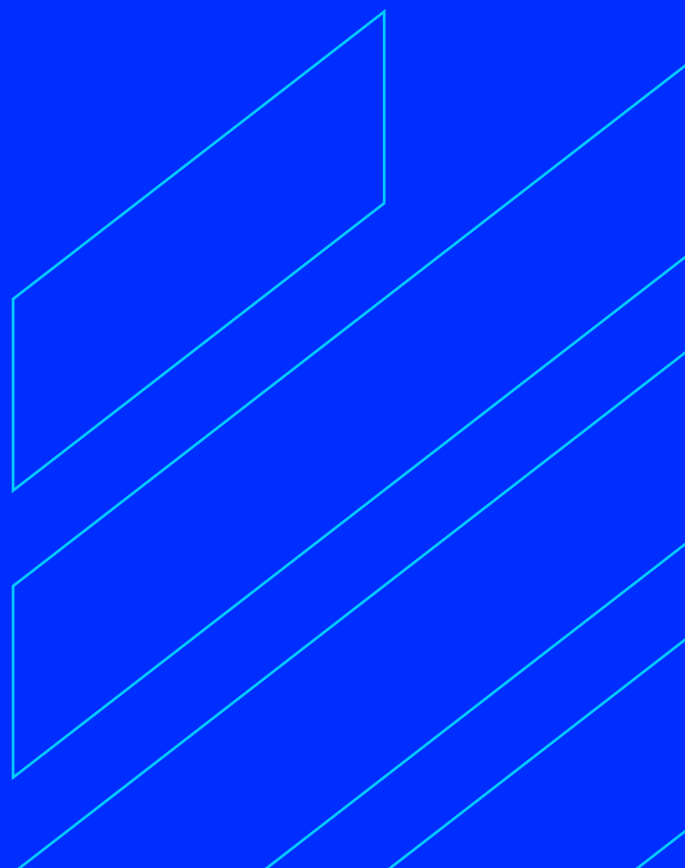




Code of Conduct

CORPORATE GUIDELINE OF THE DUISPORT GROUP



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One Port, one Team!



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Preface by the Executive Board

Dear Colleagues

What makes us successful as a company? Is it revenues that rise year after year and growing profits? Record cargo turnover figures that we present on a regular basis, while simultaneously driving forward new, innovative projects? Absolutely! But what is the foundation of this success? It's you. It's every one of us! It is the daily work and tireless commitment of each individual employee in the duisport Group. Without your commitment, not a single article could be handled in the Port of Duisburg and not a single cent earned. Regardless of the area in which you work, you all contribute to the success of our company. Because the greatest success of any company is the team that stands behind it. Logistics, in particular, only works when one cog in the wheel meshes reliably with the other.

It requires dependable rules in order to ensure that day-to-day work runs smoothly between all colleagues. These rules serve as a guide for our collaboration and ensure trust, fairness and reliability. Your personal conduct has a major influence on the success and reputation of duisport – both internally and externally.

We attach particular importance to maintaining an honest, open and naturally respectful relationship with one another. We act as a team, do not make any foul plays, and are always open to criticism. And something happens to go wrong, we clarify this internally, enter into a dialog, and make the necessary adjustments.

As the Executive Board of duisport, we are aware of the very special function we assume as role models – each and every day. We are happy to fulfill this role, for we manage the Port of Duisburg in accordance with the principles of responsible corporate governance. Our success as a team depends on the integrity of each of its members. Our following Code of Conduct should therefore act both as a benchmark and as a compass for our cooperation as #teamduisport.

We look forward to celebrating many more successes together with you in the future and to working together to continuously develop the Port of Duisburg.

Executive Board



MARKUS BANGEN
Chief Executive Officer



LARS NENNHAUS
Member of the Executive Board

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Scope

This guideline applies to all employees of the entire duisport Group. This includes all companies in which Duisburger Hafen AG directly or indirectly holds more than 50% of the voting rights and/or can exercise a controlling influence. This Code of Conduct is not binding for companies in which Duisburger Hafen AG does not exercise a controlling influence, but is intended to serve as a guide.

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Principles and guidelines

The duisport Group stands for logistical expertise, innovative strength, customer orientation, and motivated employees who act responsibly. We at duisport develop sustainable infrastructure and (inter)nationally networked logistics solutions in order to strengthen the resilience and competitiveness of North Rhine-Westphalia and Germany as business locations.

Managers have a special function as role models, and their actions are measured against the Code of Conduct. As role models, they see to it that the employees in their area of responsibility apply the Code of Conduct. Honest and open information and mutual support are signs of good, trusting cooperation between employees and managers.

Failure to observe the Code of Conduct may lead in some cases to considerable damage to the company, its reputation, and its employees, as well as compromise its business partners, customers and third parties. We provide regular training to support our employees in upholding the Code of Conduct.

3.1 Legal and internal requirements

For us, it is a matter of course that our employees comply with all applicable laws, other legal regulations, and internal requirements in the scope of our business activities.

It is the responsibility of each and every employee to familiarize themselves with the regulations that apply to their personal situation and professional field of activity and to inform themselves accordingly through training and instruction.

We base our conduct on the highest ethical standards and always act in accordance with them. Our Code of Conduct reflects these standards, which our employees are obligated to adhere to on their own responsibility.

¹ In the following, the term "employee" is used globally for everyone who works at duisport Group, including executives.

3.2 Values

As the duisport Group, we treat each other with appreciation, openness, respect, and honesty. Authenticity, trust, transparency, and reliability are particularly important to us.

We take sufficient time for discussions and cooperation with our employees and partners and create a space and opportunities for ideas and innovations. In its business models, the duisport Group advocates sustainable business practices, safeguarding social and ecological standards, and the interests of society as a whole. Quality, the environment, safety, and reliability are an integral part of our corporate identity. We see ourselves as a service provider and put customer needs first. Each employee acts reliably and according to binding principles, applying the highest standards of quality to their work. By bringing in their contribution and their energy, our employees achieve great things. The duisport Group values satisfied employees who take responsibility in their area and contribute to the further development and implementation of the company's objectives. Individual support enables personal success, and an active exchange allows employees to learn from each other. With this in mind, team spirit plays an especially important role in the duisport Group. Working as a team, the duisport Group shows courage and responsibility in all business areas. This includes continuously questioning the status quo and developing and implementing new ideas.





Social responsibility

4.1 Human rights and environmental risks in accordance with the Supply Chain Due Diligence Act (LkSG)

Our overriding goal is to respect, protect, and uphold the human rights of every individual. We therefore respect human rights, maintain fair working conditions, and uphold social standards in our daily business activities. We promote human rights all along our value chain and look for indications of human rights violations as part of our business activities. We have defined our behavioral requirements in relation to our suppliers in our Code of Conduct for Suppliers.

The following are the human rights and environmental risks to which we pay particular attention:

- Prohibition of child labor – Section 2 para. 2 no. 1 and 2 LkSG
- Prohibition of forced labor and all forms of slavery – Section 2 para. 2 no. 3 and 4 LkSG
- Disregard for occupational health and safety and work-related health hazards – Section 2 para. 2 no. 5 LkSG
- Disregard of freedom of association – Freedom of association and right to collective bargaining – Section 2 para. 2 no. 6 LkSG
- Prohibition of unequal treatment in employment – Section 2 para. 2 no. 7 LkSG
- Prohibition of withholding an appropriate wage – Section 2 para. 2 no. 8 LkSG
- Destruction of natural resources through environmental pollution – Section 2 para. 2 no. 9 LkSG
- Unlawful violation of land rights – Section 2 para. 2 no. 10 LkSG
- Prohibition of the hiring or use of private/public security forces that may bring about adverse effects due to lack of instruction or control – Section 2 para. 2 no. 11 LkSG
- The prohibition of [...] any action or omission in breach of duty that is directly capable of impairing a protected legal position (arising from the human rights conventions within the meaning of Section 2 para. 1 LkSG) with particular severity and whose unlawfulness is obvious upon a reasonable appraisal of the circumstances in question – Section 2 para. 2 no. 12 LkSG
- Prohibited production, use, and/or disposal of mercury (Minamata Convention) – Section 2 para. 3 no. 1 to 3 LkSG
- Prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs – Section 2 para. 3 no. 4 and 5 LkSG
- Prohibited import/export of hazardous waste within the meaning of the Basel Convention – Section 2 para. 3 no. 6 to 8 LkSG

If timber appears as a raw material in the supply chain, the duisport Group company concerned shall comply with all applicable regulations and laws regarding the procurement of timber and the supply of timber products, in particular those of EU Regulation 995/2010. In this way, we are making an important contribution to the prevention of illegal logging.

If our employees identify or receive information about risks related to human rights or environmental risks within their working environment, they report this immediately and assist us in taking the necessary steps to remedy any violations.

4.2 Diversity and equal treatment

The duisport Group creates a working environment characterized by mutual trust and equal opportunities in which diversity and inclusion are valued and everyone is treated with dignity and respect. Staff-related decisions, e.g. recruitment, training, promotion, or disciplinary measures, are made free of any discrimination. Every employee has the opportunity to develop within the company and receives individual support.

We believe that a diverse and inclusive workplace culture is crucial for building a vibrant, innovative community and for business success. Diversity and an open corporate culture promote creativity, productivity, and therefore competitiveness and the capacity for innovation. Together, we are committed to an inclusive workplace where each individual is valued without prejudice. Any form of exploitation, disregard, or discrimination against individuals on the basis of Section 1 of the German General Equal Treatment Act (AGG) as amended, as well as disregard for occupational safety regulations or employee rights, is unacceptable and will not be tolerated.

We condemn any form of discrimination, harassment, bullying or abusive conduct, and sexual harassment, including unwanted sexual advances or comments. We will take decisive action against any violations.

4.3 Employee rights/employee representation

The duisport Group recognizes the right of all employees to form unions and appoint employee representatives on a democratic basis. The Group is committed to working openly and trustingly with employee representatives, engaging in constructive and cooperative dialog, and striving for a fair balance of interests. We adhere to the legal obligations arising from collective agreements and other employee-related agreements.

The right to appropriate remuneration is recognized for all employees. Wages and social benefits correspond at least to the relevant national and local legal standards.

4.4 Occupational health and safety

The health and safety of employees is a top priority for the duisport Group. Safety and health in the workplace are an integral part of all operational processes. The legal requirements must be implemented and complied with in full. Managers instruct and support employees in dealing with health and safety issues in the workplace on their own responsibility.

Our employees observe the requirements for occupational health and safety for their own protection and for the protection of colleagues and third parties. The applicable laws on working hours must be observed.

The same safety standards apply to employees of subcontractors working on behalf of the duisport Group as to employees of the duisport Group. This is taken into account in the selection process and in the course of cooperation.

The duisport Group attaches great importance to fair working conditions and offers, among other things, a wide range of measures for occupational health management and achieving a good work-life balance

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Sustainability and environmental protection

The duisport Group promotes transparent dialog and joint cooperation with its stakeholders and always takes social, ecological, and economic concerns into consideration in its actions in accordance with the principle of sustainability.

Sustainability is part of our entrepreneurial understanding and is taken into account in all company-related decisions. We take responsibility in dealing with our environment, make our contribution to climate protection, and promote circularity in our activities. We are committed to complying with all relevant environmental laws and regulations and strive for transparency and continuous improvement in terms of our impact on the environment.

Effective environmental and climate protection is achieved by means of targeted measures in all our business areas. Our focus is on encouraging a modal shift, the promotion of renewable drive technologies, and the planning, construction, and operation of logistics properties in accordance with the latest sustainability criteria. For us, the top priority is to integrate the guiding principles of sustainable action into all our business practices.

In this regard, our employees are our most important asset. We encourage them to integrate sustainable thinking and action into their daily work and to promote environmental and climate awareness throughout the workforce. We advocate the responsible use of our environment, energy, and resources by issuing guidelines and promoting active participation in campaigns and measures.

5.1 Corporate digital responsibility

We are committed to corporate digital responsibility (CDR) and advocate responsible and environmentally responsible action in the digital age. We respect the privacy of our customers and employees and are committed to keeping their data safe and secure. We promote transparency and disclosure in relation to our digital practices and are committed to upholding ethical standards with respect to artificial intelligence, automation, and technological development, as well as to disseminating information about the impact of digital technologies on the environment and climate.

We encourage our workforce to continuously develop digital skills in order to ensure that they are capable of putting the principles of CDR into practice in their daily working environment. Through these principles, we undertake to assume our digital responsibility while simultaneously strengthening the skills and commitment of our employees in the digital field.



Compliance

6.1 Fair competition

The provisions of competition and antitrust law ensure fair and free competition, which in turn guarantees entrepreneurial freedom of action and effective consumer protection. They are directed in particular against concerted anti-competitive practices between competitors and the abuse of a dominant market position.

We strictly adhere to the provisions of competition and antitrust law. In particular, we refrain from unlawful agreements or concerted practices with competitors. We likewise refrain from entering into any anti-competitive arrangements with customers. We observe fair business practices and respect the intellectual property rights and trade secrets of third parties.

Our employees observe these guidelines in their day-to-day business and do not actively or passively participate in discussions with competitors on topics that are relevant to competitors, such as information on pricing or business performance. They are aware that anti-competitive practices can, in certain cases, have consequences under civil and criminal law as well as result in severe fines.

6.2 Prohibition of corruption

All forms of corruption and attempted corruption are expressly prohibited. Corruption refers to bribery, the receiving of bribes, and the giving or accepting of undue advantage. Undue advantages must always be assumed if the type and scope of the advantage are suitable for unduly influencing the actions and decisions of the recipient.

Employees must avoid any semblance that the business decision could have been made on the basis of irrelevant considerations or personal interests. All prices, services, conditions, and agreements must stand up to an objective and transparent assessment.

Under no circumstances may the acceptance and granting of gifts violate the law or gifts be granted to parties involved in a tender or bidding process. This also applies to the acceptance and granting of gifts that are paid for from one's own private funds or granted indirectly (e.g. via related parties). Particular vigilance must be exercised when dealing with public officials, as the corruption provisions are particularly strict in this case. When commissioning external consultants and intermediaries, we ensure that remuneration is only paid for services actually rendered and that this remuneration is commensurate with the service provided.

Our employees must only give or accept gifts, invitations, and hospitality if they are not inappropriately generous or otherwise inappropriate (e.g. if granted as a "quid pro quo" for establishing a business relationship). Our employees must reject inappropriate benefits and inform their superior should they be offered.

In case of questions or doubts, employees should consult their superior or the Compliance Officer. The Corporate Guideline on Anti-Corruption also applies.

6.3 Donations/sponsorships/community investment

The duisport Group is an active member of society and, in the interest of the company, contributes to society in various ways. Direct or indirect donations in the name of a company of the duisport Group may only be granted to non-political organizations and after consultation with the relevant management. Financial contributions to political parties in Germany or abroad, party-affiliated or party-like organizations, individual elected officials, or candidates for political office are prohibited. Any sponsoring activities by the duisport Group are conducted in an appropriate, transparent way and in accordance with the applicable Corporate Guideline on Handling Donations and Sponsorships as well as our mission statement on social commitment.

6.4 Dealing with business partners and subcontractors/conflicts of interest

Business decisions are made exclusively in the interests of the duisport Group. Suppliers and service providers are selected according to objective and comprehensible criteria and procedures. Conflicts of interest with private interests or other economic or other activities, including those of family members or other closely related persons or organizations, must be avoided at the outset. Should such conflicts nevertheless arise, transparent disclosure is essential for resolving the conflict.

6.5 Money laundering

We only maintain relationships with reputable business partners. All business processes must be properly documented. Our employees must be alert to suspicious behavior that could provide sufficient grounds for the suspicion of money laundering. They must report any suspicions to their supervisor and the Compliance Officer immediately.

6.6 Product responsibility

We have a responsibility to ensure the safe handling of our products and services. We adhere to the applicable legal and official regulations for ensuring compliance with the requirements for product conformity. To ensure compliance with these regulations, we use methods, processes, and production facilities that correspond to the state of the art and our quality standards. We employ continuous product monitoring to ensure the longterm compliance with these standards.

6.7 Export control, taxes, and customs duties

We comply with all national and international regulations that restrict or prohibit the import, export, or domestic trade of goods, technologies, or services. We observe foreign trade law, customs regulations, and the approval procedures resulting from these (embargoes, sanctions).

We are committed to complying with all national and international tax and customs laws and obligations in the countries in which we operate.

6.8 Data protection

We take the protection of personal data (e.g. name, address, birthday) of our employees, business partners, customers, and third parties very seriously. We only collect, store, process, and use personal data in accordance with legal requirements.

Our employees handle all personal data in a responsible way. They comply with the legal requirements on data protection and act in accordance with the internal requirements for handling personal data. All employees are also responsible for ensuring that personal data is protected against unauthorized access by third parties. In cases of doubt, they should contact the Data Protection Officer or their supervisor.

We also always process other (non-personal) data in a responsible way and in accordance with applicable laws. We are committed to complete transparency when handling data. The unauthorized disclosure of confidential information, in particular for non-business-related purposes, may be penalized in individual cases

6.9 IT security

Cybersecurity is an important concern for us. IT-supported company processes can be exposed to such risks as hacker attacks, malware, or other damaging impairments. We comply with the legal requirements for IT security. Our employees observe the company's internal requirements for the handling of data and documents and take the appropriate security precautions.

6.10 Representation of interests of the economy

We make use of legally permissible opportunities to exert political influence (e.g. through business associations) in a transparent and permissible way. We maintain neutrality at all times in our dealings with political parties and interest groups.

Our employees observe the company's internal requirements for participating in interest groups and consult with the responsible parties (e.g. from External Affairs and Corporate Communications) as to how they should represent the company.

6.11 Communication and marketing

We respect and actively follow an open, transparent communication and marketing policy with all economic stakeholders, customers, and the public. For us, it is important to be perceived and valued as a trustworthy partner.

Our employees observe the internal regulations on corporate communication and see to it that their conduct in the public realm does not damage the reputation of the duisport Group. Highly public statements made on behalf of the duisport Group vis-à-vis customers, the press, or the general public must only be made by the responsible departments (e.g. Corporate Communications) in consultation with the Executive Board.

Our social media netiquette is applied to ensure appropriate communication on the internet and on social media platforms.

6.12 Handling of company property

The property and resources of the duisport Group must be treated carefully and appropriately and protected against theft, misuse, or loss. The use of company property for private purposes is only permitted with the prior approval of the supervisor.

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Training

We ensure that our employees can carry out their work in a safe and responsible way. To this end, we expect our employees to attend the training courses required according to their respective position and scope of responsibilities on a regular basis.

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Whistleblowing and reporting

The following list of questions is intended as an initial orientation to help our employees provide answers on their own:

- Is my decision legal?
- Is my decision in agreement with the company's internal requirements?
- Do my decisions put other people at a disadvantage?
- Would my decision remain the same regardless of the specific person affected by it?
- Is my decision safe for other people within the environment of the company?
- Have I considered the impact of my decision on the environment?
- Have I recognized and weighed up the risks associated with my decision?
- Would the company's reputation be affected if my decision were to become publicly known?

Supervisors or the Compliance Officer are there to help you in making a final assessment or with other questions about the Code of Conduct.

Compliance with the Code of Conduct is monitored by the Compliance Officer and formally by internal audit conducted in accordance with the Corporate Guideline on Internal Audits.

It may occur that our employees either unintentionally or intentionally violate our Code of Conduct or witness such a violation. In order to ensure the integrity of our company processes, we rely on our employees to act responsibly in the event of violations and suspected violations and to speak up in the event of problems or cases of doubt.

We have several communication channels through which our employees or external parties can report cases of doubt or observed violations.

Each employee of the duisport Group has the opportunity to use the whistleblower system ("Compliance Hotline") to provide information on misconduct, especially criminally relevant conduct, within the duisport Group and to report violations of the laws of the European Union.

The external Compliance Hotline also acts as a reporting point for the complaints procedure according to the Supply Chain Due Diligence Act (LkSG).

The Compliance Hotline enables employees, business partners, and third parties to submit information and complaints – upon request: anonymously – regarding risks related to human rights and environmental risks as well as violations of human rights or environmental obligations in the business area of the duisport Group or of a direct or indirect supplier (supply chain).

Available complaint channels and contact persons

The groups of people named above can reach their personal contact person or their legal representative via two different complaint channels.

1. Telephone hotline, external compliance consultant Dr. Matthias Brockhaus, attorney at law:
+49 800 5893833

Availability: Monday to Friday 10:00 AM to 12:00 PM and 3:00 PM to 7:00 PM (CET) – except for German public holidays

2. Email, internal Compliance Officer of the duisport Group Christian Negele, attorney at law:
compliance@duisport.de

For further internal contact options, such as the Compliance Board, please refer to the Corporate Guideline on the Reporting and Whistleblower System of the duisport Group.

Employees must not be disadvantaged due to reporting wrongful behavior. It must be ensured that their identity remains protected.



Penalties

Any of our employees who violate the law, other applicable legal regulations, internal company regulations, or the rules set out in this Code of Conduct, as well as those who do not behave in accordance with the rules, must expect appropriate consequences within the scope of company and legal regulations. This may result in termination of the employment relationship as well as in claims for compensation.

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Entry into force

This Guideline enters into force upon signature by the Executive Board and publication on the intranet of the duisport Group.

Duisburg, November 29, 2023



MARKUS BANGEN
Chief Executive Officer



LARS NENNHAUS
Member of the Executive Board



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