

# EUROKAI Non-Financial Group Report for 2020

## Introduction

This non-financial Group report is produced 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 business year 2020. It is available publicly on our website at:

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

## Group entity and business model

The focus of work in 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 Lisbon (Portugal) and in Ust-Luga (Russia). 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.

## 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 principal and operating companies. Minority interests that are not directly active in the core business, as well as companies in which the Group has a stake through minority interests outside Germany, are not reported on here, as they 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 covers topics that are necessary for an understanding of the business performance, the results of operations and the position of the Group, as well as the impact of its business activities on non-financial aspects. It references the Sustainability Reporting Standards of the Global Reporting Initiative (GRI Standards 2016). The description of the concepts presented here was prepared in accordance with Standard 103 of the Global Reporting Initiative (GRI). 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 indicators relating to the aspects are reported on, 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, and products and services, and that have or will have a serious negative impact on the non-financial aspects defined by law and have a high likelihood of occurrence. On balance, there are no reportable net risks as defined in the German CSR Implementation Act (CSR-RUG).

### **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 assure its customers of reliable transport of their goods. 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,

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<sup>1</sup>The companies in question are: boxXpress.de GmbH, "Brückenhaus" Grundstücksgesellschaft m.b.H., DHU Gesellschaft Datenverarbeitung Hamburger Umschlagsbetriebe mbH, 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, Contrepair S.r.L., Con-Tug S.r.l., Immobiliare Rubiera S.r.l., La Spezia Shunting Railways S.p.A., 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.

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.

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 on the one hand have a high degree of relevance for understanding the business performance and position of the Group. On the other hand, the Group's business activities impact particularly on the aspects set out in the German CSR Implementation Act (CSR-RUG). The derivation of material topics is reviewed annually. Within the scope of this review, the topics CO<sub>2</sub> emissions and IT security were identified as material for the first time in the reporting year. The outcome of this process gives rise to the four material non-financial aspects energy consumption and CO<sub>2</sub> emissions (environmental topics), occupational health and safety (employee dimension), anti-corruption and anti-bribery, and IT security.

### **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 13-15.

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

Large amounts of energy are used in carrying out the Group's business activities. Energy consumption is a key performance indicator for the management of resources and has a direct impact on incurred costs, and hence on our financial performance. Most of this energy consumption is due to the use of diesel, which is mainly needed to drive the straddle carriers for providing container-handling services at the terminals. Other major energy consumers are container gantries, buildings and surface illumination. Electricity and gas are also used as energy sources in these areas.

At the same time energy consumption has a significant impact on 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 relevant issue that also drives the energy management activities of EUROKAI.

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 framework of the management system. At the level of the individual companies, energy consumption and the financial impact of achieved savings are analysed. 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:** Management of energy use at EUROGATE is undertaken centrally through the holding company of the EUROGATE Group (EUROGATE holding company). The management system in accordance with DIN EN ISO 50001 is audited annually. Accordingly, all German terminals have internal energy policy guidelines in place. Since CO<sub>2</sub> emissions in the business are closely linked to the consumption of fossil fuels, management processes are based on the energy input (use of energy), rather than on the output (CO<sub>2</sub> emissions). In this context, EUROGATE is investing in renewable energy sources to enable it to meet its own energy needs. Energy efficiency is a decision criterion for capital investments and purchasing decisions.

The certified energy management system, as an applied due diligence process, plays a central role in energy management and its further development. As part of this management system, the consumption of energy is analysed and evaluated in regular workshops. Both the energy consumption and the completed and planned projects of all responsible stakeholders are summarised in a Group-wide annual management review and submitted to the managing directors of the individual companies. They undertake an evaluation of improvements in energy efficiency with reference to the set targets.

Various larger and smaller measures address the issue of the energy efficiency of the main energy consumers. Measures and projects are regularly implemented with the aim of exploiting savings potential, e.g. detailed collection and evaluation of straddle carrier consumption data. The focus is on a continuous reduction in the consumption of fossil fuels. Energy efficiency measures have both a technical and an operational focus. EUROGATE continues to make every effort to appeal to its employees' sense of responsibility with regard to saving resources

and systematically involves them in measures to reduce energy consumption, e.g. by training employees in resource-saving operation of straddle carriers. EUROGATE regularly examines whether more energy-efficient technologies can be introduced. Thus in 2020 the conversion of the lighting systems to LED technology continued apace, investments were made in more energy-efficient equipment and a preliminary feasibility study was carried out into alternative drive technologies for the straddle carriers. Furthermore, 2020 saw the launch of a Group-wide transformation process, within the scope of which measures were defined that will have a positive impact on energy efficiency going forward.

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 key performance indicators for CONTSHIP Italia and EUROGATE are consumption in total megawatt hours and energy consumption per container.

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

	<b>CONTSHIP Italia*</b>	<b>EUROGATE**</b>
Target	Lower energy consumption	Lower energy consumption per container handled by 20% up to 2020 (compared with 2008)
Status 2019	73,976 MWh (of which 6,680 MWh renewables)	Reduction of 17.8% per container handled
Status 2020	44,575 MWh (of which 3,912 MWh renewables)	Reduction of 15.8% per container handled
Comment	A reduction was achieved. This was mainly due to the disposal of the indirectly held equity interest in Medcenter Container Terminal, Gioia Tauro, and the cessation of operations at Cagliari International Container Terminal.	The target was not met. The increase in energy consumption in 2020 is mainly attributable to changes in operational processes in connection with managing the COVID-19 pandemic, a decline in container throughput and the switch to a new IT system in Bremerhaven.  The new target is to improve energy consumption in % per container handled (compared with the previous year)

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

\*\*When calculating the key indicator kWh/container, the container-related consumption figures for the principal companies (EUROGATE container terminals, EUROGATE Technical Services GmbH and EUROGATE holding company) were taken as a basis.

The key performance indicators for CONTSHIP Italia and EUROGATE are total CO<sub>2</sub> emissions in tonnes of CO<sub>2</sub> (t CO<sub>2</sub>) and CO<sub>2</sub> emissions per container.

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

	<b>CONTSHIP Italia*</b>	<b>EUROGATE**</b>
Target	Lower CO <sub>2</sub> emissions	Lower CO <sub>2</sub> emissions per container handled by 25% up to 2020 (compared with 2008)
Status 2019	22.577 t CO <sub>2</sub>	Reduction of 27.3% per container handled
Status 2020	12.278 t CO <sub>2</sub>	Reduction of 27.8% per container handled
Comment	A reduction was achieved. This was mainly due to the disposal of the indirectly held equity interest in Medcenter Container Terminal, Gioia Tauro, and the cessation of operations at Cagliari International Container Terminal.	The target was met in 2017. This was mainly attributable to the implementation of energy efficiency projects.  The new target is to improve CO <sub>2</sub> emissions in % per container handled (compared with the previous year)

\*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 indicator CO<sub>2</sub>/container, the container-relevant CO<sub>2</sub> emissions of the principal companies (EUROGATE container terminals, EUROGATE Technical Services GmbH and the EUROGATE holding company) were taken as a basis.

## **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 of the work is performed using heavy equipment at the terminals (mainly straddle carriers and container gantries), and is susceptible to prevailing weather conditions. Given the physical nature of this work and the deployment of much of the workforce in a three-shift system, promoting and protecting their health is particularly important.

Occupational safety not only concerns the health and well-being of our employees; it also has a vital impact on their performance. In particular, handling operations at our seaports require a high level of safety awareness.

The 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 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 2020, the possibilities for organising training courses in the respective programmes were very restricted. 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.

**EUROGATE:** Management of occupational health and safety is the responsibility of the individual companies and their respective managing directors. Based on the respective workflows, the individual companies and each of their management boards establish and regularly update guidelines and operating instructions for occupational health and safety. As part of their duty of supervision, managers are tasked with assessing hazards and monitoring compliance with the guidelines and operating instructions in their area of responsibility. Each terminal has an occupational health physician and an occupational safety specialist, and safety officers are appointed.

At EUROGATE, technical and organisational measures have been taken to lower risk exposure and reduce accidents. Ongoing measures include regular training courses and instruction sessions on safety standards and accident prevention guidelines, plus monitoring compliance. Standards are in force governing compliance with occupational safety rules, for example mandatory wearing of personal protective clothing and equipment on 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 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 Hamburg terminal, the safety days, which in 2020 focused on the topic of road safety to and from work, were supported among others by the Verkehrswacht road safety organisation and the Hamburg police bicycle patrol. Employee awareness was also raised at the Wilhelmshaven terminal with a variety of emergency exercises during ongoing operations. Parallel to this, the German ADAC automobile association carried out winching exercises with a rescue helicopter. This involved dropping rescue operators onto one of the container gantries and airlifting people by helicopter from a crane.

The key ratios for CONTSHIP Italia and EUROGATE in the area of occupational health and safety are the number of reportable work-related accidents (accidents at the workplace and on the way to/from work) and the number of accidental deaths (as a result of accidents at work and on the way to and from work).

The number of work-related accidents is regularly monitored as an indicator of occupational safety. 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 to prevent accident-related fatalities	
Status 2019	Work-related accidents: 61 Accident-related fatalities: none	Work-related accidents: 366 Accident-related fatalities: none
Status 2020	Work-related accidents: 14 Accident-related fatalities: none	Work-related accidents: 326 Accident-related fatalities: none
Comment	The target was met. As part of the defined monitoring process in the area of occupational safety, measures to counter this development are developed based on the analysis of hazardous situations, accident severity and cause. The drop in the total number of accidents in Italy was attributable to the disposal of the indirect equity interest in Medcenter Container Terminal S.p.A. held by Contship Italia S.p.A. in April 2019 and the cessation of operations at Cagliari International Container Terminal in September 2019. Another reason was the pandemic-related decline in throughput volumes, which led to a reduction in the number of employee hours in 2020.	

\*In Italy, accidents must be reported if a person is killed as a result of an accident or injured to a degree that renders them unable to work 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 accidents must be reported if a person is killed as a result of an accident or injured to a degree that they are unable to work for more than three days. In addition to the accident figure for its own employees, the EUROGATE figure takes temporary contract workers into consideration. Accidents involving external contractors are not included.

## Anti-corruption and anti-bribery

Compliant, fair and reliable conduct is a sine qua non for the long-term success of any company. Within the EUROKAI Group, the umbrella term “compliance” relates to the adherence to statutory standards and internal company policies and working towards their observance in the EUROKAI Group companies. These include the relevant policies and principles governing the avoidance of 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 be in compliance 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 ombudsman 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 covering a number of points, a code of conduct and an anti-corruption policy. These regulations came into force on 1 January 2017. The policies and code summarise the Group’s values in the form of a commitment to fair and free competition and form the basis for our understanding of entrepreneurial compliance. These documents state that EUROGATE neither tolerates corruption nor allows discrimination. All commercial decisions must be consonant with the law and be governed by EUROGATE’s standards of ethics and integrity as set out in the policies.

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 company. When introducing the compliance management system, EUROGATE appointed a compliance officer. An external ombudsman has also been appointed to whom employees can turn anonymously. Once a year, the compliance officer submits an internal report to the Group Management Board and the

supervisory bodies. This contains, among other things, an inventory 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. This process was communicated by the compliance officer at a number of works meetings. Building on the in-person training courses which were held in 2017 upon introduction of the compliance management system, workshops were organised in 2019 with sensitive areas of the company. The in-person training courses for sensitive areas planned for 2020 had to be postponed until 2021 due to the COVID-19 pandemic.

Compliance management at North Sea Terminal Bremerhaven GmbH & Co. (NTB), operated as a joint venture between EUROGATE and APMT, is undertaken separately. The shareholders' guidelines and policies are discussed with the relevant employee groups within the scope of regular compliance training courses. Thus both shareholders' compliance rules are likewise followed at NTB. Responsibility for this lies with the NTB Management Board. The internal control manual sets out 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 2020. An annual risk inventory, an annual fraud risk assessment and monthly evaluations of the internal control system serve to 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.

This 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 2019	none	none
Status 2020	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 a commercial perspective, 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:** An IT security management system is currently being established. 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. In implementing relevant processes, the Group intends to appoint an IT security officer and define the necessary organisational structures, procedures, roles and accountabilities.

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

**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 has been appointed. 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 policy regulates 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 downtimes. The security management approach follows the NIST Cyber Security Framework and in its practical implementation is based on the DIN EN ISO 27001 and the IEC 62443 standards. In addition, agreements are in place with local and European logistics partners (for example EU-ISAC), as well as with relevant authorities and other 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 planned and approved by the Group Management Board as part of an annual planning process. As a rule, they are systematically 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. Various approaches based on NIST, IEC62443 and alternative market approaches are being examined for modelling the measurability of the protection achieved through non-financial performance indicators. The EUROGATE ISMS was audited in 2020 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 will be dealt with within the scope of targeted measures. Further audits will be carried out by the internal Group auditing department.

## **Further aspects**

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

Hamburg, 30 March 2021

Personally Liable General Partner

Kurt F.W.A. Eckelmann GmbH, Hamburg

Thomas H. Eckelmann

Cecilia E. M. Eckelmann-Battistello

*The assurance engagement performed by Ernst & Young (EY) relates exclusively to the German version of the non-financial report 2020 of EUROKAI GmbH & Co. KGaA. The following text is a translation of the original German Independent Assurance Report.*

## **Independent Auditor's Limited Assurance Report**

To EUROKAI GmbH & Co. KGaA, Hamburg We have performed a limited assurance engagement on the non-financial group report of EUROKAI GmbH & Co. KGaA according to § 315b HGB, for the reporting period from 1 January 2020 to 31 December 2020 (hereafter non-financial group report). Our engagement did not include any disclosures for prior years.

### **Management's responsibility**

The legal representatives of the Company are responsible for the preparation of the non-financial group report in accordance with §§ 315c in conjunction with 289c to 289e HGB.

This responsibility includes the selection and application of appropriate methods to prepare the non-financial group report as well as making assumptions and estimates related to individual disclosures, which are reasonable in the circumstances. Furthermore, the legal representatives are responsible for such internal controls that they have considered necessary to enable the preparation of a non-financial group report that is free from material misstatement, whether due to fraud or error.

### **Auditor's declaration relating to independence and quality control**

We are independent from the Company in accordance with the provisions under German commercial law and professional requirements, and we have fulfilled our other professional responsibilities in accordance with these requirements.

Our audit firm applies the national statutory regulations and professional pronouncements for quality control, in particular the by-laws regulating the rights and duties of Wirtschaftsprüfer and vereidigte Buchprüfer in the exercise of their profession [Berufssatzung für Wirtschaftsprüfer und vereidigte Buchprüfer] as well as the IDW Standard on Quality Control 1: Requirements for Quality Control in audit firms [IDW Qualitätssicherungsstandard 1: Anforderungen an die Qualitätssicherung in der Wirtschaftsprüferpraxis (IDW QS 1)].

### **Auditor's responsibility**

Our responsibility is to express a limited assurance conclusion on the non-financial group report 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 International Auditing and Assurance Standards Board (IAASB). This Standard requires that we plan and perform the assurance engagement to obtain limited assurance about whether the non-financial group report of the Company has been prepared, in all material respects, in accordance with §§ 315c in conjunction with 289c to 289e HGB. In a limited assurance engagement the assurance procedures are less in extent than for a reasonable assurance engagement and therefore a substantially lower level of assurance is obtained. The assurance procedures selected depend on the auditor's professional judgment.

Within the scope of our assurance engagement, which has been conducted between November 2020 and March 2021, we performed amongst others the following assurance and other procedures:

- Inquiries of employees regarding the selection of topics for the non-financial group report, the risk assessment and the concepts of EUROKAI for the topics that have been identified as material,
- Inquiries of employees responsible for data capture and consolidation as well as the preparation of the non-financial group report, to evaluate the reporting processes, the data capture and compilation methods as well as internal controls to the extent relevant for the assurance of the non-financial group report,
- Identification of likely risks of material misstatement in the non-financial group report,
- Inspection of relevant documentation of the systems and processes for compiling, aggregating and validating data in the relevant areas, e.g. energy management, in the reporting period and testing such documentation on a sample basis,
- Analytical evaluation of disclosures in the non-financial group report,
- Inquiries and inspection of documents on a sample basis relating to the collection and reporting of selected data,
- Evaluation of the presentation of disclosures in the non-financial group report.

### **Assurance conclusion**

Based on our assurance procedures performed and assurance evidence obtained, nothing has come to our attention that causes us to believe that the non-financial group report of EUROKAI GmbH & Co. KGaA for the period from 1 January 2020 to 31 December 2020 has not been prepared, in all material respects, in accordance with §§ 315c in conjunction with 289c to 289e HGB.

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

We issue this report on the basis of the engagement agreed with EUROKAI GmbH & Co. KGaA. The assurance engagement has been performed for the purposes of the Company and the re-port is solely intended to inform the Company as to the results of the assurance

engagement and must not be used for purposes other than those intended. The report is not intended to provide third parties with support in making (financial) decisions.

### **Engagement terms and liability**

The “General Engagement Terms for Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften [German Public Auditors and Public Audit Firms]” dated 1 January 2017 are applicable to this engagement and also govern our relations with third parties in the context of this engagement ([www.de.ey.com/general-engagement-terms](http://www.de.ey.com/general-engagement-terms)). In addition, please refer to the liability provisions contained therein no. 9 and to the exclusion of liability towards third parties. We assume no 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 summarized 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.

Munich, 30 March 2021

Ernst & Young GmbH  
Wirtschaftsprüfungsgesellschaft

Nicole Richter  
Wirtschaftsprüferin  
(German Public Auditor)

Hans-Georg Welz  
Wirtschaftsprüfer  
(German Public Auditor)