

## **Transparency Act**

Account of due diligence pursuant to Section 4 of the Transparency Act 2025

Euro Terminal

### **Introduction**

Caiano Maritime AS owns 50.0997% of the shares in the Norwegian holding company Euro-Terminal AS. Through two Polish subsidiaries, Euro Terminal Real Estate Sp. z o.o. and Euro Terminal Sp. z o.o., Euro Terminal owns and operates a large port in north-western Poland, close to the German border.

As part of the Caiano Group and in recognition of the importance of respecting fundamental human rights and ensuring decent working conditions, Euro Terminal has implemented relevant elements of the Norwegian Transparency Act. This implementation was carried out across all companies in the group structure, including the parent company Euro Terminal AS and its subsidiaries: Euro Terminal Real Estate Sp. z o.o., Euro Terminal Sp. z o.o. and Euro Forwarding and Shipping Agency Sp. z o.o. The process was conducted during 2022–2023, and routines have been established both internally and in relation to suppliers and business partners.

The company is committed to ensuring decent working conditions and respect for fundamental human rights in its own operations, throughout the supply chain and in other business relationships. The purpose of the Transparency Act is therefore of significant importance to the company, and due diligence assessments and transparent reporting form an integral part of its governance framework.

### **About Euro Terminal**

Located in the Polish port of Świnoujście, close to the open sea, Euro Terminal is a natural Baltic hub for cargo traffic to and from Central and Eastern Europe.

Euro Terminal is a multipurpose terminal with dedicated handling and storage facilities for a wide range of cargo, including general cargo, frozen fish, project cargo and ro-ro units. In addition, the company leases land. The terminal area covers approximately 53 hectares and includes, among other things, a total quay length of approximately 2,200 metres, with depths ranging from 6.3 to 9.5 metres.

In 2023, Euro Terminal acquired an additional 19 hectares located 35 km south of Świnoujście, adjacent to the S3 expressway. This area may be further developed as a storage yard, parking or logistics hub.

The Port of Świnoujście forms part of the Baltic–Adriatic Core Network Corridor under the TEN-T (Trans-European Transport Network).



In 2025, 524,000 tonnes of various types of cargo and 86,000 roro units were handled at Euro Terminal.

### **Policies and governance framework in Euro Terminal**

Euro Terminal has implemented the Euro Terminal Code of Conduct and the Euro Terminal Ethical Guidelines for Suppliers, which set out expectations relating to human rights and decent working conditions.

The company applies a combination of internal procedures and external regulatory frameworks to support compliance with the Transparency Act. These include:

- contractual provisions requiring suppliers to acknowledge and comply with the Ethical Guidelines,
- supplier questionnaires covering relevant topics under the Transparency Act, and
- reliance on applicable Polish and European legal frameworks, including labour law, whistleblower protection rules and the Central Register of Beneficial Owners.

### **Due diligence process**

Euro Terminal conducts due diligence assessments in line with the Transparency Act and based on the principles reflected in international standards such as the OECD Guidelines for Multinational Enterprises.

The assessments are risk-based and include identification, assessment and follow-up of actual and potential adverse impacts on human rights and decent working conditions. The main elements of the process include:

- mapping of operations and supply chains,
- risk assessment of suppliers and business partners,
- use of supplier questionnaires and contractual requirements, and
- follow-up measures, including dialogue and on-site verification where relevant.

### **Identified risks and impacts**

#### *Euro Terminal's own operations*

Ensuring a safe and healthy working environment is a key priority for Euro Terminal. Safety protocols, handling guidelines and procedures are implemented and followed to maintain safe operations. The company invests in training programmes to enhance the skills and competencies of its workforce and complies with applicable labour laws as well as internal work rules and remuneration regulations.

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The overall risk of breaches of decent working conditions is assessed as low to medium, primarily due to the nature of stevedoring operations involving physical labour and the use of heavy equipment.

An annual Occupational Health and Safety Performance Review is conducted. In 2025, six workplace accidents were recorded. All were classified as non-severe, resulting in absences ranging from 3 to 103 days. No occupational diseases were identified.

The company recognises that workplace accidents may affect employee well-being and therefore analyses all incidents to identify root causes and implement preventive measures.

Euro Terminal occasionally hires third-party labour from stevedoring pools in situations involving port congestion or limited internal capacity. The use of such labour entails risks related to working conditions, including fair pay, training, insurance and treatment.

#### *Supply chain*

Euro Terminal has operated in the Polish market for over 30 years and has established relationships with a stable group of suppliers. These suppliers operate within the legal framework of Polish and European law and are subject to supervision by public authorities, including in some cases sector regulators (e.g. banks and insurers).

The overall risk in the established supplier base is therefore assessed as relatively low.

The risk is considered somewhat higher for new suppliers and suppliers located outside the European Economic Area.

#### **Measures implemented**

To address identified and potential risks, Euro Terminal has implemented several measures, including:

- contractual obligations for suppliers to comply with ethical guidelines,
- periodic supplier questionnaires,
- on-site checks of third-party labour (including training, protective equipment and compliance with procedures), and
- training and continuous improvement initiatives in occupational health and safety.

Supplier audits are carried out for new long-term suppliers, and the company plans to conduct further audits of selected suppliers based on risk assessments.

#### **Results and effectiveness**

Due diligence assessments conducted in 2025 did not identify any actual adverse impacts on human rights or decent working conditions.

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However, the assessments confirmed the importance of continued focus on occupational health and safety and on working conditions relating to third-party labour. Follow-up measures and monitoring activities will therefore be maintained and further developed.

### **Right to information**

The Transparency Act grants the right to request information on how companies covered by the Act address adverse impacts on fundamental human rights and decent working conditions.

Requests may be sent to: [post@caiano.no](mailto:post@caiano.no)

Haugesund, 16 June 2026

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