



## Speaking Up Guideline

### 1. Introduction and Purpose

Reederei F. Laeisz G.m.b.H. strives to achieve transparency and a high level of business ethics in a way outlined in the Code of Conduct. To maintain trust in the business operations, the company has established a Speak Up system to act in a fast and firm way wherever a serious breach of the Code of Conduct and/or other company policies and/or national/international laws is suspected. The purpose is to encourage all employees and business partners to report their concerns in respect of serious misconducts related to the Code of Conduct and/or other company policies and/or national/international laws by offering a possibility to alert the company about suspicions of misconduct in confidence without any risk of subsequent victimisation, discrimination or disadvantage, and to ensure an appropriate investigation process.

### 2. Application

This procedure applies to the company Reederei F. Laeisz G.m.b.H. and affiliated companies (hereinafter referred to as "company"), their employees and business partners.

### 3. Terms and Definitions

employee	The term includes every person (on shore and at sea) who works for the company under an employment contract.
serious misconduct	Serious misconduct involves any illegal or unlawful behaviour, as well as irregularities, related to the business activities of the company and concerning the fundamental interests of the company or the life and health of individuals, e. g. acts or omissions that do not comply with the Code of Conduct and/or other company policies or that endangers people's health, safety or the environment.
report	To report means the oral or written communication of information on breaches either openly or anonymously.

### 4. Responsibilities

Management	The management has the overall responsibility for the compliance with and to inform and make the employees aware of this guideline.
Investigation Team	The investigation team can consist of the following persons, e. g.: <ul style="list-style-type: none"><li>- Member of the Board of Directors,</li><li>- Member of the HR department,</li><li>- Member of the Worker's council,</li><li>- Head of Legal Department.</li></ul>
Compliance Officer	The Compliance Officer advises and supports the management and the investigation team.

### 5. References

This policy is based on the EU Directive on Whistleblower Protection, EU General Data Protection Regulation, and national legislation on whistleblowing.



## 6. Related Documents

- MLC Complaint Procedure (seafarer)

## 7. Procedure for Reporting

### a) When to report?

Concerns about all irregularities and misconduct relating to the company should be raised basically through the normal internally available reporting channels, e. g. by approaching the superior or, if the concern regards the superior, the Managing Director.

The Speak Up system should be used only as a channel to alert the company about serious risks affecting individuals, the company, the society or the environment and when the employee do not feel comfortable to conduct a direct dialogue. The processing may only refer to data about serious misconducts concerning, e. g.:

- bribery, corruption, criminal offenses, breaches of the Code of Conduct or
- other serious improprieties concerning the organization's vital interests or the life or health of individual persons, as for instance serious environmental crimes, major deficiencies that regard the security at the place of work and very serious forms of discrimination or harassments.

### b) How to report?

An employee who reports a concern of a serious misconduct under this Policy should:

- disclose the information in good faith,
- have reasonable grounds for believing that the information is true,
- not act maliciously, nor knowingly make false allegations,
- not seek any personal or financial gain.

Abuse of the reporting system is a serious disciplinary offence.

There are different alternative ways to report:

- contact the superior, HR department or Managing Director of the company,
- contact the Compliance Officer, Mr. Mathias Kroh (kroh@laeisz.de or +49(0)381 6660 - 217),
- anonymous or confidential messaging through the Speak Up communication channel on the website [www.laeisz.de](http://www.laeisz.de). The Speak Up system is operated by an independent service provider and is available 24/7. The employee can speak up or ask questions via the system directly to the company.
- contact the competent authority in your country of residence, however, it is strongly recommended to report concerns within the company to enable an immediate examination of the case by the investigation team.

The report should be made normally in text form (writing or via e-mail).

Business partners can also report their concerns by anonymous or confidential messaging through the Speak Up communication channel on the website [www.laeisz.de](http://www.laeisz.de).



The company encourages anybody who shares their suspicions to be open with their identity. All messages received will be handled confidentially and in conformity with the applicable data protection laws. For those wishing to remain anonymous, a channel for anonymous reporting (see under (iii)) is offered.

c) Content of the report

To adequately assist the company in the investigation process, the report should be based on facts, and the following questions should be addressed:

- (i) What happened, and where and when?
- (ii) Who is involved?
- (iii) Is this expected to happen again? If yes, when and where?
- (iv) Who else may have knowledge of the above, or may have access to the relevant information?
- (v) Is there any supporting documentation available? If yes, please include it.
- (vi) Is there any other information that may be relevant and helpful?

8. Investigation process

a) The Investigation Team and Compliance Officer

Access to messages received through the Speak Up channel is restricted to appointed individuals with the authority to handle these cases. Their handling is confidential. When needed, individuals who can add expertise may be included in the investigation process. These people can access relevant data and are also bound to confidentiality.

If a person raises a concern e. g. directly to a Managing Director or the Compliance Officer, the message is treated according to these guidelines.

b) Confirmation of receipt

Receipt of the message will be confirmed by the Compliance Officer within 7 (seven) days.

c) Acceptance or rejection of an investigation process

The investigation team decides whether to accept or decline the message. If the message is accepted, appropriate measures for investigation will be taken.

The investigation team may decline to accept a message if:

- the alleged conduct is not a reportable conduct under this Speaking Up guideline,
- the message has not been made in good faith or is malicious,
- there is insufficient information to allow for further investigation,
- the subject of the message has already been solved.

If a message includes issues not covered by the scope of this Speaking Up guideline, the investigation team should nonetheless take appropriate actions to get the issue solved.

d) Investigation

All messages are treated seriously and in accordance with this Speaking Up guideline:



- No one from the investigation team, or anyone taking part in the investigation process, will attempt to identify the reporter.
- The investigation team can, when needed, submit follow-up questions via the channel for the communication.
- A message will not be investigated by anyone who may be involved with or connected to the misconduct.
- The investigation team decides if and how a report should be escalated.
- Reports are handled confidentially by the parties involved.

The investigation team will send a notification of the outcome of the investigation within 3 (three) months upon the date of receiving the message.

## 9. Personal data and confidentiality

### a) Protection in the case of non-anonymous reporting

A person expressing genuine suspicion or misconduct according to these guidelines will not be at risk of losing their job or suffering any form sanctions or personal disadvantages as a result. It does not matter if the reporter is mistaken, provided that he or she is acting in good faith.

Subject to considerations of the privacy of those against whom allegations have been made, and any other issues of confidentiality, a reporter will be kept informed of the outcomes of the investigation into the allegations.

In cases of alleged criminal offences, the reporter will be informed that his/her identity may need to be disclosed during judicial proceedings.

### b) Protection of, and information to, a person specified in a report

The rights of the individuals specified in a report are subject to the relevant data protection laws. Those affected will be entitled to the right to access data relating to themselves and should the information be incorrect, incomplete or out of date to require amendments or deletion of data.

These rights are subject to any overriding safeguarding measures required to prevent the destruction of evidence or other obstructions to the processing and investigation of the case.

### c) Deletion of data

Personal data included in a report and investigation documentation is deleted when the investigation is complete, with the exception of when personal data must be maintained according to other applicable laws. Permanent deletion is carried out 90 days after completion of the investigation. Investigation documentation and reports that are archived should be anonymized under GDPR; they should not include personal data through which persons can be directly or indirectly identified.