

# Sustainability report 2024



## A moving stop

We set new customer records in the summer of 2024 and saw traffic volumes stabilise while we continued to invest in our zero direct emissions vision and enhance our competitiveness.



**Scandlines Infrastructure ApS**

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Our zero direct emissions vision is on track.

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### About the sustainability report

This report covers the activities and results of Scandlines Infrastructure ApS (the "Company") for the period 1 January 2024 - 31 December 2024, and was prepared in accordance with the GRI standards.

Our approach based on the GRI Standards, is focusing on identifying and reporting on relevant stakeholder concerns and the context and materiality of our efforts as well as presenting a comprehensive overview of Scandlines' sustainability work.

The information in the report has been sourced and presented with a view to ensure quality in terms of accuracy, balance, clarity, comparability, reliability and timeliness.

The report also represents our statutory statement on social responsibility in accordance with section 99a of the Danish Financial Statements Act, as well as on data ethics in accordance with section 99d of the Danish Financial Statements Act.

We look forward to continuously evolving and improving our approach, welcoming any feedback from our stakeholders.







# Overview

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# Scandlines at a glance

Scandlines operates two short-distance ferry routes between Germany and Denmark with high frequency and large capacity. Our ports and ferry routes constitute a crucial piece of infrastructure that connects motorways E47 and E55 between Europe and Scandinavia. Our moving stop offers shorter driving times, an opportunity to rest while sailing and a more efficient alternative to the Great Belt Bridge, direct routes between Germany and Sweden as well as airline travel.

## Fleet

# 7 ferries

Our six hybrid ferries are supplemented by a conventional freight ferry, which also acts as a replacement ferry when needed. Our new zero direct emissions freight ferry is due to be commissioned in 2025.

## Departures

# 38 thousand

Our infrastructure and ferries provide a direct connection between Continental Europe and Scandinavia with regular departures throughout the day.

## Passengers

# 6.4 million

Our ferries, infrastructure and staff create value for professionals, leisure travellers and shoppers looking for efficiency, convenience or a good deal on board.

## Landings

# 4 ports

We own the three ports in Puttgarden, Rødby and Gedser and rent the port in Rostock. Our terminals are directly connected to the European motorway network, providing seamless and swift access, loading and exit for business and private passengers.

## Cars

# 1.6 million

Scandlines connects the European motorway network with frequent departures around the clock and an average waiting time of 10 minutes on the Puttgarden-Rødby route.

## Lorries

# 693 thousand

The efficiency and reliability of our moving stop is valued by freight customers who take the opportunity to comply with resting time regulation while sailing.

### Puttgarden-Rødby

Four hybrid ferries with a crossing time of only 45 minutes and up to 96 departures per day. The route enables cars to travel from Hamburg to Copenhagen in 4 hours and 15 minutes at competitive prices. One conventional ferry is deployed to meet freight customer demand, while also acting as a replacement ferry, and one new zero direct emissions freight ferry is due to be commissioned in 2025.

### Rostock-Gedser

Two hybrid ferries with a maximum crossing time of 2 hours and up to 20 departures per day. The route enables cars to travel from Berlin to Copenhagen in less than 6 hours at competitive prices.

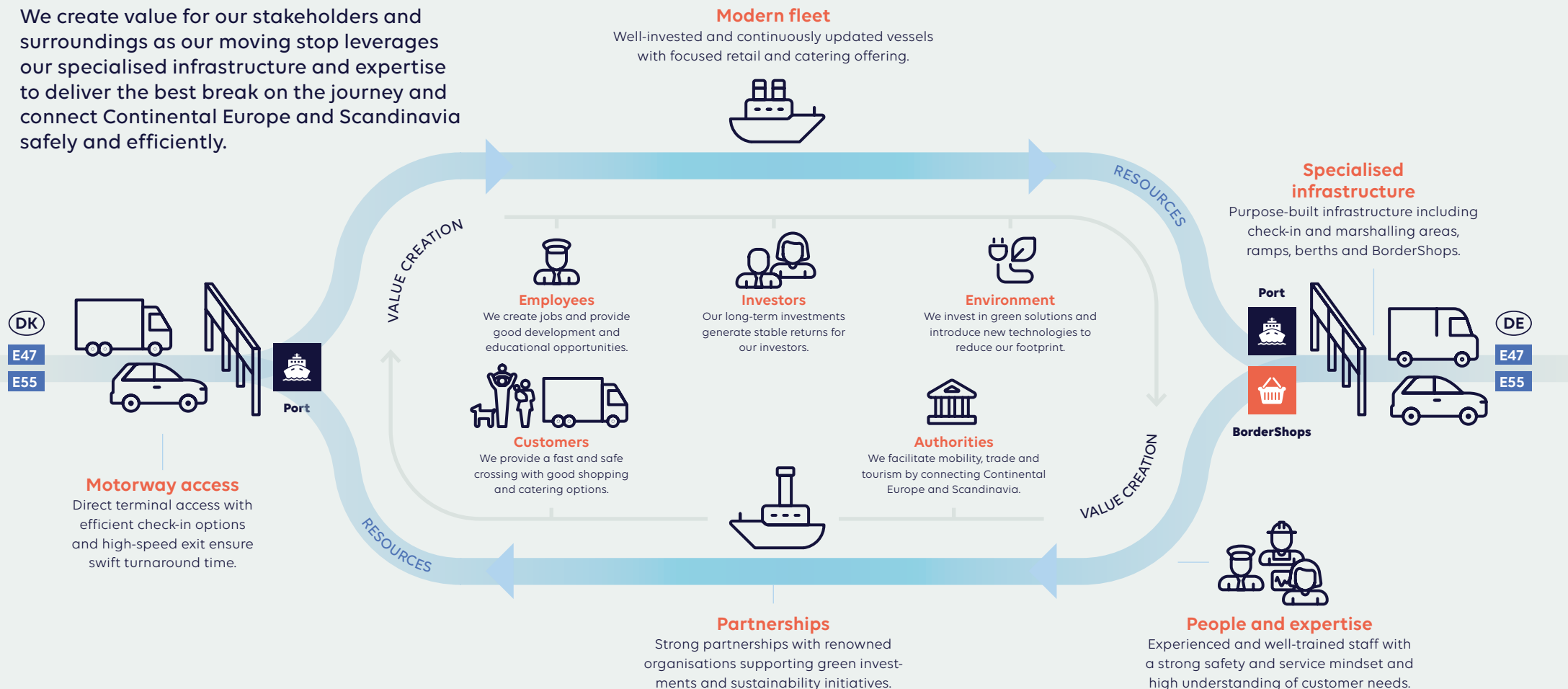
### Border shopping

Customers enjoy unparalleled shopping opportunities and online pre-ordering at two BorderShops and one Easymarked located in the ports of Puttgarden and Rostock, respectively.



# Our moving stop

We create value for our stakeholders and surroundings as our moving stop leverages our specialised infrastructure and expertise to deliver the best break on the journey and connect Continental Europe and Scandinavia safely and efficiently.





# Snapshot of 2024

~10.1 MEUR

We continued our green investments with the construction of the new zero direct emissions freight ferry which will be deployed in 2025, as well as getting our ports ready to accommodate this new ferry.

-20% CO<sub>2</sub>e

We reduced our total scope 1 CO<sub>2</sub>e emissions by 20 percent compared to our base year 2019.

49%

We increased the number of electric and hybrid vehicles in our car pool from 39 to 49 percent.

28%

We have improved the share of recycled waste by 28 percent in the last five years.

## SDG indicators relevant for Scandlines



Since 2021 Scandlines Infrastructure ApS has been committed to the UN Global Compact corporate responsibility initiative and its principles in the areas of human rights, labour, the environment and anti-corruption.



## CEO letter

# Progress of our zero direct emissions vision on track

The construction of our new zero direct emissions ferry continued in 2024 with expected commissioning in 2025. At the same time, we progressed on the planned conversion of two Puttgarden-Rødby vessels to plug-in-f ferries to realise our target of zero direct emissions on this route in 2030 and for Scandlines by 2040. During this transition, health and safety and improving our social impact to benefit our stakeholders remain at the core of our mission, while preparing for upcoming regulatory changes.

We revised our strategy in 2024 to futureproof Scandlines. Sustainability is a core element, underlining our ambition for environmental leadership in ferry operation. We continued to prepare Scandlines for the future by introducing Lean management to streamline our processes, encourage innovation, and reinforce our commitment to operational excellence, while remaining committed to our zero direct emissions vision.

### Continued progress to achieve our vision

After the launch of the new zero direct emissions freight ferry in November 2023, the remaining work on the vessel continued during 2024. When commissioned in the second half of 2025, the ferry will operate the Puttgarden-Rødby route with capacity for 66 freight units and 140 passengers.

I am very pleased that our new zero direct emissions freight ferry was named Short-Sea Ferry of





**I am very pleased to see that we are on track towards realising our zero direct emissions vision, that we are continuously developing an even better workplace while remaining focussed on relentless improvement of the health and safety conditions of our people and our customers.**

Eric Grégoire  
CEO

the Year at the Ferry Shipping Summit Award in November 2024, acknowledging our efforts to reach our vision.

In addition, the conversion of two of our four passenger vessels to plug-in hybrid ferries on the Puttgarden-Rødby route progressed to plan and is essential for our target of zero direct emissions on this route in 2030 and on a group-level by 2040. Once converted, 80 percent of the power for a crossing will come from batteries charged in the ports utilising the same charging equipment installed for as the new ferry. The hybrid conversion retrofitting of the two ferries will start in the second half of 2025 with diesel generators being replaced by 5 MWh energy storage systems.

The project and particularly the ultrafast charging system was acknowledged by the jury of the German mobility industry DVWG prize in November 2024, where we received the innovation prize.

### **We are safer together**

This slogan frames our safety work in Scandlines, and underlines that a shared safety culture, understanding and know-how are key to success. An external evaluation showed that we are on the right track with already implemented initiatives, but also that our health and safety

strategy needed to be adjusted in certain areas. Furthermore, we have taken necessary steps towards creating a safety culture with higher emphasis on proactive incident prevention, while maintaining high focus on root cause analysis of registered incidents.

### **People, diversity and inclusion**

We saw an increased participation rate for our annual employee engagement survey, as well as a slight upward trend in the engagement rate - progress driven by dedicated efforts from all employees and the company. Scandlines wishes to be a workplace where everyone feels respected, valued, and empowered, and therefore we introduced a Diversity, Equity, Inclusion, and Belonging (DEIB) policy as framework for minimising biases, providing equal career development opportunities, and maintaining a respectful and harassment-free environment.

### **Preparing for new reporting requirements**

In the future, when more regulatory guidance is available, Scandlines will report its sustainability work in accordance with the EU Corporate Sustainability Reporting Directive (CSRD). In preparation, we have conducted our first double materiality assessment to further streamline our sustainability initiatives and efforts. In the present

report, we have taken the first steps towards the new framework with updated material topics as well as reorganised sections and content.

We are looking forward to fostering a company culture where employees thrive, advancing our path to operational excellence, strengthening our sustainability performance, new partnerships, and above all being the best experience for our customers.

**Eric Grégoire**  
CEO





# Focus

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# Materiality assessment

We conducted our first double materiality assessment confirming our material sustainability topics with a particular focus on environmental protection and health & safety.

In 2024, Scandlines maintained its focus on the ten principles of the UN Global Compact and has extended the previous materiality assessment which was based on the Global Reporting Initiative (GRI). The focus on the company's positive and negative economic, environmental and social impacts was extended to include the assessment of impacts, risks, and opportunities (IROs) for approx. 100 sustainability matters as part of a double materiality assessment covering our own operations as well as our direct value chain. The assessment encompassed short- medium- and long-term considerations as well as IROs based on the sectors we operate in, the products and the geographic regions. This assessment also considered our external and internal stakeholders.

Consequently, we have changed our reporting from being based on six key focus areas to the most material topics under each of the three categories Environment, Social, and Governance. We remain confident that we can deliver positive improvements in each of these areas. As sustainability risks, including climate, are now

integrated in the materiality assessment, we will no longer report the in a separate chapter. For an overview of Scandlines' risks, please refer to the annual report. In our sustainability work we place particular emphasis on environmental protection and health & safety of all parties. Based on our operations of high-frequency ferry routes in the Baltic Sea, these areas entail the highest impact and offer the most potential for making a positive contribution to our surroundings. An overview of our material sustainability topics can be found on page 11. The GRI reference index table is presented at the end of this report.

## Stakeholders

We value our stakeholders' opinion and engage with them on a regular basis to discuss concerns, share knowledge, build stronger relations, and strengthen our sustainability efforts. Our key stakeholders were identified by assessing their direct impact on our business as well as their exposure to any direct impact from our operations. We have also identified

key stakeholders with whom we share specific sustainability objectives.

### Employees and workers

We have established safety committees and conduct work environment seminars for employees, and we cooperate with workers' councils and workers' unions on an ongoing basis to maintain and strengthen relations. In 2024, we held our first ever joint meeting for our on board staff to connect and strengthen relations.

### Customers

We conduct surveys to obtain feedback from our passengers, and we engage with our freight customers at regular meetings and when attending conferences and congresses. We further use the Net Promoter Score to measure customer satisfaction. Our freight customers express an increasing interest in understanding the impact of CO<sub>2</sub>e emissions using Scandlines' operations.

### Investors

We engage with our investors and cover sustainability topics at scheduled and ad hoc meetings as well as through ongoing informal dialogue. Our Safety and Sustainability Committee was created in 2021 on the back of such dialogues. In 2024, our investors continued to support our sustainability efforts.

### Vendors and workers in the value chain

We have around 1,500 vendors and stay in close contact with a wide range of them daily and conduct a number of vendor audits annually.

### Authorities and political decision makers

We regularly meet with authorities and political decision makers to discuss and demonstrate climate investments and a range of other topics.

### Associations/NGOs

We are long-standing members of Green Ship of The Future, a Public Private Partnership for innovation and demonstration of technologies and methods to lower climate impact from shipping. We also work with associations such as the German environmental non-profit organisation "NABU" (Naturschutzbund) to further strengthen our profile by developing sustainability initiatives.

### Communities

We support the communities close to our harbours through sponsorships of local sports clubs and school projects, among other things. We have demonstrated our support of improving sustainable tourism by becoming a business partner of the 'sustainable destination Rostock & Warnemünde' via TourCert. We also collaborate with local job centres on the Danish islands of Lolland and Falster and work with German schools on and around the island of Fehmarn to recruit temporary staff, in particular. Together with three partners we continue to look for investors to develop the port area in Gedser not used for transportation purposes to attract businesses and tourism.

### Natural environment

For the first time, we have specifically considered the natural environment as a silent stakeholder in our materiality assessment 2024 by using publicly available reports.



# Our ESG focus

## Environment

Scandlines impacts the environment through its own operations and those of its business partners and customers. The emissions produced impact climate change and the wrong use of chemicals can negatively impact the environment or health of employees and others. Spills and pollution can potentially occur onshore and at sea. Large amounts of (hazardous) waste are generated through products and services. Further, our operations and those of our business partners impact biodiversity, for example in the areas where we operate.

We are therefore committed to protecting the environment, particularly in relation to the preservation of our marine environment. We have defined a vision of converting the group's vessels to zero direct emissions ferries and claim a position as an industry leader with a clear impact on the sector's sustainable future. We calculate our emissions and strive to find ways of reducing them. We further aim to reduce our environmental impact in other areas, such as pollution, biodiversity, and other emissions. We also focus on ensuring that resources are used responsibly by recycling and reducing waste as much as possible, as well as responsibly processing hazardous waste onshore for safe removal and disposal.

We collaborate with nature protection organisations to identify ways of reducing our impact on the biodiversity of the territories we operate, by carefully analysing our impact on all realms of nature.

**Zero**  
direct emissions vision



## Social

Due to the nature of our industry, accidents impacting our employees, customers, and other related parties may potentially occur any time if precautions are not taken. Being the principal employer in some of the regions where we operate, we have a high responsibility towards our employees and workers in providing stable employment, decent work environment including equal treatment and providing relevant education and development opportunities. We recognize our impact on and responsibility for the communities we work and live in, as well as on the working conditions of our workers in the value chain.

The safety and well-being of our employees, workers, customers, vendors, and other stakeholders are of paramount importance to us and we are committed to do everything possible to ensure this – not just physically but also mentally and emotionally. We comply with – and go beyond – applicable regulation and internationally recognized standards for maritime workplaces and strive to avoid all incidents. We aim to ensure high employee satisfaction levels by providing a great and inclusive working environment in terms of career development opportunities, diversity, and integration.

**Zero**  
incidents journey

**High**  
employee satisfaction



## Governance

With millions of customers and more than 1,500 vendors, Scandlines has a responsibility to ensure fair and transparent business, and contracts which consider environmental principles, ensure the health and safety of workers and employees of vendors, and ensure that human rights principles are adhered to. This responsibility extends to providing a good corporate culture, compliance with laws and regulations, as well as external engagement to improve business conditions.

We never compromise on our commitment to honest and ethical behaviour, and we comply with all relevant laws in all jurisdictions in which we do business. We maintain a comprehensive compliance program, conduct regular compliance risk assessments and training of relevant employees, and we have established a whistleblower hotline accessible to internal and external parties, which can be used anonymously.

We treat all vendors with respect and adhere to principles of diversity and antidiscrimination, and we strive to properly manage potential conflicts of interest. We have high requirements for our vendors and expect them to sign our Vendor Code of Conduct, which includes the principles set out in the UN Global Compact. On a regular basis, we conduct reviews and audits considering, among other things, modern slavery.

**Zero**  
tolerance of compliance violations

**Respect**  
for all vendors







# Environment

Due to our business activities, environmental protection remains at the heart of our attention. We recognise our impacts, as well as the risks and opportunities related to climate change, biodiversity, pollution, and waste.

## Climate change

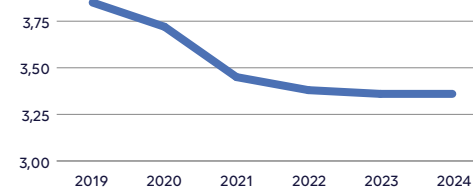
### Activities and results

#### Our “Green Ambition”

We are committed to transforming our business to zero direct emissions by 2040 - with our Puttgarden-Rødby route to accomplish this vision as early as 2030. We aim to align with the ambitions of the Paris Agreement to fight global warming

#### Co<sub>2</sub>e emissions per trip

Tonnes



and lead the transformation. We have invested around EUR 380 million between 2013-2024 in further removing direct scope 1 emissions and in driving technological advances to future-proof our position as a pioneer in low emission ferry operations. See further information on page 15. Our new direct emissions free freight ferry is expected to be put into operations in the second half of 2025. See further information on page 17.

The conversion of our existing fleet to zero direct emissions ferries continued in 2024 as we drew on our experience in pioneering hybrid ferries and establishing the largest hybrid ferry fleet in operation in the world. Late 2023, it was decided to further electrify two of our hybrid ferries on the Puttgarden-Rødby route. By converting the two vessels to plug-in ferries, they can charge at least 80 percent of the energy needed for crossing while in port. For this project we received the Innovation prize of the German mobility industry in 2024. See further information on page 16.

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Teams in our operations continued to share knowledge about the ferries and created best practices on how to manoeuvre and navigate them in an as energy efficient way as possible. We trained our officers in our own simulator and followed up on 'Ships and Harbours' meetings, where propulsion energy and hotel load energy are benchmarked. We did our utmost to be efficient in loading/unloading the port operations. Shorter port stays allow for more time at sea leading to energy savings at sea whilst maintaining the schedule, so-called slow steaming. Our Energy Management System collects data from different energy users and instruments on board and can be accessed whenever needed via our reporting tool to further optimise sailing.

### Emissions overview and accuracy

Overall scope 1 emissions from bunker fuel were reduced by 3.2 percent compared to 2023 due to the full effect of the new center propellers installed on M/V Copenhagen and M/V Berlin in 2023, as well as an improved utilization of the rotor sails. The effect was slightly offset by new emission factors used for CH<sub>4</sub> and N<sub>2</sub>O to align with MRV reporting.

We have reduced our scope 1 emissions by 12.8 percent per trip compared to our baseline year 2019, saving 18,418 tonnes of CO<sub>2</sub>e, had we sailed the same number of trips. This remained constant compared to 2023 due to a decrease of trips sailed. Emissions will significantly further decrease when the new zero direct emissions freight ferry is in operation and the further electrification of two vessels is finalised.

We continued to improve transparency of our operations through our greenhouse gas emissions calculations and our work of improving data to accurately track progress. This year, we have obtained an external verification of our full emissions calculations. We also started to include the emissions from business travel in private cars, while we continued to offset business flight trips via atmosfair, a German non-profit organisation,

which actively contributes to CO<sub>2</sub> emissions mitigation.

### Electric cars

The electrification of our car fleet continued, and we increased the share of electric and hybrid cars of our total car fleet to 49 percent. They use 100 percent renewable electricity when they charge at our facilities.





## Climate risk assessment

As part of the updated materiality assessment, an in-depth assessment of our impacts, risks, and opportunities relating to climate change adaptation, climate change mitigation, and energy was conducted.

### Physical risks

The assessment of our exposure to physical chronic and acute climate risks is based on external expert reports summarising the exposures for each Scandlines location under a low (IPCC RCP2.6 scenario with an expected 2 °C increase at the end of the century) and a high (IPCC RCP8.5 scenario with an expected 4-5 °C increase at the end of the century) carbon climate scenario, as well as different short- (2021-2040), medium- (2040-2060), and long-term (2060-2100) time frames.

After deselecting non-relevant climate risks based on the geographic regions we operate in and our business activities, we identified and assessed the most relevant ones, combined with possible transition risks, at an externally led workshop with internal stakeholders from all parts of the business. Here it

was also concluded that exposure to physical risks is considered of greater relevance in the medium- to long-term.

We have identified the acute climate risks of storms and changing precipitation patterns for all our ports as most relevant to Scandlines due to the possible damage to our assets which can also impact the actual operation of our ferries with a potential impact on departures. Following a significant storm surge in 2023, which pushed Bordershop Puttgarden into the quay leading to significant damage, the fendering was strengthened to better withstand future storms from the easterly directions in addition to the existing safeguards from westerly winds providing a compromise between timely repair and economic considerations. Whilst an increase of storms was identified as relevant already in low emissions and short-term scenarios, the risk of heavy precipitation only becomes relevant in the high carbon medium-term exposure scenario.

Higher increases of the global mean temperature result in a higher overall risk impact on

Scandlines' operations and its supply chains (e.g. availability of certain spare parts). More frequent and severe occurrences of our identified acute physical risks may cause temporary stops in operations and lost revenue. We monitor the frequency of these occurrences and assess the need for adaptive measures on the vessels and in the ports. Higher global temperatures with more frequent and longer heat periods may also change travel patterns of leisure customers in the future, as travelling south may become unattractive and leisure travel towards Northern Europe may increase. These changes in customer behaviour cannot be fully assessed at this stage but might require adjustments to Scandlines' operations.

### Transition risks

Transition to a low carbon economy represents, in addition to possible risks, also the opportunity to pursue Scandlines' zero direct emissions vision. The most relevant risks relate to regulatory changes which, on the one hand, significantly increase the required time spend and necessary investments to ensure continued compliance, but on the other hand also

provide opportunities for additional revenues and funding, as well as cost reductions. Failing to adequately invest in the pursuit of our vision entails a risk of losing business customers to competitors also focussing on transitioning to a lower carbon economy.

Operating expenses will increase due to the introduction of carbon taxes and the inclusion of shipping in the Emission Trading System. Further, capital expenses are necessary to continue the transformation of the fleet to zero direct emissions, a transfer that also entails risks using new technologies. Expenditure will also increase on the back of increasing raw material and commodities prices.

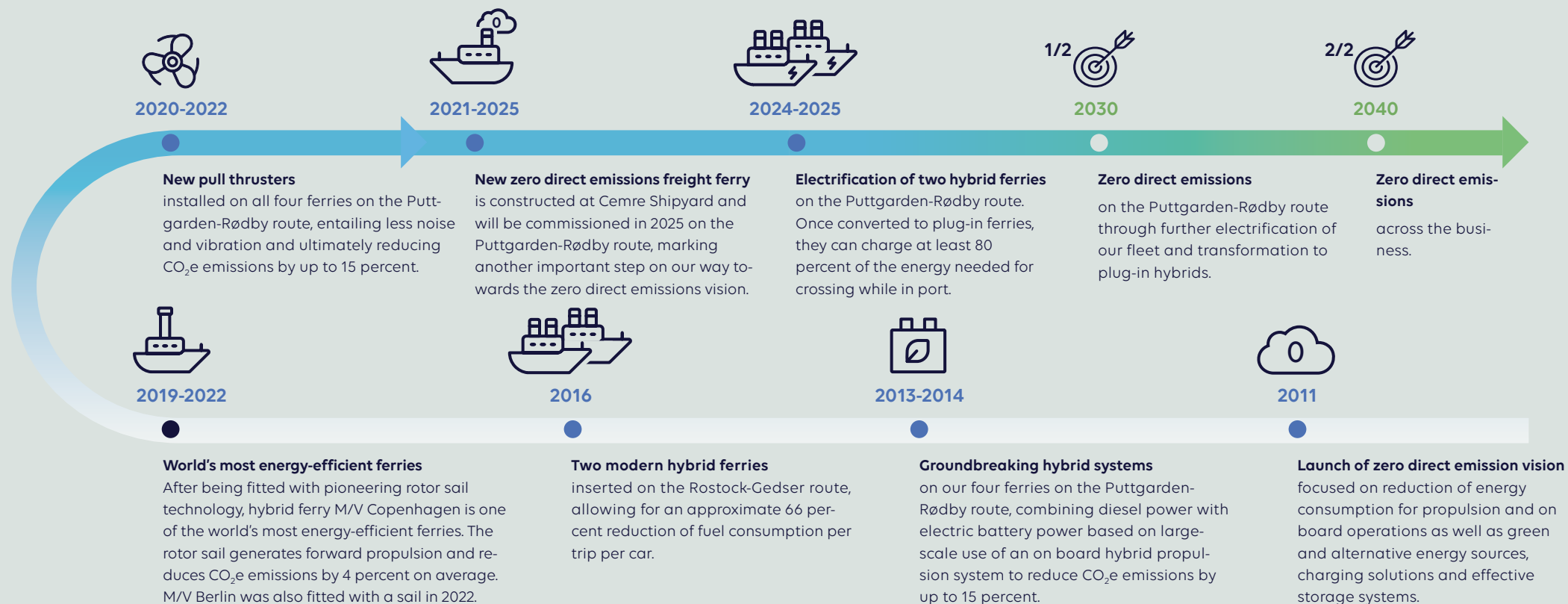




# Our journey towards zero direct emissions

We have committed to transform our business to zero direct emissions by 2040 - with our route on Puttgarden-Rødby to be free of direct emissions as early as 2030. We aim to align our ambitions with those of the Paris agreement to fight global warming and lead the transformation to zero direct emissions operations. Our green investments of around EUR 380 million between 2013-2024 further removed direct emissions (scope 1) and drove technological advances to future-proof our position as a true pioneer in fossil fuel free ferry operations.

ZERO DIRECT  
EMISSIONS BY  
**2040**





# Scandlines wins innovation award for electrification of Fehmarn Belt link

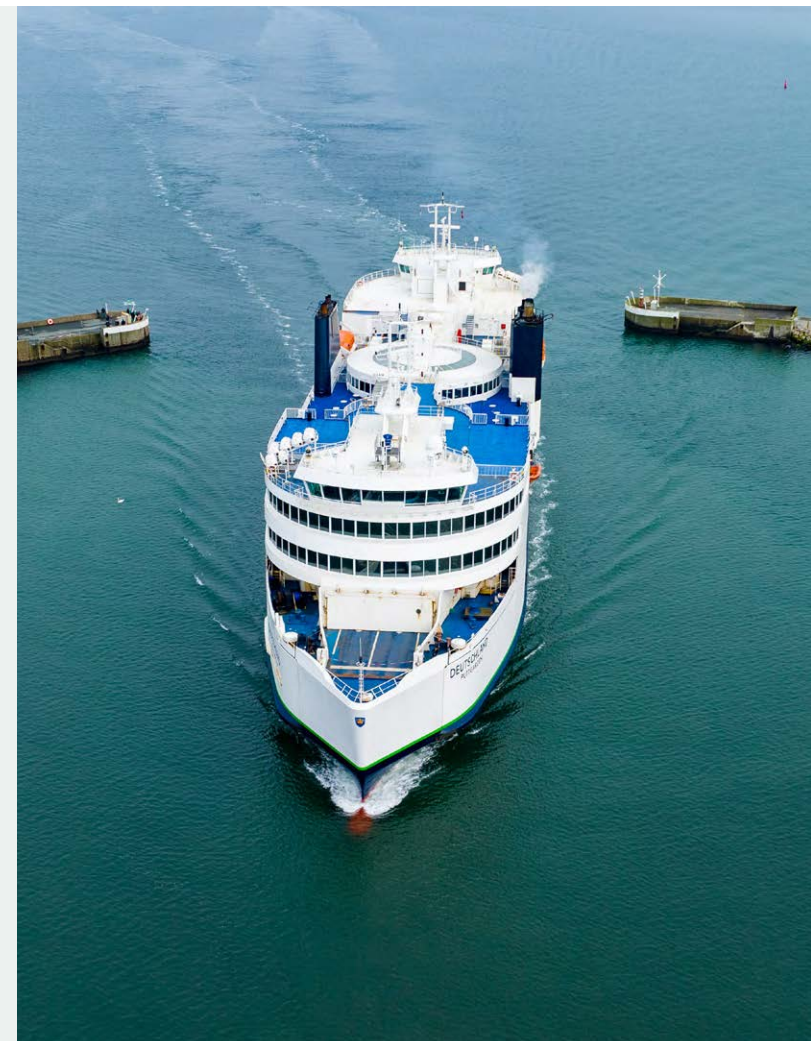
At the end of 2023, Scandlines announced that two of the four passenger ferries on the Puttgarden-Rødby route will be converted to plug-in hybrid ferries, where 80 per cent of the energy required for a crossing will be derived from 5 MWh batteries that are expected to be charged in the ports via a high-performance charging system in just 12 minutes.

The project and particularly the ultrafast charging system was acknowledged by the jury of the German mobility industry DVWG prize, who presented Scandlines with their innovation prize in November 2024. The German Ministry of Transport has also awarded the project financial support as part of a funding programme covering sustainable modernisation of coastal vessels to reduce emissions (NamKü).

The conversion of the ferries will begin in 2025, and Scandlines has entered a contract with a

global leader in power, propulsion and lifecycle solutions for the marine market, to supply all the electrical systems onboard the ferries, supervise the installation and to be responsible for the commissioning.

The conversion of the ferries Schleswig-Holstein and Deutschland is part of the ambition to operate the Puttgarden-Rødby route without direct emissions by 2030 and to realise the company's zero direct emissions vision by 2040.





# Award-winning innovation

The construction of our new zero direct emissions freight ferry continued at Cemre Shipyard in Turkey and entered its final phase in the second half of 2024 before planned commissioning in 2025.

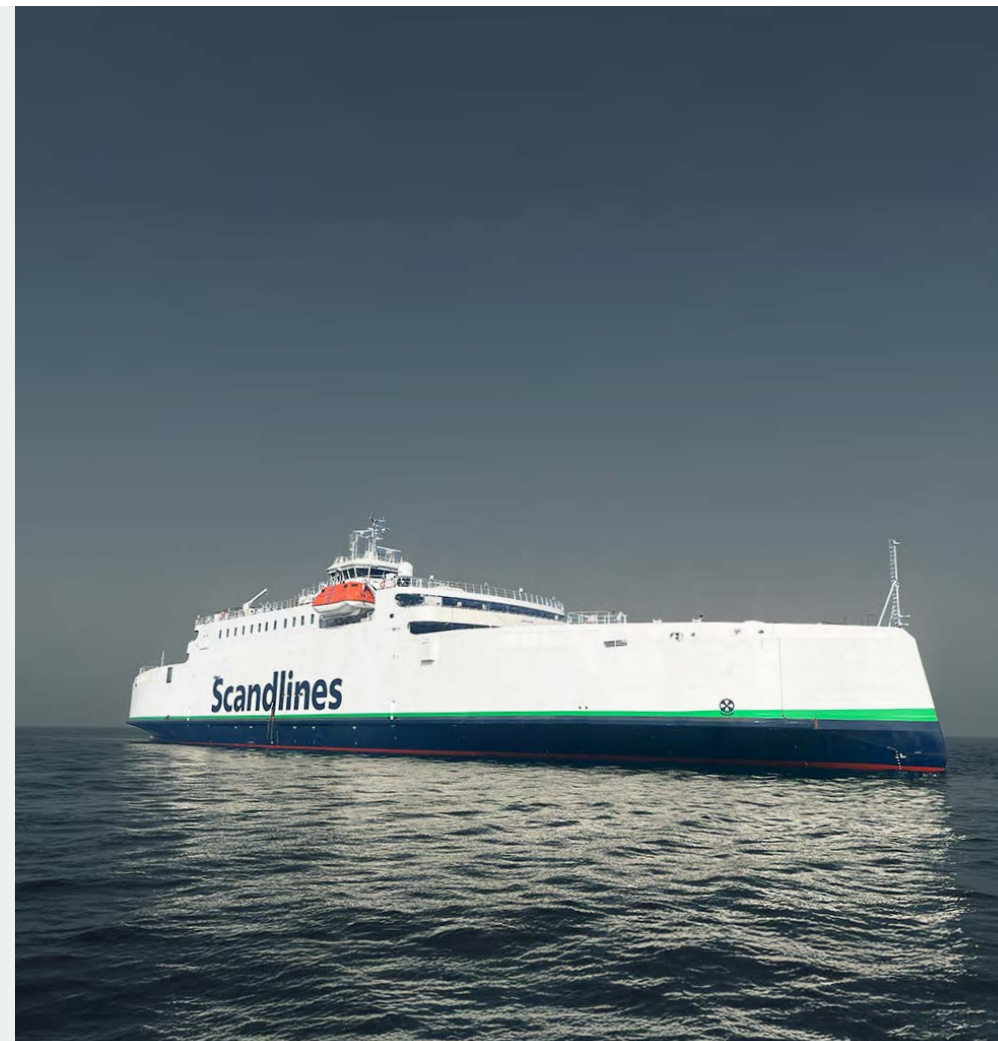
During the summer, the vessel entered the floating dock for fitting of a forward thruster as well as cleaning and painting works after having been launched in late 2023.

The ferry is expected to take the long journey from Turkey to Rødbyhavn in Denmark during 2025 for its naming ceremony and subsequent commissioning.

The ferry carries the world's largest lithium-ion battery bank and is intended to serve our customers on the Puttgarden-Rødby route with the

capacity to transport 66 freight units and 140 passengers across the Fehmarn Belt in 70 minutes with zero direct emissions and in 45 minutes as a hybrid ferry. Once the battery charger in Puttgarden is commissioned the zero direct emission crossing will be reduced to 45 minutes.

In November 2024, the ferry was named Short-Sea Ferry of the Year at the Ferry Shipping Summit Award, which supports ferry companies and ports that lead the way with ideas and possible solutions promoting sustainable development across strategic, operational and tactical levels.







## Biodiversity

### Activities and results

We take our responsibility to protect nature seriously, especially our local environment. We aim to prevent spills and pollution through an extensive maintenance program. In case of accidental pollution, processes are in place to immediately limit any damage and negative impacts. Our continuous initiatives to reduce waste and harmful chemicals are beneficial for both humans and nature in proximity to Scandlines. Thanks to an impact and dependency assessment conducted in 2024, we are now able to plan more targeted projects to limit our negative impact on biodiversity and have started to prepare an approach to make our ports step-by-step more biodiversity friendly through changed land management and new green structures.

In parallel with our own investments and activities, we continued our long-term cooperation with the German environmental non-profit organisation NABU. In 2023, we received support from NABU to develop a companywide biodiversity approach. In 2024, we joined a pilot project to identify corporate impacts and dependencies on biodiversity.



# Scandlines tests online tools to measure biodiversity impact

Sustainability is more than reducing CO<sub>2</sub>e emissions from our ferries. Since 2023, Scandlines has been developing a biodiversity approach to identify Scandlines' impacts and dependencies on biodiversity and possible ways to mitigate them.

On the recommendation of NABU (Naturschutzbund e.V.), our long-term partner, Scandlines has been part of a project with several companies and environmental protection organisations to develop guidelines for how to deal with the issue of biodiversity in the future.

The project, initiated by the Environmental Foundation Michael Otto, comprised testing of online tools for corporate biodiversity assessments to analyse dependencies, impacts and risks in relation to nature and biodiversity. For Scandlines such impacts include noise and light pollution from the ferries and the harbours as well as the impacts of waste generated through operations and by customers.

**"To analyse our impact on nature we must also assess every link in our supply chain, which makes the biodiversity topic quite complex. The assessment tools can help us prioritise so that we start where we can make the biggest difference and in that perspective, the project has been very useful to exchange ideas with other companies and stakeholders."**

Juliane Gallersdörfer, Scandlines Sustainability Coordinator





# Pollution

## Activities and results

We comply with all relevant regulations to prevent pollution on- or offshore and have a policy to not discharge any waste to the Baltic Sea. This includes our closed-looped scrubbers for which all waste is discharged onshore. We operate our own sewage plant in Puttgarden which cleans discharged water for the route Puttgarden-Rødby.

We use chemical substances but pay close attention to their safe handling – for our environment but also people. Scandlines always aims to replace chemical substances with less harmful alternatives. Internal chemical audits are to be conducted at all locations to ensure that no blacklisted or unapproved substances are in use. The chemical risk assessment is currently updated to include the long-term effects on the body of hazardous substances.

Should a spill or pollution happen, processes are in place to immediately limit any damage and to alleviate the negative impacts; if required, in close liaison with local authorities.

# 0

As in the last years, we had no reportable environmental incident related to pollution in 2024.







## Waste

### Activities and results

The operation of vessels and ports generates waste relating to – among other things – replacement of spare parts, maintenance of green areas, construction work and processing of sewage. Our customers generate waste in the ports and on board our vessels. Our shops mainly produce packaging waste, while the restaurants principally produce food waste. Some office waste is produced in the administrative areas. We maintain our focus on appropriate waste management ensuring that no waste is

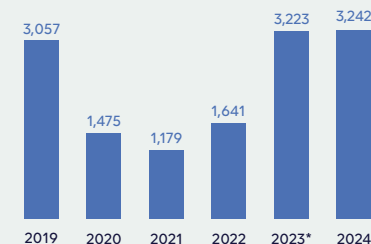
discharged in the Baltic Sea but is disposed of by certified third parties or treated by us.

The amount of waste generated remained stable in 2024 and the share of recycled waste improved by 2 percent. We continued our projects onshore to reduce and better segregate waste. Since 2020, we have worked to reduce food waste in our restaurants and will continue to do so. We now measure food waste in all outlets on all ferries including the crew mess. In addition, we measure food production waste on six of our ferries as well as in the canteen of Rødby.

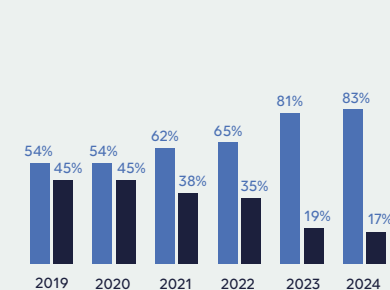


### Waste volumes

Tonnes



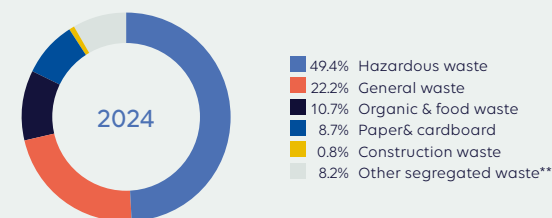
### Waste treatment



Recycling Combustion

Shares <1% are excluded.

### Waste fractions



The above values exclude waste from construction/disposal of ferries.

\* Waste oil from the vessels was newly included as a waste type in 2023 as we were previously unable to calculate the amount. Waste oil (1,325 metric tonnes) makes up 97.6 percent of the hazardous waste and is recycled in its entirety. It makes up 51 percent of all recycled waste.

\*\* each < 5%





# Scandlines turns waste into an opportunity

Five years ago, Scandlines started reconsidering its perception of waste, going from sending 45 percent of the waste to combustion to only 17 percent in 2024 by recycling and selling the resources for reuse.

The largest benefits were found for our ports and vessels in Denmark. As a first step, better waste sorting led to increased recycling, including re-sale of cardboard, metal waste and wood panels to business partners. This leads to reduced new material usage and lower CO<sub>2</sub>e emissions as the materials can be reused instead of bringing new materials processes. Similarly, our food waste is now sent to a biogas plant to generate energy for households and fertiliser for agriculture.

Another initiative is our waste compactor which is now equipped with an automated sensor system that orders emptying when it is 75 percent full. Picking up waste only when needed saved 80

emptying drives in Denmark in only four months, corresponding to 30,000 kilometres and associated CO<sub>2</sub>e emissions.

Scandlines also cleans and reuses working clothes used by short-term contract employees in the peak travelling season. This reduces clothing waste and the need for new purchased items.





## Outlook

Our new zero direct emissions ferry is expected to be put into operation in the second half of 2025. Preparations in the ports of Puttgarden and Rødby continue.

The conversion of the two hybrid-ferries on the Puttgarden-Rødby route into plug-in hybrids will be finalised. The bigger power storage systems as well as charging equipment will be installed on the vessels in the second half of 2025.

We will continue investigating alternative fuels for the Rostock-Gedser ferries as well as new

energy storage solutions, including alternative fuel usage.

We will pursue the definition of our biodiversity approach and strategy and launch related activities.

We will introduce internal chemical audits at all locations to ensure that no blacklisted or unapproved substances are in use. We will also continue our efforts to further reduce the use of chemicals and aim to further reduce and better segregate waste.

### → KPIs

- CO<sub>2</sub>e emissions (scope 1, 2 & 3)
- CO<sub>2</sub>e emissions per trip (t/trip)
- Electricity consumption onshore (MWh)
- Share of renewable energy onshore (%)
- Environmental accidents/violations (#)
- Share of electric/hybrid cars in fleet (%)
- Charging stations for electric cars (#)
- Waste volumes (tonnes)
- Waste fractions (%)
- Waste treatment
- Non-segregated waste share (%)



## Policy

Our Code of Conduct and the ESG policy specify Scandlines' commitment to protecting the environment, particularly relating to preserving our marine environment.

Our ESG policy presents our strategic goal of leading the environmental change in the Baltic Sea by reducing emissions and realising our vision of zero direct emissions ferries. We are furthermore focussed on reducing energy consumption, our impact on the biodiversity in the region where we operate, and the use of chemicals. We continuously work on reducing our waste generation, while simultaneously improving our waste segregation.

Our Code of Conduct and the ESG policy are available to all employees.





# Social

Our focus remains to ensure a healthy and safe work environment for our employees and workers in the value chain. This also requires good training and development for our employees. We further acknowledge and want to foster an environment where our employees thrive and can balance their job with their personal life, feel secure, develop, and are treated equally and fairly. At the same time, we recognise our impact on and responsibility for the communities we work and live in.

## Health and Safety

### Activities and results

In 2024, we continued investing in the safety of all stakeholders. External input and internal initiatives emphasised a strong focus on preventative actions.

### Fleet compliance

In 2024, our fleet passed all audits conducted by the maritime authorities, and it was compliant with the demands of national and international maritime regulations, including the International Safety Management Code (SMS). Our classification society, Lloyd's Register, continuously maintains oversight of our ferries to ensure that all statutory rules and regulations are observed

and that maintenance procedures are performed and documented accurately.

### Injury frequencies

Overall, during 2024, the Lost Time Incident Frequency (LTIF) increased by 5.7 percent from 2023 with a final value of 10.31. While the number of lost time injuries stayed on the same level as 2023, working hours decreased, which results in a higher LTIF. Our ambition remains at zero injuries. On our journey towards a proactive safety culture, we have introduced new initiatives, including 1) Safety Observation Rounds, where physical surroundings, including the condition of tools





and availability of protective equipment are frequently inspected for hazards, and 2) a "safety five" checklist for dynamic risk assessments to be performed before starting any job. This checklist frames a common understanding of what it requires to work safely and is combined with the ISPS (International Ship and Port facility Security) card carried by all employees.

Although the overall safety performance did not improve, some units and departments managed to eliminate Lost Time Injuries (LTI) for 12 consecutive months. Thus, the vessel M/V Deutschland could celebrate an LTI-free year in April 2024 and the same occurred for the German operational onshore organisation in November 2024.

Next to the already existing route cause analysis, we continued the process of defining and mitigating the most frequent hazards, which has resulted in a strategic assessment of where to focus our safety efforts. Various projects were launched in the year to address key focus areas.

### Continued strengthening of the safety culture

In addition to legal requirements, we continued to build awareness of safety issues and culture among our officers by performing Maritime Crew Resource Management (MCRM) training.

As the construction of the Fehmarn Belt tunnel progresses, traffic on the Puttgarden-Rødby route will grow. Scandlines continued to participate in operational and maritime committees with all in-

involved parties to ensure an unchanged high level of safety for our customers and employees.

Our crewmembers conducted weekly and monthly safety drills and tested equipment in accordance with requirements and our crisis management plan.

A general update on our crisis management procedures took place in close cooperation with the local authorities.

### We are safer together

Our safety work is summarised in our slogan "We are safer together". As our vision is an interdependent safety culture, a shared safety understanding and common know-how is key to success. To provide all employees with the knowledge needed to support this vision several activities were initiated, for example two safety stand downs.

As tradition holds, we facilitated two work environment seminars. The first was for the German part of the organisation with the theme "Nutrition and sports". The second was for the Danish part of the organisation with the theme incident investigation and accident prevention..

As a part of the annual employee engagement survey, employees were asked their view on safety at work. This included questions about how safety activities are being prioritised, to which level people feel safe at work, and if safety is something that is being talked about. These

## Scandlines "Safety five" checklist







questions scored better compared to all other questions in the survey, demonstrating that safety is increasingly on everyone's mind, and that it is the perception of the organisation that managers and leaders are putting safety first.

### Safety strategy

We constantly work to align and streamline our safety performance and aspire to meet the same high level of safety awareness throughout the organisation. Safety boards from all parts of the organisation continued collaborating with HSEQ professionals on risk assessments, incident analysis and new initiatives.

In 2023, an external consultant assessed our organisational structure as well as our safety culture. The gap analysis presented early 2024 indicated that several activities already implemented are likely to have positive outcomes in the future, while it also contained improvement areas based on which our health and safety strategy was updated.

### Monitoring and best practices

As the top priority for our safety work is to change from a reactive to a proactive safety approach, we have introduced a new tool for root cause analysis. It allows us to go from the reactive aspect of analysing incidents to a preventive understanding of how to avoid them. The tool includes an assessment of mitigating actions, and we share lessons learned and actions at our weekly cooperate safety meetings to ensure that they are shared in the organisation.

### Safety dialogues - an everyday activity

In 2022, the HSEQ department launched 'safety dialogues', to increase knowledge and awareness of safety in everyday life. These short conversations about safety initiated by managers were extended to include all employees in 2023. Documentation of safety dialogues was simplified and integrated on our 'Safety First' page on the intranet, where also all safety related information can be easily accessed and tracked. In 2023, our leaders conducted an average of 20 safety dialogues each, and our target for 2024 was 24 safety dialogues per manager, corresponding to a total of 3,624 dialogues per year.

The target was significantly exceeded, as 4,378 talks were registered in 2024.

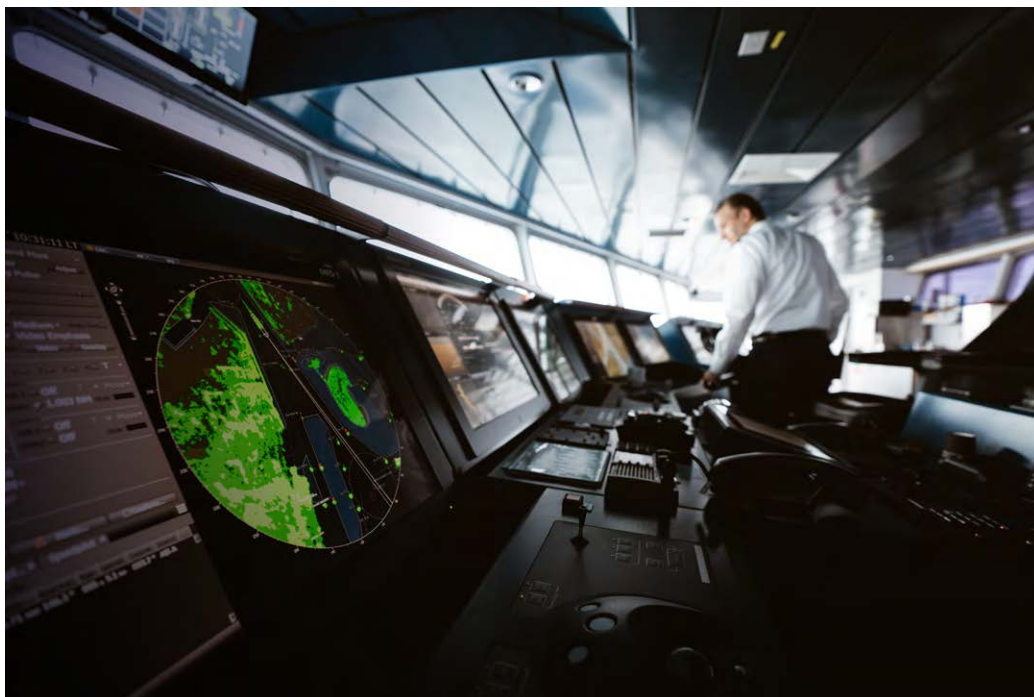
In February 2024, the trade association BG Verkehr interviewed our specialist for occupational safety in Germany, Philipp Höppner, to put a spotlight on how safety dialogues generate more acceptance and awareness for occupational safety measures and help normalise talking about safety in daily work life.

### Harbour safety points

We have installed safety points in Rødby, where aid supplies are gathered and easily accessible for both employees and customers. A representative number of employees were educated as first aiders with skills to handle the equipment in case of an emergency.

### Chemicals, hazardous substances and PPE

To ensure that Scandlines continues to be a safe place to work and that we safeguard the environment, a corporate environmental coordinator was added to the health & safety team. Efforts continued in 2024 to ensure new processes were introduced and existing ones were improved, including around the selection, approval and uses of chemicals, chemical audits, and personal protective equipment (PPE) testing.





## Outlook

We will ensure continued compliance with all national and international regulations in our maritime and land-based activities, expecting to pass all audits and spot checks conducted by authorities in 2025.

We aim to reduce the LTIF and continue the journey towards zero incidents, based on a strong safety culture present in everyday work life. For this purpose, we will continue to implement our "safety awareness" program aimed to align the safety standards for all employees and to generate a shared understanding of everyone's responsibility for a safe workplace. We will

introduce "safety notices" which will allow every employee to report safety related concerns or observation through the intranet with the aim to prevent accidents. To further ensure that safety is embedded in every position, we will include safety awareness in the recruiting and onboarding process, and implement a mandatory online safety awareness module as supplement to live trainings.



### KPIs

#### Health and Safety

- Lost Time Incident Frequency (LTIF)
- Safety Dialogues
- Passenger injuries (per million pax)
- Fatalities (#)



## Policy

#### Health & Safety

Our commitment to ensuring the safety and well-being of our employees, customers, vendors, and other stakeholders is laid down in our Code of Conduct, ESG policy and health & safety policy. We comply with – and go beyond – applicable regulation and internationally recognised standards for maritime and land-based workplaces and actively strive to prevent incidents.

Our Code of Conduct and policies cover physical safety and well-being as well as mental and emotional aspects. We encourage employees to balance work and private life with a view to provide a healthy work environment for all.

The Code of Conduct, ESG policy, well-being and mental health policy, and the health & safety policy are available to all employees.





## People

In 2024, we improved our employee engagement score, launched our DEIB program, and prepared for the launch of an extended version of the group-wide Scandlines' Academy.

### Activities and results

In 2024, we employed an average of 1,579 employees (headcount) in Germany and Denmark compared to 1,593 in 2023.

### Employee Engagement

In 2024, we conducted our employee engagement survey for the third consecutive year. With a participation rate of 76 percent (2023: 68 percent), the survey saw significant engagement from colleagues across Scandlines, marking a notable improvement in involvement. The overall engagement score increased to 3.64 out of 5, reflecting a 0.12-point increase compared to the previous year.

This positive development highlights the dedicated efforts of both managers and employees to foster engagement and strengthen their sense of belonging at Scandlines.

The survey explored key topics, including engagement and motivation, development opportunities, management support, recognition, workplace safety, and communication.

These insights have enabled all departments to identify their primary areas for improvement, ensuring targeted actions that address employee concerns and aspirations.

By continuing to prioritise open dialogue, acknowledge contributions, and invest in leadership development, Scandlines aims to sustain and further enhance employee engagement in the years to come.

### Diversity, equity, inclusion, and belonging

In 2024, we took significant steps to enhance our understanding of diversity within our employee population and to support data-driven decision-making in this critical area, including launching a new Diversity Dashboard. It provides insights to how diversity is represented across Scandlines, and enabling us to identify trends, gaps, and opportunities for improvement.

In 2024, we further solidified our commitment to creating a workplace where everyone feels respected, valued, and empowered by launching our first Diversity, Equity, Inclusion, and Belonging (DEIB) Policy. This includes initiatives



to reduce bias in recruitment, ensure equitable career development opportunities, and maintain a respectful and harassment-free environment.

The representation of women in managerial roles also increased slightly to 31.1 percent (2023: 29.4 percent). While this marks progress, we remain committed to improving gender diversity and fostering an environment that supports women in pursuing leadership opportunities.

These efforts reflect our continued commitment to creating a workplace where diversity is seen as a strength and all employees can thrive.

### Emphasising mental health

At Scandlines, we remain deeply committed to prioritise mental health and well-being and rooted in our policy for this area we continued to focus on promoting the importance of good mental health and providing employees and managers with the tools to handle sensitive situations, such as stress management, responsibly.

Supporting mental health is an integral part of ensuring our employees can maintain a healthy work-life balance and perform at their best. This focus remains a key pillar of our people strategy as we strive to create a workplace where everyone feels valued and empowered.





# Scandlines promotes diversity and inclusion matters

To further develop Scandlines as a responsible and attractive workplace, a strong commitment on diversity, equity, inclusion, and belonging (DEIB) matters is material. In 2024, the board approved our new DEIB policy, which aims to promote diversity and inclusion across all levels of the organisation.

The commitment to fostering a diverse, equal, inclusive, and belonging workplace includes the creation of a 'One Scandlines' approach regardless of where our employees are located and who they are, and of a work environment where all current and future employees feel respected, included and appreciated.

We also wish to ensure that all employees are evaluated based on their qualifications and that they can pursue and develop their careers with us – and that talents are attracted, retained, developed, and fully engaged for Scandlines to access the best competencies.

Based on the policy the targets for gender distribution at managerial levels were revised to reflect a goal of achieving a minimum of 36 percent female representation by 2025 (compared to 31.1 percent in 2024).

In 2025 we will take the next steps implementing the DEIB policy with concrete actions such as revising our job postings to ensure that they are inclusive, providing D&I trainings for managers, and conducting exit surveys with employees who have chosen to seek job opportunities outside Scandlines to gather insights.







### Starting our Lean journey

In 2024, we started on our Lean journey with the aim to streamline our processes, encourage innovation, and reinforce our commitment to operational excellence. As a first step, we have already educated the first 15 employees in the methodology in 2024 and hired a dedicated Lean responsible to drive this journey.

### Community engagement

We collaborate with local job centres on the Danish islands of Lolland and Falster and work with German schools on and around the island of Fehmarn to recruit temporary staff, in particular. We also support the local areas by means of sponsorships of local sports clubs and school projects, among other things.

Together with three partners, we continued to look for investors to develop the port area in Gedser not used for transportation purposes to attract businesses and tourism. The municipality of Guldborgsund has received financing of DKK 10.6 million from the Danish agency for economic development (Erhvervsfremmestyrelsen) for the ambitious project to strengthen tourism and creating growth in the southern part of Falster.

## Outlook

We will continue implementing actions based on the employee engagement survey results to refine our people vision, strategy, and long-term goals. Building on our updated diversity approach, we remain committed to fostering an inclusive and equitable workplace for all employees. Additionally, we will focus on succession planning to identify and develop internal and external successors for critical roles, ensuring organisational resilience. Through talent management, we aim to nurture emerging talents, supporting their growth through tailored development plans and strategic initiatives like Scandlines Academy. These efforts are central to building a future-ready workforce that drives our business success.

### Building a Scandlines Academy

In 2025, we will take a significant step towards enhancing the development of our people by launching an extended version of our Scandlines Academy groupwide.

In addition to the existing maritime safety trainings, another cornerstone of the academy will be people manager training, a series of courses tailored to equip our managers with the tools and insights needed to lead with confidence, foster team engagement, and drive results. Building on the Lean journey initiated in 2024, we will

continue to incorporate Lean principles into our training programs.

Through Scandlines Academy, we aim to create an environment where every employee feels valued and empowered to reach their full potential. By investing in our people, we are building a stronger, more agile Scandlines, ready to face the challenges of tomorrow and deliver on our promises to customers and stakeholders alike.



### KPIs

#### People

- Gender splits (%)
- Employee engagement survey
- Retention rate, voluntary (%)
- Contributions to community projects and associations (tEUR)



## Policy

### People

We believe that a diverse workforce makes our business and our community more vibrant and successful. This is why we are committed to providing a good working environment where we show mutual respect and adhere to principles of diversity and anti-discrimination as specified in our Code of Conduct, the ESG policy, our well-being and mental health policy, our policy on gender, and our DEIB policy. In line with our policies, we adhere to all human rights and relevant labour laws. We take a zero-tolerance approach to bullying, harassment, discriminatory practices and any behaviour that threatens or intimidates a person based on their ethnicity, religion, gender, beliefs or sexuality. All employees are compensated and offered development opportunities based on qualifications, performance and ethical conduct to ensure a fair and transparent working environment.

The Code of Conduct, ESG policy, well-being and mental health policy, the policy on gender equality, and the DEIB policy are available to all employees.



# Governance

Our governance setup with sustainability and safety clearly anchored in the business strategy and the organisation is unchanged. It is a key to ensure a healthy corporate culture, compliance with laws and regulations as well as ethical behaviour internally and in our supply chains. Furthermore, it guides our responsibilities for working conditions of workers in the value chain.

## Governance setup

Our investors and management are committed to continuously improving Scandlines' sustainability efforts to build a stronger business and to minimise impact on our surroundings.

### Ownership and governance

Scandlines operates a two-tier management structure comprising a Supervisory Board and Management Board, which is responsible for the overall strategy as well as daily operations as per requirements given under the Danish Companies Act.

The Supervisory Board comprises 11 members – 7 shareholder representatives and 4 employee elected members – none holding executive

director positions in Scandlines. Shareholder representative members of the Supervisory Board are elected for one year at a time by the company's general meeting, which comprises members of a consortium of long-term infrastructure investors including Igneo Infrastructure Partners (50.1 percent), Federated Hermes (14.9 percent) and 3i Group plc (35 percent). The chair of the Supervisory Board is not a senior executive in the organisation.

Two out of the seven current shareholder representatives, including the Chair, are considered independent. The Supervisory Board holds profound understanding of the sector, our geography, and main products. Additional special

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competencies are held within health and safety, sustainability, and the financial sector.

Our investors are further represented in the three Supervisory Board Committees related to Audit and Risk, as well as Safety and Sustainability. In addition to the statutory corporate setup, a Remuneration Committee is established, as well as an Investor Committee for the purpose of providing input in respect of the overall direction and management of the Scandlines group.

Ultimately, the responsibility for decision-making lays with the Management Board, which is supervised by the Supervisory Board.

Responsibility for sustainability resides with the Chief Operating Officer as member of the Management Board and ultimately with the whole Management Board more largely, who report directly to the Supervisory Board and the relevant committees. At least once a year, the Supervisory Board reviews and approves our sustainability

topics, related risk management and our sustainability reporting, ensuring that all relevant topics are covered.

### Diversity

At Supervisory Board level, we had a 27 percent share of women among shareholder-elected members. Achieving the target of 25 percent, the new target is to increase this share to 30 percent by 2026. We do not measure further characteristics of underrepresented social groups.



## Sustainability governance structure





## Compliance & ethics

In 2024, we continued focussing on compliance and ethical business behaviour, on training our employees and on raising awareness across the organisation.

### Activities and results

In 2024, we upheld our comprehensive compliance program, as potential non-compliance with relevant rules and regulations may have a significant detrimental impact on our business, financial performance, reputation, employees, and customers. We upheld a zero-tolerance approach to any compliance violation, including violations of anti-bribery and corruption legislation. We conducted regular compliance risk assessments across the organisation to address relevant compliance risks, including risks related to corruption, and to ensure awareness of any regulatory changes.

#### Compliance documents and procedures

We upheld and communicated our compliance-related policies and procedures to all relevant parties, comprising the governance body members, employees, and business partners. As described below, we have mechanisms in place to allow any stakeholder to seek advice on implementing our policies and practices for responsible business conduct and to raise concerns about Scandlines' business conduct. In 2024, there were no instances of non-com-

pliance with laws and regulations reportable to authorities. We received no substantiated complaints on breaches of customer privacy, nor did we identify any reportable leak, theft, or loss of customer data, to be investigated by the respective authorities.

Invitations were sent to all relevant employees for regular training sessions on compliance, data protection, IT security, and other topics, mainly via e-learning. The completion rates for these e-learning were at 94.8 percent for compliance and 76.4 percent for data protection which we aim to improve every year.

External representatives of the Supervisory Board had their own training programs and confirmed their training to us. Two independent directors conducted our own compliance training.

We continued conducting compliance controls and reviews to ensure our compliance with rules, regulations, and internal instructions.

#### Procedures for critical concerns

Critical concerns can be raised through various processes and communicated to the Supervisory Board. Managers can report concerns through an enterprise risk management process shared with the Management and Supervisory Boards, including sub-committees. Additionally, a whistleblower system is in place for internal and external stakeholders to report serious misconduct or unethical behavior. Reports can be made anonymously to an external law firm or via email to the compliance function.

We strive to minimize negative impacts, especially on the environment, by collaborating with local organizations and supporting initiatives. If any negative impact is identified, we adhere to local statutory grievance mechanisms, including customer complaints systems, data protection authorities, mechanisms for employees, and courts. A dedicated customer service center handles complaints, and relevant grievance mechanism information is provided on our website.

Grievances are addressed according to severity and reported to the relevant board or compliance function. We are analysing the received customer complaints to learn from them, discuss possible solutions and take actions to improve. We updated our Modern Slavery Act statement in 2024, enforced throughout the value chain via our Vendor Code of Conduct.

#### Data ethics policy

Our data ethics policy is evaluated annually and the most recent is [available here](#). No significant updates were needed in 2024. This policy complements our data protection policies and provides ethical guidance in scenarios where existing laws may not apply. It covers the handling of data and security measures, ensuring compliance with legislation and authority decisions. We use artificial intelligence, machine learning, and algorithms to improve customer services and promote transparency. An internal team ensures implementation and employee training, with mechanisms for reporting non-compliance, under the oversight of the Data Protection Committee.





## Our supply chain

We continued to ensure compliance and promote sound business conduct throughout our supply chain by actively engaging with our vendors.

### Activities and results

Scandlines works with a wide range of vendors, including manufactures (primarily Retail and Catering), contractors, shipyards, wholesalers, brokers etc. In total Scandlines has a supplier base of approx. 1.500 vendors providing goods and services to the company with the top 30 vendors accounting for 64 percent of our annual spend and the top 100 vendors for 82 percent. The majority of Scandlines' main vendors are contracted through long-term frame agreements or yearly supply agreements. The majority of vendors are local, meaning Danish or German.

Our Vendor Code of Conduct includes emphasis on compliance with laws and regulations, ethical and legal behaviour, working conditions, health & safety as well as environmental protection. In 2024, 98 percent of vendors within retail and

catering signed the Vendor Code of Conduct or similar agreement (2023: 90 percent). For all other vendors with an annual spend above EUR 20,000 the signature rate was 94 percent in 2024 (2023: 97 percent).

### Local procurement

Where possible, we aim to procure from suppliers located in Germany and Denmark. In 2024, 80.7 percent of our total spend was allocated to local suppliers, with a further 5.2 percent being procured in Sweden.

### Vendor screening

In 2022, we implemented a dedicated tool for screening and monitoring our (potential) main vendors in Procurement against environmental and social criteria, economic and reputational criteria. We adjust our criteria to serve our purposes better. Today we not only screen potential main vendors, but also reassess our vendor portfolio regularly, based on perceived risk.

## Outlook

We will continue all compliance and ethics initiatives and maintain the whistleblower hotline. We will strive to increase the data protection compliance rate next year.

We will continue to enhance our third-party due diligence procedures.



### KPIs

- Share of employees completing compliance e-learning (%)
- Share of vendors having signed Vendor Code of Conduct (Retail & Catering) (%)
- Share of vendors having signed Vendor Code of Conduct (Procurement) (%)



## Policy

Our Code of Conduct, ESG policy, and Gifts, Business Invitations, Reimbursement of Expenses and Hospitality policy outline our commitment to ensuring ethical and honest behaviour, show mutual respect and adhere to principles of diversity and anti-discrimination as well as properly managing potential conflicts of interest, and conducting our contracting and procurement practices in a fair and transparent manner. This commitment extends to our vendors as it is integrated in our Vendor Code of Conduct, which is also based on the principles set out in the UN Global Compact; including for example our expectation that business partners respect human rights, refrain from using child or forced labour and respect national laws and regulations.

The Code of Conduct, the ESG policy and the Gifts, Business Invitations, Reimbursement of Expenses and Hospitality policy, as well as all policies around data protection are available to all employees. The Vendor Code of Conduct is distributed to all vendors.

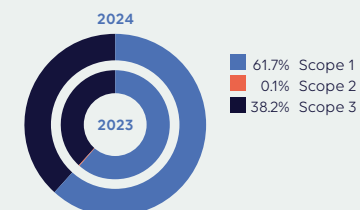
# ESG KPIs and performance

	2024	2023	2022	baseline year 2019
<b>Environment</b>				
Direct CO <sub>2</sub> e emissions scope 1 (t-CO <sub>2</sub> e)	126,916	131,127	131,393	158,139
Indirect CO <sub>2</sub> e emissions scope 2 market-based (t-CO <sub>2</sub> e)*	129	353	251	2,532
Indirect CO <sub>2</sub> e emissions scope 2 location-based (t-CO <sub>2</sub> e)	1,767	2,358	-	-
Indirect CO <sub>2</sub> e emissions scope 3 (t-CO <sub>2</sub> e)	78,633	81,436	84,472	-
CO <sub>2</sub> e per trip overall (t-CO <sub>2</sub> e)	3.36	3.36	3.38	3.85
Electricity consumption onshore (MWh)	6,568	6,651	6,461	7,756
Share of renewable electricity onshore (%)	100	100	100	37
Environmental accidents/violations entailing fines/sanctions	0	0	0	0
Share of non-segregated waste on overall waste (%)**	22.2	24.7	45.2	57.8
Share of electric/hybrid cars in the car fleet (%)	49	39	24	-
Number of charging stations for electric cars (#)	41	41	34	4

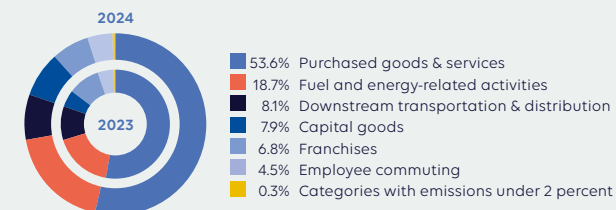
\* As of 2022, indirect emissions from heating are included.

\*\* The large drop in 2023 compared to previous years is mainly due to the first time inclusion of segregated waste oil in the waste statistic

## CO<sub>2</sub>e emission contributions



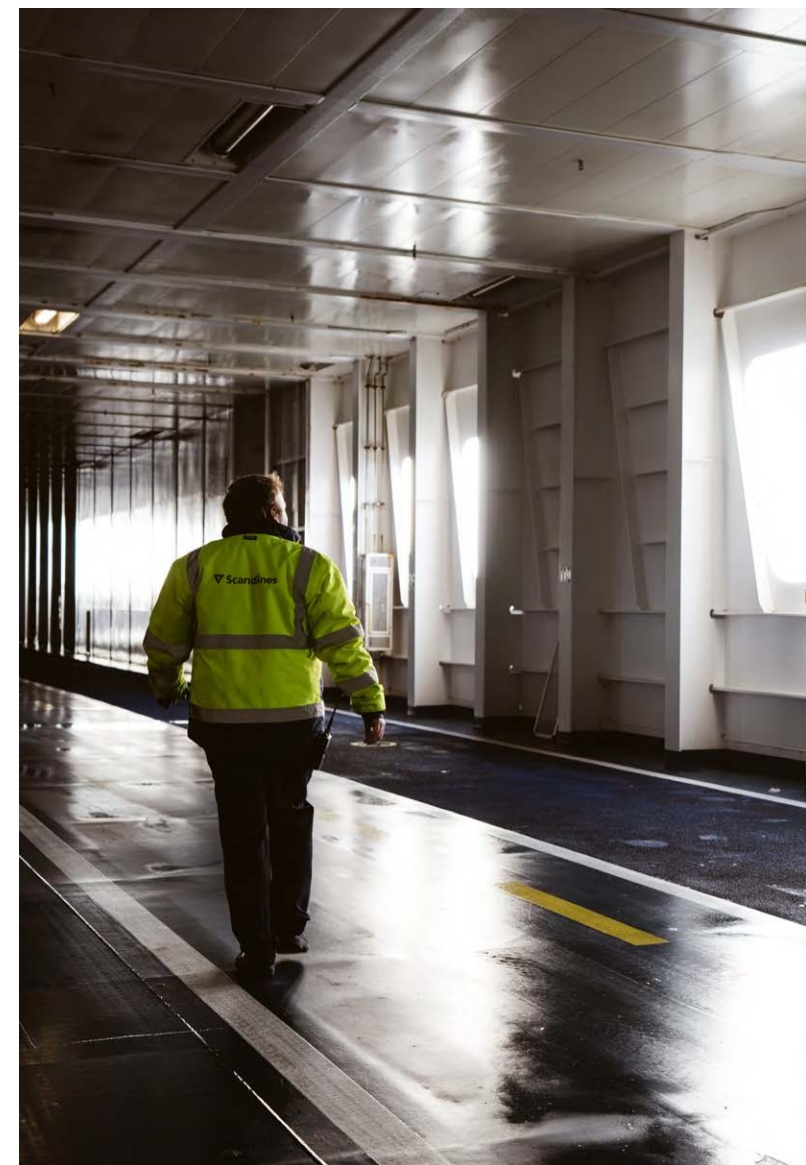
## Composition of scope 3 CO<sub>2</sub>e emissions



The overall split of emissions between the three scopes remained stable. Changes in scope 2 emissions related to more accurate emission factors. Changes occurred also for some categories within scope 3. On the one hand we saw an increase in emissions related to capital goods due to investments made, as well as an increase in fuel and energy related emissions due to a new heating source identified. On the other hand emissions from business partners reduced due to their own initiatives.

# ESG KPIs and performance

	2024	2023	2022	baseline year 2019
<b>Social</b>				
Total number of employees (average FTEs)	1,377	1,453	1,391	1,533
- By work location (shore / sea, average FTEs)	578 / 799	623 / 830	610 / 782	668 / 865
- By employment contract (permanent / temporary, headcount)	1,290 / 289	1,344 / 249	1,385 / 272	-
- By region (Germany / Denmark, headcount)	801 / 778	810 / 783	836 / 821	-
- By gender (female / male, headcount*)	564 / 1,015	574 / 1,019	600 / 1,057	572 / 961
- Share of female staff (headcount %)	36	36	36	37
Share of female managers (headcount %)	31	29	30	-
Share of female top managers (headcount %)	21	-	-	-
Share of female shareholder-elected Supervisory Board members (headcount %)	27	25	25	-
Retention rate, voluntary (%)	94	-	-	-
Employee engagement survey result (x out of 5)	3.64	3.52	3.32	-
Lost Time Injury Frequency (LTIF) (incidents / million exposure hours)	10.31	9.75	12.55	8.7
Safety dialogues (average completion by manager/year)	29	20	-	-
Passenger injuries (per million pax)	4.4	3.6	3.9	2.2
Fatalities (#)	0	0	0	0
Contributions to community projects and associations (tEUR)	227	247	388	466
* Figures provided for 2019 represent average FTEs, whereas figures from 2020 represent headcount.				
<b>Governance</b>				
Share of vendors having signed Vendor Code of Conduct – Retail & Catering (%)	98	90	97	94
Share of vendors having signed Vendor Code of Conduct – Procurement (%)	94	97	100	-
Share of employees completing compliance e-learning (%)	95	87	54	70







# Indexes and definitions

37 — GRI index

48 — KPI definitions



# GRI index

We have prepared the sustainability report 2024 in accordance with the GRI Standards. This GRI index provides an overview of GRI disclosures presented in various sections of the report and a number of additional disclosures ensuring adherence to the GRI Standards as well as a high level of transparency and accountability.

## General indicators

Disclosure	Name of disclosure	Page or comment
3-1	Process to determine material topics	Pages 10-11, 31
3-2	List of material topics	Page 11
3-3	Management of material topics	Pages 10-35
2-1	Organisational details	Pages 2, 4, 32, 51  Additional information: Scandlines Infrastructure ApS is a Danish limited liability company.
2-2	Entities included in the organisation's sustainability reporting	All entities included in the consolidated financial statements are presented in the annual report note 26 and covered by this report. The annual report describes the approach for consolidating information.
2-3	Reporting period, frequency and contact point	The sustainability report is published annually in line with the annual report and covers the period 1 January 2024 to 31 December 2024. Both reports are published on the same day. The contact point for questions about the report or reported information is: Jenny Schmigale, Head of Sustainability & ESG Compliance, Jenny.Schmigale@scandlines.com.

Disclosure	Name of disclosure	Page or comment
2-4	Restatements of information	2-21 The annual total compensation ratio between the highest compensated individual and the median annual total compensation was 1.30 in 2023. The ration was mistakenly reported as 1:26, as the median compensation of Danish employees only was used. The fixed ratio uses the median compensation of both Danish and German employees in 2023.  The KPI Passenger injuries (per million pax) for 2023 was corrected from 3.4 to 3.6 due to a calculation error.
2-5	External assurance	The greenhouse gas inventory for 2024 was prepared in accordance with ISO 14064-1 and verified by TÜV NORD CERT in compliance with the requirements of ISO 14064-3. Scope 1 emissions relating to bunker are certified in line with the requirements of the Regulation (EU) 2015/757 on the monitoring, reporting and verification of carbon dioxide emissions from maritime transport.  The overall report is not subject to external assurance.
2-6	Activities, value chain and other business relationships	Page 5, 33. Annual report, page 4 "Scandlines at a glance".  Additional information: There were no significant changes to the organisation or the supply chain in 2024.



Disclosure	Name of disclosure	Page or comment																					
2-7	Employees	Pages 26-28, 35																					
		<table><tr><th>Head count</th><th>Female/Male</th><th>Denmark/ Germany</th></tr><tr><td>Total employees</td><td>564 / 1,015</td><td>778/ 801</td></tr><tr><td>Permanent employees</td><td>454 / 836</td><td>599 / 691</td></tr><tr><td>Temporary employees</td><td>110 / 179</td><td>179 / 110</td></tr><tr><td>Full-time employees</td><td>387 / 787</td><td>561 / 613</td></tr><tr><td>Part-time employees</td><td>92 / 98</td><td>59 / 131</td></tr><tr><td>Non-guaranteed hours employees</td><td>85 / 130</td><td>158 / 57</td></tr></table>	Head count	Female/Male	Denmark/ Germany	Total employees	564 / 1,015	778/ 801	Permanent employees	454 / 836	599 / 691	Temporary employees	110 / 179	179 / 110	Full-time employees	387 / 787	561 / 613	Part-time employees	92 / 98	59 / 131	Non-guaranteed hours employees	85 / 130	158 / 57
Head count	Female/Male	Denmark/ Germany																					
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Permanent employees	454 / 836	599 / 691																					
Temporary employees	110 / 179	179 / 110																					
Full-time employees	387 / 787	561 / 613																					
Part-time employees	92 / 98	59 / 131																					
Non-guaranteed hours employees	85 / 130	158 / 57																					
		Additional information: The numbers are presented as headcounts at the end of the reporting period. Seasonal variations can occur due to the nature of the business. Data has been compiled from TalentSoft, Scandlines' HR system.																					
2-8	Workers who are not employees	Information not available as this data is not tracked.																					
2-9	Governance structure and composition	Page 30-31																					
		Additional information: <ul style="list-style-type: none"><li>• Shareholder-elected members are elected for one year with the possibility of re-election.</li><li>• Shareholder-elected members do not hold other significant positions and commitments which would compromise their ability to perform their duties within the organisation.</li><li>• Stakeholder representation is ensured through employee representation (as per mandatory law). And so is Investor representation (as per shareholder agreement).</li></ul>																					

Disclosure	Name of disclosure	Page or comment
2-10	Nomination and selection of the highest governance body	Nomination and selection processes for the highest governance body and its committees: Shareholder representatives are elected by the general meeting, employee representatives are elected by the workforce in a democratic vote. Committees and their members are nominated by the Investor Committee and, where applicable, jointly with the Supervisory Board, in accordance with their proper nomination criteria. Participation of female members is a special focus area and the percentage of membership has increased throughout the years.
2-11	Chair of the highest governance body	Page 30
2-12	Role of the highest governance body in overseeing the management of impacts	Pages 10, 30-31
2-13	Delegation of responsibility for managing impacts	Page 31
2-14	Role of the highest governance body in sustainability reporting	Page 31



Disclosure	Name of disclosure	Page or comment
2-15	Conflicts of interest	The rules of procedure describe the processes for the Supervisory Board to ensure that conflicts of interest relating to transactions or arrangements involving the represented companies or board members are prevented and mitigated. Any such conflict is to be declared to the other Board members.
2-16	Communication of critical concerns	Pages 32
2-17	Collective knowledge of the highest governance body	Shareholder-elected members of the Supervisory Board obtain training through their respective employers, or take the same training as employees. Employee-elected members obtain the same information as all employees. The members of the Safety & Sustainability Committee are the specialists on this matter and report to the Supervisory Board on latest developments, etc. Should the need occur, dedicated training sessions would be organised.
2-18	Evaluation of the performance of the highest governance body	Not applicable

Disclosure	Name of disclosure	Page or comment
2-19	Remuneration policies	<p>Remuneration policies for members of the highest governance body and senior executives:</p> <ul style="list-style-type: none"><li>• A Remuneration Committee is appointed to lead the process and decide on Management Board members remuneration.</li><li>• When settling remuneration for Management Board members it may be decided, that a member of the Management Board is eligible to receive an extraordinary, deferred amount in compensation for forfeited incentives in the member's former position or other kinds of sign-on bonuses.</li><li>• The Service Agreements of Management Board members may be terminated by a member or by Scandlines in accordance with the contractual notice-periods set forth in the Management Board members' Service Agreements.</li><li>• During the employment and for a period after the end of the employment, the Management Board members are covered by a non-competition clause. In case of non-compliance with a restrictive covenant in the clause, the member shall pay liquidated damages in accordance with the conditions set forth in the Service Agreements.</li><li>• Management Board members are covered by a mandatory pension scheme, which accounts for a percentage of the annual base salary. The full pension contribution is paid by Scandlines in addition to the annual base salary.</li></ul>

The Management Board members' eligibility to receive the STIP and LTIP bonuses are based on both financial and operational metrics to be determined each year.





Disclosure	Name of disclosure	Page or comment
2-20	Process to determine remuneration	<ul style="list-style-type: none"><li>A Remuneration Committee is appointed to lead the process for Management Board members' remuneration, and to make recommendations to the shareholders to secure a formal and transparent procedure.</li><li>The Remuneration Committee shall make a report to its shareholders after each meeting and on all matters within its duties and responsibilities. When setting remuneration for Executive Directors, the Remuneration Committee has regards to remuneration trends across the company.</li><li>The Committee may obtain independent professional advice by appointment of external consultants to advice the Committee on issues within its terms of reference.</li></ul>
2-21	Annual total compensation ratio	<p>Ratio of the annual total compensation for the organisation's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual): 1:30.</p> <p>Ratio of the percentage increase in annual total compensation for the organisation's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual): 0.9:1.</p> <p>The calculation includes all employees present in the organisation as of 31 December 2024.</p>
2-22	Statement on sustainable development strategy	Page 7-8

Disclosure	Name of disclosure	Page or comment
2-23	Policy commitments	<p>Scandlines is signatory of the UN Global Compact. These principles were used to develop our Code of Conduct and our Vendor Code of Conduct. Further, we comply with the Modern Slavery Act on a voluntary basis. Both consider human rights, due diligence, etc. The policy commitments – and particularly those to human rights – apply to all of our activities, to our vendors and sub-suppliers. Our commitments are approved by members of the Management Board, and where applicable also the Supervisory Board. They are available on the website and as part of contractual agreements. On our website, they can be found here:</p> <p>Modern Slavery Act statement: <a href="https://www.scandlines.com/about-us/transparency/">https://www.scandlines.com/about-us/transparency/</a></p> <p>Code of Conduct: <a href="https://www.scandlines.com/about-us/compliance/">https://www.scandlines.com/about-us/compliance/</a></p> <p>Vendor Code of Conduct: <a href="https://cmxsapnc.cloudimg.io/v7/https://www.scandlines.com/media/talfqsef/scl_vendor_coc_2024_uk.pdf?func=proxy?la=en">https://cmxsapnc.cloudimg.io/v7/https://www.scandlines.com/media/talfqsef/scl_vendor_coc_2024_uk.pdf?func=proxy?la=en</a></p> <p>Commitment to the UN Global Compact: <a href="https://www.scandlines.com/about-us/our-green-agenda/a-sustainable-future/">https://www.scandlines.com/about-us/our-green-agenda/a-sustainable-future/</a></p>
2-24	Embedding policy commitments	Pages 22, 26, 29, 33
2-25	Processes to remediate negative impacts	Pages 32
2-26	Mechanisms for seeking advice and raising concerns	Pages 32



Disclosure	Name of disclosure	Page or comment
2-27	Compliance with laws and regulations	Pages 32
2-28	Membership associations	Pages 6, 51
2-29	Approach to stakeholder engagement	Pages 10
2-30	Collective bargaining agreements	85 percent of the employees on the payroll of Scandlines Infrastructure ApS and its subsidiaries are covered by collective bargaining agreements. Employees not covered by collective bargaining agreements are not disadvantaged compared to those covered by collective bargaining agreements.



## Topic-specific disclosures

Disclosure	Name of disclosure	Page or comment
<b>Environmental protection</b> Biodiversity		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Our operations and owned territory are placed in the Baltic sea region, Germany and Denmark. Scandlines owns the territory for three of its four ports. Whilst we generally operate in the marine ecosystem, the port of Gedser is further situated in a Natura2000 area (Ramsar site no. 164).
304-2	Significant impacts of activities, products and services on biodiversity	<p>In 2024, we assessed the materiality of Scandlines' direct impacts on biodiversity, the impacts on ecosystem services, the extent and quality of ecosystems as well as the state of species.</p> <p>Scandlines' actual direct impacts on biodiversity are related to light pollution in the ports and from the vessels. The port has to be lighted for practicality and security reasons. Artificial light sources however disrupt the lifecycle of species, especially nocturnal wildlife, terrestrial as well as aquatic, contributing to loss of habitat and biodiversity loss. Areas affected are the ports as well as surrounded areas due to the lights' intensity. The impacts may partially be reversed through changes in light colour and light source positioning, which is currently investigated.</p> <p>Another impact is the underwater noise from the vessels which affects the marine life in the Fehmarn Belt area – among these the harbor porpoises. The areas impacted are those where our routes operate, and the impact is permanent. Scandlines has obtained a noise reduction of our vessels between Puttgarden and Rødby by installing new thrusters.</p> <p>Further emissions like Greenhouse gases, NOx or accidental emissions like microplastics, or chemicals from cleaning or anti-fouling products were also identified as negative direct</p>

Disclosure	Name of disclosure	Page or comment
304-2	- continued	<p>impacts from Scandlines contributing to biodiversity loss, either through contributing to climate change or pollution of the local ecosystem. With our Green Ambition, we continue to work on the reduction of emissions. At the same time, we aim to reduce the use of harmful chemicals.</p> <p>Spills and pollution can have a negative effect on species on-shore or offshore. Depending on their severity, the extent of the areas impacted can differ as well as the duration of impacts and their reversibility. It is Scandlines policy to not discharge anything into the Baltic Sea. Further, we aim to prevent spills and pollution with the help of extensive maintenance programs, training, etc. Should a spill or pollution happen, processes are in place to immediately limit any damage and to alleviate negative impacts; if required, in close liaison with local authorities.</p> <p>Due to Scandlines' operations, dredging of the seabed in front of the Port of Gedser, is sometimes necessary (last time 2010). Furthermore, the ports are cleaned up from sediments (sand silt seaweed, paint particles etc.) anywhere between every second year to twice a year. The cleaned-up sediments are disposed of in a designated area in the Baltic Sea (with permit from authorities), which may damage the natural seabed structures there.</p> <p>We are aware that we have a large indirect impact on biodiversity through our supply chains for our operations as well as for our retail and catering activities. Mining, logging, unsustainable agriculture and fishery practices, transport infrastructure, energy generation (even if renewable) and inadequate handling of toxic substances are ways in which Scandlines' supply chains could potentially cause harm to nature and contribute to the loss of habitats and biodiversity to varying degrees of areas impacted, duration, and reversibility. We will assess the impact of our supply chains further in the future.</p>



Disclosure	Name of disclosure	Page or comment
304-2	- continued	The land in the ports is used for shipping operations, waiting areas for customers and administrative offices. Some of the green areas used to be mowed and the habitat for local animals and insects (e.g. birds) was reduced. On-going construction in the ports leads to more sealed surfaces which presumably impacts soil functions negatively and degrades and further fragments species habitat. Other land areas were turned into flower meadows in the port of Puttgarden and more than 40 nesting places for bats and swifts were created. In addition, an insect hotel was built. We are currently working on an approach to make the green space management in our ports more biodiversity friendly.
304-3	Habitats protected or restored	The protected area of the port of Gedser encompasses 30,000 m <sup>2</sup> . Scandlines, together with Guldborgsund Municipality and the Danish society for Nature Conservation developed and implemented a plan in 2011 to protect certain species. Its implementation was reviewed in 2021, and no further measures to be undertaken were identified.
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	The port of Gedser is situated in a Natura2000 area and home to two protected species; the willowherb hawkmoth and the green toad. More generally, the Baltic Sea is home to some species, which are threatened according to the IUCN Red List criteria. Scandlines' operation only affects such species in cases of spills and accidents, which can generally impact the marine ecosystem.
<b>Environmental protection</b> Emissions		
305-1	Direct (Scope 1) GHG emissions	Pages 34, 49

Disclosure	Name of disclosure	Page or comment
305-2	Energy indirect (Scope 2) GHG emissions	Pages 34, 49
305-3	Other indirect (Scope 3) GHG emissions	Pages 34, 49
305-4	GHG emissions intensity	Pages 34, 49
305-5	Reduction of GHG emissions	Compared to 2019, the last year of normal business activity pre-Covid, Scandlines reduced scope 1 bunker emissions by 32,241 tonnes CO <sub>2</sub> e (CO <sub>2</sub> , CH <sub>4</sub> , NO <sub>x</sub> ) in 2024.
305-6	Emissions of ozone-depleting substances (ODS)	Not applicable due to the type of business.
305-7	Nitrogen oxides (NO <sub>x</sub> ), sulfur oxides (SO <sub>x</sub> ), and other significant air emissions	Information incomplete / not available.
306-1	Waste generation and significant waste-related impacts	Pages 20
306-2	Management of significant waste-related impacts	Pages 20
306-3	Waste generated	Page 20
Additional information: Data on waste volumes and waste fractions is provided by certified waste disposal companies.		





Disclosure	Name of disclosure	Page or comment
306-4	Waste diverted from disposal	Page 20  Additional information: a. All waste which is not sent to disposal, is recycled (2,681 metric tonnes). b. All hazardous waste not sent to disposal is recycled (1,582 metric tonnes). c. All non-hazardous waste not sent to disposal is recycled (1,099 metric tonnes). d. All hazardous and non-hazardous waste is diverted from disposal offsite.
306-5	Waste directed to disposal	Page 20  Additional information: a. All waste, which is not recycled, is directed to disposal for combustion (546 metric tonnes of waste) or landfilling (15 metric tonnes). b. All hazardous waste directed to disposal is incinerated with energy recuperation (19 metric tonnes) c. Non-hazardous waste directed to disposal is incinerated with energy recuperation (526 metric tonnes) or landfilled (15 metric tonnes). d. All hazardous and non-hazardous waste is directed to disposal offsite.

Disclosure	Name of disclosure	Page or comment
<b>Health &amp; safety</b> Occupational health and safety		
403-1	Occupational health and safety management system	Pages 23-26
403-2	Hazard identification, risk assessment, and incident investigation	Pages 23-26
403-3	Occupational health services	Pages 23-26
403-4	Worker participation, consultation, and communication on occupational health and safety	Pages 23-26
403-5	Worker training on occupational health and safety	Pages 23-26
403-6	Promotion of worker health	Pages 23-26
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Pages 23-26



Disclosure	Name of disclosure	Page or comment
403-8	Workers covered by an occupational health and safety management system	Pages 23-26
403-9	Work-related injuries	Pages 23-26, 35
403-10	Work-related ill health	Pages 23-26, 35
416-1	Assessment of the health and safety impacts of product and service categories	All significant product and service categories were assessed for their health and safety impacts and areas for improvement were identified.
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	There were no incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services within the reporting period.
<b>People</b> Employment		
401-1	New employee hires and employee turnover	<p>Total number and rate of new employee hires during the reporting period, by age group, gender and region: 407 new employee hires, &lt; 30: 51 percent, 30-50: 29 percent, &gt; 50: 20 percent, 135 females/272 males, 248 Denmark/159 Germany.</p> <p>Total number and rate of employee turnover during the reporting period, by age group, gender and region: 399 employees left, &lt; 30: 38 percent, 30-50: 31 percent, &gt; 50: 31 percent, 138 females/261 males, 235 Denmark/164 Germany.</p> <p>These calculations include seasonal workers.</p>

Disclosure	Name of disclosure	Page or comment
401-2	Benefits provided to full-time employees that are not provided to temporary or parttime employees	For employees in both countries, Germany and Denmark, the same rights to benefits apply. Differences might occur but would be related to the union agreement under application and the job category.
401-3	Parental leave	Information incomplete / not available as not consistently tracked.
402-1	Minimum notice periods regarding operational changes	In our countries of operations (Germany and Denmark), legal regulations are in place to ensure minimum notice periods and they are adhered to. In Germany, this happens in liaison with the workers' councils, in Denmark, with the unions. Local collective bargaining agreements cover such instances.
<b>People</b> Training and education		
404-1	Average hours of training per year per employee	Information incomplete / not available as not consistently tracked.
404-2	Programs for upgrading employee skills and transition assistance programs	Pages 27-29
404-3	Percentage of employees receiving regular performance and career development reviews	78 percent.



Disclosure	Name of disclosure	Page or comment
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## People

### Diversity and equal opportunity

405-1	Diversity of governance bodies and employees		Age	Age	Age		
		Governance	bracket	bracket	bracket		
		bodies*	< 30	30-50	> 50	Female	Male
		Total (%)	0%	21%	79%	21%	79%

\*Governance bodies are defined as: Supervisory Board and Management Board  
Note: we do not track other indicators of diversity at this stage.

Employees	Age bracket < 30	Age bracket 30-50	Age bracket > 50	Female	Male
Total (%)	17%	41%	42%	36%	64%

405-2	Ratio of basic salary and remuneration of women to men	By employment category: offshore to onshore	
		By gender: women to men	
		Basic salary	82%
		Remuneration	64%

Note: excluding one-off payments

## People

### Non-discrimination

406-1	Incidents of discrimination and corrective actions taken	No incidents of discrimination were raised during the reporting period.
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Disclosure	Name of disclosure	Page or comment
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407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	There is no risk to the right of freedom of association and collective bargaining in our operations. Through our Vendor Code of Conduct we set the expectation that we do not work with vendors where this may be the case.
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## Compliance & ethics

205-1	Operations assessed for risks related to corruption	Pages 32
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205-2	Communication and training about anti-corruption policies and procedures	Pages 32, 35  Additional information: 11 out of the 11 supervisory board members have received training on anti-corruption (100 percent). All administrative employees and employees with management responsibility (385, representing 24 percent of all employees) have the possibility to conduct a dedicated compliance e-learning including anti-corruption, of which 95.1 percent completed it (95.4 percent in Denmark, 94.6 percent in Germany). This rate is above the prior year completion rates (e.g. 87.1 percent in 2023).
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205-3	Confirmed incidents of corruption and actions taken	There were no confirmed incidents of corruption, neither with employees, nor business partners. There were no public legal cases regarding corruption brought against the organisation or its employees during the reporting period.
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Disclosure	Name of disclosure	Page or comment
<b>Compliance &amp; ethics</b> Anti-competitive-behaviour		
206-1	Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	There were no legal actions pending or completed during the reporting period regarding anti-competitive behaviour or violations of anti-trust or monopoly legislation in which the organisation has been identified as a participant.
<b>Compliance &amp; ethics</b>		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Page 32
<b>Healthy supply chains</b> Procurement practices		
204-1	Proportion of spending on local suppliers	Page 33
<b>Healthy supply chains</b> Freedom of association and collective bargaining		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	There is no identified risk to the right of freedom of association and collective bargaining in our operations. Through our Vendor Code of Conduct we set the expectation that we do not work with vendors where this may be the case.

Disclosure	Name of disclosure	Page or comment
<b>Healthy supply chains</b> Child labour		
408-1	Operations and suppliers at significant risk for incidents of child labour	There is no identified significant risk for incidents of child labour in our operations. Through our Vendor Code of Conduct we set the expectation that we do not work with vendors where this may be the case.
<b>Healthy supply chains</b> Forced or compulsory labour		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	There is no identified significant risk for incidents of forced or compulsory labour in our operations. Through our Vendor Code of Conduct we set the expectation that we do not work with vendors where this may be the case.





# KPI definitions

## Environment

### Direct CO<sub>2</sub>e emissions scope 1

All direct emission sources where Scandlines has operational control. This includes all use of fossil fuels for stationary combustion or transportation, in owned, leased or rented assets.

The emission factors represent the amount of CO<sub>2</sub>e produced when burning one ton of fuel. Therefore each fuel type produces a different amount of CO<sub>2</sub>e. For bunker, the emissions factor is based on the DIN EN 16258:2013-03. The CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions are certified by Lloyds Register. For car fuel, the emission factors are based on the GLEC Framework 2024, version 3.1, October 2024. For heating oil the emission factors are based on the Bundesamt für Wirtschaft und Ausfuhrkontrolle v. 1.3, 30.11.2022.

### Indirect CO<sub>2</sub>e emissions scope 2

Indirect emissions related to purchased energy. The values for purchased electricity are based on the reporting of the energy providers regarding the energy mix provided under the contract in application. As of 2022, indirect emissions from heating are included. The heating type and consumption is based on the contracts in application. Emissions factors for market based emis-

sions are derived from the City of Rostock and location based emissions from Bundesamt für Wirtschaft und Ausfuhrkontrolle v. 1.3, 30.11.2022 for Germany and CTR, HOFOR and VEKS (2024) for both location-based and market-based emissions for Denmark.

### Indirect CO<sub>2</sub>e emissions scope 3

A materiality assessment was conducted to determine the scope of indirect emissions to be included. The data reflect the categories that are relevant to Scandlines applying up-to-date emission factors where appropriate.

### CO<sub>2</sub>e per trip overall

Total CO<sub>2</sub>e emissions from bunker consumption divided by total number of trips sailed.

### Electricity consumption onshore

Total amount of electricity purchased as reported by the energy providers.

### Share of renewable electricity onshore (land-based)

Share of renewable energy in the energy mix. The values are based on the reporting of the energy

providers regarding the energy mix provided under the contract in application.

### Environmental accidents/violations entailing fines/sanctions

Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations.

### Share of non-segregated waste on overall waste

Share of non-segregated waste on the overall waste volumes excluding sewage, waste from construction of the new ferry and waste from the disposal of a ferry. Waste volumes are derived from the annual waste statistics provided by the waste disposal companies.

### Waste volumes

Waste volumes are derived from the annual waste statistics provided by the waste disposal companies and excluding sewage, waste from construction of the new ferry and disposal of a ferry.

### Waste fractions

Waste fractions are derived from the annual waste statistics provided by the waste disposal

companies and excluding sewage, waste from construction of the new ferry and disposal of a ferry.

### Waste treatment

Waste treatments are derived from the annual waste statistics provided by the waste disposal companies and excluding sewage, waste from construction of the new ferry and disposal of a ferry.

### Share of electric/hybrid cars in the car fleet

Share of electric and hybrid cars for cars owned or leased by Scandlines Infrastructure ApS and its subsidiaries.

### Number of charging stations for electric cars

Number of charging stations for electric or hybrid vehicles operated by Scandlines Infrastructure ApS for the use by employees and customers.

# KPI definitions

## Social

### Total number of employees

Full-time equivalent (FTE) number of employees on the payroll of Scandlines Infrastructure ApS and its subsidiaries based on a monthly average for the fiscal year.

### Total number of employees by work location (sea/shore)

Full-time equivalent (FTE) number of employees on the payroll of Scandlines Infrastructure ApS and its subsidiaries based on a monthly average for the fiscal year and split by working for a department on board a vessel (sea) or not (shore).

### Total number of employees by employment contract (permanent and temporary)

Number of employees on the payroll of Scandlines Infrastructure ApS and its subsidiaries, working on either permanent or temporary employment contracts as of 31 December of the fiscal year.

### Total number of employees by region

Number of employees on the payroll of Scandlines Infrastructure ApS and its subsidiaries, work-

ing either in the legal entities based in Germany or Denmark as of 31 December of the fiscal year.

### Total number of employees by gender

Number of employees on the payroll of Scandlines Infrastructure ApS and its subsidiaries, identified as female or male as of 31 December of the fiscal year.

### Total number of employees – share of female staff

Share of women in the total workforce (based on headcount) as of 31 December of the fiscal year.

### Share of female managers

Share of women in management positions which are defined as positions with direct reports (based on headcount) as of 31 December of the fiscal year.

### Share of female top managers

As of 2024, share of female top managers are defined as women who are members of the Scandlines Senior Leadership Team or CEO office as of 31 December of the fiscal year. This KPI was newly

introduced and replaces the KPI “Share of women in director positions” defined as Vice President level and above (based on headcount) as of 31 December of the fiscal year.

### Share of female shareholder-elected Supervisory Board members

Share of women from the shareholder-elected members of the Supervisory Board of Scandlines Infrastructure ApS as of 31 December of the fiscal year.

### Retention rate, voluntary

The percentage of employees who were active one year ago and are still employed as of 31 December of the fiscal year, excluding those who left involuntarily.

### Lost-time injury frequency (LTIF)

A lost time injury (LTI) is a work-related injury which makes an employee unable to report to work for more than 24 continuous hours after the injury was sustained (note: this excludes the day the injury occurred). The LTIF is calculated per

one million exposure hours (LTI x 1.000.000 / Total actual exposure hours for the Company).

### Passenger injuries

This frequency is calculated as a function of the number of passenger injuries reported per one million passengers during the fiscal year.

### Fatalities

A death directly resulting from a work related injury regardless of time between the injury and the death (where the injury is the root cause of the fatality) including employees and contractors.

### Contributions to community projects & associations

Sum of contributions to community projects (e.g. school projects) and associations in the fiscal year.

# KPI definitions

## Governance

### Share of vendors having signed the Vendor Code of Conduct – Retail & Catering

Vendors for direct procurement (for Retail and Catering) having either signed Scandlines' Vendor Code of Conduct, or where the vendor and Scandlines have agreed on other safeguards (e.g. mutual acknowledgement of compliance programs). Signature takes place with signing of contract.

### Share of vendors having signed the Vendor Code of Conduct – Procurement (spend > 20KEUR)

Vendors for indirect procurement, having record in Scandlines' ERP system, who either signed Scandlines' Vendor Code of Conduct, or where the vendor and Scandlines have agreed on other safeguards (e.g. mutual acknowledgement of compliance programs). Considered vendors are those with a total spend of > 20KEUR in the prior calendar year. Signature takes place with signing of contract. The Vendors with longterm contracts are being asked to sign when the threshold is reached.

### Share of employees completing compliance E-learning

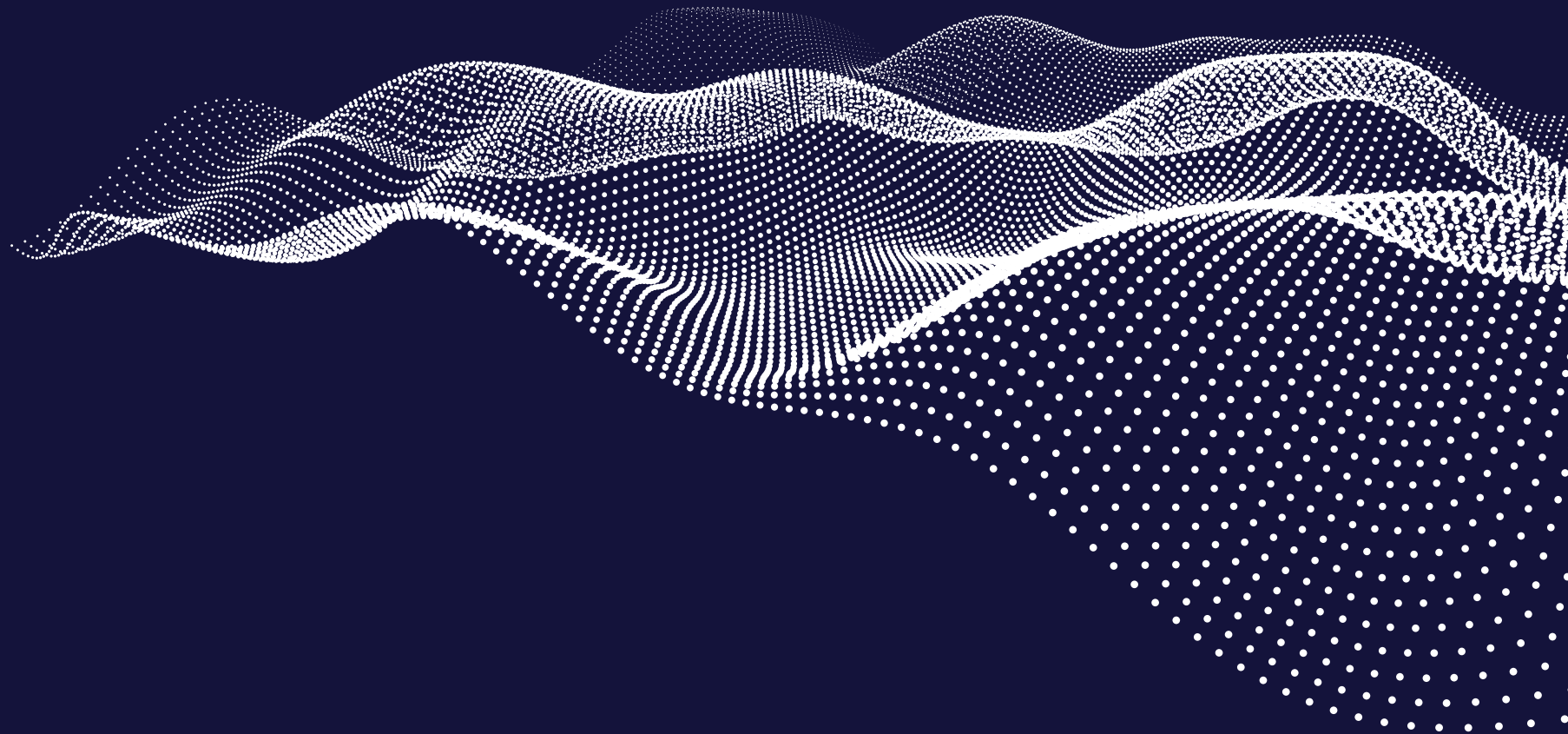
Share of administrative employees and employees with management responsibility who have completed the Compliance e-Learning during the fiscal year.

### Total number of substantiated complaints received concerning breaches of customer privacy

Total number of substantiated complaints received concerning breaches of customer privacy, incl. complaints received from outside parties and substantiated by the organisation, complaints from regulatory bodies, and total number of identified leaks, thefts, or losses of customer data.

### Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area

Number of significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area, including but not limited to: accounting and tax fraud, corruption, bribery, competition, the provision of products and services, or labour issues, such as workplace discrimination, among others. This includes compliance with international declarations, conventions, and treaties, as well as national, sub-national, regional, and local regulations.



**Contact person concerning sustainability**

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**Memberships**

