

# EUROKAI Non-Financial Group Report for 2023

## 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 2023.

In the 2023 financial year, the EUROKAI Group reports 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:

[https://www.eurokai.de/eurokai\\_en/Investor-Relations/Corporate-Governance](https://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 as well as North Africa. 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) and in Limassol (Cyprus). 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.<sup>1</sup>

This report focuses on topics that are necessary for an understanding of the business development, the performance of the business and the position of the Group, as well as the impact of its business activities on non-financial aspects. It follows the 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, EUOKAI examined whether risks exist that are linked to the company's own business activities, business relationships, or products and services and that have or can have a serious negative impact on the non-financial aspects defined by law and have a high likelihood of occurrence. On balance, there are no reportable net risks as defined in the German CSR Implementation Act (CSR-RUG).

Statutory disclosure requirements are continuing to increase. The Corporate Sustainability Reporting Directive (CSRD) was published in the EU Official Journal on 16 December 2022. The CSRD will replace the existing EU Directive on non-financial reporting (NFRD) and will, among other things, extend the scope, increase the specificity and broaden the requirements for sustainability reporting as well as the external audit obligation for financial years from 2024. On 31 July 2023, a Delegated Regulation adopted by the European Commission was published, which contains revised European Sustainability Reporting Standards (ESRS) in Annex I, which will form the basis for the content of EUOKAI's sustainability reporting from the 2024 financial year onwards.

EUOKAI is actively preparing for adoption of the new reporting requirements. The materiality analysis is being revised in accordance with the principle of dual materiality contained in the CSRD to determine the scope of the report. Furthermore, the data points contained in the ESRS will be mapped against the status quo of our own reporting. EUOKAI will prepare its next sustainability report (financial year 2024) in accordance with the requirements of the CSRD and ESRS.

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<sup>1</sup>Companies not classified as material are: boxXpress.de GmbH, "Brückenhaus" Grundstücksgesellschaft m.b.H., DHU Gesellschaft Datenverarbeitung Hamburger Umschlagsbetriebe mbH, driveMybox logistics GmbH, EUROGATE Beteiligungs-GmbH, EUROGATE City Terminal GmbH, EUROGATE Container Terminal Wilhelmshaven Beteiligungsgesellschaft mbH, EUROGATE Geschäftsführungs-GmbH & Co. KGaA, EUROGATE International GmbH, EUROGATE KV-Anlage Wilhelmshaven GmbH, EuroXpress HGF GmbH, HVCC Hamburg Vessel Coordination Center GmbH, IPN Inland Port Network GmbH & Co. KG, IPN Inland Port Network Verwaltungsgesellschaft mbH, J.F. Müller & Sohn AG, MSC Gate Bremerhaven Verwaltungsgesellschaft mbH, North Sea Terminal Bremerhaven Verwaltungsgesellschaft mbH, PCO Stauereibetrieb PAETZ & Co. Nfl. GmbH, 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 Logistica S.A., EUROGATE Container Terminal Limassol Ltd., EUROGATE Tanger S.A., EUROGATE Damietta GmbH, Damietta Alliance Container Terminal S.A.E., Contship Damietta S. r. l., Tanger Alliance S.A., TangerMedGate Management S.a.r.l., OJSC Ust-Luga Container Terminal and EUROGATE Rail Hungary Zrt.

## **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.

## **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 topics that on the one hand 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 2023 financial year. These were: energy consumption and CO<sub>2</sub> 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 pages 31–34.

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

The Group's business activities consume large amounts of energy. Energy consumption is a key performance indicator for the management of resources and has a direct impact on incurred costs, and hence on financial performance. Most of this energy consumption 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. Efforts to limit climate change and minimise the Group's own carbon footprint are a socially significant issue. Together with the cost aspect associated with energy consumption these drive 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 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. Only energy procurement is managed centrally. 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 policy (with ref. to ISO 9001) governs compliance with statutory regulations and helps to raise awareness of the importance of a sustainable business development across the CONTSHIP Italia Group. 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. Furthermore, the maritime terminal in La Spezia is also certified in accordance with the ISO 14001 environmental management system standard and ISO 45001 health and safety management system.

Line managers and management bodies are expected to encourage and promote a resource-saving attitude. The Group intends to steadily reduce the carbon footprint resulting from the consumption of energy by investing in high-quality transport equipment and technologies. Local management is involved in this process and within the context of the management system. Energy consumption and the financial impact of achieved savings are analysed at the level of the individual companies. No formal, quantitative reduction targets are set; however, the Group pursues the qualitative goal to reduce energy and CO<sub>2</sub> emissions in absolute terms compared with the previous year.

Energy audits pursuant to EU Resolution 2012/27 are performed every four years; the first audit took place in 2015. In December 2023 a new energy audit was carried out and the related report was produced with reference to the year 2022. These audits deliver proposals on further possible measures to reduce energy consumption.

**EUROGATE:** In 2022, a central energy management system was established on the basis of DIN EN 50001 aimed at achieving a structured improvement in energy efficiency. Responsibility for the central energy management system lies with the Managing Director of EUROGATE Technical Services GmbH. 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. This flows into the 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. The goal is to achieve a continuous reduction in the consumption of fossil fuels. Energy efficiency measures have both a technical and an operational focus. EUROGATE remains committed to appealing to its employees' sense of responsibility with regard to saving resources and involves them in drives to cut energy consumption. EUROGATE regularly examines options for using more energy-efficient technologies. Thus the 2023 financial year saw renewed investments made in additional more energy-efficient equipment (hybrid straddle carriers). The Group-wide transformation process launched in the 2020 financial year continued in 2023 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 2022	62,363 MWh (of which 12,867 MWh renewables – due to energy mix by the supplier)****	407,075 MWh (of which 13,358 MWh renewables)***
Status 2023	54,396 MWh (of which 11,865 MWh renewables – due to energy mix by the supplier)	332,760 MWh (of which 11,780 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 as a result of 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 2023 financial year. The decline in container handling is the main reason for this. Some energy-reducing measures, such as the investment in hybrid straddle carriers, are already having an effect.

\*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.

\*\*\*The data published in the non-financial Group report for the 2022 financial year has since been revised and adjusted, resulting in lower energy consumption.

\*\*\*\*The data published in the non-financial Group report for the 2022 financial year has since been recalculated to include the energy consumption of OCEANOGATE (operation of locomotives), resulting in higher energy consumption.

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

CO<sub>2</sub> emissions (Scope 1 and Scope 2) 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	1. CO <sub>2</sub> neutrality by 2040 (relating to Scope 1 and Scope 2 emissions) 2. 50% reduction of CO <sub>2</sub> emissions by 2030 compared to the 2022 base year (relating to Scope 1 and Scope 2 emissions).
Status 2022	15,896*** t CO <sub>2</sub>	130,832**** t CO <sub>2</sub>
Status 2023	14,131 t CO <sub>2</sub>	106,111 t CO <sub>2</sub>
Comment	The emission factor was applied to the full electrical energy consumption, as it already takes into consideration the energy mix supplied by the energy provider (Enel Green Power). The calculation also includes the CO <sub>2</sub> reduction due to solar energy autoproduction at Sogemar.	EUROGATE has set the target to be CO <sub>2</sub> neutral by 2040 (relating to Scope 1 and Scope 2 emissions). CO <sub>2</sub> emissions (Scope 1 and Scope 2) were lower in 2023 than in the previous year. The decline in container handling is the main reason for this. Some emission-reducing measures, such as the investment in hybrid straddle carriers, are already having an effect.

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

\*\*When calculating the key performance indicator t CO<sub>2</sub>, the consumption figures for the principal companies (the German EUROGATE terminal operations in 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 2022 financial year, CO<sub>2</sub> emissions for CONTSHIP Italia were recognised with 12,910 t CO<sub>2</sub>. By contrast, in the present version the previous year's figure has been adjusted to 15,896 t CO<sub>2</sub> to include the business activities of OCEANOGATE.

\*\*\*\*The data published in the non-financial Group report for the 2022 financial year was revised in 2023 and the calculation is now based on CO<sub>2</sub> emission factors including upstream chain emissions. As a result, the CO<sub>2</sub> emissions for 2022 are higher year on year.

## **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 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 EUKAI Group's overarching goal to reduce the number of industrial accidents to a minimum and to eliminate accidental deaths altogether.

**CONTSHIP Italia:** In Italy strict statutory requirements are in force aimed at protecting workers' health. For example, in the event of proven malpractice, the management personally, as well as companies, may face prosecution. On the back of these requirements, various structural and organisational measures have been established. Each individual company analyses, documents and reports accidents to the respective occupational safety officer and the competent government departments pursuant to the statutory requirements in Italy. Accidents and near-misses are monitored and evaluated. These evaluations serve as vital information input for health-and-safety risk assessments. Regular training courses address the areas of risk identified and a health programme launched in 2019 addresses how to cope with stress and mental strain in the workplace and is designed to provide information about a healthy diet and a healthy lifestyle. The La Spezia 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, at the Hamburg and Bremerhaven sites, rescue exercises at heights were carried out with the local fire brigades. 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 as the basis for developing preventive measures and adapting risk assessments.

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 the workplace and on the way to/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 prevent accidental deaths.	
Status 2022	Work-related accidents: 23 Accidental deaths: 1	Work-related accidents: 268 Accidental deaths: none
Status 2023	Work-related accidents: 18 Accidental deaths: none	Work-related accidents: 250 Accidental deaths: 1
Comment	The decreased number of accidents reflects the improved safety awareness of employees as a result of the training and measures implemented to handle near misses.	The target to lower the number of work-related accidents was met; however, in January 2023 there was one accidental death. 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.
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\*In Italy all accidents must be reported that result in death or injury that prevents a person from working for more than one day. Some processes at the operating facilities are carried out by external contractors. Their employees account for around 40% of the total workforce on site. The CONTSHIP Italia figure does not include accidents involving temporary contract workers and external contractors.

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

## Anti-corruption and anti-bribery

To achieve long-term success, a company must conduct its activities in a compliant, fair and reliable way. Within the EUOKAI 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 EUOKAI 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 established. CONTSHIP Italia and Rail Hub Milano have established a surveillance and monitoring system, together with corresponding processes and control bodies. In 2019, a Group-wide whistleblowing system was rolled out. All internal stakeholder groups were informed of this procedure as part of a comprehensive communication process. An external ombudsperson was appointed to manage the procedure. In November 2023, a new whistleblowing procedure was approved for all Group companies as a requirement of the new Italian Legislative Decree no. 24/2023 (transposition of the EU Directive 2019/1937 on the protection of persons who report breaches of Union law). The amendment has also been included in the Organisational, Management and Control Model of those companies that have already adopted it.

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 improvement potential 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 and apply to all EUROGATE Group entities in which EUROGATE directly or indirectly holds more than 50% of the shares or exercises entrepreneurial control, as well as to the MSC Gate Bremerhaven GmbH & Co. KG joint venture operated by EUROGATE and Terminal Investment Limited S.à.r.l ("TiL"). The self-declaration of compliance with sanctions was adopted in 2022. The code of conduct and the anti-corruption policy are currently being revised. 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 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. Group-wide compliance training sessions in the white-collar area is planned for the 2024 financial year.

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. NTB also holds regular compliance training courses. 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:

	<b>CONTSHIP Italia</b>	<b>EUROGATE</b>
Target	No cases of corruption	
Status 2022	none	none
Status 2023	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. Responsibility for IT security lies with the Group Management Board or the management boards of the respective companies of the CONTSHIP Italia Group.

The main focus of the IT security 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 includes information technology and operating technology as well as the cloud services and platforms used. In 2022, the focus was on improving the IT infrastructure. Further steps include continuing the infrastructure improvement process and defining the necessary organisational structures, procedures, roles and accountabilities. In addition, it is intended to terminate the outsourcing of the IT security officer and appoint an internal IT security officer.

In 2023, a set of cyber security improvements was finalised, such as implementing the Sophos MDR, adopting the office 365 E5 security service and activating the conditional MFA. The BitSight cyber security posture indicator increased from 530 points (March 2022) to 710 points (December 2023). Further actions will be put in place in 2024.

**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 (responsible for defining the ISMS and reporting to the Group Management Board) 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 the EGH IT department and EUROGATE Technical Services. A dedicated unit responsible for implementing the ISMS has also been set up within EGH IT. 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 NTB, operated as a joint venture between EUROGATE and APM Terminals, which is managed separately. An ISMS guideline and policy regulate the organisational and technical requirements of the EUROGATE ISMS. The ISMS is reviewed and approved annually by the Group Management Board.

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 recovery times. A key element of the ISMS is a risk management system geared towards minimising risk or creating an acceptable level of residual risk for EUROGATE. The ISMS is implemented on the basis of the PDCA (Plan – Do – Check – Act) cycle. The ISMS approach follows ISO 27001 and in the area of plant and machinery is additionally based on 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. They are generally structured systemically and include the development of rules and guidelines, measures to implement the requirements and internal audits to check their effectiveness. 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. Manual and automated compliance checks are performed as internal audits and extended where necessary. The results of these checks are included in the above reports.

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 were 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. A malware protection solution supports the continuous weak point monitoring of IT systems and their patch status in the site networks and the company’s own cloud environments. A penetration testing tool is used for internal penetration tests. The allocation, setup and documentation as well as the number of active user accounts are monitored automatically. In addition, in various areas of the IT landscape internal audits to check compliance with the guidelines are carried out and recorded in an annual audit plan. A tool-supported assessment of the achieved ISMS maturity level has been in use since 2023.

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 serve as central IT security metrics and are regularly reviewed.

The following table shows the current status of target attainment:

	<b>CONTSHIP Italia</b>	<b>EUROGATE</b>
Target	No system downtimes due to security incidents and no cases of data loss and/or manipulation	
Status 2022	System downtimes due to security incidents: 0 Cases of data loss and/or manipulation: 0	System downtimes 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 EUROKAI 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 2023 to disclose information in accordance with the EU Regulation 2020/852 (EU Taxonomy Regulation). The EU Taxonomy Regulation is a central component of the EU Commission's Action Plan: Financing Sustainable Growth. It thus creates a legally standardised classification system for recognising green, or environmentally sustainable, economic activities. The EU Taxonomy Regulation is complemented by five further Delegated Acts (DA):

- Climate DA: Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 establishing the technical screening criteria for the environmental objectives 1 and 2
- Disclosures DA: Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 specifying the content and presentation
- Complementary Climate DA: Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 establishing the technical screening criteria as regards economic activities in certain energy sectors complementing the first two environmental objectives ("Nuclear & Gas")
- Amended Climate DA: Commission Delegated Regulation (EU) 2023/2485 of 27 June 2023 (published in the EU Official Journal in November 2023) amending the Climate DA by establishing additional technical screening criteria for existing and new economic activities for the first two environmental objectives
- Environmental DA: Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 (published in the EU Official Journal in November 2023) establishing the technical screening criteria for environmental objectives 3 to 6 and amending the Disclosure DA

The disclosure requirement is based on the following three quantitative key performance indicators (KPIs) for the respective reporting year:

- proportion of environmentally sustainable revenue (turnover)
- proportion of environmentally sustainable operating expenditure (OpEx)
- proportion of environmentally sustainable capital expenditure (CapEx)

Non-financial undertakings are required to determine these proportions annually and publish them using the predefined reporting templates provided for this purpose. Only environmentally sustainable economic activities should be used to determine these performance indicators.

Under the EU Taxonomy Regulation, an economic activity qualifies as environmentally sustainable if it 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:

- a) Climate change mitigation
- b) Climate change adaptation

- c) The sustainable use and protection of water and marine resources
- d) The transition to a circular economy
- e) Pollution prevention and control
- f) The protection and restoration of biodiversity and ecosystems

For the 2023 financial year, economic activities were analysed for the first time in the context of all six environmental objectives. As with the economic activities defined in the Climate DA (environmental objectives 1 and 2), simplifications also apply for the first reporting period in respect of the activities defined in the amended Climate DA and the Environmental DA (environmental objectives 3–6). Accordingly, economic activities that were published or adapted under the latter DAs were only analysed in terms of their taxonomy eligibility in this financial year.

The performance indicators are disclosed using the mandatory reporting templates that were also adapted through the Amended Climate DA. These were supplemented by relevant qualitative information on the status quo and development.

## **Methodology and approach**

The EU Taxonomy reporting requirements are implemented by a project team consisting of experts in sustainability, compliance and technical processes in the operating companies, financial accounting and management accounting. 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) are then mapped to the various economic activities and presented in the reporting templates (see section Key performance indicators). In the 2023 financial year, we additionally conducted an analysis of the newly published Delegated Regulations. As well as the implications for EUROKAI of the Climate DA, for the 2023 financial year the implications of the Amended Climate DA and the Environmental DA are also disclosed in this report.

The starting point for the analysis of EUROKAI's economic activities with regard to their taxonomy eligibility was the analyses already carried out in financial years 2021 and 2022. These analyses were updated for the 2023 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 Commission Delegated Regulation 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.

In addition, the activities started in the 2022 financial year that relate to 7.3. Installation, maintenance and repair of energy efficient equipment were completed in the second quarter of the year. Separate demolition measures were carried out as part of these activities. For the 2023 financial year, these activities are classified as taxonomy-eligible within the meaning of environmental objective 4 and assigned to the economic activity 3.3. Demolition and wrecking of buildings and other structures.

The part of the economic activity 8.1. Data processing, hosting and related activities relating to driveMybox S.r.l. is no longer classified as taxonomy-eligible in the 2023 financial year. This conclusion was arrived at after consulting reports from industry peers in combination with a cross-industry interpretation of economic activity within the scope of the analysis of taxonomy-eligible activities. Data processing is not the value driver of the activity, but a medium for brokering transport services. Furthermore, the data is processed by a third party and EUROKAI has no control over the modalities of the data processing. The business activities of CONTSHIP Italia remain taxonomy-eligible within the meaning of activity 8.1. Data processing, hosting and related activities.

This analysis conducted for this financial year confirms the assessment that none of the economic activities carried out within the Group are taxonomy-eligible under the environmental objective “climate change adaptation”. EUROKAI did not carry out any adaptation or enabling economic activities (Article 11 (1) (a) and (b) of the EU Regulation) in the 2023 financial year. In accordance with Question 5 of the EU FAQ (2022/C 385/01) dated 6 October 2022, these are the basis for classification as taxonomy-eligible economic activities under environmental objective 2.

With the exception of the above-mentioned economic activity 3.3. Demolition and wrecking of buildings and other structures under environmental objective 4, the Group carries out no other activities that are relevant under the new economic objectives 3–6. 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 respective Commission Delegated Regulations and their degree of fulfilment was checked to assess their alignment status. In order to assess the degree of fulfilment of the criteria, the requirements of 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 2023 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 2023 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 2023 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 2023 financial year of EUR 219,089 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 219,089 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 2023. 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. 67.95% of the revenue was attributable to taxonomy-eligible but non-aligned economic activities (2022:

75.85%). Activity 6.16. Infrastructure enabling low carbon water transport accounted for the largest proportion of taxonomy-eligible activities with a proportion of 62.32% of total revenue. The decrease in taxonomy-eligible net turnover compared to the previous year was mainly due to the reclassification of activity 8.1. Data processing, hosting and related activities relating to driveMybox S.r.l. (see section Methodology and approach). The proportion of turnover of driveMybox S.r.l. relating to this economic activity was classified in financial year 2023 as taxonomy-non-eligible. Total net turnover with taxonomy-non-eligible economic activities stood at EUR 70,225 thousand (32.05%).



### 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 18,204 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 502 thousand and in Section 14 Property, plant and equipment (own assets) in the amount of EUR 9,964 thousand and Property, plant and equipment (right-of-use assets from leasing) in the amount of EUR 8,048 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 18,204 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 2023. 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. 88.60% of the CapEx was attributable to taxonomy-eligible but non-aligned economic activities (2022: 93.84%). Capital expenditure relating to Activity 6.16. Infrastructure enabling low carbon water transport in the amount of EUR 7,380 thousand (40.55% 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 a lower investment volume in Activity 6.16. Infrastructure enabling low carbon water transport as well as the reclassification described above of economic activity 8.1. Data processing, hosting and related activities. Capital expenditure relating to this economic activity was classified in financial year 2023 as taxonomy-non-eligible. In the 2023 financial year, CapEx relating to taxonomy-non-eligible economic activities amounted to EUR 2,076 thousand (11.40%).



### 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 32,655 thousand.

Operating expenditure of the EUOKAI Group in accordance with the EU Taxonomy Regulation in the amount of EUR 32,655 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 2023. 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. 75.30% of the OpEx was attributable to taxonomy-eligible but non-aligned economic activities (2022: 78.54%). Operating expenditure relating to Activity 6.16. Infrastructure enabling low carbon water transport in the amount of EUR 8,920 thousand (27.32% 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 a decline in container handling volumes and related operating expenditure. Operating expenditure relating to this economic activity was classified in financial year 2023 as taxonomy-non-eligible. In the 2023 financial year, OpEx relating to taxonomy-non-eligible economic activities amounted to EUR 8,065 thousand (24.70%).



## 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 “Template 1 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 EUROKAI Group voluntarily disclosed 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 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 521,003 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 83.38% (2022: 86.03%). Activity 6.16. Infrastructure enabling low carbon water transport accounted for the largest proportion of taxonomy-eligible activities with a proportion of 74.44% of total revenue. EUROGATE also carries out activities in the area of cargo transports (6.2. Freight rail transport), energy generation (4.1. Electricity generation using solar photovoltaic technology and 4.3. Electricity generation from wind power), energy transmission (4.9. Transmission and distribution of electricity) and cogeneration (4.30. High-efficiency cogeneration of heat/cool and power from gaseous fossil fuels). For the 2023 financial year, these activities are also classified as taxonomy-eligible economic activities within the meaning of environmental objective 1. The decrease in taxonomy-eligible net turnover of EUOKAI based on the voluntary inclusion of EUROGATE compared to the previous year was mainly due to the reclassification described above of economic activity 8.1. Data processing, hosting and related activities. The revenue attributable to this economic activity was classified in financial year 2023 as taxonomy-non-eligible. Total net turnover with taxonomy-non-eligible economic activities stood at EUR 86,611 thousand (16.62%).

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

Economic activities	Codes	Turnover [see section Key Performance Indicators] k EUR	Turnover EUROGATE based on 50% k EUR	Absolute turnover based on the voluntary inclusion of EUROGATE with 50% k EUR	Proportion of turnover (%)
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>					
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>					
<b>Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1.)</b>					
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>					
Electricity generation using solar photovoltaic technology	CCM 4.1	0	25	25	0,01%
Electricity generation from wind power	CCM 4.3	0	458	458	0,15%
Transmission and distribution of electricity	CCM 4.9	0	2.777	2.777	0,92%
Cogeneration of heat/cool and power from fossil fuels	CCM 4.30	0	1	1	0,00%
Freight rail transport	CCM 6.2	2	30.954	30.956	10,25%
Infrastructure for rail transport	CCM 6.14	9	0	9	0,00%
Infrastructure enabling low carbon water transport	CCM 6.16	137	251.313	251.449	83,22%
Data processing, hosting and related activities	CCM 8.1	1	0	1	0,00%
<b>Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)</b>		<b>149</b>	<b>285.527</b>	<b>285.676</b>	<b>94,55%</b>
<b>Total (A.1. + A.2)</b>		<b>149</b>	<b>285.527</b>	<b>285.676</b>	<b>94,55%</b>
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>					
Turnover of Taxonomy-non-eligible activities (B)		70	16.386	16.457	5,45%
<b>Total (A+B)</b>		<b>219</b>	<b>301.914</b>	<b>302.133</b>	<b>100%</b>

### 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 58,609 thousand. The

corresponding taxonomy-aligned capital expenditure was EUR 0 thousand. The resulting CapEx KPI based on the inclusion of EUROGATE was 0%.

EUR 45,754 thousand (78.07%) of the CapEx was attributable to taxonomy-eligible but non-aligned economic activities (2022: 80.14%). Capital expenditure relating to Activity 6.16. Infrastructure enabling low carbon water transport in the amount of EUR 36,145 thousand (61.67% 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 reclassification described above of activity 8.1. Data processing, hosting and related activities. Capital expenditure relating to this economic activity was classified in financial year 2023 as taxonomy-non-eligible. In the 2023 financial year, CapEx relating to taxonomy-non-eligible economic activities amounted to EUR 12,855 thousand (21.93%).

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

Economic activities	Codes	CapEx [see section Key performance indicators] k EUR	CapEx EUROGATE based on 50% k EUR	Absolute CapEx based on the voluntary inclusion of EUROGATE with 50% k EUR	Proportion of CapEx (%)
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>					
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>					
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1.)					
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>					
Electricity generation using solar photovoltaic technology	CCM 4.1	0	0	0	0,00%
Electricity generation from wind power	CCM 4.3	0	0	0	0,00%
Transmission and distribution of electricity	CCM 4.9	0	0	0	0,00%
Cogeneration of heat/cool and power from fossil fuels	CCM 4.30	0	0	0	0,00%
Freight rail transport	CCM 6.2	6.809	14	6.822	11,64%
Infrastructure for rail transport	CCM 6.14	1.510	0	1.510	2,58%
Infrastructure enabling low carbon water transport	CCM 6.16	7.382	28.763	36.145	61,67%
Data processing, hosting and related activities	CCM 8.1	428	848	1.276	2,18%
<b>CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)</b>		<b>16.129</b>	<b>29.625</b>	<b>45.754</b>	<b>78,07%</b>
<b>Total (A.1. + A.2)</b>		<b>16.129</b>	<b>29.625</b>	<b>45.754</b>	<b>78,07%</b>
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>					
CapEx of Taxonomy-non-eligible activities (B)					
		2.386	10.469	12.855	21,93%
<b>Total (A+B)</b>		<b>18.515</b>	<b>40.094</b>	<b>58.609</b>	<b>100%</b>

OpEx KPI based on the voluntary inclusion of EUROGATE

The OpEx denominator based on the proportionate inclusion of EUROGATE came to EUR 52,694 thousand. The corresponding taxonomy-aligned operating expenditure was EUR 0 thousand. The resulting OpEx KPI based on the inclusion of EUROGATE was 0%.

EUR 44,627 thousand (84.69%) of the OpEx was attributable to taxonomy-eligible but non-aligned economic activities (2022: 86.68%). Operating expenditure relating to Activity 6.16. Infrastructure enabling low carbon water transport in the amount of EUR 28,516 thousand (54.12% 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 decline in container handling volumes and related operating expenditure, as described above. In the 2023 financial year, OpEx relating to taxonomy-non-eligible economic activities amounted to EUR 8,067 thousand (15.31%).

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

Economic activities	Codes	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 (%)
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>					
<b>A.1. Environmentally sustainable activities (Taxonomy-aligned)</b>					
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1.)					
<b>A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)</b>					
Demolition of buildings and other structures	CE 3.3	0	340	340	0,65%
Freight rail transport	CCM 6.2	6.515	100	6.615	12,55%
Infrastructure for rail transport	CCM 6.14	5.767	0	5.767	10,94%
Infrastructure enabling low carbon water transport	CCM 6.16	8.920	19.596	28.516	54,12%
Data processing, hosting and related activities	CCM 8.1	3.388	0	3.388	6,43%
<b>OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2.)</b>					
<b>Total (A.1. + A.2)</b>					
		<b>24.591</b>	<b>20.036</b>	<b>44.627</b>	<b>84,69%</b>
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>					
OpEx of Taxonomy-non-eligible activities (B)					
		8.065	2	8.067	15,31%
<b>Total (A+B)</b>					
		<b>32.655</b>	<b>20.038</b>	<b>52.694</b>	<b>100%</b>

## Outlook

As expected, from the 2024 reporting year, the existing reporting obligations under Article 8 of the EU Taxonomy Regulation 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” will be extended to include the taxonomy alignment assessment.

From the 2024 financial year, EUOKAI will prepare its sustainability report in accordance with the requirements of the CSRD and ESRS (see section About this report). Sustainability information in accordance with the ESRS must be reported including the disclosures under the EU Taxonomy Regulation, meaning that both parts of the report will continue to be published together.

Hamburg, Germany, 18 March 2024

Personally Liable General Partner

Kurt F.W.A. Eckelmann GmbH, Hamburg

Thomas H. Eckelmann

Tom H. Eckelmann

## **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 2023 to 31 December 2023 (hereinafter "non-financial Group report").

### **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 of the Group, 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 Quality Assurance Standard 1: Requirements for quality assurance in auditing practice [*IDW Qualitätsmanagementstandards 1: Anforderungen an das Qualitätsmanagement in der Wirtschaftsprüferpraxis (IDW QMS 1 (09.2022))*] published by the IDW (Institut der Wirtschaftsprüfer – Institute of Public Auditors in Germany), 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 of the Group, 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 relating to all six environmental objectives taking

account of the transitional provisions to facilitate first-time application for the 2023 financial year,

- Analysis and evaluation of the processes to determine the 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 2023 to 31 December 2023 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, 18 March 2024

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

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