

# EUROKAI Non-Financial Group Report for 2021

## Introduction

This non-financial Group report has been prepared pursuant to Sections 315 b and 315 c in conjunction with Sections 289 c to 289 e of the German Commercial Code (HGB) and relates to the EUROKAI Group for the financial year 2021.

In the 2021 financial year, the EUROKAI Group reports for the first time on key performance indicators that are required to be disclosed on the basis of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 (EU Taxonomy Regulation) and the associated published delegated acts (see section – EU Taxonomy)

The non-financial Group report is available publicly on our website at:

[http://www.eurokai.de/eurokai\\_en/Investor-Relations/Corporate-Governance](http://www.eurokai.de/eurokai_en/Investor-Relations/Corporate-Governance)

## Group entity and business model

The focus of the business activities of the companies consolidated in the EUROKAI Group is on container handling in continental Europe. These companies operate container terminals, in some cases with partners, at La Spezia, Ravenna and Salerno (Italy), in Hamburg, Bremerhaven and Wilhelmshaven (Germany), as well as in Tangier (Morocco), in Limassol (Cyprus), in Ust-Luga (Russia) and, until October 2021, in Lisbon (Portugal). The EUROKAI Group also has shareholdings in a number of inland terminals and railway operating companies.

Secondary services are also provided in the form of intermodal services (carriage of sea containers to and from terminals), repairs, depot storage and trading of containers as well as cargomodal services and technical services.

Control of the EUROKAI Group is vested in three business segments, “CONTSHIP Italia” “EUROGATE” and “EUROKAI”, with the EUROGATE joint venture being included in the consolidated EUROKAI financial statements using the equity method of accounting in line with the provisions of IFRS 11. EUROKAI is a financial holding company.

## About this report

All information refers to the parent company, including those domestic and foreign companies which EUROKAI incorporates into its consolidated financial statements or which are classified as associated companies.

This report covers the operating companies active in the core business of the Group that exert material influence on the non-financial aspects. It does not report on minority interests that are not directly involved in the core business, or on companies in which the Group has a stake

through minority interests outside Germany, as these are not classified as material in relation to the non-financial impact of their activities and the potential for exerting influence.<sup>1</sup>

This report focuses on topics that are necessary for an understanding of the business development, the performance of the business and the position of the Group, as well as the impact of its business activities on non-financial aspects. It follows the 2016 Sustainability Reporting Standards published by the Global Reporting Initiative (GRI), taking updates into consideration. The description of the concepts presented here was prepared in accordance with Standard 103 of the Global Reporting Initiative. Management of non-financial aspects does not follow a Group-wide approach. Instead, the topics are managed decentrally within each of the corporate groups. Accordingly, the following pages set out both the concept for CONTSHIP Italia and the concept for EUROGATE. Key non-financial performance indicators relating to the aspects are reported on; they are selected according to the thematically related GRI Standard.

As part of the reporting process, EUOKAI examined whether risks exist that are linked to the company's own business activities, business relationships, or products and services and that have or can have a serious negative impact on the non-financial aspects defined by law and have a high likelihood of occurrence. Our conclusion is that no reportable net risks as defined in the German CSR Implementation Act (CSR-RUG) exist.

### **Importance of sustainability**

For EUOKAI, sustainability means, above all, ensuring the future viability of the corporate Group. Within the scope of its business activities and on the basis of internal processes, EUOKAI gives equal consideration to economic efficiency, environmental protection and social responsibility. Compliance with laws and internal policies and guidelines forms the natural basic prerequisite for day-to-day business operations. Container terminals are hubs of international trade; therefore, efficient seaport operations are key to enabling EUOKAI to ensure that its customers benefit from reliable goods transport. At the same time, EUOKAI strengthens the local economy and provides jobs. Its business activities impact on both people and the environment, for instance through the Group's consumption of resources.

### **Process for determining materiality**

The decentralised structure of the Group essentially governs the process of assessing materiality for identifying, prioritising and validating the contents of this report. In this process, the materiality analyses based on GRI guidelines undertaken in 2016 at the CONTSHIP Italia level and at the EUROGATE level served as the starting point.

---

<sup>1</sup>Companies not classified as material are: boxXpress.de GmbH, "Brückenhaus" Grundstücksgesellschaft m.b.H., DHU Gesellschaft Datenverarbeitung Hamburger Umschlagsbetriebe mbH, driveMybox GmbH, EUROGATE Beteiligungs-GmbH, EUROGATE City Terminal GmbH, EUROGATE Container Terminal Wilhelmshaven Beteiligungsgesellschaft mbH, EUROGATE Geschäftsführungs-GmbH & Co. KGaA, EUROGATE International GmbH, EUROGATE KV-Anlage Wilhelmshaven GmbH, EuroXpress HGF GmbH, HVCC Hamburg Vessel Coordination Center GmbH, IPN Inland Port Network GmbH & Co. KG, IPN Inland Port Network Verwaltungsgesellschaft mbH, J. F. Müller & Sohn AG, MSC Gate Bremerhaven Verwaltungsgesellschaft mbH, North Sea Terminal Bremerhaven Verwaltungsgesellschaft mbH, PCO Stauereibetrieb PAETZ & Co. Nfl. GmbH, REMAIN Holding GmbH, SCL Service-Centrum Logistik Bremerhaven GmbH, TRIMODAL LOGISTIK GmbH, Contrepaire S.r.l., Con-Tug S.r.l., Immobiliare Rubiera S.r.l., Spedemar S.r.l., Terminal Container Ravenna S.p.A., boxXagency Kereskedelmi és Szolgáltató Kft, CONTRAIL Logistics S.A., EUROGATE Container Terminal Limassol Ltd., EUROGATE Tanger S.A., TangerMedGate Management S.a.r.l., OJSC Ust-Luga Container Terminal, Medgate FeederXpress Ltd., FLOYD Zrt.

In defining material topics for this report, these materiality analyses were used as the basic materiality threshold for an initial prioritisation of topics. In the following, the material topics for the non-financial report were derived from these. These topics are on the one hand of high relevance for gaining an understanding of the business performance and position of the Group. At the same time, the Group's business activities have a significant impact on the aspects set out in the German CSR Implementation Act (CSR-RUG). The derivation of material topics is reviewed annually. This review is carried out by managers from different corporate divisions who are in a position to assess the interests of the various stakeholders.

Within the scope of this review, the four previously identified material non-financial aspects of the company's business activities, energy consumption and CO<sub>2</sub> emissions (environmental matters), occupational health and safety (employee dimension), anti-corruption and anti-bribery, and IT security, were confirmed.

### **External audit**

The contents of this non-financial report were audited in accordance with ISAE 3000 (revised) to obtain limited audit assurance. The scope of the audit and the auditor's assessment can be found in the Auditor's Limited Assurance Report on page 19–22.

### **Environmental matters – energy consumption and CO<sub>2</sub> emissions**

The Group's business activities consume large amounts of energy. Energy consumption is a key performance indicator for the management of resources and has a direct impact on incurred costs, and hence on financial performance. Most of this energy consumption results from the use of diesel fuel, mainly for the operation of straddle carriers used for container transport at the terminals. Other energy consumers are container gantries, buildings and area lighting. Electricity and gas are used as energy sources in these areas.

At the same time, energy consumption substantially impacts the environment, because it uses natural resources and produces greenhouse gas emissions. Together with the cost aspect associated with energy consumption, efforts to limit climate change and minimise the Group's own carbon footprint are a socially significant issue that also drives EUROKAI's energy management activities.

The strategic orientation of the two segments consolidated in the EUROKAI Group, CONTSHIP Italia and EUROGATE, differs as regards energy consumption and CO<sub>2</sub> emissions both from a conceptual perspective and in terms of progress.

**CONTSHIP Italia:** Apart from the purchase of energy, CONTSHIP Italia manages its concept for energy reduction decentrally. All companies in the CONTSHIP Italia Group have a code of conduct which defines Group values and policies. This also covers the reduction of energy consumption. Each employee is required to declare their adherence to this principle. A quality, health and safety policy at the maritime terminal in La Spezia governs compliance with statutory regulations and helps to raise awareness of the importance of a sustainable business development. The policy further comprises principles governing the avoidance of accidents and contamination, the monitoring and control of environmental impacts and an efficient use of resources, with the aim of continually improving processes and performance. Line

managers and management bodies are expected to encourage and promote a resource-saving attitude. The Group intends to steadily reduce the CO<sub>2</sub> footprint resulting from the consumption of energy by investing in high-quality transport equipment and technologies.

The container terminals are certified in accordance with the DIN EN ISO 14001 environmental management system standard. Local management is involved in this process and within the context of the management system. Energy consumption and the financial impact of achieved savings are analysed at the level of the individual companies. No formal, quantitative reduction targets are set; however, the Group pursues the qualitative goal to reduce energy and CO<sub>2</sub> emissions in absolute terms compared with the previous year. Energy audits pursuant to EU Resolution 2012/27 are performed at least every four years; the first audit took place in 2015; a second followed in 2019. These audits deliver proposals on further possible measures to reduce energy consumption.

**EUROGATE:** Since 2013, management of energy use pursuant to DIN EN 50001 at EUROGATE has been undertaken centrally through the holding company of the EUROGATE Group (EUROGATE holding company). In the 2021 financial year, responsibility for this was transferred to EUROGATE Technical Services. A central energy management system based on DIN EN 50001 is being developed in an efficient form, which will be used in place of DIN EN 50001. An audit pursuant to DIN 16247 will also be carried out.

The most recent external audit according to DIN 50001 took place in April 2021 – the corresponding certificate is valid until 31 May 2022. In future, auditing will be carried out pursuant to DIN 16247 and an energy audit will be conducted every four years. In addition, an individual energy management system is being established comprising key performance indicators, targets, regular energy efficiency assessments, a list of technical measures, technical inspections, process audits and management reviews.

In this context, EUROGATE has invested in renewable energy sources to enable it to meet its own energy needs. Energy efficiency is a decision criterion when making capital expenditure and purchasing decisions.

Various large and smaller measures aim to achieve improvements by tackling the energy efficiency of the major energy consumers. Measures and projects are regularly implemented that focus on utilising savings potential, for example with in-depth capture and analysis of straddle carrier consumption data. Especially important here is achieving a continuous reduction in the consumption of fossil fuels. Energy efficiency measures have both a technical and an operational focus. EUROGATE remains committed to appealing to its employees' sense of responsibility with regard to saving resources and involves them in drives to cut energy consumption. EUROGATE regularly examines options for using more energy-efficient technologies. Thus the 2021 financial year again saw investments made in more energy-efficient equipment and, among other things, the procurement of hybrid straddle carriers. Furthermore, EUROGATE is supporting a project with a focus on testing alternative drive technologies for straddle carriers under the lead management of federally owned NOW GmbH. The Group-wide transformation process launched in the 2020 financial year continued in 2021 with the goal to improve operational workflows and potentially have a positive impact on energy efficiency in subsequent years.

Moreover, EUROGATE generates its own renewable energy from two wind turbines, four photovoltaic plants, and one wood-chip power station. It also runs three combined heat and power plants for energy generation.

The most important key performance indicator at CONTSHIP Italia and EUROGATE in the area of energy consumption is consumption in total megawatt hours.

Energy consumption is regularly monitored. The following table shows the current status of target attainment:

	CONTSHIP Italia*	EUROGATE**
Target	Lower energy consumption	
Status 2020	44,575 MWh (of which 3,912 MWh renewables)	420,180 MWh (of which 12,418 MWh renewables)
Status 2021	49,183 MWh (of which 2,579 MWh renewables)	435,999 MWh (of which 12,376 MWh renewables)
Comment	There was a slight increase in energy consumption in the 2021 financial year. This is attributable to the recovery in container throughput and the associated higher handling volume compared to the previous year. The container throughput and workload at the terminals was lower overall in the previous year due to the COVID-19 pandemic, which had a corresponding effect on energy consumption.	There was a slight increase in energy consumption in the 2021 financial year. This is attributable to the recovery in container throughput and the associated higher handling volume compared to the previous year. The container throughput and workload at the terminals was lower overall in the previous year due to the COVID-19 pandemic, which had a corresponding effect on energy consumption. Energy consumption has risen disproportionately in relation to the increase in handling volume. In the 2021 financial year, the non-financial key performance indicator was adjusted in order to present total energy consumption transparently and because a key performance indicator relating to the number of containers moved would have been distorted in particular by coronavirus-related effects (high yard utilisation).

\*Excluding fuel volumes from purchased intermodal services and excluding heating energy consumption in office buildings in La Spezia.

\*\*When calculating the key performance indicator MWh, the consumption figures for the principal companies (the German EUROGATE terminal operations in Bremerhaven, Hamburg and Wilhelmshaven and the respective service companies at each location, and EUROGATE holding company) were taken into consideration.

The most important key performance indicator at CONTSHIP Italia and EUROGATE in the area of emissions is total CO<sub>2</sub> emissions in tonnes (t CO<sub>2</sub>).

CO<sub>2</sub> emissions are regularly reviewed. The following table shows the current status of target attainment:

	CONTSHIP Italia*	EUROGATE**
Target	Lower CO <sub>2</sub> emissions	
Status 2020	12,278 t CO <sub>2</sub>	101,649 t CO <sub>2</sub>
Status 2021	12,912 t CO <sub>2</sub>	104,415 t CO <sub>2</sub>
Comment	<p>There was a slight increase in CO<sub>2</sub> emissions in the 2021 financial year. This is attributable to the recovery in container throughput and the associated increase in energy consumption and resulting CO<sub>2</sub> emissions. The container throughput and workload at the terminals was lower overall in the 2020 financial year due to the COVID-19 pandemic, which had the effect of temporarily reducing energy consumption and CO<sub>2</sub> emissions. However, CO<sub>2</sub> emissions increased to a lesser degree than total energy consumption in the 2021 financial year, which is also attributable to the adjustment of the underlying conversion factors for the Italian electricity mix.</p>	<p>There was a slight increase in CO<sub>2</sub> emissions in the 2021 financial year. This is attributable to the recovery in container throughput and the associated increase in energy consumption and resulting CO<sub>2</sub> emissions. The container throughput and workload at the terminals was lower overall in the 2020 financial year due to the COVID-19 pandemic, which had the effect of temporarily reducing energy consumption and CO<sub>2</sub> emissions. However, CO<sub>2</sub> emissions increased to a lesser degree than total energy consumption in the 2021 financial year.</p> <p>In the 2021 financial year, the non-financial key performance indicator was adjusted in order to present total emissions transparently and because a key performance indicator relating to the number of containers moved would have been distorted in particular by coronavirus-related effects (high yard utilisation).</p>

\*When calculating total CO<sub>2</sub> emissions, direct emissions (Scope 1) from diesel combustion as fuel for the vehicles of the various companies were taken into account, as well as indirect emissions (Scope 2) that result from electricity consumption. The CO<sub>2</sub> emissions resulting from the consumption of natural gas are not included in the calculation due to its limited use (exclusively in the canteens of the intermodal terminals).

\*\*When calculating the key performance indicator t CO<sub>2</sub>, the consumption figures for the principal companies (the German EUROGATE terminal operations in Bremerhaven, Hamburg and Wilhelmshaven and the respective service companies at each location, and EUROGATE holding company) were taken into consideration.

The changed supply chain situation in the 2021 financial year due to the COVID-19 pandemic resulted in heavy capacity utilisation at the terminals, with negative impacts on productivity and thus on energy consumption. The pandemic situation also led to a massive scale-up of the digital infrastructure, among other things to enable mobile working wherever feasible. Lower staff presence on site in turn had a mitigating effect on energy consumption. However, increased ventilation of buildings to minimise the risk of infection drove and continues to drive heating costs up.

## **Employee dimension – occupational health and safety**

Protecting the Group's own employees and employees of external companies against work-related injuries or sickness and safeguarding their health and well-being is a top priority. Most work is performed using heavy equipment at the terminals (mainly straddle carriers and container gantries), and is susceptible to prevailing weather conditions. Considering the manual nature of this work and the deployment of much of the workforce in a three-shift system, promoting and protecting their health is especially important.

Occupational health and safety concerns not just the health and well-being of our employees, but also has a vital impact on their performance. Especially goods handling operations at our seaports require a high level of safety awareness.

Management of occupational health and safety is the responsibility at both CONTSHIP Italia and EUROGATE of the individual companies and their respective managing directors, since it is influenced particularly by local factors. Nevertheless, the EUROKAI Group's overarching goal is to reduce the number of industrial accidents to a minimum and to eliminate accident-related fatalities altogether.

**CONTSHIP Italia:** In Italy, strict statutory requirements are in force aimed at protecting workers' health. For example, in the event of proven malpractice, the management personally, as well as companies, may face prosecution. On the back of these requirements, various structural and organisational measures have been established. Each individual company analyses, documents and reports accidents to the respective occupational safety officer and the competent government departments, pursuant to the statutory requirements in Italy. Accidents and near-misses are monitored and evaluated. These evaluations serve as vital information input for health-and-safety risk assessments. Regular training courses address the areas of risk identified and a health programme launched in 2019 addresses how to cope with stress and mental strain in the workplace, and is designed to provide information about a healthy diet and a healthy lifestyle. In 2021, the possibilities for organising training courses in the respective programmes were restricted due to the infection control measures in place. The maritime container terminal of the CONTSHIP Italia Group is certified in accordance with DIN EN ISO 45001. The certification audits deliver proposals for potential measures to prevent industrial accidents and improve occupational health and safety.

**EUROGATE:** Management of occupational health and safety is the responsibility of the individual companies and their respective managing directors. The individual companies and each of their management boards draw up and regularly update guidelines and operating instructions for occupational health and safety based on their specific workflows. As part of their duty of care, managers are tasked with assessing hazards and monitoring compliance

with the guidelines and operating instructions in their area of responsibility. Each location has an occupational health physician, an occupational safety expert and a safety officer.

At EUROGATE, various technical and organisational measures have been put in place to lower risk exposure and reduce accidents. Ongoing measures include regular training and instruction courses on safety standards and accident prevention guidelines, as well as monitoring whether these regulations are observed. Standards are in force governing compliance with occupational safety rules, for example mandatory wearing of personal protective clothing and equipment at the terminal site. Workplaces are regularly inspected to assess hazards at the workplace and to advise on measures to minimise risk. Any injuries and accidents that occur are categorised and evaluated.

At the German terminals, along with regular occupational health days, special safety days are also organised, where a day of workshops and training sessions is dedicated to the topic of safety. These are also attended by executive managers, since they bear particular responsibility to lead by example. The activities at the safety days are regularly organised in cooperation with external partners. At the Wilhelmshaven site, under the motto “Drill Week”, unannounced emergency drills were held over a week during ongoing operations to raise staff awareness. At the Bremerhaven and Hamburg sites, the safety day was cancelled due to the pandemic. Regular health and safety briefings, site inspections and systematic accident evaluations are carried out at all sites, on the basis of which preventive measures are developed and risk assessments are adapted. A special focus in the past year was on the development, implementation and follow-up of infection prevention and control measures.

The key ratios for CONTSHIP Italia and EUROGATE are the number of reportable work-related accidents (accidents at the workplace and on the way to/from work) and the number of fatal accidents (as a result of accidents at work and on the way to and from work).

As an indicator of occupational safety, the number of work-related accidents is regularly monitored. The following table shows the current status of target attainment:

	<b>CONTSHIP Italia*</b>	<b>EUROGATE**</b>
Target	Minimise the number of work-related accidents and prevent accident-related fatalities.	
Status 2020	Work-related accidents: 14 Accident-related fatalities: none	Work-related accidents: 326 Accident-related fatalities: none
Status 2021	Work-related accidents: 27 Accident-related fatalities: none	Work-related accidents: 344 Accident-related fatalities: none
Comment	<p>The target to prevent accident-related fatalities was met in the past financial year.</p> <p>The rise in the number of work-related accidents at CONTSHIP Italia and EUROGATE is attributable to the renewed increase in handling volume in the 2021 financial year after a temporary decline in the 2020 financial year due to the pandemic.</p> <p>Furthermore, as part of the defined monitoring process in the area of occupational safety, measures that sustainably support the target of minimising the number of work-related accidents are developed based on the analysis of hazardous situations, accident severity and cause.</p>	

\*In Italy, all accidents must be reported that result in death or injury that prevents a person from working for more than one day. Some processes at the operating facilities are carried out by external contractors. Their employees account for around 40% of the total workforce on site. The CONTSHIP Italia figure does not include accidents involving temporary contract workers and external contractors.

\*\*In Germany all accidents must be reported that result in death or injury that prevents a person from working for more than three days. The EUROGATE figure includes accidents involving not only the company's own employees, but also temporary contract workers. It does not record accidents involving employees of external contractors.

## **Anti-corruption and anti-bribery**

To achieve long-term success, a company must conduct its activities in a compliant, fair and reliable way. Within the EUROKAI Group, the umbrella term “compliance” relates to the adherence to statutory standards as well as internal corporate guidelines and policies and working to ensure their observance in the EUROKAI Group companies. Responsibility for the respective regulations lies with the individual sub-groups, including the relevant policies and principles for preventing bribery and corruption.

**CONTSHIP Italia:** CONTSHIP Italia has a code of conduct in place which defines the Group's core values. Corresponding guidelines for conduct which reflect these values supplement this code. The code states that all activities of the CONTSHIP Italia Group shall comply with the legislative framework, the principles of fair competition, honesty, integrity, fairness, good faith, and respect the legitimate interests of customers, employees, shareholders, business and financial partners.

In 2019, a Group-wide whistleblowing system was rolled out. All internal stakeholder groups were informed of this procedure in the course of a comprehensive communication process. An external ombudsperson was appointed to manage the report procedure.

Responsibility for adherence to compliance-related issues rests with the Management Board of Contship Italia S.p.A., the holding company of the Contship Italia Group, and the management boards of the respective companies in the CONTSHIP Italia Group. Internal audits support the identification of potential improvements with regard to compliance with the Group's guidelines. On the basis of the audit results, each company develops an action plan should significant discrepancies have been identified. The compliance supervisory bodies set up in 2018 are responsible for monitoring compliance with the guidelines.

**EUROGATE:** EUROGATE has established a compliance management system which comprises a compliance policy with several sections, a code of conduct and an anti-corruption policy. These regulations came into force on 1 January 2017. Cementing the Group's commitment to fair and free competition, the guidelines and the code of conduct summarise the Group's values and provide the basis for our understanding of entrepreneurial compliance. These documents state that EUROGATE neither tolerates corruption nor permits discrimination. All business decisions must comply with the law and meet EUROGATE's standards of ethics and integrity as described in the policies and guidelines.

Technical competence for the compliance management system lies with the legal department of the EUROGATE holding company and the compliance officer. Responsibility for compliance

with the anti-corruption policy lies with the Group Management Board and the management boards of the respective EUROGATE Group companies. On introduction of the compliance management system, EUROGATE also appointed a compliance officer. Furthermore, an external ombudsperson was appointed to receive anonymous information. If necessary, independent external consultants are called in for advice, audits and assessments. Once a year, the compliance officer presents an internal report to the Group Management Board and the supervisory bodies. Among other points, this contains the current status of the main compliance risks as well as proposals for new measures or changes.

When the compliance regulations came into force, all employees received a copy of the anti-corruption policy and the code of conduct. The compliance officer explained this process at a large number of staff meetings. In 2019, following on from the basic in-person training courses conducted in 2017 when the compliance management system was introduced, workshops were held for employees in particularly sensitive areas of the company. The in-person training courses for sensitive areas planned for the financial years 2020 and 2021 had to be postponed due to the COVID-19 pandemic as well as the considerable workload imposed by the transformation process.

Compliance management at North Sea Terminal Bremerhaven GmbH & Co. (NTB), which is operated as a joint venture between EUROGATE and APMT, is conducted separately. Regular compliance training courses take place in which the partners' guidelines and policies are discussed with the relevant groups of employees. This means that the compliance regulations of both partners are also observed at NTB. Responsibility for this lies with the NTB Management Board. There is an internal control manual that defines the company's main principles for combating corruption and bribery. Training courses organised jointly with an external partner are generally held once a year. The main topics of the training courses are determined in advance in cooperation with the management. Due to the COVID-19 pandemic, no training courses were held in the financial years 2020 and 2021. An annual risk inventory, an annual fraud risk assessment and monthly evaluations of the internal control system identify any impacts associated with this issue.

The central key performance indicator at CONTSHIP Italia and EUROGATE is the number of confirmed cases of corruption. In the pandemic-beset 2021 financial year, the risk of corruption was again generally lower due to reduced personal contact and the shift of meetings to digital media.

The number of corruption cases serves as a key anti-corruption and anti-bribery metric and is reviewed regularly. The following table shows the current status of target attainment:

	<b>CONTSHIP Italia</b>	<b>EUROGATE</b>
Target	No cases of corruption	
Status 2020	none	none
Status 2021	none	none
Comment	The target was met. There were no confirmed cases of corruption in the reporting year.	The target was met. There were no confirmed cases of corruption in the reporting year.

## IT security

Secure and reliable IT-assisted processes are the prerequisite to enable a container terminal to operate efficiently. This applies not only from an entrepreneurial point of view, but is also important economically. As hubs where national and international supply chains converge, container ports help to ensure the smooth functioning of the economy and trade. Efficient IT security protects the processes at the container terminal and consequently the entire port system.

**CONTSHIP Italia:** Work continues on establishing the IT security management system. The implementation is being rolled out and managed by the IT security department of CONTSHIP Italia's holding company, which also has the technical competence regarding this topic. Responsibility for the topic lies with the Group Management Board or the management boards of the respective companies in the CONTSHIP Italia Group.

The main focus of the concept is on the availability and integrity of IT systems and data, with the aim of minimising potential damage and times to restore service. The management concept will include information technology and operating technology as well as the cloud services and platforms used.

In 2021, the focus was on improving the IT infrastructure. As the implementation of relevant processes continues, the Group intends to appoint an IT security officer and define the necessary organisational structures, procedures, roles and accountabilities.

**EUROGATE:** The ever-growing number of IT-based business processes that have emerged in recent years, as well as the dovetailing of EUROGATE's systems with those of other providers along the logistics chain, increase the demand for a secure IT infrastructure. Cyber threats are on the increase all the time and are constantly changing. At the same time, the EUROGATE Group's reliance on IT systems is growing, especially in light of the planned automation projects. IT security is therefore crucial to enabling and ensuring efficient business processes across the companies in the EUROGATE Group.

Technical competence for the EUROGATE information security management system (ISMS) lies with the IT department of the EUROGATE holding company. Overall responsibility lies with the Group Management Board and the management boards of the respective companies in the EUROGATE Group. An IT security officer and an OT security architect have been appointed. An IT and an OT security board have also been set up and equipped with resources from the IT department and EUROGATE Technical Services. The ISMS covers all German EUROGATE terminals with the exception of North Sea Terminal Bremerhaven GmbH & Co. (NTB), operated as a joint venture between EUROGATE and APMT, which is managed separately. An IT security guideline and policy regulate the organisational and technical requirements of the EUROGATE ISMS.

The main focus of the existing concept is on the availability and integrity of the IT systems and data, with the aim of creating a resilient infrastructure based on risk assessment and of minimising potential damage and times to restore service. A key element of the ISMA is a risk management system geared towards minimising risk or creating an acceptable level of residual risk for EUROGATE. The security management approach follows the NIST Cybersecurity Framework and in its practical implementation is based on the IEC 62443 standard and the security catalogue that forms the basis of the two-yearly critical infrastructure

(KRITIS) audit. In addition, the Group coordinates and exchanges information with local and European logistics partners (for example via EU-ISAC), as well as with relevant authorities and EUROGATE service providers. These help to ensure that new risks can be promptly identified and addressed. The EUROGATE ISMS includes information technology and operating technology, as well as the cloud services and platforms used.

The EUROGATE ISMS defines and regulates the necessary organisational structures, procedures, roles and accountabilities. It encompasses organisational, technical, regulatory and staff training measures. All measures are conceived and approved by the Group Management Board as part of an annual planning process. As a rule, they are systemically structured. Ad-hoc measures may be introduced during the year based on weak point analyses and alerts. The results are reported to EUROGATE's risk management and to the Group Management Board in the IT security officer's annual review. This report contains the current implementation status, a review of the past year and recommendations for the coming year.

The goals and targets are set on the basis of a general risk assessment for EUROGATE and concrete risk analyses for the respective projects. The EUROGATE ISMS was audited in the 2020 financial year in accordance with the guidelines of the Federal Office for Information Security (BSI), since EUROGATE is classified as an operator of critical infrastructure (KRITIS) pursuant to the IT Security Act (ITSG). The focus of the audit was to assess the status quo with respect to implementing the BSI guidelines. The deviations and recommendations resulting from the audit are dealt with within the scope of targeted measures. Implementation will be reviewed in the 2022 financial year within the scope of the next KRITIS audit. In addition, self-assessments based on NIST, IEC62443 are used for modelling the measurability of the level of protection achieved through non-financial performance indicators. Furthermore, various external assessments are being rated with the use of security scorecards.

During the COVID-19 crisis, EUROGATE also introduced remote work. To this end, a technical solution was implemented that was designed according to the number of users and the security requirements for access to the internal systems. IT security in remote work is achieved through the use of IT equipment provided and managed by the IT department in connection with multifactor authentication. The introduction of digitalised training offerings regarding business-related topics in general and security awareness in particular was already planned before the pandemic, but COVID-19 accelerated their implementation. The same applies to technical means of digital collaboration (collaboration tools). The use of corresponding platforms was promoted and trained.

### **Further aspects**

Issues relating to social welfare and human rights in general are rated as not being material or as being of subordinate relevance for the EUROKAI Group with regard to risks and impacts on the course of business.

## EU Taxonomy

As a preparer of a consolidated non-financial statement, the EUROKAI Group is required in the financial year 2021 to disclose information in accordance with the EU Taxonomy Regulation. The EU Taxonomy Regulation is a central component of the EU Commission's Action Plan: Financing Sustainable Growth. The EU Taxonomy is a regulatory classification system for recognising green, or environmentally sustainable, economic activities. The regulation requires companies to report on the results of this classification annually.

As a basic principle, the EU Taxonomy Regulation obliges non-financial undertakings to report on the proportion of their turnover generated with products or services that are associated with environmentally sustainable economic activities as defined under the EU Taxonomy. In addition, they are required to disclose the proportion of capital expenditure (CapEx) and, where applicable, the proportion of operating expenditure (OpEx) in connection with assets or processes associated with economic activities that are classified as economically sustainable as defined under the EU Taxonomy.

For the first year of application of the EU Taxonomy Regulation in 2021, the Commission Delegated Regulation of 6 July 2021 provides for extensive simplifications. Non-financial undertakings shall only disclose the proportion of taxonomy-eligible and taxonomy non-eligible economic activities in their total turnover, capital and operational expenditure and the qualitative information relevant for this disclosure. Companies are not required to further assess economic activities for taxonomy alignment based on the already published technical screening criteria – environmental sustainability as defined under the EU Taxonomy Regulation – in the first year of application.

Pursuant to Article 1 of the Commission Delegated Regulation on specifying the content and presentation of information to be disclosed, an economic activity is classified as taxonomy-eligible if it is described in the adopted delegated acts, irrespective of whether that economic activity meets any or all of the technical screening criteria laid down in those delegated acts. Conversely, a taxonomy non-eligible economic activity means any economic activity that is not described in the adopted delegated acts. Article 9 of the EU Taxonomy Regulation establishes six environmental objectives:

- a) Climate change mitigation;
- b) Climate change adaptation;
- c) The sustainable use and protection of water and marine resources;
- d) The transition to a circular economy;
- e) Pollution prevention and control;
- f) The protection and restoration of biodiversity and ecosystems.

So far, the delegated act adopted on 4 June 2021 published technical screening criteria for the first two environmental objectives “climate change mitigation” and “climate change adaptation”. Accordingly, for the 2021 financial year, companies are only required to disclose the taxonomy eligibility of their economic activities with reference to these two environmental objectives.

Pursuant to Section 315 e (1) of the German Commercial Code (HGB), EUROKAI's consolidated financial statements as at 31 December 2021 were prepared in accordance with IFRSs. The amounts used to calculate the turnover, CapEx and OpEx key performance

indicators were accordingly based on the figures reported in the consolidated financial statements. Both turnover and CapEx figures can be reconciled directly. Due to the definition of the relevant OpEx given in the EU Taxonomy Regulation, this key performance indicator cannot be directly derived from the reported figures in the consolidated financial statements. The proportion of taxonomy-eligible turnover, capital and operating expenditure in the respective totals of the EUKOKAI Group for the financial year 2021 is disclosed based on a full analysis of the economic activities.

The focus of the business activities of the companies consolidated in the EUKOKAI Group is on container handling in continental Europe. The operation of container terminals is to be classified as a taxonomy-eligible economic activity, since based on the description in the Climate Delegated Act for the environmental objective “climate change mitigation”, this activity falls under Section 6.16 Infrastructure enabling low-carbon water transport. The Group’s economic activities in the cargo and repair segments (especially container repairs) are also considered part of container terminal operations and, as such, are also to be classified as taxonomy-eligible.

Another core economic activity of the EUKOKAI Group is goods transport. Goods are transported both by rail and by road. The transport of goods is also to be classified as a taxonomy-eligible economic activity, since Annexes I and II to the Climate Delegated Act concerning the first two environmental objectives climate change mitigation and adaptation contain a respective Section 6.2 Freight rail transport and a Section 6.6 Freight transport services by road.

Other economic activities of the Group are in the field of energy generation (wind power and bioenergy) and energy transmission. These activities are similarly covered by the annexes to the delegated act concerning the first two environmental objectives and are therefore also taxonomy-eligible: Section 4.3 Electricity generation from wind power, Section 4.8 Electricity generation from bioenergy and Section 4.9 Transmission and distribution of electricity. A small proportion of other Group activities are not classified as relevant economic activities as described in the delegated act published to date.

## **Key performance indicators**

In determining the KPIs proportion of taxonomy-eligible and taxonomy non-eligible economic activities in its total turnover and its capital and operating expenditure to be reported in the financial year 2021, EUKOKAI took into account the specific requirements of “Annex I – KPIs of non-financial undertakings” of the Delegated Regulation of 6 July 2021.

### KPI related to turnover

The turnover KPI is calculated as the part of the net turnover derived from products and services associated with taxonomy-aligned economic activities in a given financial year divided by the net turnover for the same period.

$$\text{Turnover KPI} = \frac{\text{taxonomy-aligned net turnover}}{\text{total net turnover}}$$

The total revenue for the 2021 financial year of EUR 233,399,000, as recognised in the consolidated statement of profit or loss and other comprehensive income, constitutes the denominator of the turnover KPI.

The revenue recognised in the consolidated statement of profit or loss and other comprehensive income in the amount of EUR 233,399,000 (see Section 5 Revenue of the Notes to the consolidated financial statements) for the EUROKAI Group was analysed across all Group entities to determine whether it was generated with taxonomy-aligned economic activities as defined by Annex I (substantial contribution to climate change mitigation) and Annex II (substantial contribution to climate change adaptation) of the Delegated Regulation (EU) 2020/852. The respective turnover was allocated to the taxonomy-aligned economic activities of EUROKAI (see above) based on a detailed analysis of the items recognised in revenue. The part of the net turnover derived from products or services associated with taxonomy-aligned economic activities for the 2021 financial year constituted the numerator of EUR 233,399,000.

The turnover KPI of 100% was derived from the determined amounts of total revenue and the proportion of the Group's revenue that comes from activities that meet the taxonomy alignment criteria.

#### KPI related to capital expenditure (CapEx)

The CapEx KPI represents the part of the capital expenditure (CapEx) that is either related to assets or processes that are associated with taxonomy-aligned economic activities, part of a credible plan to expand taxonomy-aligned economic activities or to allow taxonomy-eligible economic activities to become taxonomy-aligned, or related to the purchase of products and services from taxonomy-aligned economic activities.

$$\text{CapEx KPI} = \frac{\text{taxonomy-aligned capital expenditure}}{\text{total capex in acc. with EU Taxonomy Regulation}}$$

The total capital expenditure in accordance with the EU Taxonomy Regulation amounted to EUR 15,951,000. In the Notes to the consolidated financial statements, these capital expenditures were recognised under additions in Section 13. Intangible assets in the amount of EUR 686,000 and in Section 14. Property, plant and equipment in the amount of EUR 15,265,000.

These additions were analysed to determine taxonomy-alignment and compared with Annex I (substantial contribution to climate change mitigation) and Annex II (substantial contribution to climate change adaptation) of the Delegated Regulation (EU) 2020/852. The part of the additions that reflects taxonomy-aligned capital expenditure for the 2021 financial year constituted the numerator of the CapEx KPI of EUR 15,219,000.

The CapEx KPI of 95.41% was calculated from the determined amounts of total capital expenditure pursuant to the EU Taxonomy Regulation and the taxonomy-aligned capital expenditure.

#### KPI related to operating expenditure (OpEx)

The OpEx KPI corresponds to the part of the operating expenditure as defined by the EU Taxonomy that is related to taxonomy-aligned economic activities, to a CapEx plan or to the purchase of products from taxonomy-aligned economic activities.

$$\text{OpEx KPI} = \frac{\text{taxonomy-aligned operating expenditure}}{\text{direct, non-capitalised costs (R\&D, building renovation measures, lease, maintenance and repair)}}$$

To determine the denominator, the accounts reflecting the direct, non-capitalised costs that relate to research and development, building renovation measures, short-term lease, maintenance and repair were considered. The resulting OpEx denominator was EUR 30,862,000.

The numerator in the amount of EUR 30,862,000 resulted from an analysis of the assets underlying the expenditure recognised in the above accounts with respect to their taxonomy alignment in accordance with Annex I (substantial contribution to climate change mitigation) and Annex II (substantial contribution to climate change adaptation) of the Delegated Regulation (EU) 2020/852.

OpEx includes individual classifications of expenses by nature in Sections 8 Cost of materials and 10 Other operating expenses in the Notes to the consolidated financial statements that meet the definition of OpEx as specified in the EU Taxonomy Regulation. These items mainly include expenses for maintenance and repair materials as well as expenses for repairs and maintenance and other rent.

The OpEx KPI of 100.00% was derived from the determined amounts of the OpEx denominator and the OpEx numerator in accordance with the EU Taxonomy Regulation.

### **Key performance indicators based on the voluntary inclusion of EUROGATE**

Pursuant to Annex I (1.2.3. Contextual information) of the Delegated Regulation of 6 July 2021, EUROKAI may disclose additional KPIs based on turnover, CapEx and OpEx that include equity investments in joint ventures accounted for using the equity method pursuant to IFRS 11 or IAS 28, on a pro rata basis corresponding to their share in the equity of the joint venture.

In this context, the EUROKAI Group voluntarily disclosed additional KPIs based on turnover, CapEx and OpEx that include the EUROGATE joint venture. This takes into account the fact that EUROKAI holds a 50% stake in EUROGATE. For this voluntary disclosure, the methodology was the same as for determining the mandatory disclosures.

#### Turnover KPI based on the voluntary inclusion of EUROGATE

The total net turnover based on the pro rata inclusion of EUROGATE amounted to EUR 539,354,000. The corresponding taxonomy-aligned net turnover was EUR 537,689,000. The resulting turnover KPI based on the inclusion of EUROGATE was 99.69%.

#### CapEx KPI based on the voluntary inclusion of EUROGATE

The total capital expenditure in accordance with the EU Taxonomy Regulation based on the pro rata inclusion of EUROGATE amounted to EUR 30,490,000. The corresponding taxonomy-aligned capital expenditure was EUR 29,066,000. The resulting CapEx KPI based on the inclusion of EUROGATE was 95.33%.

#### OpEx KPI based on the voluntary inclusion of EUROGATE

The OpEx denominator based on the pro rata inclusion of EUROGATE came to EUR 48,958,000. The corresponding taxonomy-aligned operating expenditure was EUR 48,954,000. The resulting OpEx KPI based on the inclusion of EUROGATE was 99.99%.

## **Outlook**

Effective from the 2022 financial year, more in-depth analyses will be necessary in order to meet specific criteria related to the identified economic activities. In addition to an evaluation with regard to the alignment criteria, this also includes the assessment of whether a taxonomy-aligned economic activity qualifies as contributing substantially to an environmental objective defined by the EU Taxonomy Regulation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives. Furthermore, compliance with minimum social standards in accordance with the OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, ILO Core Labour Standards and the International Bill of Human Rights must be ensured.

Hamburg, 30 March 2022

Personally Liable General Partner

Kurt F.W.A. Eckelmann GmbH, Hamburg

Thomas H. Eckelmann

Cecilia E. M. Eckelmann-Battistello

## **Independent practitioner's report on a limited assurance engagement on non-financial reporting**

To EUROKAI GmbH & Co. KGaA, Hamburg

We have performed a limited assurance engagement on the non-financial Group report of EUROKAI GmbH & Co. KGaA, Hamburg (hereinafter the "company") pursuant to Section 315 b HGB ["Handelsgesetzbuch": German Commercial Code] for the period from 1 January 2021 to 31 December 2021 (hereinafter "non-financial Group report").

We did not report on disclosures in the non-financial report relating to prior periods.

### **A. Responsibility of the Management Board and the Supervisory Board**

The Management Board and the Supervisory Board of the company are responsible for the preparation of the non-financial Group report in accordance with Sections 315 c in conjunction with 289 c to 289 e HGB and Article 8 of REGULATION (EU) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 June 2020 on establishing a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (hereinafter the "EU Taxonomy Regulation") and the delegated acts adopted thereunder, as well as for making their own interpretation of the wording and terms contained in the EU Taxonomy Regulation and the delegated acts adopted thereunder, as set out in the "EU Taxonomy" section of the non-financial statement.

This responsibility of the Management Board and the Supervisory Board includes the selection and application of appropriate methods of non-financial reporting as well as making assumptions and estimates related to individual non-financial disclosures, which are reasonable in the circumstances. Furthermore, the Management Board and the Supervisory Board are responsible for such internal control as they have considered necessary to enable the preparation of a non-financial Group report that is free from material misstatement, whether due to fraud (manipulation of the non-financial report) or error.

The EU Taxonomy Regulation and the delegated acts adopted thereunder contain wording and terms that are still subject to considerable interpretation uncertainties and for which clarifications have not yet been published in every case. Therefore, the Management Board and the Supervisory Board have disclosed their interpretation of the EU Taxonomy Regulation and the delegated acts adopted thereunder in the "EU Taxonomy" section of the non-financial Group report. They are responsible for the defensibility of this interpretation. Due to the immanent risk that indeterminate legal terms may be interpreted differently, the legal conformity of the interpretation is subject to uncertainties.

### **B. Practitioner's declaration relating to independence and quality**

We are independent of the entity in accordance with the provisions under German commercial law and professional requirements, and we have fulfilled our other ethical responsibilities in accordance with the relevant provisions within these requirements.

Our audit firm applies the German national legal requirements and the German profession's pronouncements for quality assurance, in particular the Professional Code for German Public Auditors and German Sworn Auditors in the exercise of their profession [Berufssatzung für Wirtschaftsprüfer und vereidigte Buchprüfer (BS WP/vBP)] as well as the IDW Quality

Assurance Standard 1: Requirements for quality assurance in auditing practice [*IDW Qualitätssicherungsstandards 1: Anforderungen an die Qualitätssicherung in der Wirtschaftsprüferpraxis (IDW QS 1)*], and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### **C. Practitioner's responsibility**

Our responsibility is to express a limited assurance conclusion on the disclosures in the non-financial statement based on the assurance engagement we have performed.

We conducted our assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): "Assurance Engagements other than Audits or Reviews of Historical Financial Information", issued by the IAASB. This Standard requires that we plan and perform the assurance engagement to allow us to conclude with limited assurance that no matters have come to our attention that cause us to believe that the disclosures in the company's non-financial Group report have not been prepared, in all material respects, in accordance with Section 289 c to 289 e HGB and the EU Taxonomy Regulation together with the adopted delegated acts, as well as the interpretation by the legal representatives as set out in the "EU Taxonomy" section of the non-financial Group report.

In a limited assurance engagement, the assurance procedures are less in extent than for an audit to obtain a reasonable assurance engagement and therefore a substantially lower level of assurance is obtained. The assurance procedures selected depend on the practitioner's professional judgement.

Within the scope of our assurance engagement, we performed amongst others the following assurance procedures and further activities:

- Obtaining an understanding of the structure of the sustainability organisation, the procedures for risk assessment and materiality analysis and approaches applied to topics identified as material,
- Enquiries of personnel involved in the preparation of the non-financial statement regarding the preparation process, the internal control system relating to this process and selected disclosures in the non-financial report,
- Identification of the likely risks of material misstatement of disclosures contained in the non-financial report,
- Review of relevant documentation and records for the collection of data as well as conducting random plausibility checks on the data,
- Analytical evaluation of selected disclosures in the non-financial Group report,
- Analysis and evaluation of the process for the identification of taxonomy-eligible economic activities and the corresponding determination of the derived key performance indicators on revenue, capital expenditure (CapEx) and operating expenditure (OpEx),
- Reconciliation of selected disclosures as well as the key performance indicators on taxonomy-eligible economic activities with the corresponding data in the annual financial statements and the management report,
- Evaluation of the presentation of the disclosures in the non-financial Group report.

In determining the disclosures in accordance with Article 8 of the EU Taxonomy Regulation, the Management Board and the Supervisory Board are required to interpret undefined legal terms. Due to the immanent risk that undefined legal terms may be interpreted differently, the legal conformity of their interpretation and, accordingly, our assurance engagement thereon are subject to uncertainties.

#### **D. Assurance conclusion**

Based on the assurance procedures performed and assurance evidence obtained, nothing has come to our attention that causes us to believe that the disclosures in the company's non-financial Group report for the period from 1 January 2021 to 31 December 2021 have not been prepared, in all material respects, in accordance with Section 315 c in conjunction with Section 289 c to 289 e HGB and the EU Taxonomy Regulation together with the adopted delegated acts, as well as the interpretation by the legal representatives as set out in the "EU Taxonomy" section of the non-financial Group report.

#### **E. Intended use of the assurance report**

The assurance engagement has been performed for purposes of the company and the report is solely intended to inform the company as to the results of the assurance engagement. Consequently, it may not be suitable for any other purpose than the aforementioned. The report is not intended to provide third parties with support in making (financial) decisions. Our responsibility lies solely towards the company. We do not assume any responsibility towards third parties. Our assurance conclusion is not modified in this respect.

#### **F. Engagement terms and liability**

The General Engagement Terms for Wirtschaftsprüfer und Wirtschaftsprüfungsgesellschaften [German Public Auditors and Public Auditing Firms] dated 1 January 2017, apply to this engagement, and also govern our relations with third parties in the context of this engagement. We also refer to the liability provisions included in Section 9 of those terms and to the exclusion of liability towards third parties. We do not assume any responsibility, liability or other obligations towards third parties unless we have concluded a written agreement to the contrary with the respective third party or liability cannot effectively be precluded.

We make express reference to the fact that we do not update the assurance report to reflect events or circumstances arising after it was issued unless required to do so by law. It is the sole responsibility of anyone taking note of the result of our assurance engagement summarised in this assurance report to decide whether and in what way this result is useful or suitable for their purposes and to supplement, verify or update it by means of their own review procedures.

Bremen, Germany, 31 March 2022

**FIDES Treuhand GmbH & Co. KG**  
**Wirtschaftsprüfungsgesellschaft**  
**Steuerberatungsgesellschaft**

Tobias Kersten  
German Public Auditor

ppa. Marc Middendorf  
German Public Auditor