



Hanseatic
Energy
Hub

WHISTLEBLOWER SYSTEM POLICY

CONTENT

WHISTLEBLOWER SYSTEM POLICY 1

Foreword..... 3

1. Scope 4

2. Definitions..... 4

3. How do we protect reporting persons? 4

4. What can I report? 5

5. What can I not report? 5

6. Who is responsible for receiving and processing of reports? 5

7. How can I submit a report? 6

8. What will happen after I submit my report? 6

9. How will my report be investigated? 6

10. What happens after the investigation? 7

11. Informing the management 7

12. When will I receive feedback on my report? 7

13. Final analysis 8

14. Data protection 8

15. Entry into force..... 8

Foreword

Hanseatic Energy Hub GmbH has committed itself to a sustainable energy transition by building an import terminal that will contribute to the supply of LNG and later green gases to Germany and at the same time prepare the market ramp-up for hydrogen.

We can only achieve our company goals if we act with integrity and in accordance with the applicable laws and regulations (compliance).

Anonymous and non-anonymous reports from our employees, customers, suppliers, partners or any external third party are seen as an important element on our path to continuously improving our organization and in maintaining a fully compliant business. All such reports are taken seriously and will be stringently and carefully followed up.

To ensure that an anonymous or non-anonymous report is treated in strict confidence and that reporting individuals are protected from unlawful reprisals, we have implemented a modern Whistleblower System that opens up a technically secure communication channel for such reports which guarantees transparent, speedy, and objective clarification.

Our Whistleblower System fulfills the latest legal requirements for whistleblower protection as per the Whistleblower Protection Act (HinSchG) for companies with 50 employees.

Individuals reporting in good faith will not have to fear any reprisals of any kind (such as consequences on employment-contracts or legal actions).

If anyone becomes aware of misconduct, legal breaches, retaliation measures by Hanseatic Energy Hub GmbH or its employees we expressly ask and wish for your assistance and your report. We strongly believe our Whistleblower System strengthens our responsibility for the energy transition, our corporate culture, and our company's success.

Yours sincerely

Management of Hanseatic Energy Hub GmbH

1. Scope

In accordance with this policy, a Whistleblower System has been set up at Hanseatic Energy Hub GmbH ("HEH").

The system described below applies equally to all reports received from employees, suppliers, customers, other business partners and all external third parties who have a direct or indirect relationship with HEH.

2. Definitions

Breaches means all violations of applicable EU law and applicable national laws as well as material violations of HEH's internal regulations.

A breach of internal regulations is material in particular if it could entail safety, liability, or reputational risks for HEH.

Information on breaches is if there is knowledge of breaches or, in any case, if there are well-founded suspicions based on facts.

Reports are reports of information about (possible) breaches to the internal reporting offices defined in chapter 7 of this policy.

Reporting persons are all persons who have obtained information about breaches and report them.

The person concerned is the individual implicated in the report.

Retaliation are actions/omissions related to work that are a reaction to a report and (may) entail an unjustified detriment to the reporting person.

3. How do we protect reporting persons?

Persons who report breaches honestly and in good faith we will be protected from unfair treatment. For this purpose, the following principles apply at HEH:

Confidentiality

We will keep your identity confidential. Your identity may only be disclosed without your consent to the persons responsible for receiving and processing reports and for taking follow-up measures. The same applies to the identity of the persons concerned or others named in the report, unless disclosure is necessary in order to take follow-up measures.

The obligation to maintain confidentiality does not apply if you report incorrect information about breaches intentionally or in a grossly negligent manner. The obligation to maintain confidentiality also does not apply if authorities or courts demand the disclosure of certain information; in such a case we will inform you in advance of the disclosure of your identity unless the respective authority or court has informed HEH that it would jeopardize the relevant investigations, inquiries, or court proceedings.

Protection from retaliation measures

We will protect you from retaliation. Discrimination, hostility, and other disadvantages for reporting persons are prohibited, as are threats or attempts in this respect, and such actions, threats or attempts can be sanctioned under labor law. If you contact the internal reporting office because of such adverse effects, you will be given immediate assistance.

This does not apply if you submit incorrect reports intentionally or with gross negligence; in such a case we may sanction you under labor law and criminal law and may assert claims for damages.

The protection against reprisals also extends to persons who are connected to you as a reporting person and who could be at risk of reprisals due to a possible close, for example family or similarly close connection.

No responsibility for obtaining, accessing and disclosing information

We will not hold you responsible for obtaining or accessing the reported information, unless obtaining or accessing it constitutes a criminal offense in itself (e.g., trespassing, data espionage). Similarly, we will not hold you responsible for disclosing confidential information if you had reasonable grounds to believe that it was necessary to disclose the information in order to reveal a breach.

4. What can I report?

Our Whistleblower System is only available for reporting breaches within the meaning of the above definitions.

We therefore ask you to submit reports in particular in the following cases:

- Corruption / bribery
- Breaches of antitrust laws and competition laws, in particular procurement rules
- Fraud, embezzlement
- Breaches of immission control regulations (e.g., in accordance with the Federal Immission Control Act (Bundes-Immissionsschutzgesetz))
- Cases of theft, damage, misappropriation, or misuse of company assets
- Breaches of the Water Resources Act (Wasserhaushaltsgesetz)
- Breaches of building regulations
- Breaches of embargoes and sanctions
- Breaches of occupational safety and health regulations
- Conflicts of interest
- Breaches of proper bookkeeping, accounting, and financial reporting
- Breaches of tax and social security regulations
- Breaches of data protection regulations
- Serious misinformation or misleading statements, declarations, or actions
- Infringement of intellectual property laws
- Breaches of business secrets, company secrets and other confidential information
- Cases of verbal, non-verbal, physical, or sexual harassment, bullying, discrimination or violence at work
- Breaches of human rights and environmental obligations in our own business or that of direct or indirect suppliers.
- Other breaches of applicable law, insofar as they are reportable under the German Whistleblower Protection Act (Hinweisgeberschutzgesetz, HinSchG), as well as significant breaches of the internal regulations of Hanseatic Energy Hub GmbH

5. What can I not report?

Our Whistleblower System shall not be used as a "personal grievance box," i.e., as reporting channel for legally irrelevant matters which cannot be considered as breach, such as

- Pure dissatisfaction with colleagues or superiors
- Pure dissatisfaction with work processes or work instructions
- Incidents from the private sphere without connection to HEH

For any such matters with a connection to the company, the responsible supervisor is usually the right person to contact.

6. Who is responsible for receiving and processing of reports?

Our internal reporting office is responsible for receiving and processing your report. This is operated by Janina Stemke, Team Assistant, and Birgit Stüven, Team Assistant, as deputy.

The persons acting on behalf of the internal reporting office ("Reporting Officers") are independent in this function and are not bound by instructions from the management.

7. How can I submit a report?

You can submit your report to our internal reporting office (by disclosing your identity or anonymously) via the Integrity Line reporting system we use. This is available at:

<https://hanseaticenergyhub.integrityline.com>

Reports submitted on Integrity Line are encrypted and secure. They are entered in an input mask in Integrity Line and can be made in German or in English. If necessary, your report will also be accepted in another language and machine translated for further processing.

At your request, a personal meeting with the responsible reporting officer can also be arranged.

When submitting your report, please ensure that the information you provide is always truthful, objective, and unbiased, and the type and amount of information you provide makes it possible to verify and investigate the subject matter of the report. Your report must be sufficiently detailed, specific, comprehensible, and plausible to enable an investigation. Otherwise, it is not possible to follow up on the report.

When submitting your report, you will be asked (even if the report is made anonymously) to set up a secure inbox for protected follow-up communication. This is necessary to enable any inquiries and keep you informed about the status of processing.

8. What will happen after I submit my report?

After receiving your report, the internal reporting office will first carry out an initial review. This includes the following evaluation:

- Does the report fall within the scope of the reporting system (relevance)?
- Can the facts presented by the reporting person actually be true (plausibility)?
- Does the report contain sufficient factual indications of a breach on which an investigation can be based (substantiation)?

If possible and necessary for further processing, the internal reporting office will contact you for follow-up-questions.

- **Not relevant, plausible, and substantiated:** If it is determined that the subject of the report does not constitute a reportable breach, or that it is not plausible or substantiated, the internal reporting office will complete the verification process and document the result. You will be informed of this wherever possible.
- **Relevant, plausible, and substantiated:** If a report is relevant, plausible, and substantiated, the internal reporting office will follow up on your report and initiate the necessary follow-up measures.

9. How will my report be investigated?

If a further investigation of your report is necessary, this will be initiated and coordinated by the internal reporting office.

Depending on the subject matter of the report, the identity of the person(s) concerned and the location of the alleged misconduct, the internal reporting office may involve other specialist departments (e.g., Audit, HR, Data Privacy Officer), local staff or external third parties. In such case the internal reporting takes the necessary steps to ensure the confidentiality of your identity and – to the extent possible – that of the person(s) concerned. In particular, your identity may not be disclosed to the management, or any other person involved in the investigation.

The following principles apply to each investigation:

- Each investigation will be conducted fairly and transparently. All investigative measures are limited by the subject matter of the investigation which is defined by the circumstances described in the report. No investigation will be conducted without a specific focus (Fair trial).

- All investigative measures must be suitable, necessary, and appropriate for clarifying the relevant facts (proportionality).
- Each investigation will be conducted neutrally and objectively under the presumption of innocence. If legally permitted, the person(s) concerned will be informed in advance that they are the subject of an investigation and of their rights under data protection laws unless it jeopardizes the purpose of the investigation. The person(s) concerned will also be given the opportunity to comment on the subject matter of the investigation and to state their position (right to be heard). Their statement will be considered when assessing the facts of the case and deciding on possible follow-up measures.
- Furthermore, to the extent possible and required by law, your identity and that of the person(s) concerned will be kept confidential and at all times care is taken to ensure that, in addition to the Reporting Officers, other persons are only informed about a report to the extent that this is absolutely necessary for the investigation.

10. What happens after the investigation?

The internal reporting office will close the investigation if

- either sufficient knowledge of the facts is available to reliably assess the (non-)existence of the breach addressed by the report, or
- (1) further clarification of the facts is not possible by reasonable means or appears disproportionate.

After the investigation has been completed, the internal reporting office prepares a written investigation report. This report contains a short description of the facts of the case and the (substantiated) result of the investigation, whether and why the suspicion was confirmed or not, or why further investigation of the facts was not indicated, as well as a recommendation on necessary follow-up measures.

The recommendation for the necessary follow-up measures is recorded in the investigation report. If a suspicion against employees is confirmed, it will be examined together with the HR department whether and, if so, which measures should be taken in the specific case. The (reasoned) recommendation on this will also be included in the investigation report.

The reporting officers will submit the investigation report for consultation and final decision on follow-up measures to the management.

The person(s) concerned will also be informed of the result of the investigation, provided that there are no objective reasons against such information, such as an ongoing investigation. If the misconduct addressed in the report is not confirmed during the investigation, this will also be reported to the superior of the person(s) concerned or to close colleagues at the request of the person(s) concerned to eliminate existing suspicions (rehabilitation).

11. Informing the management

The internal reporting office informs the management regularly and as required on incoming reports and consults with the management on whether an internal investigation should be carried out in a specific case.

The management will be informed of the results of an investigation at the latest when the investigation is concluded, unless earlier information appears necessary due to the findings of the investigation (e.g., to secure claims by taking measures to prevent the limitation period, notification of an insured event).

In the event of a conflict of interests, information will only be given to those members of the management who are not affected by the conflict of interests. If the entire management is affected by a conflict of interests, the chairman of the body responsible for the control of the management or alternatively its members will be informed.

12. When will I receive feedback on my report?

The internal reporting office will confirm receipt of your report after seven days at the latest.

You will receive further feedback, in particular on the initiation of an investigation as well as planned or already taken follow-up measures, no later than three months after receipt of your report or, if receipt of your report has not been acknowledged after seven days, no later than three months and seven days after receipt of your report.

13. Final analysis

Upon completion of the investigation, the internal reporting office will examine with the management whether the report or the information obtained during the investigation has revealed deficits or weaknesses in the implemented procedures or processes of HEH. If this is the case and if the deficits/weaknesses continue to exist, they will be remedied by the management by taking the necessary corrective measures.

14. Data protection

If personal data is processed as part of the processing of reports, this is done in compliance with data protection regulations. HEH must provide information about the legal basis for the processing of personal data when processing reports: This is Art. 6 (1) f) of the EU General Data Protection Regulation ("GDPR"); HEH's legitimate interest lies in maintaining integrity and compliant behavior (compliance).

15. Entry into force

This policy enters into force on December 15, 2023.