

DRAFT EUROKAI Non-Financial Group Report for 2022

Introduction

This non-financial Group report is produced pursuant to Sections 315b and 315c in conjunction with Sections 289c to 289e of the German Commercial Code (HGB) and relates to the EUROKAI Group for the financial year 2022.

In the 2022 financial year, the EUROKAI Group reports for the first time in full on key performance indicators that are required to be disclosed on the basis of Regulation (EU) 2020/852 of the European Parliament and 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

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, in La Spezia, Ravenna and Salerno (Italy), in Hamburg, Bremerhaven and Wilhelmshaven (Germany), as well as in Tangier (Morocco), in Limassol (Cyprus) and in Ust-Luga (Russia). In Russia, the EUROKAI Group holds a 20% stake in JSC Ust-Luga Container Terminal via the EUROGATE Segment. Due to the geopolitical situation and the resulting sanctions in place, the indirect investment was written off in the reporting year, as the long-term assumption is that handling volumes are not expected to stabilise. Furthermore, in the current environment, cash recoveries from Russia can be ruled out. Under the currently prevailing conditions, a disposal of the investment is also unlikely to be realisable. 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. 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.¹

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 Sustainability Reporting Standards published by the Global Reporting Initiative (GRI). The description of the concepts presented here was also prepared in accordance with the GRI Standards. 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. For the disclosure of the aspects, non-financial key performance indicators are reported on that are selected according to the thematically related GRI Standard. As part of the reporting process, EUROKAI 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. On balance, there are no reportable net risks as defined in the German CSR Implementation Act (CSR-RUG).

Importance of sustainability

For EUROKAI, 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, EUROKAI 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 EUROKAI to ensure that its customers benefit from reliable goods transport. At the same time, EUROKAI 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.

¹Companies not classified as material 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, TRIMODAL LOGISTIK GmbH, Contrepair 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 Tangerang S.A., TangerMedGate Management S.a.r.l., JSC Ust-Luga Container Terminal and EUROGATE Rail Hungary Zrt.

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 a first step, relevant topics are identified at the level of CONTSHIP Italia and at the level of EUROGATE based on the GRI Standards. If a topic is deemed to be fundamentally relevant for one of the segments, a materiality analysis is carried out from the perspective of the EUROKAI Group as a whole based on the materiality threshold in accordance with Section 289c (3) of the German Commercial Code (HGB). Accordingly, the Group reports on the one hand on topics that are of high relevance for gaining an understanding of the development, performance and position of EUROKAI and on the other hand where EUROKAI exerts material influence through its business activities. The materiality analysis is reviewed annually through a survey of internal experts and decision-makers who are able both to assess the non-financial aspects from an internal standpoint and from the perspective of external stakeholders.

Within the scope of this review, the four previously identified material non-financial aspects remained unchanged for the 2022 financial year. These were: energy consumption and CO₂ emissions (environmental matters), 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 assurance. The scope of the audit and the auditor's assessment can be found in the Auditor's Limited Assurance Report on page 27–30.

Environmental matters – energy consumption and CO₂ 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 is due to the use of diesel fuel, mainly for the operation of straddle carriers and tractor units 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 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 significant issue that also drives EUROKAI's energy management activities.

The strategic orientation of the two segments that characterise the EUROKAI Group, CONTSHIP Italia and EUROGATE, differs as regards energy consumption and CO₂ 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 as well as environmental 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 CO₂ 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 CO₂ emissions in absolute terms compared with the respective 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: In the 2022 financial year, a more efficient central energy management system was established on the basis of DIN EN 50001 aimed at achieving a structured improvement in energy efficiency. In parallel, an energy audit pursuant to DIN EN 16247 is carried out on a rotating basis across the various sites, which identifies efficiency potential. In 2022, the Hamburg Container Terminal site was considered in detail and the findings were incorporated into central energy management.

The energy audit is conducted every four years, and in addition the individual energy management system comprising key performance indicators, targets, regular energy efficiency assessments, a list of technical measures, technical inspections, process audits and management reviews is further enhanced. 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 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 driving to cut energy consumption. EUROGATE regularly examines options for using more energy-efficient technologies. Thus the 2022 financial year again saw investments made in more energy-efficient equipment (hybrid straddle carriers). The Group-wide transformation process launched in the 2020 financial year continued in 2022 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, three 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 2021	50,339*** MWh (of which 2,579 MWh renewables)	435,999 MWh (of which 12,376 MWh renewables)
Status 2022	49,621 MWh (of which 6,924 MWh renewables)	412,587 MWh (of which 13,358 MWh renewables)
Comment	The increase in the share of renewables is attributable to the change of supplier and the resulting change in the energy mix. There was a slight decrease in energy consumption due to the development in handling volumes.	In view of the increasing importance of the carbon footprint, the goal is to further expand renewables and further reduce energy consumption. Energy consumption was down in the 2022 financial year. At the same time, favourable wind conditions led to increased utilisation of wind energy. Container throughput decreased slightly on the back of global economic events leading to a corresponding reduction in energy consumption.

*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 Hamburg, Bremerhaven and Wilhelmshaven and the respective service companies at each location, as well as the EUROGATE holding company) were taken into consideration.

***In the non-financial Group report for the 2021 financial year, energy consumption for CONTSHIP Italia was recognised with 49,183 MWh. By contrast in the present version, the previous year's figure has been adjusted to reflect the correct amount of 50,339 MWh.

The most important key performance indicator at CONTSHIP Italia and EUROGATE in the area of emissions is total CO₂ emissions in tonnes (t CO₂).

CO₂ emissions are regularly reviewed. The following table shows the current status of target attainment:

	CONTSHIP Italia*	EUROGATE**
Target	Lower CO ₂ emissions	
Status 2021	12,910*** t CO ₂	104,415 t CO ₂
Status 2022	12,541 t CO ₂	101,752 t CO ₂
Comment	The lower CO ₂ emissions in the 2022 financial year are attributable to the greener energy mix of the electricity provider.	In view of the increasing importance of the carbon footprint, the goal is to reduce it further. Container throughput decreased slightly in the 2022 financial year on the back of global economic events, leading to a corresponding slight reduction in energy consumption. At the same time, increased wind energy generation led to a higher proportion of renewables in the mix.

*When calculating total CO₂ 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 CO₂ 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 CO₂, the consumption figures for the principal companies (the German EUROGATE terminal operations in Hamburg, Bremerhaven and Wilhelmshaven and the respective service companies at each location, as well as the EUROGATE holding company) were taken into consideration.

***In the non-financial Group report for the 2021 financial year, CO₂ emissions for CONTSHIP Italia were recognised with 12,912 t CO₂. By contrast in the present version, the previous year's figure has been adjusted to reflect the correct amount of 12,910 t CO₂.

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 has long been 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 the quantity and quality of 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. This is implemented through the EUOKAI Group's

overarching goal 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. 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. 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: The management boards of the individual EUROGATE companies 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 training and briefings, a number of events with a focus on occupational health and safety are also organised. These are also attended by executive managers, since they bear particular responsibility to lead by example. These activities are regularly organised in cooperation with external partners. For example, in May 2022, a drill was carried out with the Hamburg Police. In July 2022, the Hamburg Fire Brigade also held an event on the terminal site to explain how to fight fires caused by the lithium-ion batteries of our hybrid straddle carriers. At the Bremerhaven site, rescue exercises at heights were carried out with the Bremerhaven Fire Brigade. Building evacuation drills were also conducted on the basis of practice runs of a fire alarm being activated. 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.

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:

	CONTSHIP Italia*	EUROGATE**
Target	Minimise the number of work-related accidents and prevent accident-related fatalities.	
Status 2021	Work-related accidents: 27 Accident-related fatalities: none	Work-related accidents: 344 Accident-related fatalities: none
Status 2022	Work-related accidents: 23 Accident-related fatalities: 1	Work-related accidents: 268 Accident-related fatalities: none
Comment	1) The decline in the number of accidents in financial year 2022 reflects the improved safety awareness of employees achieved through training and measures to deal with near misses. 2) In December 2022, an accident-related fatality of an external truck driver occurred in La Spezia. The investigation by the Italian authorities is still ongoing.	The target to lower the number of work-related accidents and prevent accident-related fatalities was met. The drop in the number of work-related accidents is attributable on the one hand to the lower number of containers handled. On the other hand, the lower number of work-related accidents for this financial year is within the range of natural statistical fluctuations.

*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.

The COVID crisis team continued to coordinate regularly and adapt workplace regulations and instructions to the situation and legal rulings as and when necessary.

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. These include 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 2018, CONTSHIP Italia voluntarily implemented a surveillance and monitoring system to prevent crimes identified by Legislative Decree 231/2001 (*"Discipline of the administrative liability of legal persons, companies and associations, including those without legal personality"*) for La Spezia Container Terminal and OCEANOGATE. In accordance with this Legislative Decree, the required organisational, management and control model as well as bodies for monitoring compliance with the guidelines were set up. In the 2022 financial year, the surveillance and monitoring system was additionally implemented at CONTSHIP Italia Holding and Rail Hub Milano, and related models and surveillance bodies were established.

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 lies 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 to close identified gaps.

EUROGATE: EUROGATE has established a compliance management system, which comprises a compliance policy with several sections, a code of conduct, a self-declaration of compliance with sanctions and an anti-corruption policy. The compliance policy, code of conduct and the anti-corruption policy came into force on 1 January 2017. The self-declaration of compliance with sanctions was adopted in 2022. 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 commercial 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 board of the respective EUROGATE Group company. 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. 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. In the 2022 financial year, central compliance training sessions were held with the process owners of the individual companies. For 2023, it is planned to hold training courses as well as regularly include compliance topics on the agenda of the works meetings. The idea behind this is, on the one hand, to refresh awareness generally for compliance-related issues and, more specifically, for the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz) and the forthcoming German Whistleblower Protection Act (Hinweisgeberschutzgesetz).

Compliance management at North Sea Terminal Bremerhaven GmbH & Co. (NTB), which is operated as a joint venture between EUROGATE and APM, is conducted separately. The shareholders' guidelines and policies are discussed with the relevant employee groups within the scope of regular compliance training courses. 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. Regular compliance training courses are carried out at NTB, most recently in 2021. The next training courses are planned for the third quarter of 2023. An annual risk inventory, an annual fraud risk assessment and the 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. 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:

	CONTSHIP Italia	EUROGATE
Target	No cases of corruption	
Status 2021	none	none
Status 2022	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. Those responsible for management at CONTSHIP Italia and EUROGATE regularly exchange information on IT security issues.

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 IT security 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 2022, the focus continued to be 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, demand 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. Furthermore, as an operator of critical infrastructure, EUROGATE is obliged by law to implement a state-of-the-art information security management system.

Technical competence for the EUROGATE information security management system (ISMS) lies with the IT department of the EUROGATE holding company (EGH IT). 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 operational technology (OT) security architect have been appointed. An IT and an OT security board have also been set up and equipped with resources from EGH IT department and EUROGATE Technical Services. Measures and budgets are identified and decided as part of the annual IT planning process. 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 Terminals, which is managed separately. An ISMS 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 ISO 27001 and in its practical implementation is based on the and the IEC 62443 standard.

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 EUROGATE Supervisory Board discusses the current security status in detail annually on the basis of this report. The current OT security status and the measures derived from it are reported every six months.

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 2022 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 remedies identified in the 2020 audit as well as the current level of maturity of the ISMS. The deviations and recommendations resulting from the audit will be dealt with in 2023 within the scope of targeted measures. Implementation will be reviewed in the 2024 financial year within the scope of the next KRITIS audit. In addition, external audits of the ISMS by external auditors (Terminal Investment Limited S.a.r.l, Intargia Managementberatung GmbH) and penetration tests of selected IT systems were carried out in 2022. A security scoring system for evaluating the security status of publicly visible EUROGATE systems has been in use since 2022. Self-assessments based on IEC62443 are used for modelling the internal measurability of the level of OT protection achieved through non-financial key performance indicators. From 2023, an ISMS tool will be used to assess the ISMS maturity level.

The key performance indicators at CONTSHIP Italia and EUROGATE are system failures due to security incidents and cases of data loss and/or manipulation. These KPIs are reported for the first time in financial year 2022 and serve as central IT security performance indicators.

The following table shows the current status of target attainment:

	CONTSHIP Italia	EUROGATE
Target	No system failures due to security incidents and no cases of data loss and/or manipulation	
Status 2022	System failures due to security incidents: 0 Cases of data loss and/or manipulation: 0	System failures due to security incidents: 0 Cases of data loss and/or manipulation: 0
Comment	The target was met.	The target was met.

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.

EU Taxonomy

Background

As a preparer of a consolidated non-financial statement, the EUOKAI Group is required in the financial year 2022 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 revenue (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.

Under the EU Taxonomy Regulation, an economic activity qualifies as environmentally sustainable if that activity contributes substantially to one or more of the six objectives defined in the Regulation, does not significantly harm any of the remaining objectives and is carried out in compliance with specified minimum safeguards under the Regulation.

Article 9 of the EU Taxonomy Regulation establishes six environmental objectives:

- 1) Climate change mitigation;
- 2) Climate change adaptation;
- 3) The sustainable use and protection of water and marine resources;
- 4) The transition to a circular economy;
- 5) Pollution prevention and control;
- 6) The protection and restoration of biodiversity and ecosystems.

To date, only the Delegated Regulation (Climate Delegated Act) providing technical screening criteria for the environmental objectives of 1) climate change mitigation and 2) climate change adaptation as well as the Complementary Delegated Act for these two environmental objectives covering certain economic activities in the natural gas and nuclear energy sectors have been adopted. Reporting for the 2022 financial year therefore only takes these two environmental objectives into consideration. As soon as Delegated Act (Environmental Delegated Act) for the four environmental objectives 3–6 are published and enter into force, economic activities will also have to be checked against the technical screening criteria for these objectives.

While in the first year of application of the Regulation the Commission provided for extensive reporting simplifications, reporting undertakings are required for the first time in the 2022 reporting year to disclose full information for all of their economic activities regarding compliance with the sustainability criteria defined in the Regulation. The KPIs must be disclosed using the predefined reporting templates provided in the Climate Delegated Act relating to content and presentation and must contain the qualitative information required under this Regulation.

Methodology and approach

In order to meet the EU Taxonomy reporting requirements, a project team was formed consisting of experts in sustainability, compliance and technical processes in the operating companies, financial accounting and management controlling. This team continuously analyses and validates the status of EUROKAI's economic activities in terms of their taxonomy eligibility and alignment. On the basis of this classification, revenue (turnover), capital expenditure (CapEx) and operating expenditure (OpEx) were then mapped to the various economic activities and presented in the filled-in reporting templates (see section Key performance indicators).

The starting point for the analysis of EUROKAI's economic activities with regard to their taxonomy eligibility was the analysis already carried out in financial year 2021. This analysis was updated for the 2022 reporting year to identify newly emerging taxonomy-eligible economic activities. In addition, the classification of economic activities carried out in the previous year was reviewed on the basis of the publications issued by the EU or the IDW (Institute of Public Auditors in Germany).

The resulting focus of the business activities of the companies consolidated in the EUROKAI Group continued to be on the economic activity 6.16. Infrastructure enabling low carbon water transport set out in Annex I to the Climate Delegated Act of 4 June 2021 for the environmental objective "climate change mitigation". The operation of container terminals, including cargo and repair activities, satisfies the description contained in Annex I for the environmental objective "climate change mitigation" and is therefore also to be classified as taxonomy-

eligible. This economic activity is supplemented by an inland cargo handling depot, which in the context of the environmental objective "climate change mitigation" falls under the taxonomy-eligible economic activity 6.14. Infrastructure for rail transport.

In the provision of intermodal services, goods transport by rail continued to fall under the taxonomy-eligible economic activity 6.2. Freight rail transport. A change in the classification compared to the previous year arose in the case of road transports carried out by subcontractors engaged by the Group. As a result, on the basis of the "Commission Notice on the interpretation of certain legal provisions of the Disclosures Delegated Act under Article 8 of EU Taxonomy Regulation on the reporting of eligible economic activities and assets (2022/c 385/01)" published by the EU on 6 October 2022 (EU FAQ dated 6 October 2022), this activity is no longer classified as taxonomy-eligible, since EUROKAI has no control over whether the vehicles used by the contracted subcontractors meet the EURO VI level E standard or higher required in the description of the economic activity 6.6. Freight transport services by road.

Other economic activities of the Group are in the field of energy generation (solar and wind power) and energy transmission. These activities are to be classified as taxonomy-eligible on the basis of Annex I to the environmental objective "climate change mitigation" of the Climate Delegated Act (4.1. Electricity generation using solar photovoltaic technology, 4.3. Electricity generation from wind power, 4.9. Transmission and distribution of electricity). Furthermore, in financial year 2022 EUROKAI identified the taxonomy-eligible activities 7.3. Installation, maintenance and repair of energy efficient equipment and 8.1. Data processing, hosting and related activities included in Annex I to the environmental objective "climate change mitigation".

Based on the analysis conducted, it was determined that none of the economic activities carried out within the Group in this financial year are taxonomy-eligible under Annex II relating to the environmental objective "climate change adaptation". This assessment is based on Question 5 of the EU FAQ dated 6 October 2022. This states that to qualify as taxonomy-eligible, economic activities related to climate change adaptation must be marked as so-called "adaptation activities" in accordance with Article 11 (1)(a) of the EU Taxonomy Regulation or as a so-called "enabling economic activity" in accordance with Article 11 (1)(b) of the same Regulation. EUROKAI does not consider this to be relevant for any activity.

In the next step, the taxonomy-eligible economic activities identified within the Group were reviewed to determine whether they comply with all technical screening criteria as well as the specified minimum safeguards and thus qualify as taxonomy-aligned.

The technical screening criteria are subdivided into criteria that contribute substantially to one or more of the environmental objectives and criteria that do no significant harm in relation to the other environmental objectives. These criteria were applied to each shortlisted economic activity on the basis of the Climate Delegated Act of 4 June 2021 and their degree of fulfilment was checked to assess their alignment status. In order to assess the degree of fulfilment of the criteria, the shortlisted economic activities were analysed and corresponding supporting data was gathered. Subsequently, it was verified whether the economic activities carried out by the Group meet the specified minimum safeguards as described in Article 18 of the EU Taxonomy Regulation. These requirements are based on a number of frameworks, including the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, including the fundamental conventions identified in the Declaration of the

International Labour Organization (ILO) and the International Bill of Human Rights. Based on the recommendations contained in the final report of the Platform of Sustainable Finance, the specified minimum safeguards focus on the following four topics: human and labour rights, anti-bribery and anti-corruption, taxation, and fair competition. For an economic activity to be classified as taxonomy-aligned, reporting undertakings must provide proof of compliance attesting that it meets the respective requirements of these four topics. In the area of human rights, preparers must also prove that they have followed a dedicated due diligence process.

The taxonomy alignment analysis for the 2022 financial year showed that none of the taxonomy-eligible economic activities met all of the criteria to qualify as a taxonomy-aligned activity. Thus, EUROKAI's economic activities in financial year 2022 are to be classified either as taxonomy-eligible but non-aligned activities or as taxonomy-non-eligible activities.

In the final step, the economic activities identified and classified as described above were mapped to their respective proportion of the Taxonomy KPIs turnover, CapEx and OpEx. The consolidated financial statements for EUROKAI as at 31 December 2022 were prepared in accordance with IFRSs pursuant to Section 315e (1) of the German Commercial Code (HGB). The amounts used to calculate the turnover, CapEx and OpEx KPIs were accordingly based on the figures reported in the consolidated financial statements. The turnover and CapEx KPIs can both be reconciled directly. Based on the definition of relevant OpEx set out in the EU Taxonomy Regulation, this KPI cannot be derived directly from the reported figures in the consolidated financial statements. A potential double-counting when mapping to the KPIs can be ruled out, as the identified economic activities are mapped exclusively to the "climate change mitigation" environmental objective and the respective contributions to turnover, CapEx and OpEx are clearly mapped to only one economic activity. The KPIs related to turnover, CapEx and OpEx, as well as supplementary disclosures for each of the KPIs, are presented in the following section.

Key performance indicators

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 (numerator) in a given financial year divided by the total net turnover (denominator) for the same period.

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

The total revenue for the 2022 financial year of EUR 247,605 thousand, as recognised in the consolidated statement of profit or loss and other comprehensive income, constitutes the denominator of the turnover KPI (see also Section 5 Revenue in the Notes to the consolidated financial statements). The revenue of the EUROKAI Group in the amount of EUR 247,605 thousand did not include any taxonomy-aligned net turnover that could be included in the numerator of the turnover KPI because, as described above, no taxonomy-aligned economic activities were identified in financial year 2022. A value of 0% for the turnover KPI was derived from the determined amounts for the numerator and denominator.

A global overview of the distribution of revenue across all economic activities identified within the Group is presented in the filled-in reporting template at the end of the section. 75.85% of the revenue was attributable to taxonomy-eligible but non-aligned economic activities (2021:

100%). Activity 6.16. Infrastructure enabling low carbon water transport accounted for the largest proportion of taxonomy-eligible activities with a proportion of 68.20% of total revenue. The decrease in taxonomy-eligible net turnover compared to the previous year was mainly due to the change in the classification of road transport activities performed by subcontractors engaged by the Group, as described above. The revenue attributable to this economic activity was classified in financial year 2022 as taxonomy-non-eligible. Total net turnover with taxonomy-non-eligible economic activities stood at EUR 59,807 thousand (24.15%).

KPI related to capital expenditure (CapEx)

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

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

The total capital expenditure in accordance with the EU Taxonomy Regulation amounted to EUR 25,199 thousand and constituted the denominator of the CapEx KPI. 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 739 thousand and in Section 14 Property, plant and equipment (own assets) in the amount of EUR 16,409 thousand and Property, plant and equipment (right-of-use assets from leasing) in the amount of EUR 8,051 thousand. Additions to goodwill under intangible assets in Section 13 of the Notes to the consolidated financial statements were not taken into account for the CapEx denominator, as these do not meet the definition set out in the Taxonomy.

Capital expenditure of the EUOKAI Group in accordance with the EU Taxonomy Regulation in the amount of EUR 25,199 thousand did not include any taxonomy-aligned capital expenditure that could be included in the numerator of the CapEx KPI because, as described above, no taxonomy-aligned economic activities were identified in financial year 2022. A value of 0% for the CapEx KPI was derived from the determined amounts for the numerator and denominator.

A global overview of the distribution of CapEx across all economic activities identified within the Group is presented in the filled-in reporting template at the end of the section. 93.84% of the CapEx was attributable to taxonomy-eligible but non-aligned economic activities (2021: 94.41%). Capital expenditure relating to Activity 6.16. Infrastructure enabling low carbon water transport in the amount of EUR 13,156 thousand (52.21% of total CapEx) accounted for the largest proportion of taxonomy-eligible CapEx. The slight decrease in taxonomy-eligible CapEx compared to the previous year was mainly due to the change in the classification of road transport activities performed by subcontractors engaged by the Group, as described above. Capital expenditure relating to this economic activity was classified in financial year 2022 as taxonomy-non-eligible. In the 2022 financial year, CapEx relating to taxonomy-non-eligible economic activities amounted to EUR 1,553 thousand (6.16%).

Template: Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2022

Economic activities	Code(s)	Absolute CapEx EUR thousand	Proportion of CapEx (%)	Substantial contribution criteria							DNSH criteria ("Does Not Significantly Harm")							Minimum safeguards (J/N)	Taxonomy-aligned proportion of CapEx, year 2022 (%)	Taxonomy-aligned proportion of CapEx, year 2021 (%)	Category (enabling activity) E	Category (transitional activity) T
				Climate change mitigation (%)	Climate change adaptation (%)	Water and marine resources (%)	Circular economy (%)	Pollution (%)	Biodiversity and ecosystems (%)	Climate change mitigation (J/N)	Climate change adaptation (J/N)	Water and marine resources (J/N)	Circular economy (J/N)	Pollution (J/N)	Biodiversity and ecosystems (J/N)							
A. TAXONOMY-ELIGIBLE ACTIVITIES																						
A.1. Environmentally sustainable activities (Taxonomy-aligned)																						
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1.)		0	0.00															0.00				
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																						
6.2. Freight rail transport	49.20	7,954	31.56																			
6.14. Infrastructure for rail transport	52.21	1,521	6.04																			
6.16. Infrastructure enabling low carbon water transport	52.24	13,156	52.21																			
8.1. Data processing, hosting and related activities	63.11	1,014	4.02																			
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)		23,645	93.84																			
Total (A.1. + A.2.)		23,645	93.84															0.00				
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																						
CapEx of Taxonomy-non-eligible activities (B.)		1,553	6.16																			
Total (A.+B.)		25,199	100																			

KPI related to operating expenditure (OpEx)

The OpEx KPI corresponds to the proportion 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 leases, maintenance and repair were considered. 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. The resulting OpEx denominator was EUR 29,500 thousand.

Operating expenditure of the EUOKAI Group in accordance with the EU Taxonomy Regulation in the amount of EUR 29,500 thousand did not include any taxonomy-aligned operating expenditure that could be included in the numerator of the OpEx KPI because, as described above, no taxonomy-aligned economic activities were identified in financial year 2022. A value of 0% for the OpEx KPI was derived from the determined amounts for the numerator and denominator.

A global overview of the distribution of OpEx across all economic activities identified within the Group is presented in the filled-in reporting template at the end of the section. 78.54% of the OpEx was attributable to taxonomy-eligible but non-aligned economic activities (2021: 100%). Operating expenditure relating to Activity 6.16. Infrastructure enabling low carbon water transport in the amount of EUR 10,199 thousand (34.57% of total OpEx) accounted for the largest proportion of taxonomy-eligible OpEx. The decrease in taxonomy-eligible OpEx compared to the previous year was mainly due to the change in the classification of road transport activities performed by subcontractors engaged by the Group, as described above. Operating expenditure relating to this economic activity was classified in financial year 2022 as taxonomy-non-eligible. In the 2022 financial year, OpEx relating to taxonomy-non-eligible economic activities amounted to EUR 6,330 thousand (21.46%).

Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 as regards economic activities in certain energy sectors.

Adoption of Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 requires companies to provide additional information concerning their activities in the fields of nuclear energy and fossil gas. For this purpose, the Delegated Regulation provides a series of sequential reporting templates. The fully consolidated companies in the EUROKAI Group do not carry out any activities in this area, so that the reporting templates building on the answers to the first template “Template1 Nuclear and fossil gas related activities” were not deemed to be material.

Template 1 Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimum waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades	NO
	Fossil gas related activities	
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels,	NO

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 proportionate basis corresponding to their share in the equity of the joint venture.

In this context, the EUOKAI Group voluntarily discloses additional KPIs based on turnover, CapEx and OpEx KPIs that include the EUROGATE joint venture. This takes into account the fact that EUOKAI holds a 50% stake in EUROGATE. For this voluntary disclosure, the methodology was the same as for determining the mandatory disclosures. The composition of the key performance indicators also corresponds to the definition set out in the section headed Key performance indicators.

Turnover KPI based on the voluntary inclusion of EUROGATE

The total net turnover based on the proportionate inclusion of EUROGATE amounted to EUR 592,704 thousand. The corresponding taxonomy-aligned net turnover was EUR 0 thousand. The resulting turnover KPI based on the inclusion of EUROGATE was 0%.

The proportion of taxonomy-eligible but non-aligned economic activities in net turnover was 86.03% (2021: 99.69%). Activity 6.16. Infrastructure enabling low carbon water transport accounted for the largest proportion of taxonomy-eligible activities with a proportion of 76.84% of total revenue. The decrease in taxonomy-eligible net turnover compared to the previous year was mainly due to the change in the classification of road transport activities performed by subcontractors engaged by the Group, as described above. The revenue attributable to this economic activity was classified in financial year 2022 as taxonomy-non-eligible. Total net turnover with taxonomy-non-eligible economic activities stood at EUR 82,775 thousand (13.97%).

Template: Disclosure of turnover KPI based on the voluntary inclusion of EUROGATE

Economic Activities	Code(s)	Turnover (see section Key performance indicators)	Turnover EUROGATE based on 50%	Absolute turnover based on the voluntary inclusion of EUROGATE with 50%	Proportion of turnover
		k EUR	k EUR	k EUR	(%)
A. TAXONOMY-ELIGIBLE ACTIVITIES					
A.1. Environmentally sustainable activities (Taxonomy-aligned)					
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1.)		0	0	0	0.00
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)					
4.1. Electricity generation using solar photovoltaic technology	35.11	0	28	28	0.00
4.3. Electricity generation from wind power	35.11	0	33	33	0.01
4.9. Transmission and distribution of electricity	35.12	0	3,470	3,470	0.59
4.30. Cogeneration of heat/cool and power from fossil fuels	35.30	0	2	2	0.00
6.2. Freight rail transport	49.20	2,288	32,045	34,333	5.79
6.14. Infrastructure for rail transport	52.21	10,738	0	10,738	1.81
6.16. Infrastructure enabling low carbon water transport	52.24	168,876	286,552	455,429	76.84
8.1. Data processing, hosting and related activities	63.11	5,896	0	5,896	0.99
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)		187,798	322,130	509,928	86.03
Total (A.1. + A.2.)		187,798	322,130	509,928	86.03
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES					
Turnover of Taxonomy-non-eligible activities (B.)		59,807	22,968	82,775	13.97
Total (A.+B.)		247,605	345,098	592,704	100

CapEx KPI based on the voluntary inclusion of EUROGATE

Total capital expenditure in accordance with the EU Taxonomy Regulation based on the proportionate inclusion of EUROGATE amounted to EUR 59,236 thousand. The corresponding taxonomy-aligned capital expenditure was EUR 0 thousand. The resulting CapEx KPI based on the inclusion of EUROGATE was 0%.

EUR 47,473 thousand (80.14%) of the CapEx was attributable to taxonomy-eligible but non-aligned economic activities (2021: 95.33%). Capital expenditure relating to Activity 6.16. Infrastructure enabling low carbon water transport in the amount of EUR 34,275 thousand (57.86% of total CapEx) accounted for the largest proportion of taxonomy-eligible CapEx. The decrease in taxonomy-eligible CapEx compared to the previous year was mainly due to the change in the classification of road transport activities performed by subcontractors engaged by the Group, as described above. Capital expenditure relating to this economic activity was classified in financial year 2022 as taxonomy-non-eligible. In the 2022 financial year, CapEx relating to taxonomy-non-eligible economic activities amounted to EUR 11,763 thousand (19.86%).

Template: Disclosure of CapEx KPI based on the voluntary inclusion of EUROGATE

Economic Activities	Code(s)	CapEx [see section Key performance indicators] k EUR	CapEx EUROGATE based on 50% k EUR	CapEx based on the voluntary inclusion of EUROGATE with 50% k EUR	Proportion of CapEx (%)
A. TAXONOMY-ELIGIBLE ACTIVITIES					
A.1. Environmentally sustainable activities (Taxonomy-aligned)					
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1.)		0	0	0	0.00
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)					
6.2. Freight rail transport	49.20	7,954	261	8,214	13.87
6.14. Infrastructure for rail transport	52.21	1,521	-	1,521	2.57
6.16. Infrastructure enabling low carbon water transport	52.24	13,156	21,119	34,275	57.86
7.3. Installation, maintenance and repair of energy efficient equipment	43.2	-	2,449	2,449	4.13
8.1. Data processing, hosting and related activities	63.11	1,014	-	1,014	1.71
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)		23,645	23,828	47,473	80.14
Total (A.1. + A.2.)		23,645	23,828	47,473	80.14
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES					
CapEx of Taxonomy-non-eligible activities (B.)		1,553	10,209	11,763	19.86
Total (A.+B.)		25,199	34,037	59,236	100

OpEx KPI based on the voluntary inclusion of EUROGATE

The OpEx denominator based on the proportionate inclusion of EUROGATE came to EUR 47,528 thousand. The corresponding taxonomy-aligned operating expenditure was EUR 0 thousand. The resulting OpEx KPI based on the inclusion of EUROGATE was 0%.

EUR 41,195 thousand (86.68%) of the OpEx was attributable to taxonomy-eligible but non-aligned economic activities (2021: 99.99%). Operating expenditure relating to Activity 6.16. Infrastructure enabling low carbon water transport in the amount of EUR 28,018 thousand (58.95% of total OpEx) accounted for the largest proportion of taxonomy-eligible OpEx. The decrease in taxonomy-eligible OpEx compared to the previous year was mainly due to the change in the classification of road transport activities performed by subcontractors engaged by the Group, as described above. Operating expenditure relating to this economic activity

was classified in financial year 2022 as taxonomy-non-eligible. In the 2022 financial year, OpEx relating to taxonomy-non-eligible economic activities amounted to EUR 6,333 thousand (13.32%).

Template: Disclosure of OpEx KPI based on the voluntary inclusion of EUROGATE

Economic Activities	Code(s)	OpEx [see section Key performance indicators] k EUR	OpEx EUROGATE based on 50% k EUR	Absolute OpEx based on the voluntary inclusion of EUROGATE with 50% k EUR	Proportion of OpEx (%)
A. TAXONOMY-ELIGIBLE ACTIVITIES					
A.1. Environmentally sustainable activities (Taxonomy-aligned)					
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1.)		0	0	0	0.00
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)					
6.2. Freight rail transport	49.20	5,628	207	5,835	12.28
6.14. Infrastructure for rail transport	52.21	5,463	-	5,463	11.49
6.16. Infrastructure enabling low carbon water transport	52.24	10,199	17,818	28,018	58.95
8.1. Data processing, hosting and related activities	63.11	1,879	-	1,879	3.95
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)		23,170	18,025	41,195	86.68
Total (A.1. + A.2.)		23,170	18,025	41,195	86.68
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES					
Turnover of Taxonomy-non-eligible activities (B.)		6,330	3	6,333	13.32
Total (A.+B.)		29,500	18,028	47,528	100

Outlook

From the 2023 reporting year, the existing reporting obligations under Article 8 of the EU Taxonomy Regulation on the first two climate-related environmental objectives are expected to be expanded to include reporting obligations on the other four environmental objectives “sustainable use and protection of water and marine resources”, “transition to a circular economy”, “pollution prevention and control” and “protection and restoration of biodiversity and ecosystems”. The EU Commission’s Platform on Sustainable Finance has already published a report that includes recommendations for new technical screening criteria for all six environmental objectives in the EU Taxonomy Regulation. A new Delegated Act for the adoption of these recommendations by the European Commission was not yet available at the time this report was prepared

Hamburg, 22 March 2023

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 group 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 "company") pursuant to Section 315b HGB ["Handelsgesetzbuch": German Commercial Code] for the period from 1 January 2022 to 31 December 2022 (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 315c in conjunction with 289c to 289e 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 Group report.

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 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 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 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 315c in conjunction with Sections 289c to 289e 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 Group report 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 and taxonomy-aligned economic activities and the corresponding determination of the derived key performance indicators on revenue (turnover), capital expenditure (CapEx) and operating expenditure (OpEx),
- Reconciliation of selected disclosures as well as the key performance indicators on taxonomy-eligible and taxonomy-aligned economic activities with the corresponding data in the consolidated financial statements and the Group 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 2022 to 31 December 2022 have not been prepared, in all material respects, in accordance with Section 315c in conjunction with Sections 289c to 289e 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 2023

FIDES Treuhand GmbH & Co. KG
Wirtschaftsprüfungsgesellschaft
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