiming to support business success through good governance. Each member of the Executive Board must inform the Chairman of the Executive Board immediately of important measures, decisions, significant business transactions, risks and losses within their area of responsibility. The Chairman of the Executive Board or the Executive Board member shall inform the Executive Board at the next Board meeting. In order to ensure that the Supervisory Board is provided with sufficient information, the Executive Board reports to the Supervisory Board regularly on all issues relevant to the Company relating to planning, business development, the risk situation, risk management and compliance in accordance with statutory provisions. It addresses deviations in the course of business from the plans and targets that have been drawn up, stating the reasons. In particular, the Executive Board reports in writing:

- On a quarterly basis on the development of the Group's earnings, balance sheet, cash flow, financial debt, investments, receivables and personnel, the earnings of the Group divisions and the Company's earnings and balance sheet in the financial year to date, as well as the forecast for the year as a whole.
- At the Supervisory Board meetings on the development of sales and earnings of the Group and the Group divisions in the financial year to date and the forecast for the year as a whole.

A resolution of the Executive Board is required in all matters that are of fundamental importance for the strategy, business, corporate, personnel, financial, pricing and investment policy or the risk exposure of the Company and its affiliated companies within the meaning of Sections 15 et seq. AktG.

Members of the Executive Board may not pursue personal interest in their decision-making or use business opportunities that have arisen for the Company or affiliated companies for their own advantage. Executive Board members are subject to a comprehensive non-compete agreement while working for the Company. They may only enter other commitments, especially positions on supervisory boards at companies that are not associated companies of Hapag-Lloyd AG, with the approval of the Supervisory Board. If members of the Executive Board do accept such offices with the approval of the Supervisory Board, the Executive members in question perform the role in a personal capacity – adhering to their strict obligation of confidentiality and strict separation of their activities as a member of Hapag-Lloyd's Executive Board. Each Executive Board member is required to immediately disclose any conflict of interest to the Supervisory Board and the Chief Executive Officer and to inform other Executive Board members as well. These provisions aim to enforce a sustainable and ethical mindset in corporate culture.

Compliance Organisation

Hapag-Lloyd firmly believes that compliance with all applicable laws, regulations, guidelines, industry, and ethical standards is essential for the proper operation of its business and for its commercial success. Hapag-Lloyd is therefore committed to exercising due diligence in ensuring

close compliance with all applicable laws of each country in which it operates and conducts its business with high ethical standards. With the aim of the guideline, the Compliance Organisation provides guidance to the Hapag-Lloyd organisation to mitigate compliance related risks. Implemented controls are monitored to safeguard Hapag-Lloyd's interests. The Compliance Organisation publishes informative articles to support other functions to enable business needs. To guarantee this level of diligence throughout the Hapag-Lloyd organisation, as well as due to multiple regulatory developments, the recommendations of the German Corporate Governance Codex, and the legal corporate governance requirements, an effective Compliance Organisation is of major importance. An inadequate Compliance Organisation could have severe consequences for the reputation and valuation of the Company.

The aim of the guideline is to define a Compliance Organisation, including structures, processes, responsibilities, powers of decision-making and direction, as well as the reporting chain. The Compliance department provides guidance to the Hapag-Lloyd organisation to mitigate compliance related risks, monitors implemented compliance measures and controls through multiple channels to safeguard Hapag-Lloyd's interests and supports other functions to enable business needs.

The Chief Compliance Officer (CCO) is responsible for ensuring a properly functioning Group-wide Compliance Organisation and Compliance Management System. In addition, the CCO has the ongoing duty to brief the Executive Board and the Chairman of the Supervisory Board in a timely manner on occurrences of special importance, such as intensive grave compliance breaches, including but not limited to violations of relevant laws, rules, or unethical conduct.

The Compliance department has been established to support the CCO in achieving the Compliance Commitment by the Executive Board of Hapag-Lloyd AG, safeguarding Hapag-Lloyd's legitimate interests from corruption and fraud attempts, providing guidance and support to the Hapag-Lloyd organisation to mitigate compliance risks and enable business needs. The CCO ensures the Compliance department is equipped with adequate resources in terms of personnel, budget, and time availability for exercising its functions and responsibilities.

The Compliance department, under the direction of the CCO, is fully responsible for the compliance topics of anti-bribery, anti-corruption, anti-fraud management as well as embargoes and sanctions. Competition law matters are the responsibility of the Compliance department jointly with the Legal department.

Global Code of Ethics

The Global Code of Ethics describes Hapag-Lloyd's objective to comply with all applicable local, national and international laws and regulations relevant to its business activities and expects the same from all its business partners. In some cases – such as in a specific country or industry or with a specific business partner – stricter rules than those described in the Global Code of Ethics may exist. In such cases, the stricter standard shall be applied. Further provisions aiming to eliminate the risk of mitigating business success through improper governance include zero tolerance for bribery and corruption. Hapag-Lloyd is determined to achieve and maintain the highest ethical standards within business transactions, prohibiting any form of corruption or bribery, whether public or private, active or passive. Gifts and business courtesy are managed with strict

guidelines set by the Corporate Guideline Business Courtesy to ensure they are not used improperly or perceived as bribery. Employees are only permitted to offer and receive gifts, entertainment, and hospitality in line with internal policies and never in exchange for any favours or with corrupt intent. Donations, sponsorships, and charitable contributions must be reviewed in advance according to the Corporate Guideline Sponsoring and Donations.

Third-party intermediaries are engaged only when there is a legitimate business need, following stringent due diligence and in accordance with anti-bribery and anti-corruption laws. This refers to the commercial and business considerations involved in deciding whether Hapag-Lloyd should engage with third-party agents or establish its own offices when entering new markets. Hapag-Lloyd ensures compliance with economic sanctions and embargoes, avoiding business with sanctioned entities or persons and not accepting shipments subject to trade sanctions. Fraud is strictly prohibited and viewed as an act that is unacceptable and incompatible with Hapag-Lloyd's values which could be highly damaging to its reputation and image. Applicable laws and regulations to combat money laundering are fully respected. Further, the Global Code of Ethics includes a provision on conflict of interest. When having a conflict of interest, employees are expected to act with integrity, in line with Hapag-Lloyd's ethical standards, and in the best interests of the Company.

Since every commercial activity requires decisions to be made under uncertain circumstances, risks and opportunities are an inherent part of doing business. The aim of an effective risk culture is to consciously encounter, respond to, monitor, and control risks and opportunities. Further detail on the Global Code of Ethics is provided under section 3.1.3.

Whistleblower and Non-Retaliation Policy

Hapag-Lloyd's Whistleblower and Non-Retaliation Policy is founded on the principles of integrity and transparency. The policy emphasises the importance of employees, business partners, customers, suppliers, and contractors acting in good faith and with a duty of care when encountering or suspecting compliance-related concerns. It encourages these stakeholders to speak up and report any such concerns, providing a clear framework for reporting and ensuring that all reports are handled in a fair, timely, and confidential manner. Additionally, the policy outlines the non-retaliation protection afforded to individuals who report compliance-related concerns or participate in associated investigations, further underscoring Hapag-Lloyd's commitment to fostering a culture of accountability and trust. Any form of retaliation against a whistleblower is strictly prohibited at Hapag-Lloyd and will be sanctioned. The same applies to threats and attempts of retaliation.

Procurement Guideline

This guideline defines the framework for Hapag-Lloyd's procurement activities. In all procurement processes and business relationships with suppliers, the legal provisions applicable to suppliers and purchasers as well as Hapag-Lloyd's guidelines and policies must be complied with, particularly in the area of anti-corruption and anti-money laundering, as well as to anti-trust, export control,

GSCA and labour law provisions. Hapag-Lloyd is committed to responsible purchasing. Working with suppliers who comply with the legislation and follow internationally recognised standards for environmental protection, social affairs, and corporate governance structures is essential. These standards are actively considered in supplier selection and -management. The continuous sustainability improvement is based on the shared commitments of Hapag-Lloyd and its suppliers set out in the Hapag-Lloyd SCoC. Procurement must ensure that suppliers adhere to the SCoC. Additionally, contracts with suppliers shall contain human rights and environmental due diligence clauses that build the basis for Hapag-Lloyd's compliance with legislation. These clauses are provided in contract templates developed by Global Procurement and Legal. Hapag-Lloyd recognises that achieving sustainability goals and sustainability improvement is not only the responsibility of suppliers and thus has developed recommendations for its employees trusted with procurement responsibilities towards suppliers aiming to among others create trusted relationships.

Supplier Code of Conduct

The key contents of the SCoC are described under section 3.2.2.

Policy	Process for monitoring
Anti-Bribery and Anti-Corruption Policy	The CCO is responsible for reviewing this Policy annually and revising when required. Hapag-Lloyd's internal control system is designed to ensure the integrity of its financial reporting, with clear guidelines, policies, and procedures established by Hapag-Lloyd's Accounting Department to guide its financial practices.
Rules of Procedure for the Executive Board of Hapag-Lloyd Aktiengesellschaft	The Supervisory Board creates and monitors the rules of procedure of the Executive Board.
Compliance Organisation	The CCO is responsible for reviewing this Policy annually and revising when required.
Global Code of Ethics	See section 3.1.3.
Whistleblower and Non-Retaliation Policy	The CCO is responsible for reviewing this Policy annually and revising when required.
Procurement Guideline	Annually reviewed within Hapag-Lloyd's internal control process by the Senior Managing Director Global Procurement.
Supplier Code of Conduct	See section 3.2.2.

All described policies apply to the Liner Shipping segment of Hapag-Lloyd and all its employees. The newly established Terminal & Infrastructure segment of Hapag-Lloyd is not yet covered.

Policy	(G1 ESRS 2 MDR-P 65b) Scope
Anti-Bribery and Anti-Corruption Policy	The scope of this policy covers the Liner Shipping segment.
Rules of Procedure for the Executive Board of Hapag-Lloyd Aktiengesellschaft	The Rules of Procedure of the Executive Board applies to all Members of the Executive Board.
Compliance Organisation	The scope of this policy covers the Liner Shipping segment.
Global Code of Ethics	See section 3.1.3.

Policy	(G1 ESRS 2 MDR-P 65b) Scope
Whistleblower and Non-Retaliation Policy	The scope of this policy covers the Liner Shipping segment.
Procurement Guideline	<ul style="list-style-type: none"> • The scope of this policy covers the Liner Shipping segment. • Expenditure categories not attributable to purchasing are excluded from the scope of procurement, and therefore outside of the scope of this guideline. This applies to the following expenditures: <ul style="list-style-type: none"> – Taxes, duties, financial and public charges – Wages and salaries (including allowances and bonuses) – Sponsorship, donations (see the Corporate Guidelines Sponsoring and Donations) and contributions for corporate memberships – Financial services provided by financial institutions or banks (see Corporate Guidelines Financial Management), mergers and acquisitions (see Corporate Guidelines Mergers & Acquisitions), and advisory services provided by investment banks and law firms
Supplier Code of Conduct	See section 3.2.2.

Policy	(G1 ESRS 2 MDR-P 65c) Most senior level in organisation that is accountable for implementation of policy
Anti-Bribery and Anti-Corruption Policy	The Head of Department in Corporate Headquarters and the Managing Director of each Region, Area and Terminal & Infrastructure segment in which Hapag-Lloyd will be responsible for implementation in each of their respective geographies or function.
Rules of Procedure for the Executive Board of Hapag-Lloyd Aktiengesellschaft	The Supervisory Board of Hapag-Lloyd AG is accountable for implementing the Rules of Procedure for the Executive Board.
Compliance Organisation	The Chief Compliance Officer
Global Code of Ethics	See section 3.1.3.
Whistleblower and Non-Retaliation Policy	The Management with support from the Regional Compliance Officer or the Compliance Department is responsible for implementing the Whistleblower and Non-Retaliation Policy.
Procurement Guideline	Senior Managing Director Global Procurement
Supplier Code of Conduct	See section 3.2.2.

Policy	(G1 ESRS 2 MDR-P 65d) Third-party standards or initiatives that are respected through implementation of policy
Anti-Bribery and Anti-Corruption Policy	<ul style="list-style-type: none"> • German Anti-Corruption law • U.S. Foreign Corrupt Practices Act • UK Bribery Act
Rules of Procedure for the Executive Board of Hapag-Lloyd Aktiengesellschaft	<ul style="list-style-type: none"> • AktG
Compliance Organisation	<ul style="list-style-type: none"> • German Corporate Governance Codex
Global Code of Ethics	<ul style="list-style-type: none"> • See section 3.1.3.
Whistleblower and Non-Retaliation Policy	<ul style="list-style-type: none"> • Section 5, 6 and 9 of the German Whistleblower Protection Act (HinSchG)
Procurement Guideline	<ul style="list-style-type: none"> • International Bill of Human Rights • ILO • Declaration on Fundamental Principles and Rights at Work • ILO Core Conventions • ILO Maritime Labour Convention • UNGP • OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct • SDGs
Supplier Code of Conduct	<ul style="list-style-type: none"> • See section 3.2.2.

Policy	(G1 ESRS 2 MDR-P 65e) Description of consideration given to interests of key stakeholders in setting policy
Anti-Bribery and Anti-Corruption Policy	There have been no particular considerations given to interest of key stakeholders in setting policy.
Rules of Procedure for the Executive Board of Hapag-Lloyd Aktiengesellschaft	There have been no particular considerations given to interest of key stakeholders in setting policy.
Compliance Organisation	There have been no particular considerations given to interest of key stakeholders in setting policy.
Global Code of Ethics	See section 3.1.3.
Whistleblower and Non-Retaliation Policy	There have been no particular considerations given to interest of key stakeholders in setting policy.
Procurement Guideline	There have been no particular considerations given to interest of key stakeholders in setting policy.
Supplier Code of Conduct	See section 3.2.2.

Policy	(G1 ESRS 2 MDR-P 65f) Explanation of whether and how policy is made available to potentially affected stakeholders and stakeholders who need to help implement it
Anti-Bribery and Anti-Corruption Policy	The Anti-Bribery and Anti-Corruption Policy is available on the Intranet.
Rules of Procedure for the Executive Board of Hapag-Lloyd Aktiengesellschaft	The Rules of Procedure for the Executive Board are available on Hapag-Lloyd's Intranet. The Rules of Procedure for the Executive Board are shared with Board Members.
Compliance Organisation	The Corporate Guideline Compliance Organisation is available on Hapag-Lloyd's Intranet.
Global Code of Ethics	See section 3.1.3.
Whistleblower and Non-Retaliation Policy	The Head of Department in Corporate Headquarters and the Managing Director of each Area in which Hapag-Lloyd operates will be responsible for assisting the Regional Compliance Officers and/or the Compliance Department in ensuring that the right onboarding processes are in place to ensure that all new employees review this Policy. The Whistleblower and Non-Retaliation Policy is available on Hapag-Lloyd's Intranet.
Procurement Guideline	The Procurement Guideline is available on the Intranet and furthermore communicated directly to stakeholders.
Supplier Code of Conduct	See section 3.2.2.

(G1 ESRS 2 GOV-1 5a, b) The role of the administrative, management and supervisory bodies is described in section 1.3.

Corporate culture

(G1-1 9 AR 1) Hapag-Lloyd's Liner Shipping corporate culture is founded on its Global Code of Ethics, which embodies the core values "We care. We move. We deliver." These values are considered the foundation of the Company's culture and shall guide its actions as a responsible and values-driven organisation. Managers are empowered to lead by example, taking ownership of their team's actions, and resolving conflicts. By living these values, Hapag-Lloyd aims to create a positive and inclusive work environment. A culture of honest and fair feedback shall be established through bottom-up as well as top-down models, and behaviour that does not correspond to the values is not tolerated and will be sanctioned. Integrity and a strong sense of ethics are continuously promoted by managers.

Hapag-Lloyd Liner Shipping develops its corporate culture through the competency model, which includes eight value-based behaviours describing the observable actions which are expected from all employees. To ensure that every employee lives up to Hapag-Lloyd's corporate values, the value-based behaviours are an integral part of Hapag-Lloyd's annual GSD, with which Hapag-Lloyd aims to encourage both a strong feedback culture and the value-based behaviour of each employee.

Hapag-Lloyd Liner Shipping ensures that all employees ashore and on board are familiarised with the Global Code of Ethics as part of the onboarding process and are aware of and understand the rules contained therein. Special attention is paid to maintaining a speak up culture: Employees should feel empowered to address any gaps, shortcomings, or ambiguities when they observe or suspect a compliance misconduct.

Hapag-Lloyd Liner Shipping evaluates its corporate culture via internal controls, associated policies and procedures, which help to avoid or correct any shortcomings. Identified compliance misconduct or violation of the Global Code of Ethics can lead to disciplinary measures. Serious violations can even lead to termination of the employment contract, reporting to the relevant authorities or other legal consequences.

As within the Terminal & Infrastructure segment, SAAM Terminals previously established its corporate culture based on the corporate values which had been defined within its Code of Ethics. These values are Safety, Honesty, Respect, Responsibility, and Service, which are transmitted and promoted through the induction process, internal campaigns, and its Performance Management System.

Business conduct

(G1-1 11) Hapag-Lloyd is governed by the provisions of the HinSchG, specifically sections 5, 6, and 9, which implement the requirements of EU Directive 2019/1937 on the protection of persons who report breaches of Union law.

(G1-1 10a) Compliance-related concerns can be reported via multiple reporting channels such as a "Speak Up Line" for reporting anonymously on a secure external hosted website which is available 24/7 in multiple languages. In addition, employees can speak up to divisional/local/regional Compliance officers, the Global Compliance Team, their direct supervisors or to the local/regional/global Human Resources department. All reported allegations must be forwarded to the Compliance department and handled in accordance with a standardised process. While the "Speak Up Line" is also available for the stakeholders of the Terminal & Infrastructure segment, SAAM Terminals had established its own reporting channel, "Canal de denuncias", which is accessible through its website. In addition, each business unit of SAAM Terminals has its own whistleblowing channel.

The Compliance department conducts a preliminary review to ensure the information provided by the whistleblower is sufficient and the report is credible. Reported compliance-related concerns, including actual or potential violations of human rights and/or social obligations committed by or involving Hapag-Lloyd staff, are forwarded to the Ethics Committee, which is responsible for evaluation of the reports. They meticulously decide on the necessary steps to be taken and subsequently provide their feedback to the Compliance department. This feedback is then communicated to the whistleblower, ensuring transparency and accountability in addressing the

reported concerns. Within seven days after submission of the report, the whistleblower receives a confirmation of the receipt of a report and within three months there will be feedback on the case. Once an investigation is completed, the outcome that is directly related to the reported compliance-related concern is communicated to the whistleblower. Applicable laws such as data protection legislation are complied with.

[\(G1-1 10b\)](#) Hapag-Lloyd has established a robust 'Anti-Bribery and Anti-Corruption Policy', grounded in internationally recognised standards, including those set by the U.S. Department of Justice and comparable with the German ISO 37001. The policy aligns with the United Nations Convention against Corruption, as it is grounded in the German Anti-Corruption law. Since Germany has ratified the Convention, its domestic legislation, including the Anti-Corruption law, reflects the Convention's principles, thereby ensuring the policy's consistency with international standards.

Through regular reviews and refinements, the Company ensures its policies remain comprehensive and up-to-date, supporting its ambition to be a responsible and ethical business partner.

[\(G1-1 10c\)](#) For the Liner Shipping segment protection under Hapag-Lloyd's Whistleblower and Non-Retaliation Policy is extended to whistleblowers who had reasonable grounds to believe that the information on breaches reported was true at the time of reporting in accordance with the HinSchG. The facts of the report should be described as truthfully and as accurately as possible. Baseless speculation should be avoided. A whistleblower will be protected against any kind of retaliation, even if the report afterwards is found to be unsubstantiated. Retaliation may include, but is not limited to suspension, lay-off, dismissal or equivalent measures, demotion or withholding of promotion, transfer of duties, change of location of place of work, reduction in wages, change in working hours, harassment, discrimination, failure to renew.

All employees are informed about the whistleblower reporting channels through Hapag-Lloyd's communication channels such as the Intranet and the employee magazine Logbook. Training to employees on how to use the whistleblower reporting channels is offered as part of the compliance management training concept, which includes in-person training and web-based sessions. Similar processes are established within the Terminal & Infrastructure segment. Specifically at SAAM Terminals and its business units, as its whistleblower channel is designed to ensure anonymity and no retaliation. It is accessible to employees, clients, vendors, and third parties. The investigation process involves reception, preliminary analysis, and investigation, led by the Vice President Internal Audit and the Compliance Officer, with the help of external advisors if deemed to be necessary.

[\(G1-1 10e\)](#) With the procedures to follow-up on reports by whistleblowers in accordance with the HinSchG Hapag-Lloyd commits to investigate business conduct incidents openly and objectively and will gather both facts supporting and exonerating the allegation. In the absence of proof of alleged misconduct innocence will be presumed. Negative consequences resulting from the investigation process itself should be avoided as much as possible.

(G1-1 10g) To prevent breaches of compliance, the Executive Board has implemented a range of measures as part of the compliance management system including compliance training on business conduct. Compliance training aims to enable Hapag-Lloyd employees to fulfil their personal responsibility for lawful conduct in their respective areas of responsibility. The regular Compliance training programme so far consists of the following parts: Compliance Management training and workshops, Compliance face-to-face training and Compliance WBT. In addition, the training programme encompasses compliance training for third-party agents. Every conducted training session is documented on the internal Hapag-Lloyd Academy website. Employees worldwide are regularly made aware of compliance through various internal communication measures. Compliance communication makes a significant contribution to anchoring compliance in the corporate culture. The Global Compliance Team actively contributes to compliance communication by organising compliance activities, for example compliance quiz, short mandatory compliance videos on compliance topics to emphasise the importance of compliance content.

(G1-1 10h) Hapag-Lloyd has identified certain functions that are more susceptible to corruption and bribery risks. Furthermore, the Company recognises that departments engaging in regular interactions with business partners, such as vendors and customers, as well as those responsible for pricing, are also particularly vulnerable to corruption and bribery risks. Among seafarers, Hapag-Lloyd has identified the Master, Chief Officer, and Chief Engineer roles as being particularly prone to corruption and bribery risks.

4.1.3. Management of relationships with suppliers (G1-2)

(G1-2 15a AR 2 - AR 3) In all procurement processes and business relationships with suppliers, the legal provisions applicable to suppliers and purchasers as well as Hapag-Lloyd's guidelines and policies must be complied with. This applies in particular – but not exclusively – to legal provisions in the area of anti-corruption and anti-money laundering, as well as to anti-trust, export control, GSCA, and labour law provisions. It is prohibited to conclude contracts that violate legal provisions, orders, and regulations applicable to the business relationship and, where applicable, local legal provisions or the above-mentioned guidelines and policies. Hapag-Lloyd recognises the importance of supplier management in maintaining effective control and driving continuous improvement in supplier relationships. As such, Global Procurement assumes a proactive role in managing the supplier portfolio, cultivating strategic partnerships with key suppliers, and conducting rigorous performance assessments to ensure alignment with the Company's exacting standards.

Hapag-Lloyd's key practices include:

- Supplier selection: Based on predefined requirements per category.
- Supplier qualification: Mandatory adherence to the Hapag-Lloyd SCoC and compliance standards.
- Supplier evaluation: Considers category specific KPIs and evaluates performance, strategy, risk management, human rights, and sustainability through self-reporting, audits, and monitoring.

- Supplier classification: Rankings based on performance, criticality, risk and strategic fit.
- Supplier development: Long-term optimisation measures regarding costs, performance, and risk.
- Regular reviews: Business and performance review meetings to foster continuous improvement.
- Supplier phase-out: Based on strategic decisions or performance.

Hapag-Lloyd's supplier engagement approach takes into account a range of sustainability risks, which are carefully evaluated and mitigated to ensure that the Company's high standards for responsible business practices are upheld throughout its global supply chain.

These standards include:

- Prohibition of the hiring or use of private or public security forces that would lead to impairments due to a lack of instruction or control
- Disregard for occupational health and safety and work-related health hazards
- Destruction of the basis of the livelihood of individuals through environmental pollution
- Disregard for the freedom of association – the rights to join trade unions and to engage in collective bargaining
- Unlawful infringement of land rights
- Prohibition of the employment of persons in forced labour and of all forms of slavery
- Prohibition of unequal treatment in employment
- Prohibition of child labour
- Prohibition of withholding an adequate living wage
- Prohibition of the production and/or use of substances within the scope of the Stockholm Convention and of the non-environmentally sound handling of waste containing persistent organic pollutants
- Prohibition of importing/exporting hazardous waste within the meaning of the Basel Convention
- Prohibition of the manufacture, use and/or disposal of mercury (Minamata Convention)

[\(G1-2 15b AR 2 - AR 3\)](#) The Hapag-Lloyd Liner Shipping SCoC outlines shared commitments to sustainability and serves as a guiding principle for procurement. Adherence to the SCoC and the incorporation of human rights and environmental due diligence clauses into contracts are essential requirements for suppliers.

The SCoC is a core requirement for supplier selection, outlining the essential criteria that must be upheld by Hapag-Lloyd and its suppliers.

Social criteria:

- Effective abolition of child labour
- Elimination of all forms of forced labour or modern slavery
- Occupational safety and health
- Freedom of association and the right to collective bargaining
- Diversity and inclusion
- Adequate remuneration
- Rights of communities and security

Environmental criteria:

- Decarbonisation
- Biodiversity
- Circularity
- Responsible handling of dangerous materials

(G1-2 14, G1-2 ESRS 2 MDR-P 62) Hapag-Lloyd has not established a dedicated policy specifically targeting late payments to small and medium-sized enterprises. Nevertheless, they are encompassed within the Company's overall payment practices, which emphasise timely settlements and mitigation of late payment risks.

4.1.4. Prevention and detection of corruption and bribery (G1-3)

(G1-3 18a AR 5– AR 6) Hapag-Lloyd has established comprehensive procedures to prevent, detect, and respond to corruption and bribery allegations, ensuring that any incidents are addressed promptly and appropriately.

At Hapag-Lloyd, it is of utmost priority that the Company operates in an ethical and lawful manner while complying with applicable anti-bribery and anti-corruption laws. Operating as a global company, Hapag-Lloyd's compliance extends to all applicable anti-bribery and anti-corruption laws of countries where Hapag-Lloyd has commercial activities. Hapag-Lloyd strictly prohibits giving, offering, promising, authorising, asking, soliciting, or accepting directly or indirectly anything of value with corrupt intent to and/or from government officials, business partners, including but not limited to vendors, agents, and customers, or among fellow employees anywhere in the world. Hapag-Lloyd has zero tolerance for any conduct that violates this policy.

Detect allegations or incidents of corruption and bribery

Hapag-Lloyd employs mechanisms to detect allegations or incidents of corruption and bribery as described within the "Business conduct" section. The objective of these mechanisms is to ensure thorough monitoring and prompt identification of any misconduct.

Address allegations or incidents of corruption and bribery

When allegations or incidents of corruption and bribery arise, Hapag-Lloyd aims to address them promptly and effectively, following the protocols outlined, previously described within the "Business conduct" section. With this approach Hapag-Lloyd wants to ensure that all reported allegations are investigated thoroughly and that appropriate corrective actions are taken to maintain Hapag-Lloyd's commitment to ethical business practices.

[\(G1-3 18b\)](#) Under the direction of the Ethics Committee, Hapag-Lloyd investigations related to bribery and corruption are conducted by the Corporate Audit department, separate from the management chain involved in prevention and detection, ensuring impartiality. Hapag-Lloyd's Compliance department reviews initial reports for credibility and maintains communication with whistleblowers throughout the process, providing feedback and updates as required.

[\(G1-3 18c\)](#) The CCO reports quarterly to the Executive Board of Hapag-Lloyd AG on important incidents and breaches of compliance rules. In addition, the CCO has an ongoing duty to brief the Executive Board and the Chairman of the Supervisory Board in a timely manner on occurrences of special importance, such as grave breaches of compliance, including but not limited to violations of relevant laws, rules, or unethical conducts.

Outcomes of investigations of potential incidents of corruption and bribery are reported to the Supervisory Board via the annual report detailing compliance activities and incidents by the CCO.

Prevent allegations or incidents of corruption and bribery

[\(G1-3 20\)](#) The Corporate Guidelines of Hapag-Lloyd are incorporated into the general online training platform and published in the Hapag-Lloyd intranet by the Corporate Audit Department. New Hapag-Lloyd employees in the Liner Shipping segment are required to complete this general online training on the Corporate Guidelines within 15 days of joining the Company. The Local Training Administrator monitors participation in this training to ensure compliance. Additionally, it falls upon the responsible department to determine if further communication or specialised training is necessary beyond the general publication of the Corporate Guidelines. If deemed necessary, the responsible department must organise and facilitate this additional training or communication.

[\(G1-3 21a\)](#) The training programme designed to enhance employees' understanding of anti-corruption and anti-bribery regulations consists of communication tools such as WBT or videos, informing them about how to stay compliant with anti-bribery and anti-corruption laws, as well as outlining the appropriate escalation paths and procedures. Additionally, in person training is offered that covers those topics. [\(G1-3 21c\)](#) Both the Supervisory Board and Executive Board members undergo training on anti-corruption and anti-bribery measures to ensure a robust compliance culture.

4.1.5. Incidents of corruption or bribery (G1-4)

During the reporting period there has been one conviction and no fines have been paid due to violation of anti-corruption and anti-bribery laws.

[\(G1-4 24 a\)](#) **Violations of anti-corruption and anti-bribery laws**

	2024
Number of convictions of anti-corruption and anti-bribery laws	1
Amount of fines for violation of anti-corruption and anti-bribery laws	–

(G1-3 AR 8) Prevention and detection of corruption or bribery – anti-corruption and bribery training

	2024
Share of functions-at-risk covered by training programmes	98.6%
Number of functions-at-risk covered by training programmes	12,210
Number of functions-at-risk	12,389

(G1-4 24, ESRS 2 - MDR-A) Hapag-Lloyd has implemented two actions to mitigate its material IROs related to corruption and bribery: a comprehensive compliance training programme and supplier monitoring, both designed to promote a culture of integrity and responsible business practices.

Action: Compliance training

(ESRS 2 MDR-A 68 a) Hapag-Lloyd established a mandatory compliance WBT that must be completed by every employee working under a Hapag-Lloyd Liner Shipping contract. These training sessions brief employees among others on the work of compliance and the four main topics and responsibilities of compliance, including anti-bribery and anti-corruption and the whistleblower system. It is the responsibility of each department deemed to be at higher risk regarding compliance-related topics to complete the in-person training on compliance every two years, or more frequently if necessary.

The expected outcome of this action is to equip Hapag-Lloyd Liner Shipping personnel with essential knowledge on compliance. For future reporting periods, a continuation of this action is planned.

(MDR-A 68 b-e, 69a-c) Further action details: Compliance training

MDR	Disclosure
(MDR-A 68b) Scope	All personnel with Hapag-Lloyd Liner Shipping employment contracts, both at sea and on land, as well as personnel at sea on ships managed by Hapag-Lloyd.
(MDR-A 68c) Time horizon	There is no specific year for the completion of this action, as it is an ongoing process.
(MDR-A 68d) Key action for harm mitigation	This action was not initiated to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts.
(MDR-A 68e) Progress	Hapag-Lloyd provided face-to-face training sessions on compliance-related topics, demonstrating Hapag-Lloyd's commitment to fostering a robust compliance culture across all areas of its operations.
(MDR-A 69a-c) Financial resources	As the implementation of the action plan does not require (and is not planned to require) any significant Opex and/or Capex current or future financial resources are not significant.

Action: Supplier monitoring

(ESRS 2 MDR-A 68 a) The second action plan relates to the Company's suppliers. Hapag-Lloyd engages with high-risk suppliers through a due diligence process that involves distributing comprehensive questionnaires to gather essential information and obtain their commitment to the Company's SCoC. In addition, the Company includes them in regular media monitoring. The expected outcome of this action is to strengthen Hapag-Lloyd's commitment to responsible

purchasing and ensuring selected suppliers comply with applicable laws and follow internationally recognised standards for environmental protection, social affairs, and corporate governance. For future reporting periods, a continuation of this action is planned.

(MDR-A 68 b-e, 69a-c) Further action details: Supplier monitoring

MDR	Disclosure
(MDR-A 68b) Scope	The scope of the key action involves the identification and management of Hapag-Lloyd's high-risk suppliers through regular risk assessments. A high-risk supplier is defined as a supplier identified during these assessments – both abstract and concrete – as having a high risk for breaches related to human or labour rights or environmental topics. Suppliers of the Terminal & Infrastructure segment are not yet covered in the scope.
(MDR-A 68c) Time horizon	The roll-out of the key action is planned for 2025. The key action is to be completed every reporting year as an ongoing initiative.
(MDR-A 68d) Key action for harm mitigation	This action was not initiated to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts.
(MDR-A 68e) Progress	No input on progress as no disclosure in previous period.
(MDR-A 69a-c) Financial resources	As the implementation of the action plan does not require (and is not planned to require) any significant Opex and/or Capex current or future financial resources are not significant.

4.1.6. Political influence and lobbying activities (G1-5)

(G1-5 29a) The Company has established a governance structure for overseeing political influence and lobbying activities, with specific responsibilities within the organisation. The designated Managing Director of Regulatory Affairs & Sustainability is the representative responsible for overseeing political influence and lobbying activities. The Managing Director in this role reports directly to the CEO of Hapag-Lloyd. As part of the supervisory body, no specific member is responsible for overseeing activities related to exerting political influence including lobbying activities.

(G1-5 29b AR 9 - AR 10) (G1-5 29b I AR 9, ii) Consistent with its policy, Hapag-Lloyd adheres to a strict policy of non-partisanship and does not provide financial or in-kind contributions to political parties or voter organisations. As a result, no financial or material support was extended to political entities in the reporting period.

(G1-5 29c AR 14) The Company participates in discussions and political exchanges focusing on key issues related to climate change and the decarbonisation of shipping. Notably, Hapag-Lloyd supports the work conducted by the World Shipping Council (WSC). The WSC collaborates with legislators from the IMO, the European Commission, government agencies, and other organisations to create global regulations that will accelerate the decarbonisation of shipping: Hapag-Lloyd's position, aligned with the WSC's stance, is that the shipping industry must reduce GHG emissions both in the short and long term. This public stance is in line with the management of Hapag-Lloyd's material IROs related to the topic of climate change (see section 2.2). This position aligns with the positive impact of *Prioritisation of emission reduction of the shipping industry*.

SAAM Terminals conducts lobbying meetings under the guidelines of the respective legislation to address mainly industry and security issues. In this regard, the issues are linked to IROs associated with labour standards and the working conditions of employees, occupational health and safety, and asset security. At the national level, the functions related to relations with authorities are allocated in roles such as Senior Vice President Commercial & Business Development, Senior Vice President People & Sustainability, and each general manager at the local level.

(G1-5 29d) The Company has been registered in the EU Transparency Register since November 2016 under the REG number 296016224456-02. (G1-5 30 AR 11) Members of Hapag-Lloyd's Supervisory Board and Executive Board do not hold positions in public administration in the two years preceding their appointment to their role at Hapag-Lloyd.

4.1.7. Payment practices (G1-6)

(G1-6 33b AR 16–AR 17) Hapag-Lloyd's predominant payment terms are based on a 30-day payment, although variations may apply in specific contexts.

(G1-6 33d) The average time Hapag-Lloyd takes to pay an invoice is calculated based on the date from where the contractual or statutory term is calculated until the value date of the actual payment, to be calculated in number of days. The time to pay is derived based on actual data from a full payment data set except for payments which are not related to standard vendor payments (for example internal payments, investments, hedging transactions with banks). To derive the KPI, the following approach is used:

- The payment volume for each specific time to pay period is multiplied by the time to pay (in days).
- The sum of all results from the previous step is divided by the total payment volume, yielding the KPI as an average time to pay, weighted by volume.

The percentage of payments aligned with payment terms refers to the Hapag-Lloyd AG and comprises 49.8% of the relevant payment volume for the Group. Hapag-Lloyd's systems are currently not yet designed to trigger a subsequent reconciliation against contractual payment targets. The payment parameters of various purchasing categories are collected from a large number of systems. In the current system, this data is not harmonized across all global subsidiaries of Hapag-Lloyd. It therefore cannot be verified whether the Hapag-Lloyd AG is representative for the entire group. Group-wide performance may vary accordingly. For the payments of invoices which are due "immediately" a 14 calendar day grace period was assumed, to reflect the time difference between invoice date, invoice receipt, processing time and actual payment.

(G1-6 33a, b, c) Payment practices

	2024
Average number of days to pay invoice from date when contractual or statutory term of payment starts to be calculated	35
Share of payments aligned with payment terms	90.1%
Number of legal proceedings due to late payments	–

4.1.8. Minimum disclosure requirements – metrics (G1 MDR-M)

(MDR-M 75) Description of metric used to evaluate performance and effectiveness, in relation to material impact, risk or opportunity
Related material sustainability topics:

Corruption and bribery; management of relationships with suppliers including payment practices

(MDR-M 77a) Disclosure of methodologies and significant assumptions behind metric

Metric	Methodology and assumptions
Share of functions-at-risk covered by training programmes	The coverage percentage refers to the number of function-at-risk employees covered by the specific training programmes that contain the topics of anti-corruption and anti-bribery. The KPI is calculated by dividing the number of functions-at-risk covered by training programmes by the total of functions-at-risk.
Number of functions-at-risk covered by training programmes	The KPI includes employees identified to be functions-at-risk that have access to anti-corruption and anti-bribery training programmes that are covered/have access to this training offering. The specific training programmes contain the topics of anti-corruption and anti-bribery.
Number of convictions for violation of anti-corruption and anti-bribery laws	Cases that lead to a conviction for violation of anti-corruption and anti-bribery laws in the reporting period are included in the KPI regardless of whether the case occurred in the reporting year or not.

5. ANNEXES TO THE SUSTAINABILITY STATEMENT

5.1. List of abbreviations

Abbreviation	Explanation
AER	Annual efficiency ratio
AktG	German Stock Corporation Act
ALPHA	Agile Leadership Program@Hapag-Lloyd
ATL	ATL Haulage Contractors Limited
CapEx	Capital Expenditure
CO ₂	Carbon dioxide
CRVA	Climate Risk & Vulnerability Assessment
CSRD	Corporate Sustainability Reporting Directive
DEI	Diversity, equity and inclusion
DMA	Double materiality assessment
DNSH	Do no significant harm
DWT	Deadweight tons
EEA	European Economic Area
EEDI	Energy Efficiency Design Index
EEXI	Energy Efficiency Existing Ship Index
ESG	Environment, social and governance
ESRS	European Sustainability Reporting Standards
ETS	Emissions Trading System
EU	European Union
FUP	Fleet Upgrade Program
GDPR	General Data Protection Regulation
GHG	Greenhouse gas
GRI	Global Reporting Initiative
GSCA	German Supply Chain Act
GSD	Global Staff Dialogue
HGB	German Commercial Code
HGT	Hanseatic Global Terminals
HinSchG	German Whistleblower Protection Act
IHM	Inventory of hazardous materials
ILO	International Labour Organisation
IMDG	International Maritime Dangerous Goods
IMO	International Maritime Organization
IPCC	Intergovernmental Panel on Climate Change
IRO	Impacts, risks, and opportunities
ISM	International Safety Management
ISMS	Information Security Management System
ISO	International Organisation for Standardisation
IT	Information technology
ITF	International Transport Workers' Federation
KBA	Key Biodiversity Areas
KPI	Key Performance Indicator
LMS	Learning Management System
LNG	Liquefied Natural Gas
MARPOL	International Convention for the Prevention of Pollution from Ships
MDR-P	Minimum Disclosure Requirements – Policies
MDR-A	Minimum Disclosure Requirements – Actions
MDR-T	Minimum Disclosure Requirements – Targets
MLC	Maritime Labour Convention

Abbreviation	Explanation
NACE	Statistical Classification of Economic Activities in the European Community
NIS	Directive of the European Commission on Network and Information Security
NOAA	National Oceanic Atmospheric Administration
NO _x	Nitrogen oxides
NPS	Net Promoter Score
OECD	Organisation for Economic Co-operation and Development
OpEx	Operating Expenditure
PSSA	Particular Sensitive Sea Area
QEM	Quality and Environmental Management
RCP	Representative Concentration Pathway
RMS	Risk Management System
SC	Sustainability Committee
SCoC	Supplier Code of Conduct
SDG	Sustainable Development Goals
SMS	Safety Management System
SO _x	Sulfur oxides
SSP	Shared Socioeconomic Pathway
TCFD	Task Force on Climate-Related Financial Disclosures
TDP	Talent Development Program
TEU	Twenty-foot Equivalent Unit
UK	United Kingdom
UNGP	United Nations Guiding Principles on Business and Human Rights
WBT	Web-based training
WSC	World Shipping Council
ZEMBA	Zero Emission Maritime Buyers Alliance

5.2. List of data points that derive from other EU legislations (IRO-2)

Disclosure Requirement and associated data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (27) , Annex II	
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1			
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (28) Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 (29) , Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14		not applicable for Hapag-Lloyd		
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		not applicable for Hapag-Lloyd		
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6	
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1			
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1			
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1			

Disclosure Requirement and associated data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)	
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)	
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1			
ESRS E3-1 Water and marine resources paragraph 9		not material for Hapag-Lloyd		
ESRS E3-1 Dedicated policy paragraph 13		not material for Hapag-Lloyd		
ESRS E3-1 Sustainable oceans and seas paragraph 14		not material for Hapag-Lloyd		
ESRS E3-4 Total water recycled and reused paragraph 28c		not material for Hapag-Lloyd		
ESRS E3-4 Total water consumption in m ³ per net revenue on own operations paragraph 29		not material for Hapag-Lloyd		
ESRS 2 SBM-3 – E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1			
ESRS 2 SBM-3 – E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1			
ESRS 2 SBM-3 – E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1			
ESRS E4-2 Sustainable land/agriculture practices or policies paragraph 24 (b)		not applicable for Hapag-Lloyd		
ESRS E4-2 Sustainable oceans/seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1			
ESRS E4-2 Policies to address deforestation paragraph 24 (d)		not applicable for Hapag-Lloyd		
ESRS E5-5 Non-recycled waste paragraph 37 (d)		not material for Hapag-Lloyd		
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39		not material for Hapag-Lloyd		
ESRS 2 SBM-3 – S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I			
ESRS 2 SBM-3 – S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I			

Disclosure Requirement and associated data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I			
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I			
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I			
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I			
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I			
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I			
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	
ESRS 2 SBM-3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Indicators number 12 and n. 13 Table #3 of Annex I			
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1			
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1			
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1			

Disclosure Requirement and associated data point	SFDR reference	Pillar 3 reference	Benchmark Regulation reference	EU Climate Law reference
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1			
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1			
ESRS S4-1 Policies related to consumers and end-users paragraph 16		not material for Hapag-Lloyd		
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17		not material for Hapag-Lloyd		
ESRS S4-4 Human rights issues and incidents paragraph 35		not material for Hapag-Lloyd		
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1			
ESRS G1-1 Protection of whistle-blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1			
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)	
ESRS G1-4 Standards of anti-corruption and anti-bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1			

* Data points that are subject to the phase-in regulation and are not currently reported by the company are not shown.

5.3. Content Index – List of ESRS disclosure requirements (IRO-2)

Disclosure requirements	Title	Chapter
ESRS 2	General Information	1
ESRS 2 BP-1	General basis for preparation of sustainability statements	1.1
ESRS 2 BP-2	Disclosures in relation to specific circumstances	1.2
ESRS 2 GOV-1	The role of the administrative, management and supervisory bodies	1.3
ESRS 2 GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	1.4
ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	1.5
ESRS 2 GOV-4	Statement on due diligence	1.6
ESRS 2 GOV-5	Risk management and internal controls over sustainability reporting	1.7
ESRS 2 SBM-1	Strategy, business model and value chain	1.8
ESRS 2 SBM-2	Interests and views of stakeholders	1.9
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.10
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	1.11
ESRS 2 IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	1.12
	Environmental Information	2
EU Taxonomy	Consolidated disclosures pursuant to Art. 8 of the taxonomy regulation	2.1
ESRS E1	Climate change	2.2
ESRS E1 IROs	Material impacts, risks and opportunities	2.2.1
ESRS E1 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	2.2.2
ESRS E1-2	Policies related to climate change mitigation and adaptation	2.2.3
ESRS E1-3	Actions and resources in relation to climate change policies	2.2.4
ESRS E1-4	Targets related to climate change mitigation and adaptation	2.2.5
ESRS E1-5	Energy consumption and mix	2.2.6
ESRS E1-6	Gross Scopes 1, 2, 3 and total GHG emissions	2.2.7
ESRS E1-7	GHG removals and GHG mitigation projects financed through carbon credits	2.2.8
ESRS E1-8	Internal carbon pricing	2.2.9
ESRS E1 MDR-M	Minimum disclosure requirements – metrics	2.2.10
ESRS E2	Pollution	2.3
ESRS E2 IROs	Material Impacts, risks and opportunities	2.3.1
ESRS E2 IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	2.3.2
ESRS E2-1	Policies related to pollution	2.3.3
ESRS E2-2	Actions and resources related to pollution	2.3.4
ESRS E2-4	Targets related to pollution	2.3.5
ESRS E2-4	Pollution of air, water and soil	2.3.6
ESRS E2 MDR-M	Minimum disclosure requirements – metrics	2.3.7
ESRS E4	Biodiversity and ecosystems	2.4
ESRS E4 IROs	Material impacts, risks and opportunities	2.4.1
ESRS E4 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	2.4.2
ESRS E4 IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	2.4.3
ESRS E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	2.4.4
ESRS E4-2	Policies related to biodiversity and ecosystems	2.4.5
ESRS E4-3	Actions and resources related to biodiversity and ecosystems	2.4.6
ESRS E4-4	Targets related to biodiversity and ecosystems	2.4.7
ESRS E4-5	Impact metrics related to biodiversity and ecosystems change	2.4.8
ESRS E5	Resource use and circular economy	2.5

Disclosure requirements	Title	Chapter
ESRS E5 IROs	Material impacts, risks and opportunities	2.5.1
ESRS E5 IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	2.5.2
ESRS E5-1	Policies related to resource use and circular economy	2.5.3
ESRS E5-2	Actions and resources related to resource use and circular economy	2.5.4
ESRS E5-3	Targets related to resource use and circular economy	2.5.5
ESRS E5-4	Resource inflows	2.5.6
ESRS E5	Entity-specific metrics related to resource use and circular economy	2.5.7
ESRS E5 MDR-M	Minimum disclosure requirements – metrics	2.5.8
ESRS entity specific transport of dangerous goods	Transport of dangerous goods	2.6
ESRS entity specific transport of dangerous goods IROs	Material impacts, risks and opportunities	2.6.1
ESRS entity specific transport of dangerous goods, ESRS 2 MDR-P	Minimum disclosure requirements – policies related to the transport of dangerous goods.	2.6.2
ESRS entity specific transport of dangerous goods	Entity-specific metrics related to the transportation of dangerous goods	2.6.3
ESRS entity specific transport of dangerous goods, ESRS 2 MDR-T	Minimum disclosure requirements - targets related to the transport of dangerous goods	2.6.4
ESRS entity specific transport of dangerous goods, ESRS 2 MDR-A	Minimum disclosure requirements - actions related to the transport of dangerous goods	2.6.5
ESRS entity specific transport of dangerous goods, ESRS 2 MDR-M	Minimum disclosure requirements - metrics related to the transport of dangerous goods	2.6.6
Social Information		3
ESRS S1	Own workforce	3.1
ESRS S1 IROs	Material impacts, risks and opportunities	3.1.1
ESRS S1 SBM-1	Material impacts, risks and opportunities and their interaction with strategy and business model	3.1.2
ESRS S1-1	Policies related to own workforce	3.1.3
ESRS S1-2	Processes for engaging with own workers and workers' representatives about impacts	3.1.4
ESRS S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	3.1.5
ESRS S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	3.1.6
ESRS S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.1.7
ESRS S1-6	Characteristics of the undertaking's employees	3.1.8
ESRS S1-7	Characteristics of non-employee workers in Hapag-Lloyd's own workforce	3.1.9
ESRS S1-8	Collective bargaining coverage and social dialogue	3.1.10
ESRS S1-9	Diversity metrics	3.1.11
ESRS S1	Entity-specific metrics related to own workforce	3.1.12
ESRS S1-10	Adequate wages	3.1.13
ESRS S1-14	Health and safety metrics	3.1.14
ESRS S1-16	Remuneration metrics	3.1.15
ESRS S1-17	Incidents, complaints and severe human rights impacts	3.1.16

Disclosure requirements	Title	Chapter
ESRS S1 MDR-M	Minimum disclosure requirements - metrics	3.1.17
ESRS S2	Workers in the value chain	3.2
ESRS S2 IROs	Material impacts, risks and opportunities	3.2.1
ESRS S2-1	Policies related to value chain workers	3.2.2
ESRS S2-2	Processes for engaging with value chain workers about impacts	3.2.3
ESRS S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	3.2.4
ESRS S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	3.2.5
ESRS S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.2.6
ESRS S3	Affected communities	3.3
ESRS S3 IROs	Material impacts, risks and opportunities	3.3.1
ESRS S3 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	3.3.2
ESRS S3-1	Policies related to affected communities	3.3.3
ESRS S3-2	Processes for engaging with affected communities about impacts	3.3.4
ESRS S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	3.3.5
ESRS S3-4	Acting on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	3.3.6
ESRS S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.3.7
ESRS entity specific	Information & cyber security	3.4
ESRS entity specific Information & cyber security IROs	Material impacts, risks and opportunities	3.4.1
ESRS entity specific Information & cyber security, ESRS 2 MDR-P	Minimum disclosure requirements – policies related to information & cyber security	3.4.2
ESRS entity specific Information & cyber security, ESRS 2 MDR-T	Minimum disclosure requirements – targets related to information & cyber security	3.4.3
ESRS entity specific Information & cyber security, ESRS 2 MDR-A	Minimum disclosure requirements – actions related to information & cyber security	3.4.4
ESRS entity specific data protection	Data protection	3.5
ESRS entity specific data protection IROs	Material impacts, risks and opportunities	3.5.1
ESRS entity specific data protection, ESRS 2 MDR-P	Minimum disclosure requirements – policies related to data protection	3.5.2
ESRS entity specific data protection	Entity-specific metrics related to data protection	3.5.3
ESRS entity specific data protection, ESRS 2 MDR-T	Minimum disclosure requirements – targets related to data protection	3.5.4
ESRS entity specific data protection, ESRS 2 MDR-A	Minimum disclosure requirements – actions related to data protection	3.5.5
ESRS entity specific data protection, ESRS 2 MDR-M	Minimum disclosure requirements – metrics related to data protection	3.5.6

Disclosure requirements	Title	Chapter
ESRS entity specific corporate citizenship	Corporate citizenship	3.6
ESRS entity specific corporate citizenship IROs	Material impacts, risks and opportunities	3.6.1
ESRS entity specific corporate citizenship, ESRS 2 MDR-P	Minimum disclosure requirements – policies related to corporate citizenship	3.6.2
ESRS entity specific corporate citizenship, ESRS 2 MDR-T	Minimum disclosure requirements – targets related to corporate citizenship	3.6.3
ESRS entity specific corporate citizenship, ESRS 2 MDR-A	Minimum disclosure requirements – actions related to corporate citizenship	3.6.4
Governance Information		4
ESRS G1	Business conduct	4.1
ESRS G1 IROs	Material impacts, risks and opportunities	4.1.1
ESRS G1-1	Policies related to business conduct and corporate culture	4.1.2
ESRS G1-2	Management of relationships with suppliers	4.1.3
ESRS G1-3	Prevention and detection of corruption and bribery	4.1.4
ESRS G1-4	Incidents of corruption or bribery	4.1.5
ESRS G1-5	Political influence and lobbying activities	4.1.6
ESRS G1-6	Payment practices	4.1.7
ESRS G1 MDR-M	Minimum disclosure requirements – metrics	4.1.8
Annexes to the Sustainability Statement		5
	List of abbreviations	5.1
ESRS IRO-2	List of Data points that derive from other EU legislations	5.2
ESRS IRO-2	Content Index – List of ESRS disclosure requirements	5.3
	Reconciliation to GRI Standards	5.4

5.4. Reconciliation to Standards of the Global Reporting Initiative (GRI)

GRI Standard	GRI Name	ESRS DR Reference
GRI 2: General disclosures		
GRI 2 2-2	Entities included in the organization's sustainability reporting	ESRS 2 BP-1
GRI 2 2-4	Restatements of information	ESRS 2 BP-2
GRI 2 2-6	Activities, value chain and other business relationships	ESRS 2 SBM-1
GRI 2 2-7	Employees	ESRS 2 SBM-1; S1-6
GRI 2 2-8	Workers who are not employees	S1-7
GRI 2 2-9	Governance structure and composition	ESRS 2 GOV-1
GRI 2 2-12	Role of the highest governance body in overseeing the management of impacts	ESRS 2 GOV-1; ESRS 2 GOV-2; ESRS 2 SBM-2; G1.GOV-1
GRI 2 2-13	Delegation of responsibility for managing impacts	ESRS 2 GOV-1; ESRS 2 GOV-2; G1-3
GRI 2 2-14	Role of the highest governance body in sustainability reporting	ESRS 2 GOV-5; ESRS 2 IRO-1
GRI 2 2-16	Communication of critical concerns	ESRS 2 GOV-2; G1-1
GRI 2 2-17	Collective knowledge of the highest governance body	ESRS 2 GOV-1
GRI 2 2-19	Remuneration policies	ESRS 2 GOV-3, E1.GOV-3
GRI 2 2-20	Process to determine remuneration	ESRS 2 GOV-3
GRI 2 2-21	Annual total compensation ratio	S1-16
GRI 2 2-22	Statement on sustainable development strategy	ESRS 2 SBM-1; ESRS 2 BP-2
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* This transition document is unaudited.