GRONINGEN SEAPORTS

ESG REPORT GRONINGEN SEAPORTS

Port Environmental Review System

2025/2027

INTRODUCTION

The Port Environmental Review System (PERS), developed by EcoPorts and integrated into the European Sea Ports Organisation (ESPO), is a vital tool that provides ports with a structured framework to identify and manage significant environmental aspects. By offering a tailored environmental management system, PERS helps ports like Groningen Seaports ensure that sustainability is embedded in every part of our operations. This internationally recognised methodology not only supports compliance with environmental regulations but also enables us to continuously benchmark and enhance our environmental performance against the highest European standards. For Groningen Seaports, PERS is essential to aligning our growth with our commitment to a green and sustainable future, reinforcing our leadership in environmental care and innovation.

This PERS report for 2025-2027 represents a step forward from previous years, with notable enhancements in our environmental management approach. A key update in this report is the integration of the Corporate Sustainability Reporting Directive (CSRD), ensuring that we are prepared to meet the new European reporting standards. This reflects our commitment to transparency and accountability in areas like the energy transition, circular economy, and biodiversity protection. The updated environmental aspects register also highlights our focus on addressing emerging challenges and further improving our environmental performance across all port activities.

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PORT PROFILE: GRONINGEN SEAPORTS

At Groningen Seaports, we are pioneering a new era of industrial development that prioritizes sustainability and environmental stewardship. Managing the seaports of Delfzijl and Eemshaven—situated along the Wadden Sea and the Ems estuary—we are at the heart of one of Europe's most ecologically significant areas. Recognised as UNESCO World Heritage sites, these regions boast the Wadden Sea, Europe's largest wetland, which is crucial for the survival of protected species such as seals, birds, and fish. Our commitment to balancing economic advancement with environmental integrity is demonstrated through our strict adherence to conservation regulations and our proactive creation of compensation areas and temporary nature within our ports.

Our mission focuses on the responsible and sustainable creation of clusters and partnerships in the fields of circular economy, biobased chemistry and energy. By prioritizing these key areas, we aim to generate employment, value, and quality of life for our current and future customers, stakeholders and local communities within our management area and across the Northern Netherlands. This vision reflects our dedication to fostering green business practices and contributing to regional economic growth while ensuring that our development initiatives are in harmony with the surrounding natural and residential environments. Through strategic collaborations and innovative projects, we are committed to building a sustainable and prosperous future for the region.

OVERVIEW OF PORT AREAS AND ACTIVITIES

At Groningen Seaports, we are deeply committed to the economic development of the Northern Netherlands, managing over 2,800 hectares of port and industrial terrain. The seaports of Delfzijl and Eemshaven are at the heart of our operations, serving as vital hubs for industrial and maritime activities that drive the region's economy. Delfzijl is known for being a centre of biobased and circular innovation, while Eemshaven is a key energy port, hosting renewable energy facilities that can act as a green power source for neighbouring companies and data centres. Additionally, Eemshaven is positioning itself as a major player in the hydrogen economy, with plans to develop infrastructure that supports hydrogen production, storage, and distribution.

In addition to these primary ports, we oversee several inner ports—Farmsumerhaven, and Oosterhornhaven—connected to the Eemskanaal. These facilities support a wide range of industrial activities, including logistics and manufacturing, by providing essential infrastructure such as quays, docks, and storage. Ensuring the safe and efficient handling of maritime traffic is a key responsibility, involving the coordination of shipping movements, port security, and environmental protection measures. We also ensure the provision of critical utilities like water, electricity, and data connectivity, which are vital for industrial operations.

Driven by our commitment to a green and sustainable future, we have identified six key propositions—energy, data, chemistry, offshore wind, circular economy, and hydrogen—that are essential to both sustainable development and regional economic growth. Each proposition supports our efforts to integrate renewable energy, advanced infrastructure, and innovative industrial practices. For instance, our port at Eemshaven plays a key role in the energy transition, supporting both conventional and renewable energy production, while also hosting data centres and providing them with over 8,000 MW of renewable power. Similarly, our focus on hydrogen and green chemistry contributes to responsible resource use and environmental stewardship. These propositions not only reinforce our leadership in sustainability but also foster technological innovation and resilience.

Each focus area is carefully aligned with the United Nations Sustainable Development Goals (SDGs), ensuring that our activities contribute to global objectives such as affordable energy, climate action, and responsible production. This is discussed in more detail in the environmental report, which can be found in chapter 5 of this report.

1
ENVIRONMENTAL POLICY STATEMENT

At Groningen Seaports, we are proud of the progress we have made in the sustainable development of our region in recent years and are excited about the future. Our ports at Delfzijl and Eemshaven have always been more than just a hub of economic activity; they are a dynamic engine of growth, innovation, and sustainability. With each passing year, we continue to strengthen our role in driving both the regional economy and the global transition to sustainable energy.

The last years have been important for us. We saw significant steps forward in our commitment to sustainability, including our focus on expanding green energy infrastructure and fostering a circular economy. The port of Eemshaven plays a crucial role in meeting energy demands across the country by supplying one-third of the Netherlands' energy demand. We have embraced our responsibility to drive forward the green transition, aiming to become Europe's leading hub for renewable energy and a key player in the circular economy by 2050. This vision is no longer just an ambition; it is a reality we are working towards every day.

But our journey towards sustainability has not been without its challenges. Balancing economic growth with environmental responsibility is a delicate act, especially when operating in such a sensitive natural environment as the UNESCO-recognised Wadden Sea area. We have faced dilemmas around industrial expansion versus landscape conservation, and our decisions have always been guided by the principle that economy and ecology must go hand in hand. Through innovation and collaboration with local communities and environmental organisations, we have found ways to harmonize industrial activity with nature. This balance will continue to be our guiding principle in the years to come.

Our vision for the future remains clear: generating broader prosperity for the region by accelerating the energy transition, further developing circularity in our port areas, and fostering strong innovation networks. By doing so, we are laying the foundation for a cleaner, greener future—not just for our ports, but for the entire Northern Netherlands. We are committed to ensuring that this broader prosperity contributes not only to material wealth but also improves quality of life and well-being for the people of Groningen. We believe that the benefits of this transformation should extend to all, creating new opportunities for employment and social development as we build a sustainable and thriving community.

As we face the challenges ahead, we draw confidence from the collaboration and determination that have brought us this far. We deeply appreciate the contributions of everyone involved—our employees, business partners, stakeholders, and the wider community. Together, we are shaping a brighter future for our ports and for generations to come.

Cas König, CEO

Harold Sanders, CFO

2
ENVIRONMENTAL ASPECTS AND LEGAL REQUIREMENTS

As of January 1, 2025, Groningen Seaports will be required to adhere to the Corporate Sustainability Reporting Directive (CSRD), meaning that we must report compliance for the 2025 financial year in 2026. The CSRD mandates sustainability reporting for all large companies in Europe, and the reporting requirements are further elaborated in the European Sustainability Reporting Standards (ESRS). Companies are expected to report on sustainability issues based on the principle of double materiality as prescribed in the ESRS.

In response to this, we integrated the EcoPorts certification with the CSRD reporting framework this year. The CSRD encompasses sustainability, corporate social responsibility (CSR), and governance, and Groningen Seaports will shape its policies in alignment with this overarching framework. As part of this integration, we have used and prioritized the European Sustainability Reporting Standards (ESRS) as environmental themes and identified significant environmental aspects within these themes according to the methods presented in the CSRD framework.

DOUBLE MATERIALITY ANALYSIS

In early 2024, Groningen Seaports conducted a double materiality analysis to comply with the European Sustainability Reporting Standard (ESRS). Materiality refers to identifying the most significant environmental, social, and governance (ESG) issues that impact both the organisation and its stakeholders, guiding what should be included in sustainability reporting. Double materiality expands this concept by considering not only how these issues affect the company's financial performance (financial materiality) but also how the company's activities impact the environment and society (impact materiality).

The double materiality analysis was performed in cooperation with the environmental consultant agency 2Impact. The primary goal of this analysis was to identify material topics for reporting, encompassing impacts, risks, and opportunities (appendix 2), while also refining Groningen Seaports' sustainability strategy. The material topics identified through this analysis will be used as significant environmental aspects in our reporting framework.

The process involved four steps:

1 **Preparation:** This initial step defined the organisational context, identifying key stakeholder groups and outlining the strategy, structure, business model, and relevant regulations of Groningen Seaports. Internal documents and discussions validated this context, leading to the establishment of a comprehensive value chain. The value chain has been used to determine the scope and to identify high-impact and high-risk activities

2 **Identification**: A long list of topics was generated through internal and external sources, including a mapping against ESRS sub-topics. This list underwent validation through interviews with internal and external stakeholders, resulting in the identification of impacts, risks, and opportunities related to various sustainability topics.

3 **Assessment:** Internal experts assessed the identified impacts, risks, and opportunities using criteria for impact and financial materiality. Scores were assigned based on the severity, scale, and likelihood of these factors. Calibration sessions ensured the alignment of scores and thresholds for materiality.

4 **Prioritization and Validation:** The final analysis involved validating the identified material impacts, risks, and opportunities through stakeholder surveys, internal employee feedback, and comparisons with peer organisations and ESPO priorities. This process ensured that the results accurately reflected the significance of the identified topics in relation to both the organisation and its stakeholders.

STAKEHOLDER LANDSCAPE

To ensure a comprehensive and inclusive approach to our double materiality analysis, we engaged various internal and external stakeholders throughout the process. This collaboration helped us identify important topics, gather different viewpoints, and validate our findings.

We operate within a diverse network of stakeholders, each of whom plays an important role in shaping our operations and strategy. Our key stakeholders include government bodies, businesses, regulatory authorities, environmental groups, local communities, other ports, utility providers, educational institutions, business service providers, media, and trade unions.

These stakeholders influence many aspects of what we do—from meeting regulatory requirements and safeguarding the environment to driving economic growth and shaping public perception. Our role is to ensure that their interests are considered in our decision-making processes. By building strong relationships and encouraging open communication, we aim to create value for all stakeholders while supporting the sustainable development of our region.

A short overview of our stakeholders is presented in figure 2.1, and a detailed table including all important internal and external stakeholders involved in the double materiality analysis can be found in the appendix.

Figure 2.1

IDENTIFIED ENVIRONMENTAL ASPECTS

Through our double materiality analysis, 17 sustainable topics have been found material and will be used as significant environmental aspects categorized under the ESRS subtopics. These subtopics encompass a wide range of sustainability issues that Groningen Seaports must address in its operations. Below are the ESRS subtopics and the corresponding significant environmental aspects we have identified.

Table 2.1: Environmental themes and significant environmental aspects

Environmental theme	Significant environmental aspectral rate
E1 - Climate Change	**Energy transition**
E1 - Climate Change	**Climate adaptation**
E2 - Pollution	**Wastewater**
E2 - Pollution	**Soil contamination**
E2 - Pollution	**Air pollution**
E2 - Pollution	**Water pollution**
E3 - Water and Marine Resources	**Water use**
E4 - Biodiversity and Ecosystems	**Biodiversity**
E5 - Circular Economy	**Circular economy**
S1 - Own Employees	**Health and well-being of own employees**
S2 - Employees in the Value Chain	**Safe port area**
S3 - Affected Communities	**Liveability around the port area**
S3 - Affected Communities	**Indirect employment**
G1 - Governance	**Corruption and bribery**
G1 - Governance	**Crime**
G1 - Governance	**Interests and transparency**
G1 - Governance	**Responsible supply chain**

LEGAL AND OTHER REQUIREMENTS IN THE ENVIRONMENTAL ASPECT REGISTER

The Environmental Aspect Register comprehensively documents the significant environmental aspects of our port operations, along with the relevant legal and other environmental requirements. The register is structured into multiple tables to ensure clarity and ease of reference.

In our case, the register consists of:

- **Legislation Overview by Environmental Theme:** This table provides a summary of the relevant legislation for each environmental theme under which the environmental aspects fall.
- **Theme-Specific Tables:** Each subsequent table focuses on a specific environmental theme, detailing all identified significant environmental aspects associated with that theme. These tables further specify each aspect and connect them to their applicable legal requirements.

To maintain readability and conciseness in the main document, the complete Environmental Aspect Register, including legal statement, is presented in the appendix of this PERS document.

KEY PERFORMANCE INDICATORS (KPIS)

Our key performance indicators (KPIs) have been selected to align closely with those from the PERS 2023-2025 framework, ensuring continuity and consistency in our environmental assessment. This year, we have introduced a few new performance indicators to broaden our focus. These include social KPIs related to diversity, employee well-being, and organisational reputation. These new indicators aim to provide a more comprehensive view of our impact and performance. For a detailed explanation of all our KPIs, please refer to the environmental report (chapter 5).

3
RESPONSIBILITIES AND RESOURCES

Groningen Seaports, we have established a robust and dynamic organisational structure designed to effectively manage our port responsibilities and implement a wide range of environmental initiatives. Our dedicated personnel play a key role in driving these efforts, ensuring that sustainability and environmental responsibility are ingrained in our daily operations. We prioritise the promotion of environmental awareness among all staff members, fostering a culture where sustainable practices are not only encouraged but actively pursued. By doing so, we demonstrate our strong commitment to meeting the ambitious objectives set out in our Environmental Policy Statement (Chapter 1). This approach reflects our long-term vision for environmental stewardship and positions us as leaders in sustainable port management, capable of addressing current environmental challenges.

STRUCTURE OF ORGANISATION AND POSITION OF IDENTIFIED STAFF

Since 14 June 2013, Groningen Seaports has operated as a semi-governmental public company, falling under the rules of private law. The organisation consists of a General Meeting of Shareholders (AVA), a Supervisory Board (RVC), and an Executive Board, with the latter reporting to the five-member Supervisory Board. Day-to-day operations are coordinated by the Management Team.

The Gemeenschappelijke Regeling Havenschap Groningen Seaports (GR) is the sole shareholder of Groningen Seaports NV. The GR is formed by the councils, states, and boards of the Province of Groningen, the Municipality of Eemsdelta, and the Municipality of Het Hogeland.

A key aspect of our organisation is the shipping department, led by the harbourmaster, who serves as the primary figurehead. The harbourmaster also functions as the Port Security Officer, responsible for the security of the ports. Importantly, most of the shipping department's responsibilities fall outside of Groningen Seaports NV and are directly overseen by the Gemeenschappelijke Regeling Havenschap Groningen Seaports (GR). By falling directly under the GR, the responsibilities of the shipping department and the harbourmaster are separated from the commercial activities of Groningen Seaports. The havenmeester reports to the mayors of the respective municipalities of Het Hogeland (Eemshaven) and Eemsdelta (Delfzijl). Close collaborations are maintained with regional police, the National Expertise

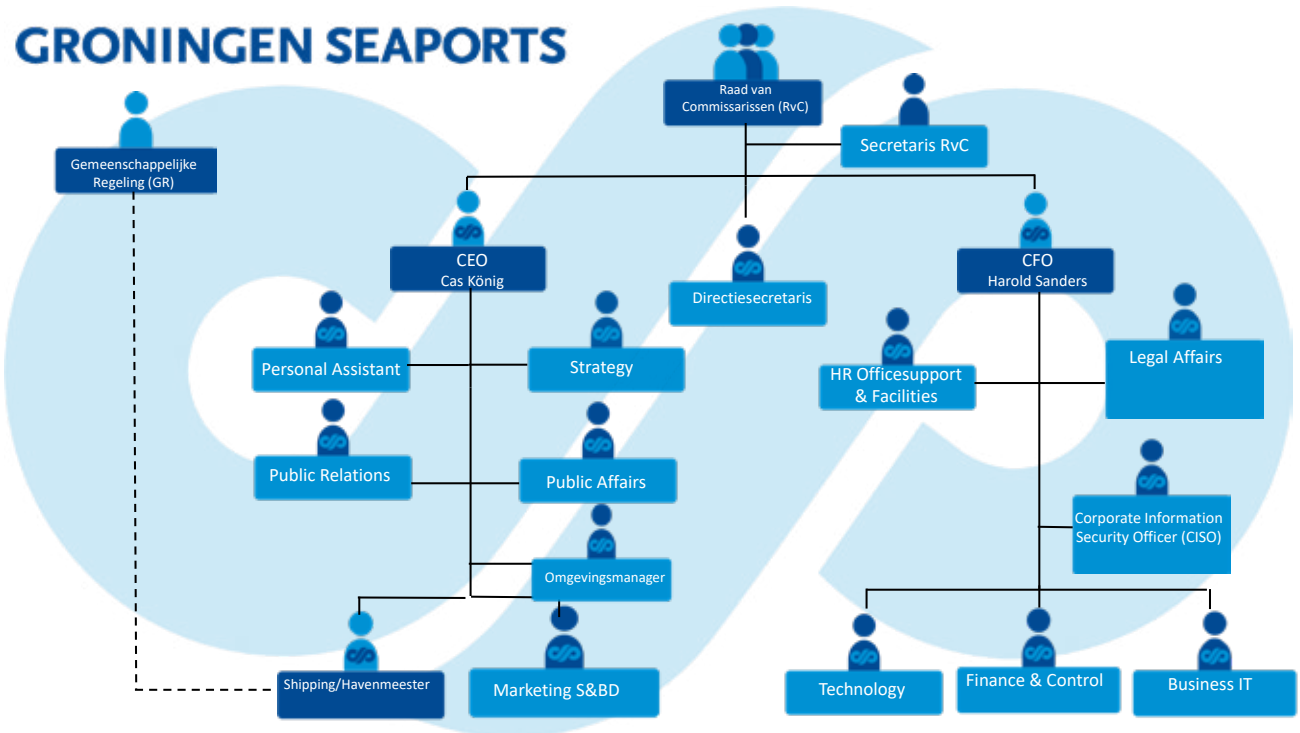


Figure 3.1: Organisation structure of Groningen Seaports

and Operations Unit (LX), Customs, the Royal Marechaussee, the Regional Information and Expertise Centre (RIEC), and the Port Security Organisation (PVO).

We have established a long-term approach to sustainability and corporate social responsibility (CSR), which is integrated into its overarching strategy. Sustainability in our organisation is both top-down as well as bottom-up initiated. ESG (Environmental, Social, and Governance) themes are developed and coordinated by the strategy department and integrated across various other departments. However, all departments bring forward initiatives and partnerships for improvement of the sustainability strategy. The sales and business development teams focus on identifying developments and trends to realize these goals, while the project team (PT) is active in implementing sustainability within the company's assets. Additionally, the facilities team concentrates on achieving sustainability within the company's buildings, ensuring that all aspects of the organisation contribute to its sustainability objectives.
Environmental Responsibilities of Key Personnel

We have documented the environmental responsibilities of key personnel, detailing their roles and departments. This documentation ensures accountability and effective management of environmentally significant activities. The specifics are reported in the "Format Documented Responsibilities and Key Personnel," which can be found in the appendix.

EVIDENCE OF EFFORTS TO PROMOTE AWARENESS

In recent years, we have intensified our efforts to raise employee awareness of sustainability, particularly in preparation for the Corporate Sustainability Reporting Directive (CSRD). Recognizing the importance of embedding environmental responsibility into its core operations, we have integrated its sustainability initiatives into our business plan, which outlines five key themes for the years 2024-2028. These themes—managing growth, improving establishment attractiveness, and ensuring a robust and future-proof organisation—are aligned with the Shareholder Strategy adopted in 2016 and support our broader mission, as well as our new Port Vision (not yet approved).

To raise awareness around the CSRD and its requirements, we have implemented several initiatives. These include informative news messages on the company intranet page, presentations during general staff meetings, and informative sessions during lunch breaks. Additionally, workshops have been organized to introduce the CSRD and important concepts such as Scope 1, 2, and 3 emissions. These workshops focus on how to implement CSRD requirements in daily operations and highlight how complying with the directive can help reduce the company's carbon footprint. By equipping employees with this knowledge, we aim to ensure effective participation in sustainability reporting and the achievement of its environmental goals.

The following measures from previous PERS versions are also still active to support its sustainability efforts:

- Sustainability Indicators: Included in annual reports since 2018 to ensure transparency and accountability regarding environmental performance.
- Promoting Digital Meetings: Encouraging the use of online services to minimize environmental impact and providing training for platforms (e.g., Microsoft Office 365).
- Employee Input: Actively encouraging employees to contribute ideas for sustainable initiatives, particularly in the development of the business plan and the Port Vision 2030.
- EcoPorts Certification: Discussing the significance of EcoPorts certification in staff meetings and communicating associated measures with external stakeholders to reinforce commitment to sustainable practices.

RESOURCES FOR ENVIRONMENTAL ACTIONS

Environmental activities and measures are integrated into our business plan, which includes financial planning and clearly defined responsibilities. The business plan 2024-2028 is accessible to all employees and provides detailed information on environmental goals and initiatives. For more information, see the webpage about the business plan 2024-2028.

4 CONFORMITY REVIEW

This conformity review addresses potential gaps in our environmental policy goals by checking our current performance and compliance.

ENVIRONMENTAL PERFORMANCE REVIEW

Our environmental performance, including key performance indicators (KPIs), is detailed in our environmental report (chapter 5). This section details our policies and the targets we have set to achieve our environmental goals. It shows our current performance by describing the actions we have taken to meet these targets and the steps we plan to take to continue our progress.

COMPLIANCE WITH ENVIRONMENTAL LEGISLATION

We ensure compliance with environmental laws through our permits. We hold permits for all our activities and strictly follow the conditions specified in these permits. The municipality conducts regular inspections to verify that we are adhering to permit requirements and complying with relevant environmental laws.

Furthermore, we comply to European regulations and guidelines such as the CSRD framework that we are currently integrating. This process is described in more detail in chapter 2.

5
ENVIRONMENTAL REPORT

The environmental report included in this PERS is structured according to the standards of the CSRD framework. These standards are based on the core Environmental, Social, and Governance (ESG) themes, which have been outlined in detail in Chapter 2. By addressing these ESG pillars, we are committed to integrating sustainable practices across all our operations, ensuring a responsible and forward-thinking approach to business in alignment with the CSRD framework.

ENVIRONMENT

At Groningen Seaports, our commitment to environmental sustainability is deeply embedded in our vision to be at the forefront of green innovation. Over the past decades, we have evolved from a traditional port operator into a dynamic economic zone, embracing a green transformation that is pivotal to our future. Our goal is to achieve CO2 neutrality by 2050—ten years ahead of the Paris Agreement targets—by focusing on renewable energy, circular economy, and waste reduction.

Eemshaven and Delfzijl are central to this transformation. Eemshaven, with its robust infrastructure and strategic location, is an important hub for advancing offshore wind energy, green hydrogen production, and potentially serving as a CO2 export hub (CCS). Additionally, by connecting with the industrial area of Delfzijl, a CO2 capture and utilization (CCU) routing can be developed. Our commitment extends to developing biobased chemistry and fostering a circular industry, positioning our ports as leading hubs in the green energy sector. We aim to transform our operational area into a fully circular economy by 2050, emphasizing resource efficiency and waste reduction.

We are also dedicated to protecting the natural environment surrounding our ports. Located near the UNESCO World Heritage Wadden Sea and the Ems-Dollard Estuary, our operations are designed to respect and preserve these unique ecosystems. Water is essential for both our industrial processes and local biodiversity. In the Eemsdelta region, where water scarcity and quality are pressing concerns, we manage water resources responsibly to support both environmental health and industrial growth. Our efforts to protect local biodiversity and maintain ecological balance are integral to our sustainability goals.

Together, these commitments reflect our determination to lead by example, demonstrating that ambitious environmental goals can drive meaningful progress in both sustainability and economic development.

ESRS E1
CLIMATE CHANGE

APPROACH AND POLICIES

Addressing climate change and advancing renewable energy are at the core of our strategic vision. As the world faces increasing environmental challenges, we are committed to playing a leading role in the transition to a net-zero economy. Our ambition is to achieve CO2 neutrality in our operations by 2050—ten years ahead of the Paris Agreement targets.

To realize our vision of carbon neutrality, we have implemented a comprehensive suite of policies focused on both our operations and the broader industrial value chain within our port area. Recognizing that the majority of our emissions occur within this value chain, we are intensifying our efforts to achieve emissions reductions through collaboration with the *Industry Forum Northern Netherlands (INN)*. As the chair of this initiative, Groningen Seaports actively engages with stakeholders to establish ambitious climate and energy agreements that address CO2 emissions reduction and sustainability across the industrial sector in the Northern provinces. The goals and actions outlined in the *Cluster Energy Strategy 2021* serve as a guiding framework for our internal policies, ensuring alignment with the national climate and energy agreements. This full report from the INN is accessible on the Groningen Seaports website.

Internally, we are also advancing our sustainability efforts through the Business Development department, which operates under a policy document called the *Area Management Plan (Dutch: GOP)*. This document establishes a sustainable framework for our internal policies, focusing on critical areas related to climate change and the energy transition. Key points from the GOP include the development of a CO2-free energy system, reduction, transport, and transshipment of CO2, and promoting clean shipping.

In addition to the GOP, our approach to sustainability and climate action is further supported by other documents, including the Business Plan 2024-2028, the Sector Plan, and policies related to procurement and site development. These documents provide detailed guidance on our strategies for sustainable growth and operational practices within the Groningen Seaports region.

RENEWABLE ENERGY

We are actively engaged in the deployment of renewable energy, with significant investments in solar and wind energy projects. Our organisation has co-developed multiple solar parks and facilitates numerous onshore and offshore wind farms, enhancing the region's capacity for sustainable energy generation. Another important aspect of our renewable energy strategy is the promotion and support of hydrogen initiatives, including our support for the NortH2 consortium, which aims to establish large-scale hydrogen production from renewable energy sources. Additionally, we are exploring the options of carbon capture and storage (CCS) and carbon capture and utilization (CCU) for our customers, collaborating with our current and future clients to strengthen their viability in line with the Paris Climate Agreement.

To facilitate the transition of companies in our value chain to renewable energy, we are supporting the construction of essential utilities and infrastructure. This includes the development of a hydrogen pipeline in cooperation with Pipelife Soluforce that will connect industrial areas to hydrogen production facilities, enabling companies to utilize hydrogen as a clean energy source. Furthermore, we are involved in initiatives to create syngas and direct current electricity networks, ensuring efficient energy distribution.

CLEAN SHIPPING

We are dedicated to promoting clean shipping through initiatives aimed at reducing the environmental impact of maritime transport. Aligned with the goals of the "Clean Shipping Program", formulated in our *Clean Shipping Brochure*, we monitor progress quarterly to ensure stakeholders work collaboratively toward sustainability. Key efforts include the promotion of alternative fuels like LNG and hydrogen, alongside the exploration of ammonia and methanol as viable clean fuel options for the shipping industry.

In addition, we focus on enhancing infrastructure that supports cleaner practices, including the development of shore power facilities that provide green energy to vessels. The mobile hydrogen shore power unit project is another innovative initiative aimed at supplying sustainable energy for maritime activities and other port functions. By facilitating infrastructure and collaborating with stakeholders, we aim to create an environment that supports clean shipping initiatives, contributing to a more sustainable maritime sector.

INFRASTRUCTURE AND EMBEDDED EMISSIONS

Our infrastructure, including roads, quays, and other assets, plays a vital role in supporting port operations and facilitating trade. However, these assets come with embedded emissions that contribute to our overall environmental footprint. We are actively investigating the extent of these embedded emissions to better understand their impact on our sustainability goals.

As part of our commitment to reducing our environmental impact, we are intensifying our efforts to choose sustainable alternatives for materials used in our infrastructure projects. Despite our commitment to sustainability, achieving climate neutrality in our assets remains challenging, as suitable sustainable alternatives are not always widely available or cost-effective. We continue to explore innovative solutions and partnerships to enhance the sustainability of our infrastructure while working towards minimizing embedded emissions.

ACTIONS

Solar Energy – Valgenweg Solar Park The Valgenweg Solar Park in Delfzijl was launched in October 2023. The park has a capacity of 17.5 MWp, producing around 17 GWh of electricity each year and cutting CO_2 emissions by at least 8,750 tons.

Offshore Wind – Hollandse Kust Noord On October 19, 2023, the final wind turbine was installed at the Hollandse Kust Noord wind farm. This offshore wind farm, assembled through Eemshaven, has a capacity of 759 MW, enough to power around one million households.

Hydrogen – Missie H2 Initiative During the International Dutch Water Week in June 2023, Missie H2 introduced the national hydrogen map, showing the many hydrogen projects in the Netherlands. The event was powered entirely by green hydrogen, demonstrating a sustainable approach to event management.

Energy Storage – GIGA Storage After acquiring a closed distribution network from DAMCO Aluminium Delfzijl Coöperatie U.A. (Aldel), GIGA Storage B.V. plans to build large-scale energy storage facilities to help TenneT manage local grid congestion and balance the electricity network. Groningen Seaports signed a 50-year lease agreement with GIGA Storage for this project.

Feasibility Study for Direct Current (DC) Network We have conducted a feasibility study for a direct current (DC) network in the Oosterhorn industrial area to facilitate the electrification of our customers.

Green Electricity For over 10 years, we have been purchasing 100% green electricity, reinforcing our commitment to sustainability and reducing our carbon footprint.

LNG – EemsEnergyTerminal In early 2023, EemsEnergyTerminal in Eemshaven won the Langman Prize for its key role in the energy transition in Northern Netherlands. This award highlights the successful public-private partnership that set up the terminal in just six months.

FUTURE ACTIONS

Lobby for Offshore Wind Expansion We will continue lobbying in favour of a 10GW production increase of wind farms in the North Sea to ensure renewable energy supply for green hydrogen production in the Eemshaven.

Participation in HyNorth Consortium We continue to take part in the consortium HyNorth, and within this consortium, we will promote the development of a hydrogen value chain in the Northern Netherlands.

Stimulation of Clean Shipping Fuels We will stimulate the use of hydrogen as a shipping fuel or the development of other clean shipping fuels.

Expansion of Shore Power Facilities We will explore the potential for extending our shore power facilities to accommodate sea shipping at our port in Eemshaven. This initiative aims to enhance our port's sustainability by providing cleaner energy options for ships.

Promotion of Hydrogen Companies We continue promoting companies that utilize hydrogen for their operations to settle in our management areas, aiming to create sufficient demand for extending hydrogen infrastructure in the Northern Netherlands.

Investigation of Hydrogen Pipeline Network We continue to investigate the construction and possible expansion of a hydrogen pipeline network, tailored to our customers' demand.

Carbon Capture and Utilization (CCU) Study Together with our customers, we will investigate the implementation of carbon capture and utilization (CCU) on a larger scale within our management areas.

Discount Systems for Sustainable Practices Together with the national sector organisation for seaports, we will stimulate the standardization and expansion of discount systems for sustainable practices.

TARGETS

As outlined in our business plan for 2024-2028, Groningen Seaports has committed to reducing CO2 emissions by 40% during the period from 2015 to 2030. This ambitious goal aligns with the ambition of the INN, which supports our efforts to contribute to regional and national climate objectives.

To provide context, the INN's Cluster Energy Strategy report highlights significant progress in reducing Scope 1 CO2 emissions within the industrial sector in the north of the Netherlands over recent decades. The baseline measurement for this initiative is set at 1990, which aligns with the targets of the Paris Climate Agreement. Specifically, from 1990 to 2019, CO2 emissions decreased from 2.7 Mton to 2.0 Mton, achieving an absolute reduction of 26% compared to 1990 levels. However, it's important to note that the relative reduction in emissions is even more substantial when considering production growth.

During this same period, production by companies in the region increased from 4.6 Mton to 7 Mton, representing a production increase of over 50%. As a result, the CO2 emissions per ton of product have decreased by 55%, demonstrating that efficiency improvements and sustainable growth have played a critical role in reducing the carbon footprint per unit of production.

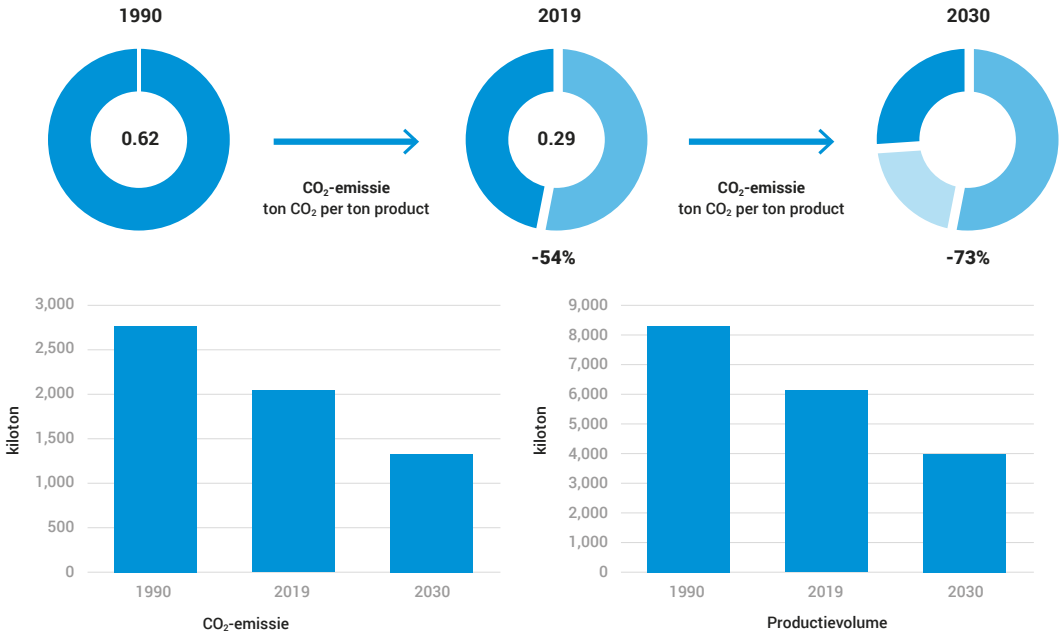


Figure 5.1: CO2 reductions targets from the INN Cluster Energy Strategy report.

KEY PERFORMANCE INDICATORS (KPIS)

Greenhouse gas emissions

For greenhouse gas emissions, CO2 emissions are measured within our controlled area. By tracking and analysing this data, we have observed a decreasing trend in emissions. This is in line with our mitigation strategies and commitment to reducing the carbon footprint in our management areas, for which we stimulate and facilitate our customers to take action.

Table 5.1: CO2 emissions measured in Mton.

Greenhouse gas emissions	2021	2022	2023
CO2 emissions (Mton)	**12.1**	**10.2**	**7.6**

Energy consumption and shore power usage

Our energy consumption has remained relatively stable for natural gas over the past five years, reflecting consistent management of our resources. In terms of electricity, we observed a steep decline in infrastructure usage between 2019 and 2020, which has since leveled off. Office electricity consumption has been stable throughout this period, demonstrating our ongoing commitment to energy efficiency across our operations.

Shore power is provided for all inland vessels that visit our port areas. Shore power usage increased steadily from 2017 to 2021, as shown in earlier versions of PERS, driven by its mandatory adoption through government regulations. This regulation was implemented due to the positive impact of shore power in reducing fossil fuel consumption. However, after 2021, we noticed a slight decline, which we believe is because shore power has reached a stable level. Fluctuations in usage also occur based on the number and type of ships visiting the port.

Table 5.2: Energy consumption of natural gas (m3) and electricity (MWh).

Energy consumption	2019	2020	2021	2022	2023
Gas					
Natural gas (m3)	**33,087**	**30,412**	**34,157**	**32,919**	**31,720**
Electricity					
Office (MWh)	288	249	230	242	245
Infrastructure (MWh)	1517	806	827	832	779
Shore Power (MWh)	1,113	1,396	1,495	1,430	1,411
Total Electricity (MWh)	**2,918**	**2,451**	**2,552**	**2,504**	**2,435**

Renewable energy

Our installed capacity for renewable energy continues to grow, with the recent opening of facilities such as the Valgenweg Solar Park. Construction of offshore wind parks is also ongoing. In addition to developments in the Netherlands, the COBRA and NorNed cables from Denmark and Norway, respectively, land in Eemshaven. Furthermore, bioenergy is produced by the Eneco Bio Golden Raand bio-energy power plant, and the EEW plant incinerates waste to generate energy. EEW contributes to a more sustainable living environment by reducing the need for fossil resources in the energy chain, while providing nearby industry partners with reliable and sustainable energy.

Table 5.3: Installed renewable energy measured in megawatts (MW).

Installed renewable energy	Aantal MW 2021	Aantal MW 2022	Aantal MW 2023
Onshore			
Wind parks	**338**	**376**	**376**
Solar parks	**79**	**79**	**96**
Biomass power plant	**50**	**50**	**50**
Offshore			
Wind parks	600	600	600
COBRA (DK) en NorNed (N)	1,400	1,400	1,400
Total	**2,467**	**2,505**	**2,522**

Ships with ESI certificates and Green Awards

We actively promote green shipping by offering a 5% discount on port dues for ships with Green Awards or an ESI score higher than 20. We monitor the number of ships with ESI certificates and Green Awards for sea and inland vessels, respectively, and maintain an updated list that is refreshed monthly. Ships on this list automatically receive the port dues discount, encouraging more environmentally friendly practices in our ports.

Table 5.4: Amount of unique ships with sustainable shipping certificates visiting our ports

Sustainable shipping certificates	2021	2022	2023
Ships with ESI certificates	84	69	56
Ships with Green Awards	42	79	102
Total	**126**	**148**	**158**

ESRS E2
POLLUTION

APPROACH AND POLICIES

Reducing pollution and safeguarding the environment are key pillars of our long-term vision. As we grow, we remain committed to minimizing the environmental impact of our operations, recognizing the critical importance of air and water quality, and soil health. Our green approach has transformed our ports into hubs of sustainable progress. Through innovative technologies, responsible practices, and strong partnerships with local communities, businesses, and regulatory bodies, we strive to ensure that economic growth and environmental stewardship go hand in hand.

Our commitment to reducing pollution is guided by clearly defined policies, outlined in key documents such as the *Area Management Plan* and the *Port Waste Management Plan*. These documents detail our goals to minimize emissions and prevent pollution of water, air, and soil. They also provide comprehensive plans for managing incidents like spills, ensuring a swift and effective response. A significant aspect of our policy approach involves actively encouraging and motivating our customers to strictly follow all relevant environmental legislation.

Besides our internal policies, we also work together with industry partners, environmental groups, and government agencies to promote clean development. This collaboration happens through initiatives like the EOCB (the Expert Team for Oil and Chemical Incident Response) and CRW (Wadden Sea Coordination Agreement), which are consultation structures established with other ports focussed on pollution, the *European Water Framework Directive*, and *Ecology and Economy in Balance*. which is further explained in ESRS E4 – Biodiversity and Ecosystems.

ACTIONS

Improving Utilities We are developing utilities that support alternative energy sources, such as steam, to lower emissions and contribute to a cleaner environment.

Reusable Coffee Cups Over the past year, we have eliminated the use of disposable cardboard cups for coffee and have provided instructions to our staff to prioritize the use of reusable coffee mugs and cups.
This initiative aims to reduce waste and promote more sustainable practices within our organisation.

Ship Waste Collection We have updated our *Port Waste Management Plan* to improve waste collection and management in our ports, incorporating better digital systems and waste segregation to reduce environmental impact.

Fishing for Litter We participate in the “Fishing for Litter” project, where fishermen voluntarily collect waste caught in their nets and bring it ashore. This waste is then properly disposed of, helping to reduce marine litter and prevent it from washing up on beaches.

Nitrogen Management In response to the 2023 Council of State ruling, we are collaborating with partners to manage nitrogen emissions, support sustainable development, and help companies reduce their emissions through innovative technologies.

FUTURE ACTIONS

Dredged Sludge Monitoring We continue to monitor the quality of dredged sludge in Delfzijl and Eemshaven during recurrent water-bottom investigations.

Soil Quality Monitoring We continue to monitor imported soil to ensure that it cannot negatively impact soil quality in our management areas.

TARGETS

Our Business Plan for 2024-2028, along with the objectives tree" outlines our main targets for promoting sustainability and protecting the environment. We are focused on making our own operations more sustainable by using practices that minimize our environmental impact and enhance resource efficiency. We also aim to help the businesses in our port and industrial areas to adopt greener practices and technologies, supporting their own sustainability efforts.

So far, we have always worked on improving our environmental performance. Although we have not yet set specific numerical targets for the reduction of pollution, we know it is important to develop these goals. In the coming years, we will work on setting and implementing these targets to reduce pollution and assist our customers in achieving similar environmental improvements.

KEY PERFORMANCE INDICATORS (KPIS)

Nitrogen (NOx) emissions

Nitrogen oxide (NOx) emissions are closely monitored to track our impact on air quality and contribute to reducing environmental pollution. Over the past few years, we have observed a significant decrease in NOx emissions in the Eemsdelta region. This decline is a result of adoption of new technologies and the optimization of existing industrial processes, particularly in response to the nitrogen crisis. Some of our customers are even working towards creating zero-emission plants. This concerted effort has led to a noticeable reduction in NOx levels, with concentrations in the Eemsdelta area now consistently below the national limit values

Heavy metals

Emissions of heavy metals, such as arsenic, lead, cadmium and mercury are actively monitored, to manage their impact on the environment. Since 2010, the development of these emissions and their deposition in the region are tracked. Monitoring data, as shown in Figure 5, reveals an initial steep decline in heavy metal emissions, followed by consistently low levels over the past decade.

Figure 5.2 illustrates that the heavy metal deposition of the four main heavy metals primarily originates from outside the Eemsdelta region. The data indicates that only 0.1-0.2% of these depositions come from companies within our region. This pattern has remained fairly consistent over the last two years, highlighting the relatively minor impact of local industrial activities compared to external sources.

Soil contamination

Soil contamination is tracked to make sure any risks to health and the environment are well managed. In the previous PERS report, we identified that soil contamination is present but contained, particularly at emergency locations such as those in Delfzijl. The data on soil contamination has not been updated since the previous PERS. Nevertheless, we continue to actively monitor and manage soil quality to meet regulatory standards and address any problems that come up.

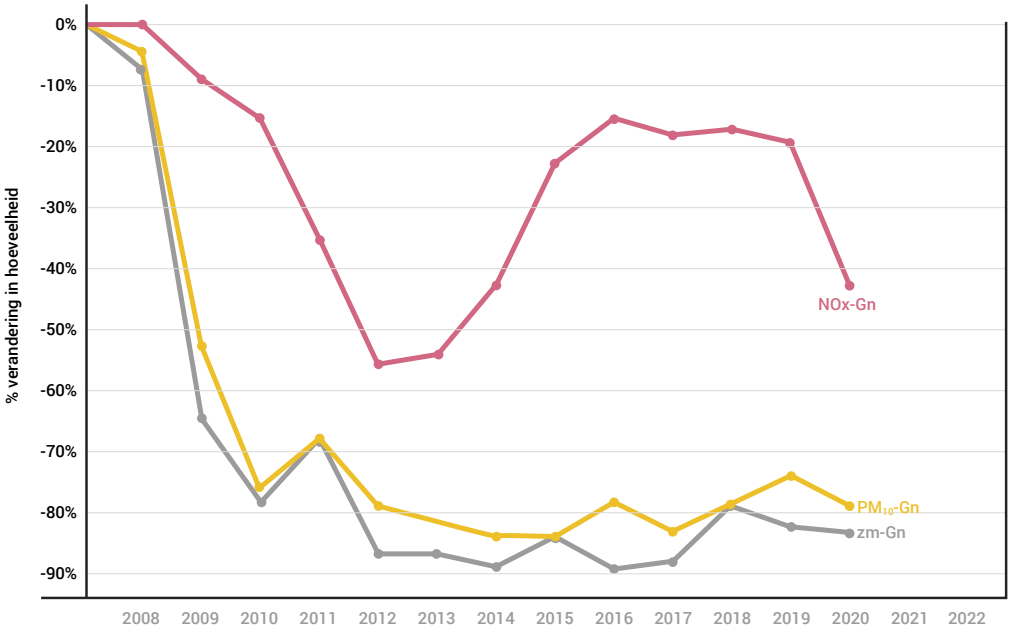


Figure 5.2: Annual emissions of NOx (red), PM10 (yellow) and heavy metals (grey). Data available at staatvangroningen.nl.

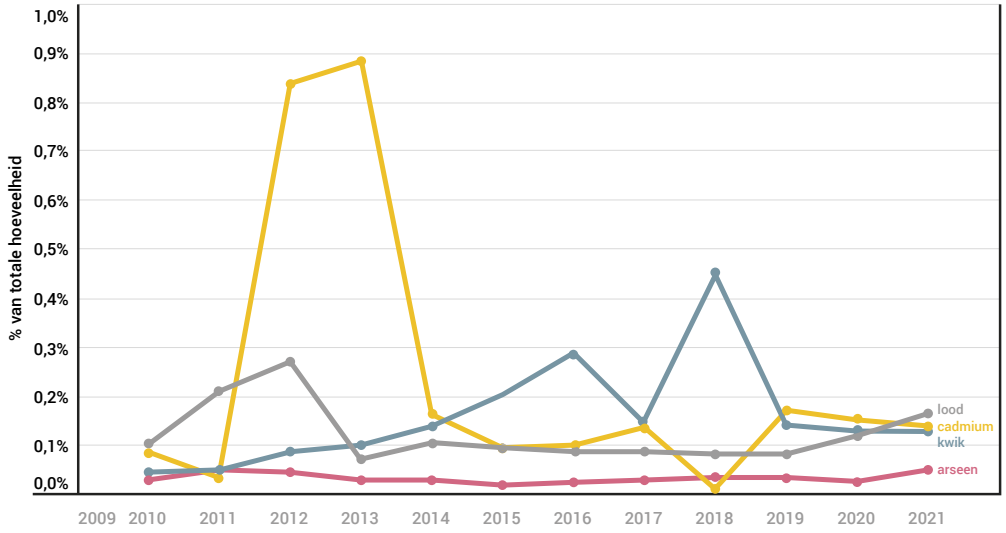


Figure 5.3: Percentage of the total deposition of arsenic (pink), lead (black), cadmium (yellow), and mercury (grey) in the Ems-Dollard region originating from local companies. Data available at staatvangroningen.nl.

ESRS E3
WATER AND MARINE RESOURCES

APPROACH AND POLICIES

We understand that water is the lifeblood of our operations and the ecosystems around us, making it central to our sustainability efforts. In the Eemsdelta region, where our ports in Eemshaven and Delfzijl are located, we face unique challenges with water scarcity and quality. Knowing how important water quality and availability are for protecting the environment, we are committed to using water responsibly across all our operations.

Our policies for managing water and marine resources are documented in the same key documents referenced in the section on ESRS E2 - Pollution: *Area Management Plan (Dutch: GOP), Port Waste Management Plan,* and *European Water Framework Directive*. These documents outline our strategies for ensuring sustainable water use, managing wastewater, and protecting water quality. Specifically, the GOP focusses on creating a sustainable water chain, supporting our overall commitment to responsible water management and environmental protection.

The main policy goals outlined in the aforementioned documents focus on the effective management of the water needs for ships and companies present in our port. For ships, we ensure that drinking water is readily available at the quays and maintain the highest quality standards. For industrial processes, we aim to meet water demand while minimizing the use of drinking water. To achieve this, we collaborate with Northwater, a water company that converts wastewater into industrial water. This process provides water suitable for industrial use, thereby reducing the demand for drinking water and supporting our commitment to sustainable water management.

To further advance our policy goals, we participate in consultation structures such as *Ecology and Economy in Balance* with environmental organisations and collaborate with other North Sea and Wadden Sea ports. These engagements help us continuously refine our strategies and work towards improved water management practices across the region.

Rainwater and Wastewater Management

In addition to managing water quality and demand, we also play a key role in handling water storage from natural fluxes. Our infrastructure is designed to efficiently manage rainwater runoff through two types of drainage systems present in the Groningen Seaports area: the rainwater sewage system (HWA) and the dry weather sewage system (DWA). The HWA system is used to channel rainwater from quays and roads directly into surface water without additional purification measures from GSP. We aim to discharge this rainwater into freshwater bodies whenever possible. Clients connected to the HWA system are responsible for filtering sand and separating oil/fat before the water enters the system.

The DWA system handles polluted water, such as wastewater from kitchens and toilets, which is directed to a treatment plant for purification before being discharged. Once the water enters the treatment plant, responsibility shifts from GSP to the regional water authority.

ACTIONS

Enhanced Drinking Water Checks While the law requires annual quality checks for drinking water at each outlet, we exceed this requirement by conducting checks at each faucet four times a year. This ensures that the drinking water consistently meets quality standards. These checks are performed by Waterland Noord.

Facilitated Expansion of NorthWater We support the expansion of NorthWater, a company specializing in industrial water supply and wastewater processing, by providing an additional 1.3 hectares of land in Delfzijl. This expansion helps enhance their capacity for treating and supplying industrial water.

Consultations on Reducing Drinking Water Usage: We have engaged in exploratory discussions with our customers to explore opportunities for further reducing the use of drinking water by implementing industrial water solutions. These discussions aim to identify and promote practices that minimize drinking water consumption in favour of industrial water.

FUTURE ACTIONS

Identification of additional KPIs for Water Usage We will identify and establish relevant Key Performance Indicators (KPIs) to monitor and measure our water usage effectively. This will help us track progress, optimize water management practices, and ensure sustainable water use across our operations.

TARGETS

Our specific objectives for water and marine resources are found in the GOP. This plan focuses on reducing the use of drinking water in industrial processes by switching to industrial water provided by NorthWater. This change is part of our effort to ensure that our industrial activities have a minimal impact on local water resources. The GOP also aims to lower the amount of wastewater we produce and reduce the amount of cooling water we take in, helping us use water more efficiently.

Although we have set these qualitative targets, we recognize the need for measurable, quantitative goals to better track our progress. Over the coming years, we are dedicated to developing specific benchmarks that will enable us to monitor our achievements more effectively and uphold our commitment to sustainable water management.

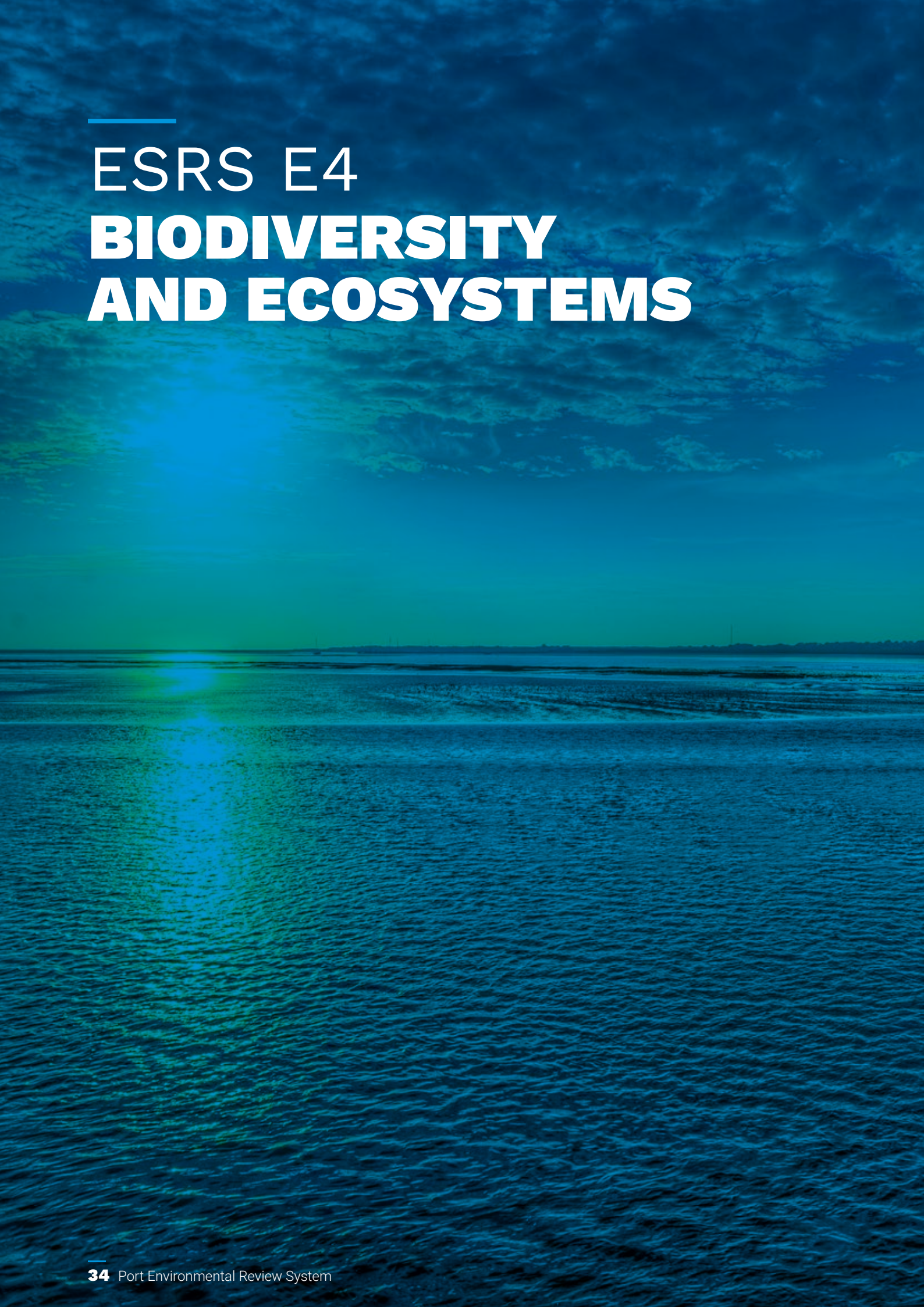
KEY PERFORMANCE INDICATORS (KPIS)

Drinking water consumption

Our drinking water consumption data over the past five years shows a clear pattern of fluctuation. While there have been significant variations in consumption levels from year to year, the overarching trend points to a general decrease. Despite the yearly fluctuations, this overall reduction in drinking water usage highlights a shift towards lower consumption levels over time. Monitoring these patterns helps us track our progress and indicates a positive movement towards more efficient water use.

Table 5.5: Drinking water consumption data.

Water consumption	2019	2020	2021	2022	2023
Drinking water (m3)	132,774	139,943	38,355	63,797	40,876



ESRS E4
BIODIVERSITY AND ECOSYSTEMS

APPROACH AND POLICIES

Groningen Seaports is located near the UNESCO World Heritage Wadden Sea and the Ems-Dollard Estuary—areas renowned for their rich biodiversity and vital ecosystems. These unique environments support a diverse range of flora and fauna and play a crucial role in maintaining ecological balance.

We are strongly committed to managing biodiversity and ecosystems sustainably, particularly in our port areas of Delfzijl and Eemshaven. Guided by the *Green and Nature Plan Delfzijl and Eemshaven*, which forms the basis for all our green space and nature conservation policies, we aim to balance economic growth with our duty to protect and enhance the natural environment. We focus on creating and maintaining green and natural areas within our ports to support and boost biodiversity, emphasizing the protection of existing species, the creation of new habitats, and the integration of these efforts with broader land and water management strategies. We also monitor the effectiveness of our initiatives, especially regarding protected species and the overall health of ecosystems. This plan not only outlines our ecological goals but also provides the legal and regulatory framework we follow, ensuring all our activities meet national and international environmental standards and align with broader sustainability objectives.

To support these policies, we have implemented additional documents and guidelines. The *Green Management Plan* details how we manage our green patches, including practices such as ecologically responsible mowing to protect local flora and fauna. Furthermore, we adhere to international treaties like MARPOL to prevent the spread of invasive species through ballast water. Our *Tender Conditions* outline strict conditions for the materials used in our operations, such as ensuring the use of responsibly sourced wood. Together, these guidelines reinforce our commitment to maintaining high environmental standards in all aspects of our operations.

Ems-Dollar 2050 program

The Ems-Dollard 2050 program (ED2050) is a collaborative effort to restore and enhance the Ems-Dollard estuary, a rare region where freshwater and seawater meet. Facing challenges that arise from drained polders and deepened shipping channels that disrupt natural processes and increase sediment turbidity, the program aims to address these issues by reducing turbidity, strengthening natural habitats, and mitigating climate change. Effective cross-border cooperation between the Netherlands and Germany is essential for implementing measures across the estuary, focusing on project execution, strategy development, and monitoring to ensure both ecological and economic benefits.

Groningen Seaports is actively involved in the ED2050 program through the *Ecology and Economy in Balance* (E&E) initiative. As part of this broader effort, Groningen Seaports plays a key role in promoting the “Ecological Plus,” which encourages companies in its management areas to contribute positively to the environment. This involves coordination with environmental NGOs, local governments, and businesses to ensure compliance with legal requirements and sustainability ambitions, while also facilitating voluntary ecological investments in regional projects.

Dredging

Dredging is vital for maintaining clear and safe waterways for ships. To minimize environmental impact, we collaborate with partners such as the Department of Waterways and Public Works and adhere to the ED2050 program. Our strategies focus on reducing sediment buildup, limiting dredging frequency, and repurposing dredged material for land-based applications like dike reinforcement and habitat restoration.

Frequent dredging increases water turbidity, which harms the estuary’s ecosystems by Limiting light penetration needed for algae growth and disrupting benthic species. By reducing dredging frequency and removing sediment effectively, we aim to lower turbidity, support natural sedimentation processes, and enhance ecological health. We comply with the Soil Quality Decree and ED2050 guidelines, regularly assessing dredged material to ensure its suitability for reuse or disposal, while also supporting environmental restoration efforts in the Ems-Dollard estuary.

ACTIONS

Reef Blocks We have implemented a trial with reef blocks made from local clay at two locations between Delfzijl and Eemshaven. These reef blocks aim to enhance underwater life and restore biodiversity in the Eems-Dollard estuary and Wadden Sea, focusing on the recovery of oyster and mussel beds.

Coastal Development Eemszijlen We are actively participating in the Eemszijlen project, which aims to develop a future-proof Wadden coast. This project focuses on creating a resilient coastline to address sea level rise, establishing a sweet-salty transition zone, enhancing natural values, improving water drainage, and ensuring sufficient freshwater availability.

Flora and Fauna Inventory In 2021, we carried out a comprehensive flora and fauna inventory to map the biodiversity status in our port areas. This inventory is conducted every 3 to 4 years to ensure that we remain informed about the ecological health of our areas.

Stern Breeding Island In 2018, we cooperated in establishing the Stern island near the Eemshaven as an alternative breeding site. This initiative has been highly successful, especially for common terns and Arctic terns, providing a crucial habitat that has significantly enhanced their breeding success in the area.

Designating Temporary Nature Areas We designate fallow grounds as temporary nature areas to enhance habitats for insects such as bees and butterflies by using flower mixtures where appropriate. We also maintain areas near Delfzijl and Borgsweer to support ground-breeding birds, ensuring these locations remain suitable for these species until new developments are planned.

Code of Conduct for Species Protection We are developing a comprehensive 'Code of Conduct for Species Protection' in collaboration with the Port of Rotterdam. This code outlines how we and our contractors should consider protected wild flora and fauna during maintenance, management, and small-scale spatial activities, helping to manage environmental impacts consistently across the industry.

Breeding Season We are making our stakeholders aware of when the bird breeding season takes place and what the consequences are for spatial development.

Renewed Collaboration for Ecology and Economy in Balance We have renewed our commitment to the Ecology and Economy in Balance initiative, partnering with stakeholders to balance ecological restoration with economic growth in the Eems-Dollard estuary. (SDG 17: Partnerships for the Goals)

FUTURE ACTIONS

Reef Blocks Update of Nature Management Plan We will update and further develop our internal nature management plan.

Formulation of Biodiversity Targets We will formulate new and improve existing biodiversity targets to measure progress toward our policy goals.

TARGETS

We are committed to achieving a measurable improvement in biodiversity within our port areas as outlined in our *Green and Nature Plan Delfzijl and Eemshaven*. This plan emphasizes our dedication to monitoring and enhancing the ecological health of our regions. Our targets include increasing the number and diversity of species across our management areas and using data-driven decision-making to adjust our management practices for better ecological outcomes. Additionally, we have concrete targets for certain species, including creating and maintaining suitable habitats for the Marsh Harrier by utilizing temporarily unused lands and establishing functional habitats for the Natterjack Toad in areas with pioneer vegetation and open ground.

In our *Area Management Plan (Dutch: GOP)*, we have also set key biodiversity targets. These include increasing the amount of natural areas within our management zones, continuing the removal of sediment from our ports, and participating in projects aimed at generating positive impacts on biodiversity. While these goals are well-defined, we acknowledge that they currently lack specific quantitative targets. However, we are actively working on developing these targets to ensure clear and measurable outcomes for enhancing biodiversity in our port areas.

KEY PERFORMANCE INDICATORS (KPIS)

Breeding Success of Terns

Common and Arctic Terns, which previously bred in the Eemshaven, have shown remarkable success since the establishment of Stern Island in 2018. Created as compensation for nesting losses in the Eemshaven, Stern Island saw both species begin breeding there in its first year. By 2019, the number of breeding pairs had doubled, reaching 812 pairs of Common Terns and 216 pairs of Arctic Terns.

This significant increase in breeding pairs, coupled with exceptionally high breeding success rates, exceeded the norms for a stable and viable population in the Wadden Sea area. This success was initially due to the absence of ground predators and flooding. However, in 2020, the introduction of a ground predator, a fox, led to a slight decline in numbers. Despite this, Stern Island continues to support a substantial number of successful breeding pairs, demonstrating the effectiveness of the compensatory measures.

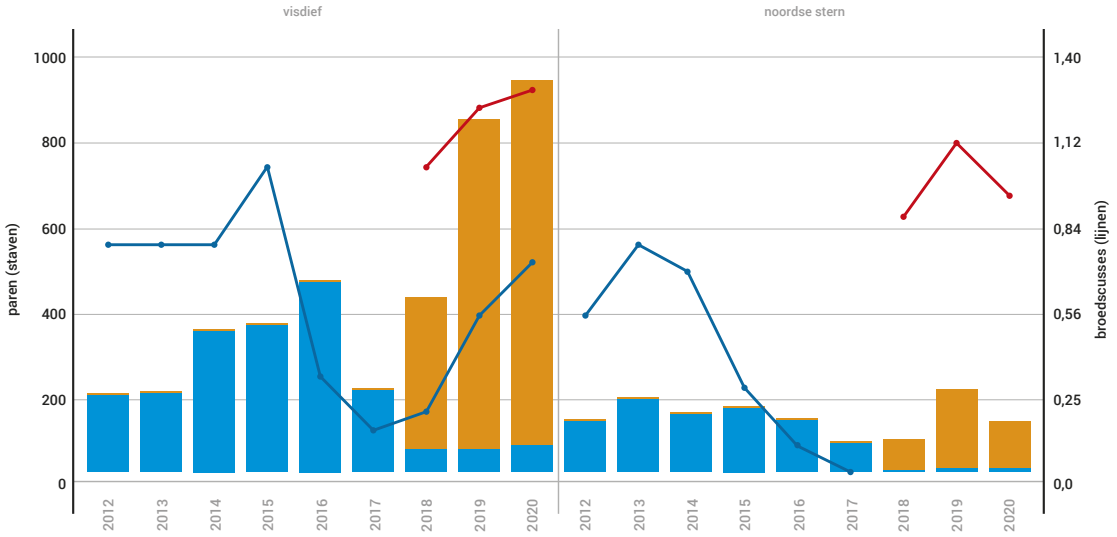


Figure 5.4: Breeding success of common (left) and arctic terns (right). Blue bars represent breeding pairs in the Eemshaven, with the line indicating breeding success. Orange bars and line represent breeding pairs and success on Stern Island respectively. Data available at staatvangroningen.nl.

Dredged material

We track the volume of dredged material to monitor our efforts in reducing the environmental impact of dredging. This helps us measure how effective our environmental practices are, especially in maintaining sediment quality and minimizing disruption to marine ecosystems. Data shown in Table 5.6 indicates that the amount of dredged material is gradually decreasing in both Eemshaven and Delfzijl, reflecting our progress in managing dredging activities.

Table 5.6: Amounts of dredged material per year in Delfzijl and in the Eemshaven

Dredging location	2019	2020	2021	2022	2023
Delfzijl (m^3)	**1,414,100**	**1,357,300**	**1,305,600**	**1,045,500**	**777,650**
Eemshaven (m^3)	**1,632,600**	**1,598,600**	**1,635,200**	**1,611,600**	**1,561,000**
Total (m^3)	**3,046,700**	**2,955,900**	**2,940,800**	**2,657,100**	**2,338,650**

ESRS E5
RESOURCE USE AND CIRCULAR ECONOMY

APPROACH AND POLICIES

With changing environmental rules and growing expectations the industrial sector needs to shift to sustainable resource use and a circular economy to stay compliant and maintain regional social acceptance. To guide this transition, we have created a policy framework. The *Sector Plan Circular Economy* sets out how to reduce waste and use resources more efficiently; the *Port Waste Management Plan* focuses on cutting port waste and improving recycling practices; and the *Area Management Plan (Dutch: GOP)* describes our approach to managing resource use. Together, these policies help us lead the transition to a circular economy.

In addition, our *Establishment Policy* emphasizes creating synergies and functional clusters of companies that can benefit from each other's resources and byproducts. To advance this approach, we are actively involved in Chemport Europe.

Chemport Europe

Chemport Europe is an innovative ecosystem based in Delfzijl that drives the advancement of both circular and biobased economies in Northern Netherlands. This initiative brings together industry players, researchers, and policymakers to foster collaboration and innovation. It focuses on integrating biobased materials—derived from crops and agricultural byproducts—into non-food applications, such as the chemical sector, thereby linking closely with the principles of the circular economy. Chemport Europe supports the development of sustainable technologies and resource-efficient practices, establishing a hub for advancements in circular and biobased chemistry. As Groningen Seaports, we actively participate in Chemport Europe by facilitating initiatives within our port areas, helping to advance these innovative practices and strengthen the region's role in the circular economy.

ACTIONS

Sustainable Fuel Production As Groningen Seaports, we facilitated the establishment of SFP's green gas production facility in Delfzijl. This facility will use plant-based residues from agriculture and food processing to produce biogas and upgrade it to green gas, which will be supplied to one of our shipping companies.

Circular Purchasing We promote circular purchasing through our procurement policy, which emphasizes both social and environmental considerations. Our purchasing conditions are designed to encourage circular buying and social returns. Groningen Seaports aims for 100% sustainable procurement in all phases of the purchasing process, following the standards of *Professional and Innovative Procurement*, also known as PIANOo.

DuSpot We actively use DuSpot, a tool that connects the supply and demand for surplus construction materials between governments and contractors. This easy-to-use platform helps ensure that leftover materials are reused and recycled effectively.

Brede Groene Dijk Project In 2022, we completed the Brede Groene Dijk project, which involved strengthening a 1-kilometer stretch of the dike along the Dollard using clay and sediment from the Dollard. This approach not only reinforced the dike but also demonstrated the circular use of dredged materials. We will monitor the dike in the coming years to evaluate the potential for similar methods to strengthen other sections of the Dollard dike.

Vereniging Circulair Groningen We participated in the establishment of the Vereniging Circulair Groningen in Eemshaven on April 6, 2023. This association, which includes around thirty founding members, aims to accelerate the circular economy in Groningen through collaboration among businesses, educational institutions, societal organisations, and government bodies.

FUTURE ACTIONS

Preparation of Development Areas We prepare additional areas for development at Oosterhorn-Zuid, Valgen, and Heveskes for companies that contribute to the circular economy and biobased chemistry to invest in.

Investigation of Energy Exchange Infrastructure We will investigate and stimulate the construction of a steam grid and residual heat pipeline so that energy can be exchanged between consumers more efficiently.

CO2 Pipeline Investigation We will investigate the construction of a CO2 pipeline that can transport captured CO2 for application in other industrial processes.

Improvement of Internal Collaboration We will continue to improve the internal collaboration between our Business Development and Sales departments with the aim of facilitating the circular economy as much as possible.

Promotion of Circular Economy Cooperation We continue to promote and enhance cooperation between circular economy chains.

TARGETS

At Groningen Seaports, we are committed to advancing sustainability through specific targets outlined in our GOP. Our goals are focused on reducing fossil resource use, developing robust resource chains, and achieving a fully circular economy within our economic zone.

We aim to phase out fossil resources across all operations in our port areas by supporting a significant reduction in their consumption and replacing them with alternative materials. By 2050, our vision is to completely replace fossil carbon with residual materials, biomass, and CO2 as raw materials throughout all our management areas.

Additionally, we are working towards building strong and circular resource chains within our port areas. By 2028, our goal is to have 50% of our designated business park occupied by circular companies. We are steadily working towards achieving full circularity across our industrial areas by 2050, ensuring that all companies within our economic zone operate within a fully circular system. This approach will emphasize waste prevention and set a standard for sustainable industrial practices in the region.

KEY PERFORMANCE INDICATORS (KPIS)

In the PERS 2023-2025 framework, the only Key Performance Indicator (KPI) included is the waste generated by ships. The table below provides data on the amount of collected maritime waste and number of ships that visited the ports of Delfzijl and Eemshaven since 2017. The amount of waste collected varies depending on the types of goods and raw materials being transported, as well as the irregular frequency of ship visits. This data is important for monitoring and managing the environmental impact of shipping activities in our ports

For the future, we are also working on developing additional KPIs that will cover the complete scope of circularity within our port areas. These KPIs will help us monitor our progress towards achieving our circularity goals and ensuring sustainable development in our port areas.

Table 5.7: Maritime waste collection and number of shipst

Maritime waste	2017	2018	2019	2020	2021	2022	2023
Collected maritime waste (m^3)	**85,841**	**29,423**	**21,588**	**12,260**	**8,719**	**9,012**	**15,090**
Number of ships	**987**	**2,229**	**910**	**4,433**	**2,021**	**2,394**	**3,041**

SOCIAL

Groningen Seaports has evolved from a traditional port authority into a dynamic economic zone, driven by a strong commitment to green energy, circular economy, and broader prosperity. Our vision extends beyond the economic contributions of our operations to encompass social responsibility, ensuring that our growth benefits not only the businesses and industries we support but also the communities and individuals who live and work in our region.

We recognise that our workforce, the communities surrounding our ports, and the broader region are integral to our success. With over 6,000 people employed across Eemshaven and Delfzijl, we strive to create a safe, inclusive, and prosperous working environment. Our commitment to corporate social responsibility (CSR) is rooted in our core values—connection, responsibility, trust, and innovation—guiding us as we foster a culture of safety, well-being, and continuous development.

As we pursue our ambition to become Europe's leading green energy hub and circular economy hotspot by 2050, we are equally focused on ensuring that the benefits of this transformation are widely shared. This involves not only economic gains but also improvements in social welfare and environmental sustainability, contributing to the broader well-being of the Groningen region. Our initiatives aim to enhance the quality of life, promote safety, and ensure that our operations are conducted with the highest regard for the environment and the people who inhabit it. Through our dedicated efforts, Groningen Seaports aspires to be the heart of progress, driving forward not just economic development but also social and environmental stewardship. Our work reflects our commitment to our employees, affected communities, and the broader society, ensuring that our growth is inclusive, sustainable, and beneficial to all.

ESRS S1-3
SOCIAL RESPONSIBILITY

We have chosen to address the environmental themes related to our "own workforce," "workers in the value chain," and "affected communities" (ESRS S1-3) within a unified narrative. By integrating these themes, we provide a comprehensive view of how Groningen Seaports approaches social responsibility, ensuring that our efforts align with the broader goal of promoting sustainability and well-being across all levels of our operations and beyond.

APPROACH AND POLICIES

Own workforce

The well-being of our workforce is not just a priority at Groningen Seaports—it is at the very core of our mission and values. We firmly believe that the success and sustainability of our organisation are directly tied to the health, safety, and satisfaction of our employees. We strive to have an inclusive and diverse workforce. We believe that diversity of people facilitates diversity of thoughts. Recognizing this, we have established a robust framework of policies and guidelines designed to support and protect our workforce.

While many working conditions are already secured through legislation and collective labor agreements (CAO), we go beyond these requirements to ensure that our employees feel valued, respected, and safe in their roles. Our commitment to our workforce is embodied in the *Code of Conduct* and its supplement, the *Amendments to the Code of Conduct*. The Code of Conduct emphasizes core principles such as openness, responsibility, confidentiality, and diligence, which are essential to fostering a culture of integrity and respect. These principles, along with the detailed procedures outlined in the *Amendments to the Code of Conduct*, guide our approach to maintaining a positive and ethical work environment. The supplement addresses specific issues like whistleblowing, the prevention of undesirable behaviour, and the responsible use of electronic communication tools, reinforcing our commitment to safeguarding our workforce and ensuring a safe, respectful, and ethical workplace.

Furthermore, we recognise the importance of providing a supportive environment where employees can voice concerns or report issues without fear of reprisal. To this end, we have appointed a confidant who is available to offer confidential support and guidance to any employee in need. This role is crucial in maintaining trust and ensuring that all concerns related to workplace behaviour, harassment, or other issues are addressed promptly and with the utmost care.

Workers in the value chain

We place a strong focus on the well-being of workers in our value chain as well, reflecting our commitment to Corporate Social Responsibility (CSR). Since much of the work in our value chain happens in our port areas, carried out by customers, suppliers and other partners, we are responsible for making sure these activities meet the highest standards of safety and fairness. Our efforts to protect workers' rights and safety are clearly outlined in two important policy documents: the *Port Regulations Groningen Seaports* and the *Procurement Policy Guidelines.*

The *Port Regulations Groningen Seaports* is a comprehensive guide that outlines the safety and environmental standards across our port facilities, focusing on the protection of all workers, particularly those handling hazardous materials. Key measures include prohibitions on open flames, smoking, and activities that could generate sparks in sensitive zones, such as oil/chemical and LNG ports. The regulation also mandates secure mooring practices and the availability of emergency towing equipment before any loading or unloading operations can begin. Additionally, it sets strict safety procedures for any work on ships, especially those carrying dangerous goods, ensuring that all activities are conducted under careful supervision and with appropriate safety measures in place.

In addition to the measures outlined in the *Port Regulations Groningen Seaports*, we have initiated the *Oosterhorn Safety Program* to further enhance safety in the Oosterhorn industrial area. This program focuses on continuous improvement through knowledge sharing, incident evaluations, and targeted training. Key activities include addressing emerging risks like hydrogen use, promoting joint safety exercises, and exploring the creation of a unified fire service. The program aims to reduce safety incidents and strengthen collaboration among stakeholders, ensuring a safer working environment in the Oosterhorn area.

Furthermore, we place great importance on socially responsible procurement, as outlined in our *Procurement Policy Guidelines.* We believe that our purchasing practices should balance economic efficiency with sustainability and ethical labour practices. This includes encouraging our suppliers to offer learning opportunities, hire individuals facing job market challenges, and invest in their development. We are committed to maintaining integrity and transparency in all our procurement processes, guided by a strict code of conduct.

Affected communities

Our commitment to Corporate Social Responsibility extends to the local communities affected by our operations. Although most of the impacts (e.g. sound and odour) are driven through our customers operating within our port areas, we acknowledge that we play a role in these impacts and that our management of them can influence our reputation. Addressing these impacts is thus essential not only for maintaining positive relationships but also for fostering sustainable development and social harmony.

Currently, we do not have a detailed, specific policy on affected communities due to the indirect nature of our impact. However, we have been taking proactive steps by hiring a strategic stakeholder manager to develop a comprehensive stakeholder management policy. This policy will include measures to encourage our customers to further reduce their impacts on surrounding local communities and to actively engage with them. Additionally, we have conducted a reputation survey to gain insights into our standing within the community and identify areas for improvement.
In addition to these efforts, we are committed to making a constructive contribution to the Delfzijl/Eemshaven region through regional sponsorship. We actively support organisations and events in culture, sports, and recreation within a ten-kilometre radius of our Delfzijl and Eemshaven offices.

ACTIONS

Actions for Our Own Workforce

Vitality Coach: Recognizing the importance of employee well-being, we provide access to a dedicated vitality coach. This coach offers personalized health checks and advice on adopting healthier lifestyle habits, contributing to the overall physical and mental well-being of our team.

Adjustable Desks and Chairs: To promote a healthier work environment, we have equipped our offices with adjustable sit-stand desks, encouraging employees to alternate between sitting and standing throughout the day. Additionally, we have provided new ergonomic office chairs, and our trained concierge is available to assist employees in setting up their workstations for optimal comfort and posture.

Healthy Eating Initiatives: In line with our commitment to promoting a healthy lifestyle, we offer free fruit in our company canteen and organize a weekly fresh soup day. These initiatives are designed to encourage healthier eating habits among our staff, contributing to their overall well-being.

Staff and Activity Committees: To enhance social cohesion and promote a positive workplace culture, we have established staff and activity committees. These committees organize a variety of leisure activities that encourage employee interaction and contribute to their overall well-being, helping to create a more engaged and satisfied workforce.

Diversity Initiatives: We are committed to fostering a diverse and inclusive workplace. We actively work to raise awareness about the importance of diversity and inclusion within our organisation. We recognise that diversity is not just a goal but an ongoing process of growth and adaptation. We are determined to intensify our efforts and create a work environment where everyone, regardless of background, feels welcome and valued. By the end of 2023, our workforce was composed of 33% women and 67% men. Our Supervisory Board also prioritizes gender diversity, with two out of five positions currently held by women.

Training and Development We prioritize continuous professional growth by offering a range of training programs for our employees. These include group training sessions that encourage teamwork and knowledge-sharing, as well as specialized courses to enhance specific skills. Additionally, we encourage personal development tracks, ensuring our team members have opportunities for long-term career growth and adaptability within the organisation.

Personal Protective Equipment (PPE) We prioritize the safety of our employees by providing all necessary personal protective equipment (PPE) tailored to their specific roles. This includes helmets, work jackets, fleece vests, safety shoes, goggles, high-visibility vests, anti-static overalls, and climbing gear, ensuring that our team can perform their duties safely and effectively.

Hybrid Working We understand the importance of work-life balance and actively encourage hybrid working arrangements. This flexible approach allows our employees to work both remotely and in the office, helping them better manage their professional and personal responsibilities.

Actions for Value Chain Workers

Seafarers House Sponsorship: We are committed to the welfare of seafarers and port workers, demonstrated through our longstanding sponsorship of the Seafarers House in Eemshaven. This facility provides essential services such as free Wi-Fi, a café, a library, games, and pastoral care, offering seafarers and port workers a place to relax and connect.

Human Rights Check: We collaborate with the ILNT (International Labor and National Trade) to conduct regular human rights assessments within our ports. These checks are essential in preventing exploitation and ensuring that all value chain workers operate in a safe and fair environment, upholding the highest standards of human rights.

SBE Incident App: To enhance safety in our port areas, we have supported the development of the Collaborating Companies Eems Region (SBE) incident app. This app facilitates the rapid sharing of incident reports among neighbouring companies, significantly improving response times and communication. By fostering a safer work environment, the app plays a crucial role in protecting value chain workers from potential hazards.

Actions for Affected Communities

Sponsorship: We maintain active communication with residents in Oudeschip, Borgsweer, Roodeschool, and Borkum. As part of our community engagement efforts, we sponsor local events, including a recent contribution of €1,500 to the Eurocup Delfzijl, a popular local sports event.

Chemistry Cluster Bike Route: To engage with the local community and promote awareness of industrial activities, we launched a bike route along the Delfzijl chemistry cluster in the summer of 2022. The route features 20 companies, each with QR codes that visitors can scan to learn more about the specific activities and operations at each site. This initiative helps to foster transparency and community involvement.

World Clean-Up Day: Demonstrating our commitment to environmental stewardship and community engagement, we participate annually in World Clean-Up Day. Each year, we join forces with local residents and sponsoring partners to clean up litter from beaches surrounding the port area, reinforcing our dedication to maintaining a clean and sustainable environment.

Buffer Zones: To mitigate the impact of industrial activities on local communities, we have established green buffer zones between residential areas and our industrial sites. These zones, which often serve a dual purpose as utility corridors, help to reduce noise, pollution, and other potential disturbances, contributing to a healthier and more pleasant living environment for nearby residents.

FUTURE ACTIONS

Support for Educational Development We continue to support the educational development of young professionals and have a constructive collaboration with local schools and universities. We will take in interns and trainees on a regular basis. (SDG 4: Quality Education)

Courses on Sustainability We are in the process of and continue to offer courses on sustainability in construction to our Port Technology department. (SDG 8: Decent Work and Economic Growth)

ENGAGING WITH WORKERS AND COMMUNITIES

At Groningen Seaports, engaging with our workforce is a priority to ensure a positive and collaborative work environment. We actively seek feedback from our employees through a comprehensive employee survey designed to measure how staff perceive organisational changes. This survey allows us to understand trust levels and strengthen connections with our employees while enabling us to track progress by comparing results with those from previous years. In addition to the survey, direct engagement occurs through bilateral meetings between employees and their supervisors. These meetings foster open communication and address individual concerns.

The *Works Council (OR)* plays a key role in representing employee interests and ensuring organisational transparency. It meets regularly with management and HR to discuss company operations and supervises important issues such as investments, technological changes, and environmental measures. The OR also has decision-making authority on matters affecting employee conditions, including pensions and working hours. It meets six times a year with management and occasionally with the Supervisory Board. Employees influence the OR's composition through elections and can submit collective concerns to the OR, which also has the right to investigate and ensure compliance with legal standards.

Engagement with value chain workers is also a key aspect of our social responsibility efforts. We maintain open channels of communication with trade unions, allowing these workers to voice their concerns indirectly. This collaborative approach ensures that their rights and interests are protected throughout our operations. Additionally, for seafarers and port workers, we support the "Seafarers House" located in the Eemshaven. This facility provides a welcoming space where seafarers can relax, connect with others, and address any issues they may face. The Seafarers House also facilitates direct communication between seafarers and our organisation, further strengthening our commitment to their welfare.

In addition to engaging with our workers, we are is committed to maintaining strong relationships with local communities. We hold periodic meetings with village organisations around the ports, offering a platform for residents to raise any concerns they may have. Our staff also attends open house events organized by other parties, such as the province or municipalities, to further engage with the community. Since May 2024, we have appointed a stakeholder manager who serves as an additional point of contact for local residents.

Furthermore, we conduct a reputation survey within these communities, allowing inhabitants to provide feedback on our operations. This survey includes an open section where residents can freely express their opinions, helping us identify areas for improvement and ensure that our activities align with community expectations.

REMEDIATION AND CHANNELS TO RAISE CONCERN

Employees who experience or witness unwanted behaviour, such as harassment, discrimination, or bullying, are encouraged to use internal channels, primarily by contacting a designated confidant. This confidant ensures confidentiality and helps explore resolution options, such as addressing the issue directly, seeking a transfer, or considering alternative employment. Additionally, the whistleblower procedure offers a secure, anonymous channel that protects against retaliation and ensures independent investigation outside of standard management structures. The whistleblower procedure is further outlined in the 'Governance' section.

In cases where direct resolution is insufficient, mediation may be pursued. Mediation involves a professional mediator, not the confidant, to ensure impartiality. The objective is to halt unwanted behaviour by confronting the perpetrator and making it clear that such conduct is unacceptable within our organisation. This method has proven effective in many cases, particularly when the perpetrator is made aware that their behaviour is being scrutinized by others within the organisation.

Community members who want to raise concerns can do so at regular meetings with village organisations or by contacting the stakeholder manager directly. We aim to work together to solve any issues and find solutions that both sides agree on. This may include actions like remediation or compensation, such as creating green buffer zones to address specific concerns. We are committed to listening to local residents and working with them to resolve issues effectively.

KEY PERFORMANCE INDICATORS (KPIS)

Workforce Composition, Diversity, and Age Overview

The table below presents an overview of our workforce data. It includes the number and full-time equivalents (FTE) of own employees, external contractors, and interns. Additionally, the table highlights key diversity metrics such as the percentage of women in the workforce, the percentage of women in management positions, and the average age of our workforce.

Over the past three years, our workforce has grown significantly, reflecting positive developments in the size of our team. Alongside this increase, there has been a gradual rise in the proportion of women in the workforce, showing progress in gender diversity. Additionally, the average age of our workforce has decreased, indicating a shift towards a younger demographic. These trends highlight our commitment to growth, diversity, and a dynamic workforce.

Table 5.8: Data on workforce composition, diversity, and average age

Workforce	2021	2022	2023
Own employees (number)	90	105	99
Own employees (fte)	87.2	99.5	94.5
Externals (number)	4	2	7
Interns (number)	28	15	19
Women in total	28%	34%	31%
Women in management	22%	24%	21%
Average age	48	47	46

Employee survey

In our recent employee survey, we asked staff to rate their happiness at work on a scale from 1 to 10. The table below presents the results for four key questions related to overall job satisfaction. While the data indicates a slight decrease in happiness over the past year, the scores remain consistent with our benchmark. This suggests that, despite minor fluctuations, overall employee satisfaction is stable and within the expected range.

Table 5.9: Job satisfaction scores from the employee survey

Question	2022	2023	Benchmark Energy
I enjoy my work	**8.3**	**7.8**	**7.8**
My work gives me energy	**7.5**	**6.9**	**6.9**
I am proud at Groningen Seaports	**7.9**	**7.3**	**7.7**
I feel like I fit in at Groningen Seaports	**8.0**	**7.6**	**7.9**

Reputation survey

For the second KPI on the reputation of Groningen Seaports among local community residents, we conducted a survey for the first time in 2023. The graph below illustrates the results from the question, “How do you assess the current image of Groningen Seaports?” The findings reveal that the majority of respondents have a fairly positive view of Groningen Seaports, with grades of 7 and 8 being the most frequently given on a scale of 1 to 10. This suggests that Groningen Seaports is perceived positively by the local communities.

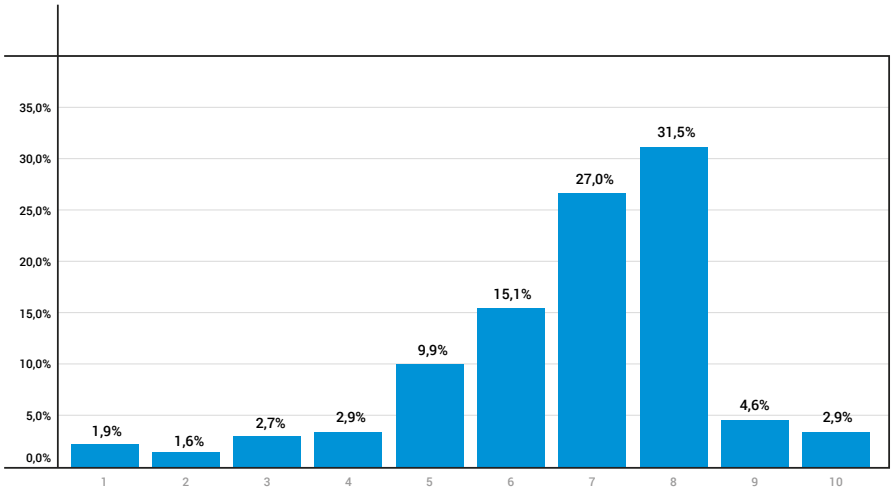


Figure 5.5: Scores on the perceived image of Groningen Seaports from the reputation survey 2023.

Sound and odour nuisance

The province of Groningen closely monitors sound and odour nuisance, with data available on the “Staat van Groningen” website. Sound impact is measured at five different locations around the ports of Delfzijl and Eemshaven. The figure below illustrates the average sound levels at two key locations: Oudeschip, near Eemshaven, and Meedhuizen, near Delfzijl.

In Oudeschip, sound levels have remained stable over the past years, while Meedhuizen has experienced fluctuations, with a notable decrease in the last year. As of 2024, sound nuisance in both locations remains below the norm of 65 dB(A).

Odour nuisance is also tracked by the province through complaints received via the “nuisance app”. The accompanying figure highlights a significant decrease in odour complaints since 2017, reflecting ongoing efforts to mitigate this issue

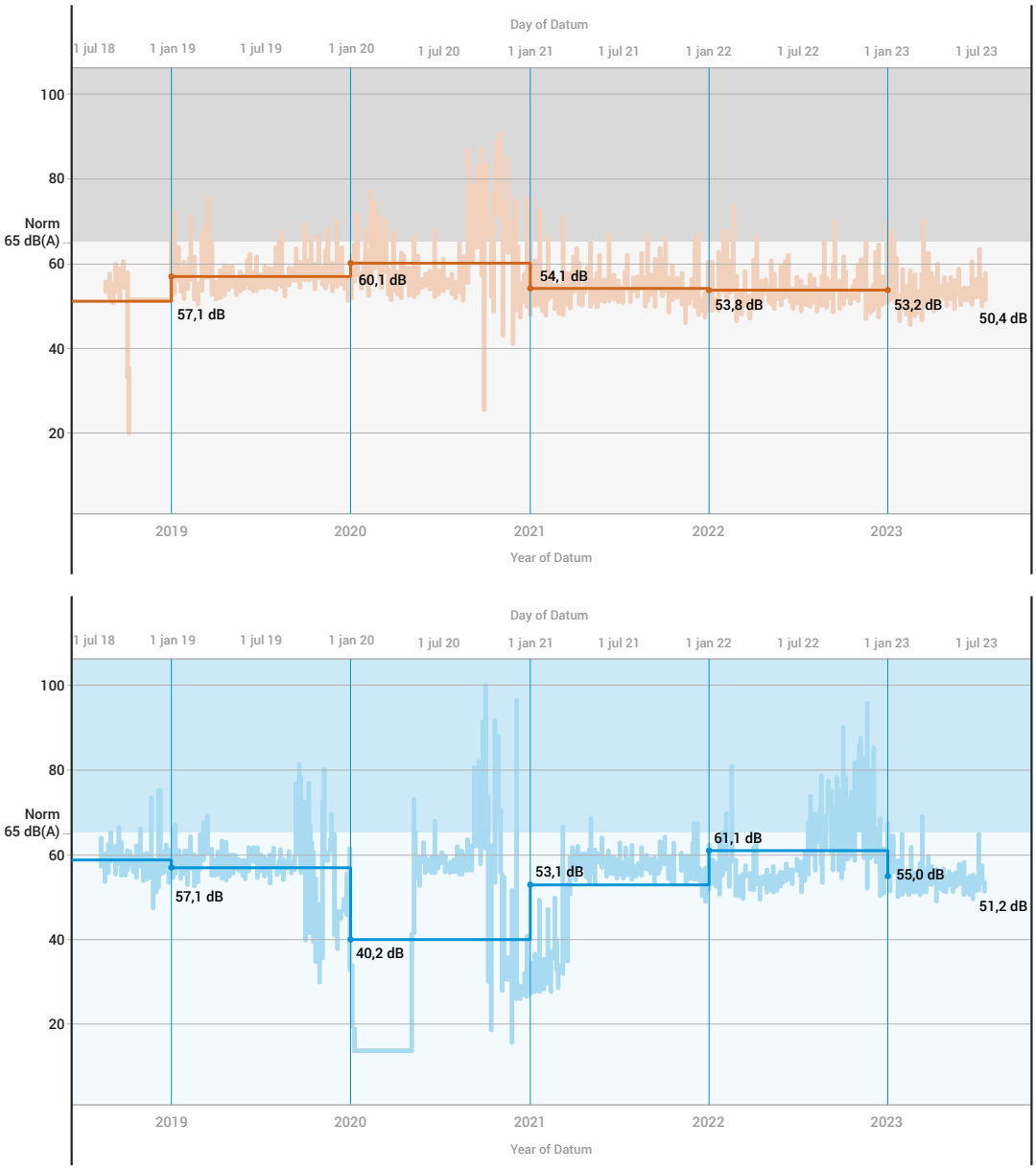


Figure 5.6: Average amount of dB(A) measure at the stations in Oudeschip (orange) and Meedhuizen (blue). Data available at staatvangroningen.nl.

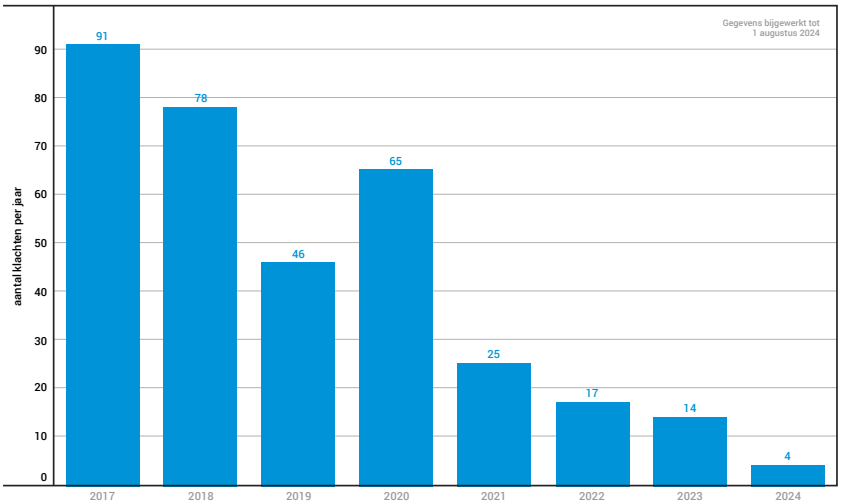


Figure 5.7: Yearly amount of complaint related to odour nuisance in the Eemsdelta region. Data available at staatvangroningen.nl

GOVERNANCE

Groningen Seaports has evolved significantly over the past decades, transitioning from a traditional port operator to a dynamic economic zone with a focus on sustainability and innovation. Central to this evolution is a commitment to strong governance, which is integral to achieving our organisation's ambitious goals of becoming Europe's green energy hub and a leader in the circular economy by 2050.

At the heart of our governance strategy is a deep-rooted sense of responsibility, transparency, and accountability. The port authority recognises the importance of engaging with all stakeholders, including customers, chain partners, shareholders, and the local community. By fostering an environment of trust and collaboration, We ensure that its governance practices not only comply with legal and regulatory requirements but also align with the broader societal expectations of fairness, ethical conduct, and sustainable development.

ESRS G1
GOVERNANCE AND BUSINESS CONDUCT

BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE

We are committed to upholding a high standard of business conduct and ethical behaviour, which forms the foundation of our corporate culture. We face various challenges related to financial integrity, ethical behaviour, and compliance. Our comprehensive Code of Conduct provides clear guidance on the expected behaviour and interactions with stakeholders, emphasizing integrity, professionalism, and adherence to legal standards. This Code, along with our detailed policies on unwanted behaviour in the workplace as described in the *Amendments to the Code of Conduct*, ensures that all actions align with both legal requirements and our organisational values.

Our approach to business conduct is further supported by the "Three Lines of Defence" model outlined in our *Risk Management Policy*. This framework is crucial for ensuring robust and effective management practices. It helps in preventing malicious practices and maintaining integrity by providing a structured approach. The model encompasses operational management and staff as the first line of defence, risk management and compliance functions as the second line, and internal audits as the third line. This layered approach ensures that risks are identified, managed, and independently reviewed, upholding high standards of integrity throughout the organisation.

In case preventive measures such as the "Three Lines of Defence" fail, we rely on our whistleblower procedure as outlined in the *Amendments to the Code of Conduct*. This procedure is designed to offer a confidential and secure channel for reporting concerns about unethical or illegal behaviour. We ensure that all employees, as well as external stakeholders, can report such issues without fear of retaliation. The procedure guarantees that whistleblowers are protected, and if they choose to remain anonymous, their identity remains confidential and cannot be traced. An established standard operating procedure ensures that any allegations are investigated thoroughly and objectively, reinforcing our commitment to integrity and ethical conduct throughout our organisation.

Certain departments, such as Sales and Nautical, face elevated risks due to their specific functions. The Sales department is at higher risk because of its frequent interactions with external stakeholders and involvement in critical financial transactions. The Nautical department, on the other hand, has increased risk due to its responsibility for security in the port areas, which makes it a potential target for criminal organisations. We implement rigorous controls and enhanced oversight in these departments to mitigate these risks, ensuring that all activities are conducted with the highest levels of integrity and security.

MANAGEMENT OF RELATIONSHIP WITH SUPPLIERS

To maintain the highest levels of integrity, we strictly adhere to guidelines that emphasize ethical behaviour throughout the procurement process. Our procurement policy dictates that all suppliers must be treated equally, with no preferential treatment given to local or regional businesses unless objectively justified. This approach ensures a level playing field for all suppliers and fosters a competitive and transparent procurement environment.

We prioritize legal compliance in all procurement activities. Our operations adhere to relevant European and national laws, including the Dutch Public Procurement Act and applicable European directives. This commitment guarantees that all procurement practices are legally sound and uphold the principles of fairness and transparency.

Furthermore, we are dedicated to maintaining professionalism and reliability in our relationships with suppliers. This includes clear and honest communication, fair competition, and a thorough assessment and allocation of risks.
Our contractual obligations are strictly defined to ensure that all agreements are legally binding and that both our organisation and our suppliers understand their responsibilities. External advisors involved in procurement processes are also required to adhere to these standards to ensure consistency and legality.

PREVENTION OF CORRUPTION AND BRIBERY

To address the elevated risks of corruption and bribery identified within our organisation, we have implemented additional measures tailored to the specific needs of the departments most susceptible to these risks. For our Sales department, which interacts extensively with external stakeholders and handles critical transactions, we enforce the “4-eyes principle.” This policy requires that all transactions undergo approval by at least one additional person, ensuring an extra layer of scrutiny and reducing the potential for unethical behaviour.

Our Nautical department faces the highest risk due to its responsibility for security in port areas. While this department has implemented stringent measures to combat corruption and bribery, we do not disclose specific details publicly. This approach is intentional to maintain the effectiveness and integrity of these preventive measures. Personnel who have access to sensitive data are thoroughly screened by the AIVD (the Dutch General Intelligence and Security Service), in compliance with international standards such as the ISPS (International Ship and Port Facility Security) Code.
The primary focus of education on preventing corruption and bribery is integrated into the Vessel Traffic Service (VTS) training program. Additionally, all incoming staff undergo onboarding training that covers these critical topics. Regular training sessions are also conducted in collaboration with partners such as the police and border control agencies, addressing issues related to corruption and bribery. These collaborative efforts ensure that our Nautical department remains vigilant and up-to-date in safeguarding security and maintaining integrity.

KEY PERFORMANCE INDICATORS (KPIS)

We use the number of convictions for breaches of anti-corruption or anti-bribery laws as a KPI to assess the effectiveness of our policies. To date, there have been no such convictions, underscoring the success of our preventive measures and commitment to ethical conduct.

6
BEST PRACTICES

CIRCULAR FENDER SYSTEMS

Groningen Seaports
Delfzijl and Eemshaven,
province of Groningen,
The Netherlands

This figure illustrates the pilot implementation of the sustainable fender system. The four uppermost beams are constructed from traditional hardwood, while the lowest visible beam and the submerged beams are made from recycled polyester.

We are addressing the growing issue of waste by exploring innovative ways to repurpose materials such as old polyester boats and wind turbine blades into fender systems for marine environments. As these materials reach the end of their life cycles, their disposal presents significant challenges, with traditional methods like incineration often leading to environmental harm. To tackle this, we have launched a pilot project in collaboration with Circular Recycling Company (CRC) and Windesheim University of Applied Sciences. Our process involves collecting and dismantling old polyester boats and wind turbine blades, shredding them into flakes, and then combining these flakes with new resin and reinforcing them with glass fibre to create a durable composite material. This composite is designed to replace the traditional hardwood used in fender systems—protective structures around bridges and docks. We are currently testing these recycled fender systems under real-world conditions at the Heemskesbrug in Delfzijl to evaluate their durability and effectiveness. Our goal is to demonstrate that repurposed materials like recycled polyester and wind turbine blades can serve as viable, sustainable alternatives in marine infrastructure, thereby reducing waste and promoting circularity. By setting a new standard for environmentally friendly practices, we aim to pave the way for broader applications of recycled materials across ports and beyond.

Environmental aspects

- Energy Transition
- Biodiversity
- Liveability around the port area
- Indirect employment

Relevance to the 5 Es framework of the ESPO Green Guide

- Engage
- Exemplify
- Enable
- Encourage

COMMUNITY-DRIVEN SOLAR POWER: The Valgenweg Solar Park

Groningen Seaports
Delfzijl and Eemshaven,
province of Groningen,
The Netherlands

This figure shows the location of the Valgenweg Solar Park.

We completed the Valgenweg Solar Park in Delfzijl, a significant step in our sustainability efforts. This project, a collaboration between Groningen Seaports, WIRCON GmbH, and Sunprojects, is distinguished by its involvement of the local community through the energy cooperative “Bronnen van ons.” This cooperative, which includes stakeholders Eemsdelta Energiek and Windvogel, enables residents of Groningen to become shareholders and benefit directly from the locally generated renewable energy. he solar park, constructed over five months, features 31,176 panels with a total capacity of 17.5 MWp, producing around 17 GWh of electricity annually and reducing CO2 emissions by over 8,750 tons. A portion of the energy generated is supplied to local companies, including Nobian’s Delfzijl facilities, reinforcing our commitment to regional sustainability. To mitigate visual impact, we have built an earthen mound along the park’s northern edge and incorporated flower strips to support local pollinators. Additionally, the park will accommodate sheep grazing with protective measures to ensure the safety of both the animals and the electrical infrastructure. This project highlights our dedication to sustainable development by effectively combining energy production with strong community engagement and environmental stewardship.

Environmental aspects

- Energy Transition
- Biodiversity
- Liveability around the port area
- Indirect employment

Relevance to the 5 Es framework of the ESPO Green Guide

- Engage
- Exemplify
- Enable
- Enforce

APPENDICES

APPENDIX 1
Responsibilities of Key Personnel

Environmental functions	Job title
Leadership Team	**Head of Sustainability and Corporate Circularity**
Port operations (dredging)	**Manager Dredging & Surveying**
Port operations (navigation)	**Harbourmaster**
Port operations (shipping)	**Harbourmaster**
Port operations (terminals)	**Harbourmaster**
Site management	**Business managers**
Strategic planning	**Team strategy**
Supplies acquisition	**Sales and Sales Support**
Licensing/Permits	**Harbourmaster, Sales and sales support, Asset management**
Quality management	**Project administrator**
On site contractor management	**Project administrator**
Emergency planning	**Harbourmaster**
Waste management	**Harbour master, Project Asset Management**
Environmental document management	**Sales and Sales Support**
Environmental datamanagement	**Sales and Sales Support**
Soil pollution assessment	**Sales and Sales Support**
Air quality monitoring	**Province of Groningen and municipalities**
Energy and carbon footprint monitoring	**Business Development**
Water quality monitoring	**Department of Waterways and Public Works and Water boards Noorderzijlvest/Hunze en Aa's**
Noise management	**Province of Groningen and municipalities**

APPENDIX 2A
Identified Impacts, Risks and Opportunities

ESRS Theme	Type	Positive/Negative	Description
E1 – Climate change	Impact	Positive	Impact on customers' greenhouse gas emissions by investing in and facilitating infrastructure for green energy (solar, hydrogen, wind)
E1 – Climate change	Impact	Negative	Impact on greenhouse gas emissions through scope 1 & 2 emissions (e.g., energy use of office buildings, employee mobility, and vessels)
E1 – Climate change	Impact	Negative	Impact on greenhouse gas emissions through scope 3 emissions from suppliers and subcontractors (e.g., land elevation and construction of sites and infra-structure (offshore sand extraction, asphalt, use of cranes, bulldozers, dredging, etc.)
E1 – Climate change	Impact	Negative	Impact on greenhouse gas emissions through scope 3 emissions from companies located in the port area (e.g., chemical companies and the coal power plant in Eemshaven)
E2 – Pollution	Impact	Negative	Impact on air quality due to activities of companies located in the port area (such as energy generation/ combustion or chemical production) associated with negative external effects, such as emissions of NOx, SOx, particulate matter, arsenic, lead, cadmium, and mercury.
E2 – Pollution	Impact	Negative	Impact on water quality due to discharges and drifting (plastics) from industry and ships.
E2 – Pollution	Impact	Negative	Impact on water quality in the Zeehaven Canal due to the discharge of industrial wastewater that still contains too much salt.
E2 – Pollution	Impact	Negative	Impact on soil quality due to (hazardous) waste from companies seeping into the soil and sometimes even into groundwater (particularly with customers invol-ved in waste recycling).
E3 – Water and marine resources	Impact	Negative	Impact on the availability of drinking water due to water usage by industry.
E3 – Water and marine resources	Impact	Negative	Impact on water quality in the Eemskanaal due to salt intrusion at the lock caused by the opening of the lock.

APPENDIX 2A
Identified Impacts, Risks and Opportunities

ESRS Theme	Type	Positive/Negative	Description
E4 - Biodiversity and ecosystems	Impact	Negative	Impact on wildlife and their breeding behaviour and population size due to noise caused by port operations, port companies, and shipping.
E4 - Biodiversity and ecosystems	Impact	Negative	Impact on the habitat of numerous animal and plant species due to dredging and the dispersion of silt, which causes water turbidity.
E4 - Biodiversity and ecosystems	Impact	Negative	Impact on plant and animal species due to the expansion of company and industry facilities, such as in Heveskes and Oosterhon-Zuid.
E4 - Biodiversity and ecosystems	Impact	Negative	Impact on plant and animal species due to the discharge of (too warm) cooling water by industry.
E4 - Biodiversity and ecosystems	Impact	Negative	Impact on animal species (migratory birds) due to wind turbines in the port area.
E5 - Circular economy	Impact	Positive	Impact on the circular economy (e.g., material usage) due to driving industrial symbiosis in the port area (such as centralizing utilities, managing ship waste, and recycling wind turbine blades into new raw materials).
E5 - Circular economy	Impact	Positive	Impact on residual streams of customers due to the development of infrastructure for capturing CO2 and using it as input for businesses.
E5 - Circular economy	Impact	Negative	Impact on the environment due to increasing freight movements and the construction of necessary infrastructure for the energy transition and circular economy (e.g., wood for biomass and pipelines for residual heat or the exchange of other liquids or gases).
E3 – Water and marine resources	Impact	Negative	Impact on the availability of drinking water due to water usage by industry.
E3 – Water and marine resources	Impact	Negative	Impact on water quality in the Eemskanaal due to salt intrusion at the lock caused by the opening of the lock.

APPENDIX 2A
Identified Impacts, Risks and Opportunities

ESRS Theme	Type	Positive/Negative	Description
S1 - Own employees	Impact	Positive	Impact on work-life balance due to facilitating hybrid working.
S1 - Own employees	Impact	Positive	Impact on employee well-being due to facilitating a wellness program for employees.
S3 - Affected communities	Impact	Positive	Impact on regional employment (e.g., modernizing work methods and creating high-quality jobs).
S3 - Affected communities	Impact	Negative	Impact on (perceived) well-being and health of local residents due to emissions caused by suppliers and companies located on Groningen Seaports' sites.
S3 - Affected communities	Impact	Negative	Impact on (perceived) well-being due to feelings of insecurity from activities at Groningen Seaports (e.g., construction activities, traffic movements).
S3 - Affected communities	Impact	Negative	Impact on the well-being of local residents due to light and noise from activities at Groningen Seaports or companies located on the sites (such as increased traffic intensity from construction activities and noise from wind turbines) — mainly incidental.
S3 - Affected communities	Impact	Negative	Impact on local residents due to odours from activities at Groningen Seaports or companies located on the sites — primarily systematic due to company operations.
S3 - Affected communities	Impact	Negative	Impact on the well-being of residents due to buildings, power lines, and wind turbines obstructing green views.
S3 - Affected communities	Impact	Negative	Impact on living space for local residents due to the expansion of port areas.
G1 - Governance	Impact	Negative	Impact on the environment and/or human rights from the extraction/production of high-risk raw material streams.
G1 - Governance	Impact	Negative	Impact on safety and well-being due to bribery of employees in cases such as cocaine smuggling (potential increase due to stricter enforcement in Rotterdam and Amsterdam and possible relocation to Groningen).

APPENDIX 2B
Identified risks and Opportunities

ESRS Theme	Type	Source	Description
E1 – Climate change	Risk	Dependency	Extreme weather conditions may require asset repairs and cause limitations in the infrastructure.
E1 – Climate change	Risk	Dependency	Sea level rise and flood risks may necessitate dike widening and larger protection zones, reducing or creating uncertainty about the available space for businesses.
E1 – Climate change	Risk	Dependency	Climate and environmental ambitions of Europe, the Dutch government, and court rulings in the Netherlands may lead to a deterioration of the business climate.
E1 – Climate change	Risk	Impact	Tightening of laws and regulations regarding nitrogen may lead to construction restrictions.
E1 – Climate change	Risk	Impact	Increasing electrification and an unbalanced energy supply and demand are causing grid congestion in high- and medium-voltage networks, which can lead to disruptions in the operations of existing businesses and limitations in connecting new companies.
E1 – Climate change	Risk	Dependency	Lack of physical and environmental space can lead to delays in the energy transition.
E1 – Climate change	Risk	Dependency	Lack of (digital) innovation and financial resources can lead to delays in the energy transition.
E1 – Climate change	Risk	Dependency	The energy crisis and rising costs of energy, construction, and raw materials can lead to higher operational costs for Groningen Seaports and bankruptcies among customers.
E1 – Climate change	Risk	Dependency	Ground subsidence caused by earthquakes can pose a risk of less suitable land and may require additional
E1 – Climate change	Opportunity	Impact	Driving the energy transition (e.g., by establishing shared utilities) can lead to attracting (innovative) customers.

APPENDIX 2B
Identified risks and Opportunities

ESRS Theme	Type	Source	Description
E2 – Pollution	Risk	Impact	Customers who go bankrupt or fail to meet their obligations regarding soil cleanup and restoration may necessitate soil investigations and remediation work.
E2 – Pollution	Risk	Impact	Contaminations caused by (former) customers can lead to costs for groundwater contamination investigations and necessary recovery measures.
E4 - Biodiversity and ecosystems	Risk	Dependency	The location of Groningen Seaports relative to the Natura 2000 area may limit expansion.
E4 - Biodiversity and ecosystems	Risk	Impact	Tightened laws and regulations for dredging (e.g., regarding water turbidity) or the use of materials may lead to higher costs.
E5 - Circular economy	Risk	Dependency	Lack of support for the circular economy could lead to delays in permits for allocating land to, for example, recycling companies.
E5 - Circular economy	Risk	Dependency	Meeting upcoming regulations on circular material use in assets and infrastructure (e.g., percentage of recycled materials) could lead to operational limitations or additional costs.
S3 - Affected communities	Risk	Dependency	Limited accessibility from the city to the port area can make it difficult to attract and retain talent.
S3 - Affected communities	Risk	Dependency	The inability to attract and retain talent due to tight laborlabour market conditions in the region (especially for technicians) can limit the growth or establishment of customers, potentially causing Groningen Seaports to miss out on leasing land and losing revenue.
S3 - Affected communities	Risk	Impact	When transporting hazardous substances in the port area by suppliers and customers, unsafe situations or incidents may occur.
S3 - Affected communities	Risk	Impact	Operations of companies in the chemical park can lead to unsafe situations (e.g., gas emissions/leaks).
S3 - Affected communities	Risk	Impact	The various negative impacts of customers can lead to a loss of support from society, politics, and local residents.

APPENDIX 2B
Identified risks and Opportunities

ESRS Theme	Type	Source	Description
G1 - Governance	Risk	Impact	Differences in perspectives between the municipality/province and Groningen Seaports can lead to uncertainty for current or existing GSP customers and complicate business operations, with a risk of bankruptcies.
G1 - Governance	Risk	Dependency	Impact on reputation due to a lack of clarity and transparency regarding the (political) interests of Groningen Seaports.
G1 - Governance	Risk	Impact	Increasing bribery to cover up criminal activities such as cocaine smuggling can lead to dangerous situations for employees and local residents.
G1 - Governance	Risk	Dependency	Increasing risk of terrorist attacks on critical infrastructure (e.g., energy and data centerscentres) may necessitate investments in additional protective measures.
G1 - Governance	Risk	Dependency	Remote working can lead to a higher risk of cybercrime because, for example, information security may be insufficiently protected.

APPENDIX 3 - ENVIRONMENTAL ASPECTS REGISTER
Appendix 3A

Theme	Laws and regulations
ESRS E1 – Climate change	• Omgevingswet • Nationale Omgevingsvisie • Klimaatwet • Warmtewet • Elektriciteitswet • Energieakkoord 2013 • Klimaatakkoord 2019 • Cluster EnergieStrategie (INN) • Investeringsplan Waterstof Noord-Nederland 2020 • Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen • Programma Aansluiting Wind Op Zee – Eemshaven (PAWOZ Eemshaven) • Verkenning Aanlanding Wind Op Zee (VAWOZ)2030 • Programma Noordzee 2022 - 2027 • Structuurvisie Windenergie op land • Biomassa 2030, Strategische visie voor de inzet van biomassa op weg naar 2030 • Stimulering Duurzame Energieproductie en Klimaattransitie (SDE++) • Programma Infrastructuur Duurzame Industrie - Plan van Aanpak • Nationaal Meerjarenprogramma Infrastructuur Energie en Klimaat (nMIEK) • Provinciaal Meerjarenprogramma Infrastructuur Energie en Klimaat (pMIEK) • Structuurvisie Buisleidingen 2012 – 2035 • Green deal Zee-, binnenvaart & havens • Green Award inland shipping
ESRS E2 – Pollution	• Omgevingswet • Nationale Omgevingsvisie • Waterwet • Kaderrichtlijn water • Nationaal Water Programma 2022-2027 • Structuurvisie Ondergrond • Besluit Bodemkwaliteit • Meststoffenwet • Erratum Regionale Nota Bodembeheer en Actualisatie Regionale bodemkwaliteitskaart • Omgevingsverordening provincie Groningen • Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen • Milieuprogramma Provincie Groningen • Landelijk afvalbeheerplan (LAP3) • European Pollutant Release and Transfer Register • Richtlijn Industriële Emissies • REACH Verordening (EG) 1907/2006 • Waterbeheerprogramma Waterschap Noorderzijlvest 2022-2027 • Waterbeheerprogramma Waterschap Hunze en Aa's 2022-2027 • Programma Eems-Dollard 2050 • Internationaal verdrag ter voorkoming van verontreiniging door schepen (MARPOL)

APPENDIX A

Theme	Laws and regulations
ESRS E3 – Water and Marine Resources	• **Omgevingswet** • **Nationale Omgevingsvisie** • **Drinkwaterwet** • **Drinkwaterbesluit** • **Waterwet** • **Kaderrichtlijn water** • **Nationaal Water Programma 2022-2027** • **Structuurvisie Ondergrond** • **Erratum Regionale Nota Bodembeheer en Actualisatie Regionale bodemkwaliteitskaart** • **Omgevingsverordening provincie Groningen** • **Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen** • **Milieuprogramma Provincie Groningen** • **Waterbeheerprogramma Waterschap Noorderzijlvest 2022-2027** • **Waterbeheerprogramma Waterschap Hunze en Aa's 2022-2027** • **Programma Eems-Dollard 2050** • **Green deal visserij voor een schone zee**
ESRS E4 – Biodiversity and Ecosystems	• **Omgevingswet** • **Nationale Omgevingsvisie** • **Vogelrichtlijn** • **Habitatrichtlijn** • **Gedragscode Natuurvriendelijk werken Groningen Seaports** • **Natura-2000 Beheerplan Waddenzee** • **Natuurbeheerplan 2025 – Provincie Groningen** • **Ontheffing tijdelijke Natuur** • **Green deal tijdelijke Natuur** • **Programma Eems-Dollard 2050** • **Integraal Management Plan Eems-Dollard**
ESRS E5 – Circular Economy	• **Omgevingswet** • **Nationale Omgevingsvisie** • **Rijksbrede programma Circulaire Economie ("Nederland circulair in 2050")** • **Grondstoffenakkoord** • **Nationaal Programma Circulaire Economie 2023 – 2030** • **Richtlijn 2018/2001; ter bevordering van het gebruik van energie uit hernieuwbare bronnen**
ESRS S1 – Own Workforce	• **Arbowet** • **Arbeidstijdenwet** • **Wet arbeid en zorg** • **Wet verbetering Poortwachter** • **Algemene Wet Gelijke Behandeling** • **Wet gelijke behandeling op grond van handicap of chronische ziekte** • **Wet gelijke behandeling van mannen en vrouwen** • **Wet gelijke behandeling op grond van leeftijd bij de arbeid** • **Tabakswet** • **Wet Arbeidsmarkt in Balans (WAB)**

APPENDIX A

Theme	Laws and regulations
ESRS S2 – Workers in the value chain	• **OESO – richtlijnen** • **ILO conventions**
ESRS S3 – Affected communities	• **Omgevingswet** • **Nationale Omgevingsvisie** • **Omgevingsverordening provincie Groningen** • **Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen**
ESRS G1 – Governance	• **Wetboek van Strafrecht** • **OESO – richtlijnen** • **United Nations Convention against Corruption** • **OECD Anti-Bribery Convention** • **Aanbestedingswet** • **Aanbestedingsbesluit** • **Europese aanbestedingsrichtlijnen (2014/24/EU, 2014/25/EU en 2014/23/**

Theme	Internal policies
Internal and general	• **Businessplan 2024-2028** • **Havenvisie 2030*** • **Havenafvalplan (HAP)** • **Gebiedsontwikkeplan (GOP)** • **Nature policy plan Delzijl and Eemshaven** • **Brochure Circulaire Economie** • **Adaptive Implementation Clean Shipping** • **Establishment Policy** • **Gedragscode integriteit**

APPENDIX 3B
Theme: ESRS E1 – Climate Change

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Energy Transition	• **CO2 emissions** • **Renewable energy sources** • **Economic development**	**External:** • Government bodies • Businesses • Regulatory authorities • Environmental groups • Local communities • Other ports • Utility providers • Educational institutions • Business service providers • Media **Internal** • Facilities and Business development	• Omgevingswet • Nationale Omgevingsvisie • Klimaatwet • Warmtewet • Elektriciteitswet • Energieakkoord 2013 • Klimaatakkoord 2019 • INN • Investeringsplan Waterstof Noord-Nederland 2020 • Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen • PAWOZ Eemshaven • VAWOZ • Programma Noordzee 2022 - 2027 • Structuurvisie Windenergie op land • Biomassa 2030 • SDE++ • Programma Infrastructuur Duurzame Industrie • nMIEK • pMIEK • Structuurvisie Buisleidingen 2012 – 2035 • Green deal Zee-, binnenvaart & havens • Green Award inland shipping • Environmental Ship Index	• Participation • Stimulation • Monitoring	• Map scope 1, 2 and 3 emissions • Implement transition plan towards climate neutrality

APPENDIX 3B
Theme: ESRS E1 – Climate Change

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Climate adaptation	• **Economic development** • **Security**	**External:** • Government bodies • Businesses • Environmental groups • Other ports • Utility providers • Educational institutions • Business service providers • Media **Internal** • Port technology	• Omgevingswet • Nationale Omgevingsvisie • Klimaatwet • Klimaatakkoord 2019 • INN • Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen • Programma Noordzee 2022 - 2027 • Programma Infrastructuur Duurzame Industrie • nMIEK • pMIEK • Structuurvisie • Buisleidingen 2012 – 2035	• Participation • Adaptation • Monitoring	Focus on long-term resilience and emergency preparedness

APPENDIX 3B
Theme: ESRS E2 – Pollution

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Air pollution	**Air quality**	**External:** • Government bodies • Businesses • Regulatory authorities • Environmental groups • Local communities • Educational institutions • Business service providers • Media **Internal** • Programma manager Sustainability	• Omgevingswet • Nationale Omgevingsvisie • Omgevings-verordening Provincie Groningen • Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen • Milieuprogramma Provincie Groningen • European Pollutant Release and Transfer Register • Richtlijn Industriële Emissies • REACH Verordening (EG) 1907/2006 • Internationaal verdrag ter voorko-ming van veront-reiniging door schepen (MARPOL) • Wet voorkoming verontreiniging door schepen • Regeling voorkoming verontreiniging door schepen • Havenverordening Groningen Seaports 2022 • Green Award inland shipping • Environmental Ship Index	Monitoring	Mapping concentrations of CO2, nitrogen and heavy metal emissions

APPENDIX 3B
Theme: ESRS E2 – Pollution

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Soil contamination	• **Soil quality** • **Dredging**	**External:** • Government bodies • Businesses • Regulatory authorities • Environmental groups • Local communities • Educational institutions • Business service providers • Media **Internal** • Programma manager Sustainability and Project Engineer Dredging	• Omgevingswet • Nationale Omgevingsvisie • Structuurvisie Ondergrond • Besluit Bodemkwaliteit • Meststoffenwet • Erratum Regionale Nota Bodembeheer en Actualisatie Regionale bodem-kwaliteitskaart • Omgevings-verordening Provincie Groningen • Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen • Milieuprogramma Provincie Groningen • Landelijk afvalbeheerplan (LAP3) • European Pollutant Release and Transfer Register • Richtlijn Industriële Emissies • REACH Verordening (EG) 1907/2006 • Programma Eems-Dollard 2050 • Havenverordening Groningen Seaports 2022 • Green deal scheepsafvalketen • Green Award inland shipping • Environmental Ship Index	• Monitoring • Containment	Focus on prevention of further contamination through monitoring and containment

APPENDIX 3B
Theme: ESRS E2 – Pollution

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Water contamination	**Water quality**	**External:** • Government bodies • Businesses • Regulatory authorities • Environmental groups • Local communities • Educational institutions • Business service providers • Media **Internal** • Programma manager Sustainability	• Omgevingswet • Nationale Omgevingsvisie • Waterwet • Kaderrichtlijn water • Nationaal Water Programma 2022-2027 • Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen • Milieuprogramma Provincie Groningen • Landelijk afvalbeheerplan (LAP3) • European Pollutant Release and Transfer Register • Waterbeheer-programma Waterschap Noorderzijlvest 2022-2027 • Waterbeheer-programma Waterschap Hunze en Aa's 2022-2027 • Programma Eems-Dollard 2050 • Internationaal verdrag ter voorkoming van verontreiniging door schepen (MARPOL) • Wet voorkoming verontreiniging door schepen • Regeling voorkoming verontreiniging door schepen • Havenverordening Groningen Seaports 2022	Monitoring	Focus on maintaining water quality through monitoring and rapid response to contamination incidents

APPENDIX 3B
Theme: ESRS E2 – Pollution

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Waste water	**Water quality**	**External:** • Government bodies • Businesses • Regulatory authorities • Environmental groups • Local communities • Other ports • Utility providers • Educational institutions • Business service providers • Media **Internal** • Port technology	• Omgevingswet • Nationale Omgevingsvisie • Waterwet • Kaderrichtlijn water • Nationaal Water Programma 2022-2027 • Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen • Milieuprogramma Provincie Groningen • European Pollutant Release and Transfer Register • Richtlijn Industriële Emissies • Waterbeheer-programma Waterschap Noorderzijlvest 2022-2027 • Waterbeheer-programma Waterschap Hunze en Aa's 2022-2027 • Programma Eems-Dollard 2050 • Internationaal verdrag ter voorkoming van verontreiniging door schepen (MARPOL) • Wet voorkoming verontreiniging door schepen • Regeling voorkoming verontreiniging door schepen • Havenverordening Groningen Seaports	• Monitoring • Stimulate reduction	Encourage innovative solutions for wastewater treatment and reduction to minimize environmental impact

APPENDIX 3B
Theme: ESRS E3 – Water and Marine Resources

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Water usage	• **Water scarcity** • **Economic development**	**External:** • Government bodies • Businesses • Regulatory authorities • Environmental groups • Utility providers • Educational institutions • Business service providers • Media **Internal** • Business development	• Omgevingswet • Nationale Omgevingsvisie • Drinkwaterwet • Drinkwaterbesluit • Waterwet • Kaderrichtlijn water • Nationaal Water Programma 2022-2027 • Structuurvisie Ondergrond • Erratum Regionale Nota Bodembeheer en Actualisatie Regionale bodem-kwaliteitskaart • Omgevings-verordening Provincie Groningen • Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen • Milieuprogramma Provincie Groningen • Waterbeheer-programma Waterschap Noorderzijlvest 2022-2027 • Waterbeheer-programma Waterschap Hunze en Aa's 2022-2027 • Programma Eems-Dollard 2050 • Green deal visserij voor een schone zee	• Monitoring • Stimulate reduction	Facilitate transition to industrial water

APPENDIX 3B
Theme: ESRS E4 – Biodiversity and Ecosystems

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Biodiversity	**Quality of local ecosystems**	**External:** • Government bodies • Businesses • Regulatory authorities • Environmental groups • Local communities • Utility providers • Educational institutions • Business service providers • Media **Internal** • Project Asset Management and Programma manager Sustainability	• Omgevingswet • Nationale Omgevingsvisie • Vogelrichtlijn • Habitatrichtlijn • Gedragscode Natuurvriendelijk werken Groningen Seaports • Natura-2000 Beheerplan Waddenzee • Natuurbeheerplan 2025 – Provincie Groningen • Ontheffing tijdelijke Natuur • Green deal tijdelijke Natuur • Programma Eems-Dollard 2050 • Integraal Management Plan Eems-Dollard	• Monitoring • Stimulation • Participation	Stimulation and participation in green deals and nature-inclusive activities

APPENDIX 3B
Theme: ESRS E5 – Circular Economy

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Circular Economy	• **Energy usage** • **Resource consumption** • **Recycling** • **Economic development**	**External:** • Government bodies • Businesses • Regulatory authorities • Environmental groups • Other ports • Utility providers • Educational institutions • Business service providers • Media **Internal** • Sales and business development	• Omgevingswet • Nationale Omgevingsvisie • Rijksbrede programma Circulaire Economie (“Nederland circulair in 2050”) • Grondstoffen-akkoord • Nationaal Programma Circulaire Economie 2023 – 2030 • Richtlijn 2018/2001; ter bevordering van het gebruik van energie uit hernieuwbare bronnen	• Stimulation • Facilitation	Stimulation and participation in green deals and nature-inclusive activities

APPENDIX 3B
Theme: ESRS S1 – Own Workforce

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Health and well-being of own workforce	• **Physical health** • **Mental health** • **Work-life balance** • **Worker's efficiency**	**External:** • Government bodies • Businesses • Regulatory authorities • Local communities • Media • Trade Unions **Internal** • HRM	• Arbowet • Arbeidstijdenwet • Wet arbeid en zorg • Wet verbetering Poortwachter • Algemene Wet Gelijke Behandeling • Wet gelijke behandeling op grond van handicap of chronische ziekte • Wet gelijke behandeling van mannen en vrouwen • Wet gelijke behandeling op grond van leeftijd bij de arbeid • Tabakswet • Wet Arbeidsmarkt in Balans (WAB)	• Participation • Stimulation • Monitoring	Regular assessment of employee satisfaction and well-being

Theme: ESRS S2 – Workers in the Value Chain

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Safe port area	• **Safety and security in port operations** • **Operational efficiency**	**External:** • Government bodies • Businesses • Regulatory authorities • Local communities • Other ports • Utility providers • Business service providers • Media • Trade unions **Internal** • Nautical department and Port technology	• OESO – richtlijn • ILO conventions	• Participation • Stimulation • Facilitation • Monitoring	Active communication about health and safety regulations

APPENDIX 3B
Theme: ESRS S3 – Affected communities

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Liveability around the port area	• **Community well-being** • **Environmental quality (noise, odour)** • **Social acceptance**	**External:** • Government bodies • Businesses • Regulatory authorities • Local communities • Utility providers • Business service providers • Media **Internal** • Stakeholder management	• Omgevingswet • Nationale Omgevingsvisie • Omgevings-verordening Provincie Groningen • Geconsolideerde Omgevingsvisie november 2023 – Provincie Groningen	• Participation • Stimulation • Monitoring	• Monitoring noise and odour and stimulate the reduction of these impacts • Participate in sponsorships for local communities
Indirect employment	• **Community well-being** • **Economic development** • **Social acceptance**	**External:** • Government bodies • Businesses • Local communities • Other ports • Utility providers • Business service providers **Internal** • Stakeholder management		•Facilitation	Facilitate indirect employment in our value chain

APPENDIX 3B
Theme: ESRS G1 – Governance

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Corruption and bribery	• **Legal compliance** • **Reputation Public trust**	**External:** • Government bodies • Businesses • Regulatory authorities • Other ports • Utility providers • Business service providers • Media **Internal** • Stakeholder management	• Wetboek van Strafrecht • OESO – richtlijnen • United Nations • Convention against Corruption • OECD Anti-Bribery Convention • Aanbestedingswet • Aanbestedings-besluit • Europese aanbestedings-richtlijnen (2014/24/EU, 2014/25/EU en 2014/23/EU)	Prevention	• Four-eyes principle for transactions • Actively communicate code of conduct and integrity • Nautical department has additional training
Crime	• **Security and safety** • **Reputation** • **Public trust**	**External:** • Government bodies • Businesses • Regulatory authorities • Local communities • Other ports • Media • Trade Unions **Internal** • Legal affairs	Wetboek van Strafrecht	Prevention	• Four-eyes principle for transactions • Actively communicate code of conduct and integrity
Interests and transparency	• **Public trust** • **Social acceptance**	**External:** • Government bodies • Businesses • Regulatory authorities • Environmental groups • Local communities • Other ports • Educational institutions • Media • Trade Unions **Internal** • Strategy and Communication	• OESO – richtlijnen • United Nations • Convention against Corruption • OECD Anti-Bribery Convention	Participation	• Regular publishing online about our activities • Guided tours and information sessions hosted

APPENDIX 3B
Theme: ESRS G1 – Governance

Environmental aspect	Impact on	Stakeholders	Applicable legislation & Legal requirements	Control measures	Remarks
Responsible supply chain	• **Reputation** • **Social acceptance**	**External:** • Government bodies • Businesses • Regulatory authorities • Environmental groups • Local communities • Other ports • Utility providers • Business service providers • Media • Trade unions **Internal** • Project Asset Management and business development	OESO – richtlijnen	Stimulation	Regular consultation structures with supply chain stimulating CSR

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