

Sustainability Report

2025





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Executive board statement

We are pleased to present Acta Marine’s sustainability report 2025, marking an important step in our commitment to transparent and responsible business practices. Our previous sustainability report was published in April 2022. Since then, the landscape in which we operate has evolved significantly. One of the most notable developments has been the introduction of the Corporate Sustainability Reporting Directive (CSRD) by the European Union. This new regulatory framework has reshaped how organizations approach sustainability and ESG reporting. In response, we have fundamentally updated our reporting approach to align with these new requirements.

Therefore, this report represents our first effort to structure our sustainability and ESG disclosures aligned with the CSRD. While our 2022 report was primarily forward-looking and built around three core pillars—reducing greenhouse gas emissions, safety and security, and durable employability—this report adopts a different structure. Our three pillars remain central to our strategy; however, they are now embedded within the CSRD framework, ensuring greater transparency and comparability. In addition to maintaining a forward-looking perspective, this report also reflects on our performance over the past years. It provides insight into the progress we have made, the challenges we have encountered, and identifies areas where we can and need to improve.

Despite this adjusted approach, Acta Marine’s commitment remains unchanged. We continue to be dedicated to responsible environmental management, to improve our ways in how we engage with our own workers and those in the value chain and enhance our safety and security culture and work environment.

Operating predominantly within the offshore renewable energy sector, we recognize our responsibility to contribute to the reduction of greenhouse gas emissions across the offshore value chain. A key milestone in this effort has been the delivery of our first methanol-diesel dual-fuel construction service operating vessel (CSOV).

This vessel represents a significant step in reducing our carbon footprint. Over the course of 2026, we expect to take delivery of three more of these methanol-powered newbuild vessels, further strengthening our ability to operate more sustainably.

On safety and security, improvements were made to safety performance monitoring and reporting, alongside further development of our integrated management system. Regarding durable employability, key initiatives included the introduction of a works council, the execution of employee satisfaction surveys, and the benchmarking and adjustment of remuneration structures. In addition, a sustainability training program was introduced for both onshore staff and seafarers, further embedding ESG awareness across our organization.

To conclude, this report outlines our ideas, initiatives, and performance across environmental, social, and governance topics. It marks an important step for Acta Marine in aligning with the CSRD while reinforcing our long-term commitment to the sustainability pillars we have defined: emission reduction, durable employability, and safety and security.

Acta Marine Executive Team

April 2026

General statement on the preparation of Acta Marine’s sustainability report for 2025

Acta Marine has prepared its 2025 sustainability report with reference to the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). The report is established on a consolidated basis (Acta Marine Holding) and encompasses the activities of Acta Marine Offshore Services, Acta Marine France, Acta Marine Management Services, and Acta Marine UK and their subsidiaries.

During the reporting period (1st January 2025 until 31st December 2025), Acta Marine initiated its alignment with the CSRD requirements. This process coincided with the introduction of the European Commission’s Omnibus regulatory adjustments, which revised the scope and applicability thresholds of the CSRD. Based on these updates and considering that Acta Marine did not exceed an average of 1000 employees during the reporting year 2025, the company is not currently subject to mandatory reporting under the CSRD/ESRS framework.

Notwithstanding this exemption, Acta Marine has decided to continue its sustainability reporting efforts in alignment with CSRD principles. In doing so, the company has adopted a pragmatic and proportionate approach, narrowing the scope of disclosures to those considered most relevant to its operations and stakeholders at this stage of implementation.

As part of this process, Acta Marine conducted a Double Materiality Assessment (DMA) and an initial ESRS scoping exercise. This resulted in the identification of approximately 500 material data points. From this dataset, a selection has been made based on relevance and feasibility, forming the basis of the disclosures included in this report.

All disclosures presented in this report are therefore made on a voluntary basis and reflect Acta Marine’s current stage of maturity in implementing CSRD-aligned reporting practices. The company intends to further develop and expand its disclosures in line with regulatory developments, relevance to stakeholders and internal capabilities in future reporting periods.

Acta Marine strategy and values

Our strategy and ambition on sustainability

At Acta Marine, sustainability has evolved into a structured, CSRD-aligned approach that extends beyond climate considerations. By 2025, we recognise sustainability as an important part of our business model, determining how we create long-term value for all stakeholders across our environmental, social, and governance responsibilities. Our sustainability strategy now builds on a formal Double Materiality Assessment, identifying the key impacts, risks, and opportunities most relevant to our fleet operations and value chain.

As decarbonisation remains at the heart of our mission, our approach has become more data-driven and transparent. With the expansion of our offshore fleet, we have implemented a climate transition plan aligned with the 2023 IMO GHG Strategy, adopting a long-term net-zero ambition around 2050. Our newbuild vessel that has been delivered in 2025 and those that will be delivered in 2026 will be methanol-fuelled (dual fuel), enabling future fuel flexibility and supporting meaningful emission reductions as alternative fuels become available. We recognise that emissions will temporarily rise during our fleet-growth phase, with a peak foreseen between 2030 and 2035, after which our reduction measures and technology choices will reverse this trend.

Our broader sustainability ambition has matured in addition to the decarbonization of our fleet. We embed safety, durable employability, responsible supply-chain practices, and transparent governance into our daily operations. We are working to improve the accuracy and completeness of our sustainability data and to increase engagement with clients and suppliers to support progress across the offshore value chain. Guided by our values and our mission to be a trusted marine support partner, Acta Marine includes sustainability in its strategic decisions, aiming to support the growth of offshore renewable energy.



Our vision, mission & values

Our Vision

We live in a changing world where climate change significantly impacts our lives and environment. This is reinforced by the rapid expansion of the global population, which further increases the demand for energy and necessitates a shift towards more sustainable sources.

Developments in offshore energy production and infrastructure are crucial in addressing these challenges. Maritime activities play a vital role in sustainably providing offshore energy for the growing global population and future generations.

Acta Marine is the trusted partner that provides services in a sustainable way to develop and maintain offshore energy infrastructure.

Our Mission

We deliver excellent marine support for offshore energy markets and its infrastructure. As a leading marine support provider, we add value to our clients and we strive for durable profitability.

By continuously adapting and improving our services and assets we enhance sustainability and contribute to the decarbonization and greenhouse gas reduction of the offshore value chain.

We work as a team in an environment of trust, built on safety and expertise, to be a force for good.

Acta Marine Core Values

As a family-owned company with a long-term vision, we take CARE of all aspects of our business: our people, our clients, business partners and shareholders, our people, our assets and the environment we work in.



- C Collaborative**

We cooperate transparently with our clients and stakeholders, building long-term relationships. We are service-oriented, taking care of our clients' needs and requirements.
- A Accountable**

Stewardship is in our DNA. We operate in a safe and responsible manner, taking ownership of our actions and behaviour. We treat people and our planet with respect.
- R Reliable**

We act with integrity and do everything in our power to maintain our reputation as the trusted marine support partner. We honour our commitments and consistently deliver quality services with care for the safety and well-being of all involved and the environment we work in.
- E Expertise**

We build on our experience in offshore waters and continuously look for the best solutions and innovations that fit the needs of our clients and the industry as a whole. Utilizing our knowledge and expertise, we explore new opportunities, technologies, markets and proactively improve our operations.

General information



ESRS 2

General disclosures

Basis for preparation

BP-1 General basis for preparation of the sustainability statement

This document represents Acta Marine’s second report on its sustainability progress and ambitions, and the first prepared following the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) in a pragmatic and proportionate way. As such and in line with the European Commission’s Omnibus regulatory adjustments, which revised the scope and applicability thresholds of the CSRD for undertakings with fewer than 1000 employees during the financial year, Acta Marine has chosen to narrow its reporting scope to those elements it considers most relevant. Accordingly, and with a clear understanding of its current position, Acta Marine’s sustainability statement for the 2025 reporting cycle focuses primarily on its own operations — particularly its offshore vessels — and addresses the sustainability matters most material to these activities.

While the Double Materiality Assessment methodology acknowledges upstream and downstream relationships, the company has not yet conducted a detailed ESG analysis of its value chain. At this stage, the reporting scope does not include comprehensive sustainability performance data from suppliers, business partners, or customers. Acta Marine recognizes the importance of these areas and has mapped key actors and dependencies as part of its ESG assessment, but the current priority is to manage impacts, risks, and opportunities within operational control. To prepare for future expansion of scope, Acta Marine will include initial assessments based on indirect parameters, such as cost spent, to estimate sustainability performance indicators like emissions in its value chain. This approach will allow the company to establish a preliminary understanding of upstream impacts while building capacity for a more detailed analysis in the coming years. The ambition is to progressively expand the scope to include upstream

value chain actors, assessing supplier practices and procurement policies, followed by downstream considerations such as customer engagement and lifecycle impacts.

This report covers the period January 1st 2025 until December 31st 2025. The reporting period and the scope of this report aligns with the scope of our financial statements unless otherwise stated. This report is prepared on a consolidated basis, covering all Acta Marine business units and subsidiaries, and is therefore issued at the level of Acta Marine Holding B.V. As we develop our internal controls, there may be inherent uncertainties related to some of our sustainability data. As Acta Marine is not required to report under CSRD/ESRS standards, the environmental, social and governance data have not been subject to external assurance. Finally, prior-year performance is presented only where the data is comparable. Where reference years are not shown, the data was either unavailable or prepared on a different reporting basis.

BP-2 Disclosures in relation to specific circumstances

Measurement uncertainty and data availability
The metrics subject to the highest level of measurement uncertainty in our disclosures primarily relate to Scope 3 greenhouse gas emissions, as these depend on data from suppliers that is currently unavailable. Consequently, we rely on estimation techniques such as spend-based or other proxy parameters, which introduce a low to medium degree of certainty and potential inaccuracies. In contrast, Scope 1 and Scope 2 emissions are relatively well defined because they are based on direct measurements of fuel consumption on board our vessels and electricity or fuel use in our offices, even though they remain indirect calculations. Beyond climate-related data, uncertainty also arises in gathering social and governance information across our supply chain, as this depends on disclosures from tier-one suppliers, which are limited at present. These factors collectively represent areas where measurement uncertainty is significant and

where improvements in data availability and supplier engagement are expected over time.

Acta Marine’s quantitative metrics and monetary amounts subject to measurement uncertainty are affected by several factors related to the availability and quality of data, the limitations of measurement techniques and systems, and reliance on third-party information. For vessel-related GHG emissions (Scope 1), uncertainty stems from incomplete fuel-flow metering across the fleet, reliance on bunker delivery notes, the use of generic well-to-wake emission factors for MGO fuels, variations in data quality from bunkering suppliers, and modelled upstream emissions where supplier-specific data are not available. Scope 2 electricity emissions depend on estimated allocations in multi-tenant office locations and the availability of supplier-specific emission factors. Scope 3 categories, including purchased goods and services, logistics, investments in new vessels, are affected by the lack of primary data from shipyards, equipment manufacturers, supply chain partners and logistics providers, requiring the use of economic input–output models. Together, these factors represent the main sources of measurement uncertainty disclosed by Acta Marine in alignment with ESRS 1 §7.2.

Assumptions, approximations and judgements made in measurement

Our greenhouse gas emissions measurements are primarily based on flow measurement data from our vessels. Currently, two of our three active vessels, Acta Auriga and Acta Centaurus, are equipped with flow measurement equipment, while Acta Orion is not yet fitted with this technology. For Acta Orion, we rely on bunker notes received throughout the year when taking in fuel and adjust these figures using fuel tank measurements at the beginning and end of the year to calculate total annual consumption. This approach involves the assumption that bunker delivery records and tank level readings accurately reflect fuel usage, and that any discrepancies due to operational factors are negligible. For vessels with flow meters, we assume the calibration and accuracy of the installed equipment remain within manufacturer specifications. Judgements include determining the completeness of bunker note data and applying corrections for tank levels to approximate actual consumption. Acta Orion is scheduled to be fitted with flow measurement equipment in 2026 and all new vessels will include this technology, which will reduce reliance on approximations and improve measurement precision over time.

Acta Marine discloses that, in addition to ESRS, sustainability-related information included in the sustainability statement is also derived from the IMO Data Collection System (IMO DCS) and the EU Monitoring,

Reporting and Verification Regulation (EU MRV). These frameworks are applied insofar as relevant to the undertaking’s maritime fuel consumption and greenhouse gas emissions reporting obligations.

Strategy and business model

SBM-1 Strategy, business model and value chain

Acta Marine’s business model

Acta Marine is a specialised offshore maritime service provider focused on delivering walk-to-work (W2W) and offshore support vessel services primarily to the offshore wind sector, and selectively to other offshore energy segments. Acta Marine’s business model is based on owning, operating and managing a fleet of purpose-built offshore accommodation and support vessels and deploying these vessels under medium (project) - to long-term (O&M) charter contracts. Value is created through safe, reliable and efficient offshore operations that enable customers to install, operate and maintain offshore energy infrastructure. The business model integrates capital allocation, vessel ownership, operational excellence, and long-term stakeholder relationships, allowing Acta Marine to support the energy transition while generating stable financial returns.

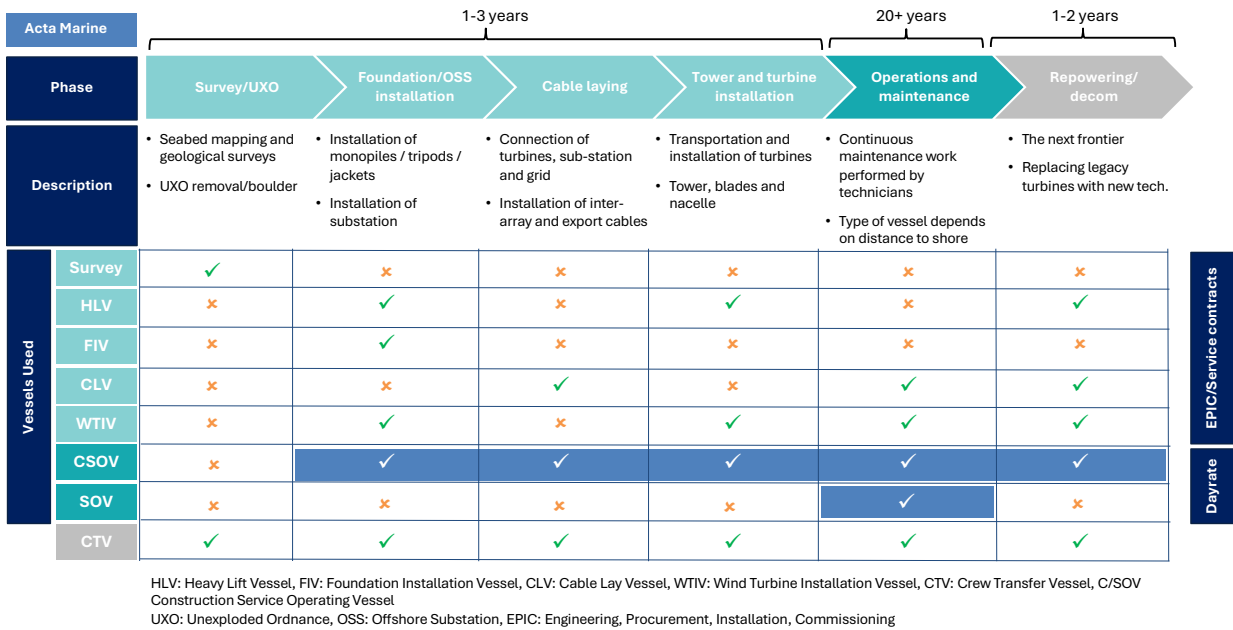
The group operates through Acta Marine Holding, which provides governance and capital allocation, supported by operating entities delivering offshore services in key markets (including the Netherlands, France, Germany, Denmark and the UK) and a management services entity providing technical management, crewing, finance, IT, QHSSE and other services. This structure enables operational control over vessels and crews and supports consistent safety, environmental and service performance.

The offshore wind value chain

The offshore wind value chain is composed of several interconnected stages that collectively enable the generation and delivery of renewable energy. At the upstream end, manufacturers produce turbines, foundations, and subsea cables, while shipyards and equipment suppliers deliver specialized vessels and components required for offshore construction. These activities are followed by midstream processes, which include the transportation, installation, and commissioning of turbines and associated infrastructure. Finally, the downstream segment encompasses operations and maintenance services, energy transmission to shore, and distribution to end-users.

Acta Marine's place in the offshore wind value chain

Wind farm construction, operation and maintenance



Acta Marine, with its fleet of CSOV and SOVs, occupies a critical position within the midstream and downstream phases of this value chain. The company provides marine support services that facilitate the installation and long-term maintenance of offshore wind farms. Its fleet of specialized vessels enables safe and efficient crew transfers, logistical coordination, and construction support during the installation phase, as well as ongoing maintenance operations throughout the lifecycle of offshore assets. By bridging the gap between upstream equipment suppliers and downstream project owners, Acta Marine ensures the execution of offshore wind projects.

Within its own value chain, Acta Marine’s upstream relationships primarily involve suppliers of vessels, marine equipment, fuel, and technical services. These suppliers include shipyards, equipment and component manufacturers, and logistics partners, selected based on reliability, safety, and compliance with environmental and quality standards. Downstream, Acta Marine serves offshore wind developers, EPC contractors, and renewable energy operators through project-based contracts. The ultimate end-users are utilities and energy consumers who benefit from the renewable electricity generated by offshore wind farms. This positioning underscores Acta Marine’s role as an essential service provider in advancing the transition to sustainable energy.

Acta Marine’s Value chain (IFRS)

This description of Acta Marine’s value chain is based on the 6 capitals of Integrated Reporting, part of IFRS, to explain how an organisation creates value over time.

Following this IR framework, Acta Marine creates value by transforming multiple forms of capital into services and outcomes that benefit customers, shareholders and society.

- **Financial capital** is invested in vessel construction, acquisition and innovation, generating revenue from W2W charter contracts both medium and long-term.
- **Human capital** is leveraged through skilled marine engineers, vessel crew and onshore specialists delivering safe and high-quality offshore operations.
- **Manufactured capital** consists of purpose-built W2W vessels, mission equipment and port infrastructure deployed across offshore projects.
- **Intellectual capital** includes expertise in vessel design, marine engineering, offshore wind operations, training and data analytics that enhance operational efficiency.
- **Natural capital** is utilised through access to ocean space and energy resources, with a focus on efficient fuel use and reduced environmental impact.
- **Social and relationship capital** is built through long-term relationships with customers, suppliers, regulators, financiers and local communities.

Furthermore, Acta Marine’s value chain is structured into upstream activities, own operations and downstream activities.

- **Upstream value chain:** shareholders, banks and institutional investors; shipyards, OEMs, crewing agents, fuel and bunker suppliers; port agents, logistics providers; regulatory bodies, classification societies and industry organisations; and maritime communities. These actors provide the financial, material, human and regulatory inputs required for vessel construction, maintenance and operations.
- **Own operations:** ownership and deployment of W2W vessels; offshore installation, operation and maintenance services; crew management, training, safety and well-being; technical, commercial and corporate management. These activities are under Acta Marine’s operational control and represent the core of value creation.
- **Downstream value chain:** customers such as utilities, turbine OEMs and EPCI contractors; offshore wind farms, substations, cables and related assets; ports supporting offshore projects; and communities and households indirectly benefiting from renewable electricity generation.

This value chain definition forms the basis for Acta Marine’s double materiality assessment and the scope of its sustainability disclosures under the ESRS.

Acta Marine’s

UPSTREAM VALUE CHAIN

Shareholders
AM shareholder

Partners
Banks, institutional investors

Suppliers tier 1
Shipyards, catering supplier, main engine OEM, crewing agents, mission equipment OEMs, vessel designers, connectivity broker and provider, insurance broker

Suppliers tier 2
Port agents, bunker suppliers,

Upstream logistics
Warehousing/stores, shipping agent, customs, port agents

Regulatory bodies
Classification society, flag authorities, IMO

Communities
IMO, KVNR, NOF, G+, IMCA

INPUT CAPITALS

Financial capital
Financial investments sourced from shareholders, loans, and government grants for renewable energy projects

Human capital
Skilled workforce including marine engineers, operational/vessel crew, and skilled office staff

Natural capital
Access to ocean spaces, raw materials such as shipbuilding steel for vessel construction, and energy resources for operations our vessels (LSMDO and methanol)

Manufactured capital
Purpose-built offshore W2W vessels, advanced mission equipment, and port facilities.

Intellectual capital
Employee training, expertise on W2W operations, knowledge on vessel design and marine engineering, leveraging data analytics to enhance operational efficiency

Social & Relationship Capital
Long-term partnerships with wind farm developers, OEMs, regulatory authorities, and local communities

value chain

Acta Marine Holding

Governance
Supervisory Board AM Holding

Business Activities
Financial capital: Allocation of capital towards acquiring vessels, developing innovative maintenance solutions, and operationalizing wind turbine services

Sites
Office Rotterdam, NL

AMOS, AMF, AM UK

Governance
Board of directors AM Holding and AMF

Business Activities

- Manufactured capital: Deployment of vessels to provide installation, maintenance and transport services to offshore wind farms.
- Social and relationship goals: Collaboration on sustainable energy goals, compliance with regulatory frameworks, and contributions to community development
- Natural capital: Minimization of environmental impact through efficient fuel use, waste reduction, and adherence to environmental regulations

Sites
Office Rotterdam, NL
Acta Orion
Acta Auriga
Acta Centaurus
Office Montoir, Fr
Acta Pegasus
Acta Hercules (2026)
Acta Gemini (2026)
Acta Aquarius (2026)
Office New Castle, UK

Acta Marine Management Services

Governance
Board of directors AM Holding

Business Activities

- Intellectual capital: Leveraging data analytics to enhance operational efficiency and reduce costs; innovation in energy-efficient vessel design
- Human capital: Training programs, safety initiatives, and employee wellness schemes to maintain high performance and morale

Sites
Office Rotterdam, NL

OUTPUT CAPITALS

Financial capital
Financial returns in the form of revenue from W2W service contracts, reinvestment into fleet expansion, and dividends for shareholders

Human capital
Skilled and motivated employees contributing to service quality and operational excellence

Natural capital
Reduced carbon footprint, sustainable resource utilization, and contribution to the global energy transition

Manufactured capital
Efficient, reliable, and safe W2W operations supporting energy production at offshore wind farms.

Intellectual capital
Increased client satisfaction, competitive advantage, and industry leadership in sustainable W2W operations

Social & Relationship Capital
Enhanced reputation, increased trust, and strengthened market position.

DOWNSTREAM VALUE CHAIN

Shareholders
AM shareholder

Communities
Families of employees, households receiving clean electric energy

Buildings locations
Wind farms, subsea infrastructure, cables, offshore substations, wind turbines, O&G facilities

Commercial partners
Commercial brokers

Customers
Utilities, Turbines OEMs, EPCI contractors, O&G operators, T&I contractors

Regulatory bodies
BV, KVNR, IMO, IMCA

Downstream logistics
Ports

SBM-2
Interests and views
of stakeholders

Organization of stakeholder engagement

Acta Marine organizes stakeholder engagement through a process designed to align with the requirements of the EU CSRD and the ESRS framework. The stakeholder engagement plan serves as a cornerstone for the Double Materiality Assessment. The process begins with identification of stakeholder groups across the value chain, starting with a structured stakeholder mapping exercise that identifies both internal and external stakeholders based on their relevance to specific sustainability topics and their degree of exposure to potential impacts. Internal stakeholders include the management team and employees (both seagoing and non-seagoing), while external stakeholders include investors, customers, suppliers, shareholders and other business partners. Stakeholders are classified into two main categories, “affected” stakeholders, whose interests are directly or indirectly impacted by Acta Marine’s operations, and “users” of sustainability statements, such as investors, lenders, and other financial actors who rely on ESG disclosures for decision-making.

Engagement is carried out through two primary methods: surveys and interviews. Consultation with affected stakeholders is primarily conducted through surveys, enabling stakeholders to validate or challenge a pre-selected list of sustainability matters and IROs (Impacts, Risks and Opportunities), score their importance, and suggest additional relevant topics. Affected stakeholders are also directly involved in the impact scoring exercise to reflect their experienced impacts.

User stakeholders, including investors, financial institutions, insurers, and other financial actors, are primarily engaged through structured interviews to validate financial risks and opportunities and to contribute to the financial scoring exercise. These interviews also enable stakeholders to elaborate on their perception of Acta Marine’s sustainability performance and the relevance of specific IROs. Borderline IROs — those with uncertain but potentially significant impacts — are specifically prioritized during interviews to ensure relevant IRO’s are adequately assessed.

The engagement process results in both quantitative and qualitative analyses of the responses, which are mapped to relevant sustainability matters and identified impacts, risks, and opportunities (IROs). These outcomes are subsequently incorporated into the Double Materiality Assessment to refine materiality scoring and ensure that stakeholder perspectives are systematically reflected in Acta Marine’s sustainability strategy.

Key stakeholders

Acta Marine’s key stakeholders are those who can significantly influence or are impacted by the company’s operations across its value chain. They include both affected stakeholders — individuals or groups whose interests are directly or indirectly affected by Acta Marine’s activities — and users of sustainability statements, such as investors and financial institutions who rely on transparent ESG reporting for decision-making.

The following groups were identified:

- **Investors and Shareholders** such as our shareholder, and financial institutions such as vessel debt providers, are users of sustainability statements. Their concerns centre on governance, corruption and bribery risks, and long-term resilience to regulatory changes. Interviews revealed that these stakeholders view robust ESG practices as essential for maintaining reputation and financial stability.
- **Our clients** such as offshore wind developers, utilities and EPC contractors, are another critical group. They depend on Acta Marine’s marine support services for construction and maintenance of offshore wind farms. Interviews with customers, including turbine OEMs, highlighted sustainability performance, emission reduction, and operational efficiency as top priorities.
- **Employees and Crew** form a primary stakeholder group. This includes shore-based staff and sea-based crew members who are essential for operational continuity and safety. Their engagement focuses on working conditions, health and safety, and equal treatment, which were rated as highly important in recent surveys.
- **Suppliers and Service Providers** including shipyards, equipment manufacturers, and technical service partners — play a vital role in Acta Marine’s upstream value chain. These stakeholders influence vessel design, lifecycle management, and compliance with environmental and social standards. Key suppliers identified include a vessel designer, shipyard, mission equipment OEM, and propulsion OEM.

Categories of stakeholders for
which engagement occurs

Stakeholders are those who can affect or be affected by the undertaking. For Acta Marine there are two main groups of stakeholders.

- **Affected stakeholders** – Individuals or groups whose interests are affected or could be affected — positively or negatively — by Acta Marine’s activities and its direct and indirect business relationships across its value chain.

- **Users of sustainability statements** – Primary users of general-purpose financial reporting (existing and potential investors, lenders and other creditors, including credit institutions, insurance undertakings), and other users of sustainability statements, including Acta Marine’s business partners, trade unions and social partners, civil society and non-governmental organisations, governments and analysts.

Materiality
assessment process

IRO-1
Material impacts, risks
and opportunities

IRO methodology and assumptions

Acta Marine applies a structured Double Materiality Assessment (DMA) methodology that is aligned with the European Financial Reporting Advisory Group (EFRAG) guidelines. This process is designed to ensure that both impact materiality (inside-out perspective) and financial materiality (outside-in perspective) are considered when identifying and defining impacts, risks, and opportunities (IROs). The methodology begins with the creation of an ESG Universe, which is a comprehensive list of potentially material sustainability matters derived from sectoral analysis and company-specific reviews. For each sustainability matter, Acta Marine identifies potential impacts, risks, and opportunities, and then defines them in detail. These definitions consider whether the matter has actual or potential, positive or negative effects on people and the environment, as well as whether it could trigger financial consequences for the company, such as influencing cash flows, cost of capital, or access to finance.

Once the initial list of IROs is prepared, an internal validation process is conducted by ESG topic owners across relevant departments. This step ensures that the identified IROs reflect operational realities and strategic priorities. Following internal validation, external stakeholders—including investors, customers, suppliers and employees—are engaged through surveys and interviews. These engagements serve to validate or challenge the company’s initial assessment and provide additional insights. Stakeholder input is weighted according to its relevance and degree of impact, and where objective evidence or scientific data is lacking, stakeholder opinions become critical for decision-making.

The process also incorporates several key principles. First, the double materiality principle is applied, meaning

that a matter is considered material if it has significant environmental or social impacts or if it creates financial risks or opportunities for the company. Second, all IROs are assessed across defined time horizons—short-term (up to one year), medium-term (one to five years), and long-term (more than five years)—and classified as either actual or potential. Third, the location of each IRO within the value chain is specified, distinguishing between upstream, own operations, and downstream activities. Finally, the methodology requires that every sustainability matter includes at least one impact and one risk or opportunity to ensure comprehensive coverage.

The outcome of this process is a refined and validated list of material IROs, which is consolidated into a final DMA matrix. This matrix forms the basis for sustainability scoping and reporting, ensuring that material data points are captured for disclosure purposes.

Input parameters used in process to identify, assess and manage material IRO’s
As mentioned above, Acta Marine’s identification of material impacts, risks, and opportunities begins with the creation of an ESG Universe, which is based on a comprehensive company review and sectoral analysis. The company review incorporates key internal documentation such as the mission statement, strategic plan, corporate governance documents, organizational charts, group structure, service descriptions, procurement policies, financial statements, sustainability reports, sustainability goals and targets, and value chain mapping. Peer identification is also included to benchmark practices. The sectoral analysis complements this by integrating peer analysis and recognized standards, including ENCOR, SASB, MSCI, and social risk indicators, alongside Acta Marine’s historical ESG priorities. From this ESG Universe, which lists all potentially material sustainability matters, specific impacts, risks, and opportunities (IROs) are identified for each matter. These IROs are then precisely defined and validated through consultation with relevant ESG topic owners within Acta Marine to ensure accuracy and relevance before moving to the scoring and stakeholder engagement phases.

IRO categories in our value chain

NI = Negative impact, PI = Positive Impact, R= Risk, O = Opportunity

Material topic	Impact Risk and Opportunity definition	Time horizons	Value Chain	Status
Climate change	R 3- Capital investment in more sustainable newbuilding vessels or innovative technologies to increase the sustainability profile of current vessels.	Mid-term	Own operations	Potential
	NI 5- Generation of greenhouse gas (GHG) emissions stemming from company-owned assets (scope 1), purchased energy (scope 2) and upstream and downstream activities (scope 3).	Short-term	Own operations	Actual
	R 7- Emissions-related regulation from governing bodies such as the EU and the IMO result in compliance costs and can lead to penalties or sanctions in case of non-compliance.	Mid-term	Own operations	Potential
	R 8- Increased operational costs for carbon offsets associated with reaching net-zero emissions.	Short-term	Own operations	Potential
	O 10- Investment in more sustainable vessels attracts funding from investors looking for green investment projects in line with EU Taxonomy criteria.	Short-term	Own operations	Potential
	NI 12- Fuel consumption from fossil sources in shipping operations contributes to significant greenhouse gas (GHG) emissions, exacerbating climate change and environmental pollution.	Short-term	Own operations	Potential
	R 13- Increased costs related to implementing fuel-efficient technologies in existing vessels or incorporating such innovations into newbuilds.	Short-term	Own operations	Potential
Pollution	NI 16- Sea and coastal water transport emits non-GHG air pollutants.	Short-term	Own operations	Actual
	R 17- Violation of air pollution standards and regulations could result in fines, legal actions and disruption of activities.	Mid-term	Own operations	Potential
Resource use and circular economy	PI 31- Proper maintenance of vessels extends the vessels' operational lifespan, enhancing asset utilization and reducing the need for premature replacements.	Short-term	Own operations	Potential
	R 32- Regular and thorough maintenance of vessels can impact short-term profitability and cash flow, particularly if maintenance needs are unexpectedly high or if they occur more frequently.	Short-term	Own operations	Potential
	PI 34- Re-selling vessels in the second-hand market minimizes waste, prolongs the life cycle of the vessels and reduces the environmental footprint.	Mid-term	Own operations	Potential
	O 36- Selling used vessels in the second-hand market at the end-of-life generates revenue.	Mid-term	Downstream	Potential

Material topic	Impact Risk and Opportunity definition	Time horizons	Value Chain	Status
Own workforce	NI 68- Neglecting to provide upskilling and educational opportunities for own employees can hinder their career development and job satisfaction.	Mid-term	Own operations	Potential
	NI 69- Failing to offer upskilling and educational opportunities to crew can result in decreased crew competency, safety, and job satisfaction.	Mid-term	Own operations	Potential
	NI 72- Allowing a gender pay gap among own employees can lead to perceptions of unfairness and inequality, undermining inclusivity and fostering a negative work environment, which may diminish employee morale and loyalty.	Short-term	Own operations	Potential
	NI 73- Failing to address and reduce the gender pay gap for crew can perpetuate inequality and exclusivity, undermining fairness and fostering a divisive work environment.	Long-term	Own operations	Potential
	NI 76- Failing to employ and include people with disabilities can lead to a lack of diversity and support within the workforce, marginalizing this group and potentially violating inclusive employment laws and principles.	Long-term	Own operations	Potential
	NI 88- Neglecting to protect the privacy of its own employees can erode trust and neglects fundamental rights.	Mid-term	Own operations	Potential
	NI 89- Violating the privacy of crew onboard vessels undermines their fundamental rights and impacts their well-being.	Mid-term	Own operations	Potential
	NI 40- Insecure employment due to fear of job loss, arbitrary dismissal, and lack of recurring contracts can lead to a negative work environment, reducing employee satisfaction and loyalty, and destabilizing the workforce.	Short-term	Own operations	Potential
	NI 41- Insecure employment conditions for crew, characterized by fears of employment loss and arbitrary dismissal, and the absence of long-term contracts, can degrade the work environment, diminish satisfaction, and lower crew loyalty and undermining motivation.	Short-term	Own operations	Potential
	NI 44- Lack of flexible working arrangements for own employees may harm their well-being, disrupt work-life balance, and lower productivity	Short-term	Own operations	Potential
	NI 45- Insufficient monitoring of working arrangements that fail to balance work and rest hours for crew can deteriorate their well-being, productivity, and morale.	Short-term	Own operations	Actual
	NI 48- Inadequate wages for own employees and crew can lead to dissatisfaction, decreased morale, and a negative work environment.	Short-term	Own operations	Potential
	R 50- The risk of discontent and potential legal or reputational repercussions if wages of own employees and crew are perceived as inadequate or not commensurate with market standards for similar work conditions, potentially leading to high turnover rates and reputational damage.	Mid-term	Own operations	Potential

Material topic	Impact Risk and Opportunity definition	Time horizons	Value Chain	Status
Own workforce (continued)	NI 52- Failure to provide for work-life balance for own employees and crew can lead to increased burnout, mental health issues, and decreased job satisfaction.	Short-term	Own operations	Potential
	R 54- Not addressing work-life balance of own employees and crew can lead to higher turnover rates and disruption of activities.	Mid-term	Own operations	Potential
	NI 56- Lack of space for social dialogue with own employees and crew can weaken corporate culture, preventing discussion and hindering improvements in working conditions.	Short-term	Own operations	Potential
	NI 60- Restricting freedom of association and not supporting works councils for own employees and crew can weaken empowerment, strain labour relations, and diminish workplace democracy.	Long-term	Own operations	Potential
	NI 65- Failure to meet or exceed health and safety standards may result in accidents or injuries affecting employees and crew.	Short-term	Own operations	Potential
Workers in the value chain	NI 92- Working with suppliers who provide poor working conditions, including insecure employment, inflexible arrangements and working time, inadequate wages and a poor work-life balance have a negative impact on the workers in the value chain.	Short-term	Upstream	Potential
	NI 94- Poor health and safety conditions onboard a company's vessel for the employees of customers can lead to increased incidents of workplace injuries and illnesses. This deterioration in safety standards compromises employee well-being and can significantly hinder operational efficiency and service quality.	Long-term	Downstream	Potential
	R 95- Inadequate health and safety measures onboard could expose the company to legal liabilities and substantial financial penalties. It risks damaging the company's reputation, potentially leading to a loss of customer trust and contracts, which can have long-lasting negative effects on business sustainability and growth.	Short-term	Downstream	Potential
	NI 98- Enforcing strict policies related to workers' rights on suppliers and business partners can avoid engagement in or tolerance of child and forced labour practices, failure to provide adequate housing, and neglecting the importance of access to clean water, sanitation, and privacy protections of workers in the upstream value chain.	Mid-term	Upstream	Potential
Business conduct	NI 104- Weak whistleblowing protections can discourage employees from reporting unethical or illegal activities, leading to unchecked misconduct and eroding internal accountability.	Short-term	Own operations	Actual
	R 108- Implementing strict social and environmental criteria for supplier selection could reduce the pool of potential suppliers and shipbuilders and increase costs.	Short-term	Upstream	Potential

Impact of high-risk activities, business relationships and geographies

Acta Marine's double materiality process involves mapping sustainability matters and their IROs across the value chain, categorizing them as upstream, own operations, or downstream. Geographic considerations are integrated, prioritizing regions with higher environmental sensitivity, regulatory complexity, or social vulnerability. The process classifies risks by time horizon, status, and severity, focusing on borderline risks during stakeholder consultation. Stakeholder engagement, through surveys and interviews, validates or challenges the initial assessment, ensuring significant influence from those most affected by the company's operations.

Own operations versus value chain impacts in the DMA

As explained, Acta Marine's Double Materiality Assessment (DMA) explicitly integrates the consideration of impacts arising both from own operations and from business relationships across the value chain. Each identified sustainability matter and its associated impacts, risks, and opportunities (IROs) is mapped to a specific segment of the value chain — upstream, own operations, or downstream — as part of the IRO definition process. This mapping ensures that the company evaluates not only direct operational impacts but also those linked to suppliers, subcontractors, and customers. For own operations, the process examines activities such as vessel operations, fuel consumption, and workforce conditions, assessing their actual or potential environmental and social impacts. During this reporting period, this has been the primary focus area. For business relationships, the methodology considers suppliers of fuel, maintenance services, and consumables, as well as subcontracted crews and service providers, recognizing their influence on emissions, labour practices, and compliance risks. This approach allows Acta Marine to identify and address adverse impacts that may occur within its own operations or through its extended network of business relationships.

Double materiality scoring - Impact materiality

Acta Marine's Double Materiality Assessment (DMA) applies impact materiality and financial materiality scoring mechanisms. For negative impacts, prioritization is based on three severity dimensions — scope (how widespread the impact is), scale (how grave the consequences are), and irremediability (the extent to which the impact can be remediated) — combined with likelihood of occurrence. Each dimension is scored on a scale from 1 (minor/negligible) to 5 (critical/widespread), while likelihood is assessed from 0.1 (highly unlikely) to 0.9 (highly likely). In cases of potential human rights impacts, severity takes precedence over likelihood, meaning that if an impact is severe, it is considered material regardless of probability. For positive impacts,

the process evaluates scale (benefit magnitude), scope (extent of beneficiaries), and likelihood, using similar scoring ranges. Positive impacts must be inherent to the business model and not derived from mitigation actions. The combined score determines materiality thresholds:

Material:	Total score > 2
Borderline:	0.9 ≤ score ≤ 2
Not-material:	score < 0.9

Borderline IROs are revisited after stakeholder engagement, and any single severity characteristic (e.g., high irremediability) can trigger reclassification as material. Stakeholder input and expert review are integrated to adjust scores where necessary, ensuring that interests and views are reflected in the final matrix.

Double materiality scoring - Financial materiality

Acta Marine assesses the likelihood, magnitude, and nature of financial effects of identified risks and opportunities through a scoring methodology defined in its double materiality assessment. This methodology is aligned with ESRS 1 section 3.5 on financial materiality and includes both quantitative and qualitative criteria. Likelihood is evaluated on a probability scale ranging from 0.1 (highly unlikely) to 0.9 (highly likely), considering the expected occurrence of the risk or opportunity within short-, medium-, or long-term horizons. Magnitude is assessed based on the potential financial impact expressed as a percentage of EBITDA, using a five-point scale:

Minor:	<1% of EBITDA
Limited:	>1% and <3%
Moderate:	>3% and <5%
Significant:	>5% and <10%
Critical:	>10%

Nature of effects considers the type of financial consequences, including impacts on cash flow, cost of capital, asset valuation, and market position. Qualitative factors such as reputational risk and strategic implications are also incorporated. The total financial materiality score is calculated by multiplying magnitude and likelihood, with thresholds applied as follows:

Material:	≥2
Borderline:	0.9–2
Not-material:	<0.9

As said before, borderline cases are revisited after stakeholder engagement, and adjustments are made where stakeholder input indicates higher relevance. For example, regulatory risks related to GHG emissions and fuel cost volatility were scored as material due to high

likelihood and significant magnitude, while opportunities such as vessel lifecycle management were upgraded after engagement because of their strategic importance.

Sustainability matters assessed to be material
Based on its Double Materiality Assessment (DMA), Acta Marine has identified the following 12 sustainability matters as material. These matters correspond to topics and sub-topics listed in Appendix A of ESRS 1 and reflect the undertaking’s material impacts on people and the environment, as well as related risks and opportunities influencing its business model and strategic decisions. These material matters act as a filter for CSRD scoping, defining approximately 500 material data points for reporting. Although the recent EU Omnibus proposal removes the mandatory CSRD reporting requirement for Acta Marine, we continue to apply the ESRS principles voluntarily but proportionally. In that light Acta Marine prioritized out of these 500 relevant material datapoints those most aligned with its ESG strategy and stakeholder expectations, ensuring that disclosures focus on topics of highest relevance and impact.

Environmental Matters

Climate change mitigation

ESRS E1 – Climate Change

Inefficient routing and use of our vessels leads to increased fuel consumption and greenhouse gas emissions negatively affecting the environment. Acta Marine’s offshore marine services activities are inherently energy-intensive and generate greenhouse gas emissions. The business model takes account of these impacts by prioritising fuel efficiency, technical optimisation of vessels, and long-term fleet renewal considerations, while the strategy recognises exposure to transition risks arising from decarbonisation policies, green fuel availability and fuel cost volatility.

Fuel consumption

ESRS E1 – Climate Change

Although fuel costs are born by our clients mostly, total cost of ownership analyses incorporates fuel costs in client analysis of our performance against peers. Therefore, increased costs associated with the purchase of sustainable fuel could potentially affect the competitiveness of our business. With 99% of our Scope 1 emissions stemming from fuel burned in our vessels, fuel consumption is a critical operational input and a key driver of environmental impact and operating costs. Strategic and operational decision-making incorporates fuel performance as an important parameter in vessel operations, maintenance planning, and investment decisions for our existing vessels and newbuilds.

Air pollution

ESRS E2 – Pollution

Marine operations emit non-GHG air pollutants that contribute to local and regional air quality impacts. The business model accounts for these impacts through compliance with applicable maritime regulations (e.g. NOx and SOx emission control).

Vessel design and lifecycle management

ESRS E5 – Resource Use and Circular Economy

Proper maintenance of vessels extends the vessels' operational lifespan, enhancing asset utilisation and reducing the need for premature replacements. This includes enabling resale or responsible end-of-life management to reduce resource intensity. Environmental impacts associated with vessel construction, use, and end-of-life are addressed through a lifecycle perspective embedded in our business model.

Climate change adaptation

ESRS E1 – Climate Change

The risk of write-offs, asset impairment, and early retirement of existing unsustainable vessels due to policy changes was especially qualified as a material topic with several of our investor stakeholders. Acta Marine’s strategy therefore needs to consider physical and transition risks linked to climate change that include potential asset impairment or early retirement of vessels. These considerations need to be reflected in long-term asset planning, capital allocation, and risk management processes.

Social Matters

Working conditions

ESRS S1 – Own Workforce

Working conditions such as arrangements that need to balance work and rest hours for crew have an influence on their well-being, productivity, and morale. Acta Marine’s business model depends on skilled shore-based employees and seafarers to ensure a high-quality service towards our clients.

Worker rights for crew

ESRS S1 – Own Workforce

Worker rights for crew include for instance the access to clean water and sanitation facilities for crew onboard vessels to ensure crew health, hygiene, and overall well-being, leading to a safe and supporting work environment. Crew members are directly exposed to human rights risks related to living conditions, sanitation, privacy, and access to essential facilities onboard vessels. Acta Marine's strategy needs to recognise these impacts as material due to their direct implications for safety, well-being, operational continuity, and reputational risk.

Double Materiality Matrix



Sustainability topic	ESRS standard
1 Climate change mitigation	E1 – Climate Change
2 Air pollution	E2 – Pollution
3 Fuel consumption	E1 – Climate Change
4 Corporate culture	S1 – Own Workforce
5 Biodiversity pressure	E4 – Biodiversity and Ecosystems
6 Corruption and bribery	G1 – Business Conduct
7 Protection of whistleblowers	G1 – Business Conduct
8 Water pollution	E2 – Pollution
9 Vessel design and lifecycle management	E5 – Resource Use and Circular Economy
10 Waste management	E5 – Resource Use and Circular Economy
11 Climate change adaptation	E1 – Climate Change
12 Equal treatment and opportunities	S1 – Own Workforce
13 Working conditions	S1 – Own Workforce
14 Worker rights for crew	S1 – Own Workforce
15 Supplier relationships	G1 – Business Conduct
16 Worker rights in the Value Chain	S2 – Workers in the Value Chain
17 Working conditions in the Value Chain	S2 – Workers in the Value Chain
18 Equal treatment and opportunities in the Value Chain	S2 – Workers in the Value Chain

Equal treatment and opportunities

ESRS S1 – Own Workforce

Impacts related to inclusion, non-discrimination, and equal opportunities are considered material for both shore employees and crew. Our business model takes account of these impacts through workforce practices that positively influence employee retention and engagement.

Working conditions in the value chain

ESRS S2 – Workers in the Value Chain

Acta Marine relies on suppliers and service providers for vessel construction, maintenance, crewing and operational support. Adequate health and safety conditions, proper working conditions and equal treatment in the supply chain are essential for Acta Marine's reputation and customer trust.

Worker rights in the value chain

ESRS S2 – Workers in the Value Chain

Child and forced labour practices, failure to provide adequate housing, and neglecting the importance of access to clean water, sanitation, and privacy protections of workers in the upstream value chain are material. Human rights impacts affecting workers employed by suppliers and contractors, including access to basic rights and protections, are considered material. These impacts are relevant to the business model given dependencies on key suppliers and the potential consequences of adverse human rights impacts for business continuity and stakeholder trust.

Governance Matters

Protection of whistleblowers

ESRS G1 – Business Conduct

Although formally assessed as borderline material, deficiencies in whistleblowing protection have nonetheless been identified as a material negative impact, given their potential to facilitate misconduct and erode internal accountability.

Supplier relationships

ESRS G1 – Business Conduct

Supplier relationships are material due to their influence on environmental and social impacts in the value chain.

Material matters and our business model

Acta Marine has assessed several environmental, social, and governance matters as material. These material matters are reflected in our business model as follows. For environmental matters, the company recognizes that its offshore marine services are energy-intensive and generate significant greenhouse gas emissions. The business model prioritizes fuel efficiency, technical optimization, and long-term fleet renewal, while the strategy addresses transition risks arising from

decarbonization policies, green fuel availability, and fuel cost volatility. Fuel consumption, which accounts for 99% of emissions, is a critical operational input and influences competitiveness; therefore, operational and investment decisions incorporate fuel performance metrics, maintenance planning, and newbuild specifications. Air pollution impacts are managed through compliance with NOx and SOx emission control regulations, and vessel design and lifecycle management are guided by a lifecycle perspective to reduce resource intensity and environmental footprint. Climate change adaptation is also embedded in strategic planning to address physical and transition risks, including potential asset impairment and early vessel retirement, influencing capital allocation and risk management processes.

For social matters, Acta Marine's business model depends on skilled shore-based employees and seafarers, with working conditions such as balanced work-rest arrangements being essential for well-being and service quality. Worker rights for crew, including access to clean water, sanitation, and privacy onboard, are prioritized to safeguard health, safety, and morale, while equal treatment and opportunities are promoted to support retention and engagement. To further account for social matters, Acta Marine's strategy integrates safety leadership and leadership development programs, structured training and certification in line with Standards of Training, Certification and Watchkeeping (STCW), transparent crewing policies that promote long-term employability and wage benchmarking to ensure fair pay scales and equal treatment, and periodic employee engagement and leadership surveys to drive culture improvement. In the value chain, the company monitors supplier health and safety standards and human rights protections to mitigate reputational and operational risks, integrating these considerations into supplier selection and audit processes.

Governance matters include development of protection of whistleblowers, which is recognized as essential for ethical conduct and risk management, and supplier relationships, which are managed to reduce ESG-related risks across the value chain. These considerations collectively ensure that Acta Marine's business model and strategy take account of the impacts, risks, and opportunities associated with its material sustainability matters.

Sustainability governance

GOV-5
Risk management and internal controls over sustainability reporting

Acta Marine established a corporate sustainability team in 2024 with the responsibility for developing, coordinating, and overseeing group-wide sustainability reporting in alignment with the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). In this context, several key risks related to sustainability reporting have been identified, including incomplete or inconsistent data collection across operational sites, risks to data accuracy arising from manual data entry and aggregation processes, and insufficient standardization and internal controls over sustainability data at both site and corporate levels. To address these risks and provide a structured reporting approach, Acta Marine implemented a dedicated sustainability reporting system in 2025 (Greenomy, currently Position Green).

This system supports the standardization, validation, and consolidation of sustainability data and enables a more controlled workflow for collecting and reporting ESG information in line with ESRS requirements. In collaboration with Greenomy, Acta Marine conducted its Impact, Risk and Opportunity (IRO) identification, Double Materiality Assessment (DMA), and stakeholder analyses, and final report scoping further strengthening the methodological foundation of its disclosures. The corporate sustainability team includes the CFO and accounting and financial control functions to align sustainability reporting processes with existing financial reporting governance, thereby supporting consistency in control design, documentation, and review practices. Acta Marine recognizes that its internal control framework over sustainability reporting is still evolving and plans to further formalize control procedures, increase automation of data flows, strengthen multi-level review and approval processes.



Sustainability governance



Environmental information

Acta Marine, as an owner and operator of marine support vessels exclusively active in offshore wind and offshore energy projects across Europe, recognizes that the majority of its greenhouse gas (GHG) emissions are generated by its fleet operations. As such, the company’s decarbonization strategy is strongly focused on reducing emissions associated with vessel activities, which continue to represent the dominant share of its Scope 1 carbon footprint.

Acta Marine has strengthened its long-term climate ambition and now targets achieving net-zero emissions across its Scope 1 operations by 2050, using 2020 as the baseline year. This ambition is aligned with the objectives of the Paris Climate Agreement and supports the transition towards a climate-neutral European economy. It also reflects increasing regulatory requirements and stakeholder expectations within the offshore wind and energy sector.

Reducing environmental impact is a core responsibility embedded in Acta Marine’s strategy and day-to-day operations. As a key service provider within the offshore energy value chain, the company plays an active role in enabling the energy transition while simultaneously working to reduce the footprint of its own activities. This dual role reinforces the importance of continuously improving operational efficiency, adopting lower-emission technologies, and supporting clients in delivering more sustainable offshore projects.

In addition to this intrinsic responsibility, Acta Marine recognizes that decarbonization is increasingly driven by external factors, including evolving European regulation, client requirements, and market developments. These drivers are accelerating the shift towards low- and zero-emission solutions across the maritime and offshore sectors.

Acta Marine therefore considers its net-zero ambition not only as an environmental objective, but also as a strategic priority that underpins long-term resilience, competitiveness, and sustainable growth. By proactively adapting its fleet, operations, and services, the company aims to remain a reliable partner in the offshore energy transition while preparing for future regulatory and market expectations.

ESRS E1

Climate change

Basis for preparation

SBM-3
Material IRO’s and their interaction with strategy and business model
Acta Marine operates within the maritime transport sector, which is estimated to account for approximately 3% of global greenhouse gas (GHG) emissions, according to the International Maritime Organization (IMO). As a provider of specialized offshore support vessels for the offshore wind industry in Europe, Acta Marine operates within a niche segment of shipping that is subject to both international and regional regulatory frameworks, while also facing distinct operational and methodological challenges.

From a regulatory perspective, Acta Marine complies with applicable IMO regulations as well as European Union climate legislation. The company is subject to the EU Monitoring, Reporting and Verification (MRV) Regulation and has been reporting emissions under this framework since the beginning of the current reporting year. Looking ahead, Acta Marine will also fall under the scope of the EU Emissions Trading System (ETS) extension to maritime transport, including offshore vessels, which is expected to apply to its activities from 2027. In parallel, Acta Marine operates in the United Kingdom, where a comparable MRV and carbon pricing mechanism for maritime emissions is expected to be introduced from mid-2026.

In mainstream shipping, emissions performance is typically measured and allocated using standardized transport work metrics such as ton-mile. However, in the offshore wind support segment, vessel operations are more complex due to the diversity of vessel types, mission profiles, and service-based contracts. As a result, such standardized proxies are not always appropriate or representative for tracking emissions intensity. Consequently, certain regulatory instruments, such as the FuelEU Maritime regulation’s annual GHG intensity reduction targets, are not directly applicable to Acta Marine’s vessel types or operational profile.

Notwithstanding these sector-specific considerations and regulatory nuances, Acta Marine aligns with overarching international and European decarbonization objectives, including the ambition to achieve net-zero GHG emissions by 2050. Beyond compliance, the company recognizes the increasing importance of emissions reduction driven by client expectations, particularly within the offshore wind sector, where developers and operators are introducing more stringent requirements related to the carbon footprint of vessel operations.

Acta Marine therefore positions its climate strategy not only in response to regulatory developments but also as a proactive contribution to the energy transition. The company’s ambition to reduce its carbon footprint is further elaborated in subsequent sections of this report.

IRO-1
Process to identify and assess material climate-related IRO’s
Climate change creates potential risks for our business, but it also presents opportunities, and both are part of the company’s strategy, and are assessed as part of our overall risk management. Based on the Double Materiality Assessment, Acta Marine’s most significant climate-related risks centre on regulatory, operational and financial exposure linked to greenhouse gas emissions and the broader energy transition.

The first major risk concerns the regulatory tightening around GHG emissions, reflected in the identified “Regulatory risk of GHG emissions,” where new or stricter emissions legislation could increase operational or compliance costs or lead to penalties for non-compliance. This is categorised as a material financial risk in our DMA, highlighting mid-term exposure within own operations.

A second significant climate-related risk relates to our dependency on fossil-fuel-based operations, where ongoing GHG emissions from company-owned assets constitute both a negative impact and a risk driver. This includes exposure to fuel-related cost increases

and evolving expectations from stakeholders and financiers regarding decarbonisation. The DMA identifies “Generation of GHG emissions” as a material impact with substantial relevance to climate change mitigation.

The third climate-related risk emerges from climate change adaptation needs, which appear in the DMA results as a material topic due to anticipated financial effects from physical climate risks. While assessed as having low impact materiality, the financial materiality score for climate change adaptation is comparatively high, suggesting exposure to weather-related disruptions to offshore operations, potential damage to assets, and increased operational downtime.

Policies

E1-2
Policies related to climate change mitigation and adaptation
Acta Marine does not yet maintain a standalone climate policy. Instead, its climate-related efforts are embedded across its existing ESG framework, which originates from the 2022 ESG programme and has since been further developed through the ESG workgroup. The company discloses climate-related actions, targets, and governance under ESRS E1 within its sustainability reporting and has implemented a transition plan that outlines decarbonisation scenarios, including the introduction of methanol-ready vessels, and long-term alignment with the IMO 2023 GHG Strategy. Although these measures reflect structured climate action, Acta Marine recognises that its current approach does not constitute a formal policy and therefore intends to formalise its climate governance, policies, and procedures in the near future.

E1-1
Transition plan for climate change mitigation
Acta Marine is currently in a phase of significant fleet expansion. During 2025 and 2026, the company’s fleet of (C)SOVs will more than double in size in order to meet increasing demand for offshore and marine support services. As a direct consequence of this expansion, absolute greenhouse gas emissions will increase significantly in the short term. Beyond this expansion phase, Acta Marine assumes continued growth of the fleet at a more gradual pace, reflecting long-term market expectations. In developing its decarbonisation scenarios, Acta Marine therefore assumes that absolute emissions will continue to increase for a limited period before reaching a peak. Based on current assumptions regarding fleet growth, technology deployment, fuel substitution potential, and regulatory developments, emissions are expected to peak between 2030 and 2035, after which a gradual decline is projected as decarbonisation measures increasingly take effect. Acta Marine has developed three decarbonisation scenarios to assess the robustness of its climate transition plan under varying external and operational conditions. These scenarios are used for strategic planning purposes and reflect different assumptions regarding the pace and timing of key transition enablers. While external factors play a significant role, Acta Marine recognises its responsibility to continuously adopt technologies that enable the transition to lower-emission operations. Accordingly, in all newbuild projects Acta Marine seeks to implement vessel designs, propulsion systems, and onboard technologies that enable future fuel flexibility and emissions reduction over the vessel’s lifetime. Even where immediate emissions reductions are constrained by fuel availability or commercial arrangements, the company considers it an obligation to ensure that new assets are technically capable of transitioning to lower-carbon fuels as these become viable. The scenarios are primarily differentiated by the assumed progression over time of two key factors:

Technology development and fuel substitution capability

The scenarios reflect different rates of technological development in engine systems, onboard equipment, and fuel integration, which determine the achievable substitution rate of methanol relative to marine diesel oil. While current vessels are only capable of partial methanol substitution, all scenarios assume continuous technological improvement over time. In faster-transition scenarios, higher substitution rates are achieved earlier as technology matures more rapidly, whereas slower-transition scenarios assume a more gradual progression. Across all scenarios, methanol substitution rates are assumed to reach approximately 95–98% by the period 2040–2045.

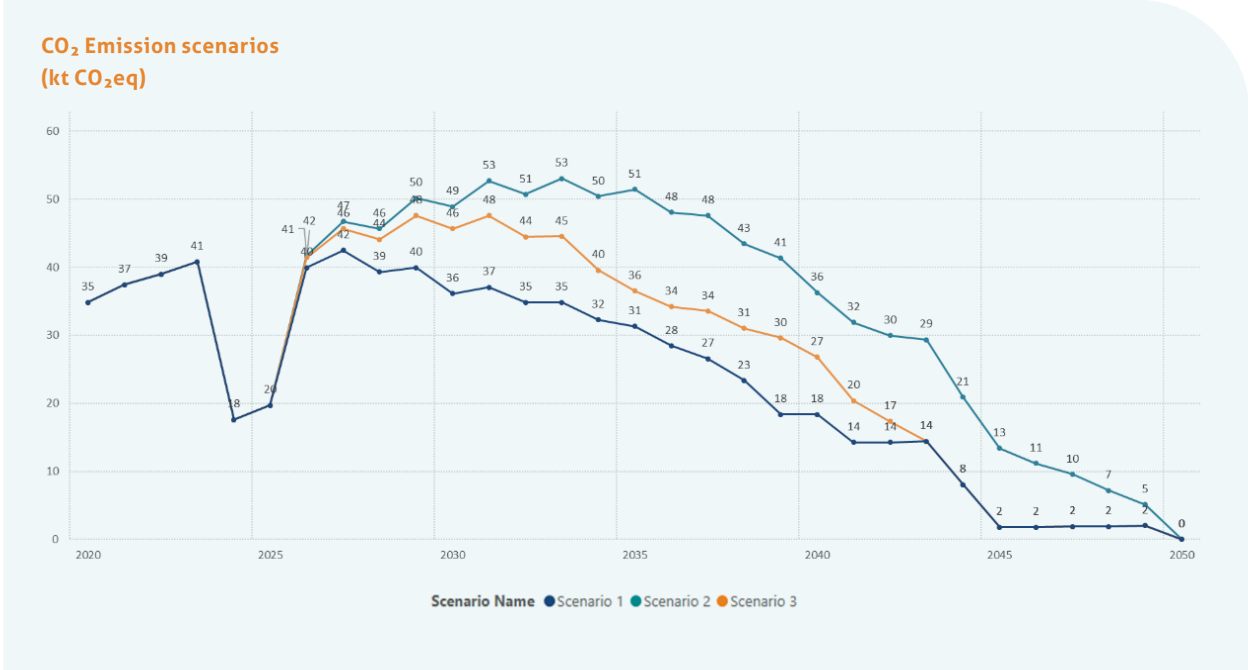
Client adoption and operational use of methanol

The scenarios also differ in assumptions regarding the adoption and operational use of methanol by Acta Marine’s clients. As the company predominantly operates under time charter agreements in which clients bear fuel costs, the deployment of methanol depends on client willingness, fuel price competitiveness, and regulatory incentives. Faster-adoption scenarios assume earlier

client uptake driven by improved fuel availability, declining prices, and regulatory measures, while slower-adoption scenarios reflect more cautious uptake due to continued cost differentials and limited supply.

The interaction between technological readiness at vessel level and client adoption of alternative fuels determines the timing and magnitude of emissions reductions in each scenario. While the pace differs across scenarios, all reflect a transition pathway in which short-term emissions growth driven by fleet expansion is followed by stabilisation and a subsequent decline as enabling conditions improve.

This scenario-based approach demonstrates that Acta Marine’s transition plan remains credible under a range of plausible future developments, while acknowledging the company’s obligation to proactively prepare its fleet for decarbonisation and the influence of external market and regulatory factors on the timing of emissions reductions.



Climate actions

E1-3 Actions and resources in relation to climate change policies

Climate change mitigation actions

The following actions and measures will be or have been implemented.

Climate change mitigation actions		
Category	Measure	Explanation
Operational measures	Fuel and emission transparency	Install fleet fuel monitoring hardware and software (flow measurement equipment) across the fleet
Operational measures	Fuel and emission transparency	Launch automated DPR including fuel and emission metrics (EU ETS) also for MRV reporting purposes
Alternative fuels and lubes	CO2 emission reduction	Enable the use of Methanol on dual fuel W2W vessels
Alternative fuels and lubes	CO2 emission reduction	Enable the use of HVO where possible and accepted by clients
After-treatment	Air pollution reduction	Installation and use of SCR installation on Walk to Work to reduce air pollution (Tier 3)
Alternative fuels and lubes	Protection of the environment	Change-out of lubrication means by biodegradable alternative
Technical upgrades	CO2 emission reduction	Refitting Existing vessels with fuel efficiency measures
Administrative	CO2 emission reduction	Exercise influence on policy makers through interest and industry groups in order to stimulate use of emission reduction technology in shipping, most importantly Methanol
Administrative	Fuel and emission transparency	Participate in the Carbon Disclosure Project (CDP)

New technologies planned to be adopted to achieve GHG emission reduction target

Acta Marine is in the process of adopting dual-fuel methanol propulsion technology as a key measure to achieve its greenhouse gas (GHG) emission reduction targets within its vessel operations. As part of its fleet renewal and growth strategy for the European offshore wind market, Acta Marine is in the process of constructing four next-generation construction support operation vessels (CSOVs) designed and equipped for methanol use.

These CSOVs will be fitted with dual-fuel diesel–methanol engines supplied by ABC (Anglo Belgian Corporation). The selected eight-cylinder engines are technically capable of operating with a fuel mix of up to approximately 70% methanol and 30% conventional marine diesel or HVO, depending on operational conditions and fuel availability. This technology enables substantial reductions in tank-to-wake CO₂ emissions compared to conventional diesel-only propulsion.

When operated on bio-methanol or renewable (green) methanol, the vessels are expected to achieve a significant net reduction in lifecycle CO₂ emissions from propulsion and auxiliary power generation. The vessels will be delivered “methanol-fuelled,” including dedicated fuel systems, safety arrangements, and control systems that allow for the progressive increase of methanol substitution as supply chains mature.

The adoption of dual-fuel methanol engines is aligned with Acta Marine’s decarbonisation pathway and supports compliance with evolving EU maritime climate regulations, including the FuelEU Maritime Regulation. This technology is intended to serve as a transitional solution that enables immediate emissions reductions while maintaining operational flexibility and reliability for offshore wind construction and support activities.

Metrics and targets

E1-4
Targets related to climate change mitigation and adaptation

Acta Marine has established measurable, outcome-oriented climate targets aligned with the IMO decarbonisation pathway and its own sustainability commitments as first published in April 2022. As an offshore vessel operator in the offshore wind and energy markets Acta Marine aligns its long-term decarbonisation ambition with the 2023 IMO Strategy on Reduction of GHG Emissions from Ships, as adopted by IMO Member States at MEPC 80. These targets are used by Acta Marine as external reference points to guide fleet development, technical investment decisions, and long-term emissions reduction pathways. The 2023 IMO GHG Strategy, which updates the Initial IMO GHG Strategy (2018), sets a global framework and future direction for international shipping. Acta Marine has considered the following IMO ambitions as directional targets for its fleet and operations:

Net-zero ambition

Achieving net-zero GHG emissions from international shipping by or around 2050. Acta Marine has adopted this ambition as directional targets for its fleet development and its operations, acknowledging that offshore service vessels will follow a different decarbonisation trajectory than deep-sea shipping.

Indicative reduction checkpoints

The 2023 IMO GHG strategy includes indicative

checkpoints for international shipping to reach net-zero GHG emissions for 2030 (by at least 20%, striving for 30%) and 2040 (by at least 70%, striving for 80%) compared to 2008. While Acta Marine does not operate a 2008 baseline fleet, these checkpoints are used as benchmark indicators to assess whether the company’s medium- and long-term emissions pathway remains aligned with the IMO trajectory.

Carbon intensity improvements

The 2023 IMO GHG Strategy envisages a reduction in carbon intensity of international shipping (to reduce CO₂ emissions per transport work or tonne-mile), as an average across international shipping, by at least 40% by 2030. Carbon intensity targets are due to its nature less relevant to offshore shipping as of the fact that transport in tonne-miles is not the right parameter to judge these intensity improvements. Therefore, this target is not included.

Uptake of zero and near-zero GHG fuels

IMO has set a new level of ambition which relates to the uptake of zero or near-zero GHG emission technologies, fuels and/or energy sources. These are to represent at least 5%, striving for 10%, of the energy used by international shipping by 2030. Acta Marine aligns with this ambition through its investment in dual-fuel methanol-ready newbuilds by which it is technically ready for future uptake of alternative low-carbon fuels, subject to regulatory clarity, fuel availability, and economic viability. The company notes that, under the current EU ETS and FuelEU Maritime framework applicable to offshore vessels, the large-scale use of green methanol is not yet economically viable,

and adoption remains contingent on future regulatory incentives, fuel market development and willingness of its clients to use this fuel type.

In summary, Acta Marine has aligned its climate strategy with the IMO 2023 GHG Strategy and its own sustainability commitments, adopting a long-term ambition to achieve net-zero greenhouse gas emissions by around 2050 while using IMO’s indicative checkpoints for 2030 (20–30%) and 2040 (70–80%) as directional benchmarks; however, as the company expands its fleet with several new vessels being delivered in 2025 and 2026 and potentially more thereafter, its carbon footprint is expected to peak between 2030 and 2035, which may temporarily affect progress toward these interim targets. Acta Marine anticipates that from 2035 onward, significant reductions in CO₂ emissions will be achievable, contingent on the availability and economic viability of green fuels and supported by client willingness to adopt these solutions.

Performance

E1-5
Energy consumption and mix

In accordance with ESRS E1-5 (Energy consumption and mix), Acta Marine determines its energy intensity based on its classification within high climate impact sectors as defined by the ESRS framework and supporting EU regulations. As a maritime service provider engaged in offshore support Acta Marine falls within the transport sector, specifically water transport, which corresponds to NACE Rev.2 classification H50. The transport sector is explicitly recognised as a high climate impact sector under ESRS due to its significant reliance on fossil fuels and associated greenhouse gas emissions. Consequently, Acta Marine calculates its energy intensity using operationally relevant denominators aligned with maritime transport activities, such as fuel consumption per vessel operational hour and in relation to the total onboard installed power (IMCA Proxy A), ensuring that the metric appropriately reflects the company’s fleet-based operations and supports comparability with industry peers.



Acta Marine targets to achieve net-zero	2020 base	2025 actual	2030 target	2035 target	2050 target
Absolute Value of scope 1 emissions (tCO ₂ eq) ¹	34,839	19,622	46,000	36,000	0
Scope 1 emissions reduction (%) ²	0%	43 %	0 %	0 %	100 %
Intensity value of Scope 1 GHG emissions reduction ³	n/a	0.20	0.18	0.11	0
Fuel switching equivalent (tCO ₂ eq)	n/a	0	9.5	36.5	100
Use of renewable energy Scope 1 (%)	n/a	0 %	17 %	51 %	100 %
Absolute value of scope 2 emissions (tCO ₂ eq)	n/a	7.3			
Absolute value of scope 3 emissions (tCO ₂ eq) ⁴	n/a	19,123			
Absolute value of total GHG emissions (tCO ₂ eq)	n/a	38,752			

¹ It is noted that, under the assumed fleet expansion scenario, the number of vessels owned by Acta Marine is currently increasing and is expected to continue to grow beyond 2035

² Scope 1 reduction in 2025 caused by the sale of all workboats in 2023

³ Proxy A, IMCA

⁴ Primarily driven by current ongoing newbuilding activities in Turkey

Gross Scopes 1, 2, 3 and Total GHG emissions

	Base year (tCO2eq)	Comparative (2024) (tCO2eq)	N (2025) (tCO2eq)	%N/N-1	2025 (tCO2eq)	2030 (tCO2eq)	2050 (tCO2eq)
Scope 1							
Scope 1 GHG emissions ¹	34,839	17,605	19,622	11.5%	19,622	46,000	0
Scope 2				2025	Comparative (2024)		
Gross location-based Scope 2 GHG emissions (tCO2eq)	7			6			
Scope 3 GHG emissions				2025 (tCO2eq)			
CAT 1- Purchased goods and services	1,381						
CAT 2- Capital goods	17,078						
CAT 3 - Fuel- and energy-related activities	0						
CAT 4 - Upstream transportation and distribution	13						
CAT 5 - Waste generated in operations	141						
CAT 6 - Business travels	494						
CAT 7 - Employee commuting	16						
Total Gross indirect Scope 3 GHG emissions	19,123						
Total GHG emissions				2025 (tCO2eq)			
Scope 1	19,622						
Scope 2	7						
Scope 3	19,123						
Total GHG emissions	38,752						

¹ On the basis of well to wake

E1-6
Gross Scopes 1, 2, 3 and Total GHG emissions

Scope 1 GHG emissions

For Scope 1, 99 percent of Acta Marine's emissions originate from the combustion of marine diesel in vessel engines. These emissions are calculated by measuring the amount of fuel consumed and multiplying it by predefined emission factors that include both tank-to-wake and well-to-wake values. Fuel consumption data are obtained from onboard monitoring systems, and the methodology assumes negligible contributions from other sources. Fuel emission factors are determined using IMO as a reference for both well to wake as well as tank to wake emission factors (10327/21 ADD 1).

Scope 2 GHG emissions

Scope 2 emissions relate to electricity and energy used to heat offices in the Netherlands, France, and the United Kingdom. These emissions are calculated using consumption data provided by third-party energy suppliers. The assumption is that supplier data is complete and accurate.

Scope 3 GHG emissions

Scope 3 emissions currently include seven categories of which two are most significant. For Category 1, Purchased Goods and Services, Acta Marine applies an expenditure-based method using emission factors from recognized sources such as DEFRA 2024 and EXIOBASE. This approach covers direct project costs, crewing-related services, repair and maintenance services, insurance, and telecommunication services. Data quality for this category is assessed as medium-to-low due to the absence of primary supplier product carbon footprints. For Category 2, Capital Goods, which includes four Service Operation Vessels under construction, emissions are allocated proportionally over the multi-year construction period from 2023 to 2025 based on annual capital expenditure. These totals are distributed across reporting periods using a spend-based method.

Hence Acta Marine reports its Scope 3 greenhouse gas (GHG) emissions in line with the operational control boundary and consistent with the principles of the Greenhouse Gas Protocol and ESRS E1 requirements, covering relevant and material categories across the value chain, with a particular focus on purchased goods and services and capital goods. The company applies a spend-based methodology, whereby financial expenditure is multiplied by emission factors primarily sourced from DEFRA datasets, complemented by EXIOBASE and other relevant databases where necessary. For emissions related to vessel construction, which constitute a significant share of Scope 3 emissions, Acta Marine has developed

an aggregated emission factor based on estimated shipbuilding activities, assigning appropriate DEFRA emission factors to these activities and combining them into a single representative factor for shipbuilding expenditure. Scope 3 emissions for the reporting year are calculated using actual spend recorded in the period, including all milestone payments made during the year, thereby aligning emissions recognition with financial flows.

Overall, data quality is high for Scope 1 and Scope 2 activity data and medium for emission factors, while Scope 3 data quality remains medium-to-low. The company acknowledges these limitations and is committed to enhancing accuracy through improved supplier engagement and integration of lifecycle emission factors for vessels.

Scope 3 GHG emissions categories included in inventory

Based on Acta Marine’s Scope 3 relevance and significance assessment, the following Scope 3 GHG emissions categories have been identified as material for inclusion in the company’s emissions inventory:

- **Category 1:** Purchased goods and services
- **Category 2:** Capital goods
- **Category 3:** Fuel- and energy-related activities
- **Category 4:** Upstream transportation and distribution
- **Category 5:** Waste generated in operations
- **Category 6:** Business travel
- **Category 7:** Employee commuting

These categories are considered relevant and significant to Acta Marine's activities and are therefore included in the Scope 3 emissions analysis.

Total GHG emissions 2025

Total scope 1,2 and 3 emissions on a consolidated level for 2025 add up to a total of 38.8ktCO2eq including 3 operational vessels in Europe (scope 1) and 4 vessels under construction in Turkey (scope 3) of which one was delivered to Acta Marine just prior to the end of this reporting year.

ESRS E2

Pollution

Basis for preparation

IRO-1 Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

Acta Marine applies an indirect methodology based on emission factors to calculate its pollution-related impacts resulting from its own operations focusing on air emissions (SO_x, NO_x and particulate matter). SO_x emissions are calculated based on fuel consumption data and sulphur content obtained from bunker delivery notes, with all vessels operating on Low Sulphur Marine Diesel Oil (LSMDO) within EU Emission Control Areas (ECAs), assuming a maximum sulphur content of 0.1% and full conversion of sulphur into SO_x during combustion using standard conversion factors. Also, NO_x emissions are determined using fuel consumption from main and auxiliary engines, multiplied by emission factors. Three vessels in our current fleet, during the 2025 reporting year, do not utilise any NO_x reduction technologies post-combustion, one vessel which was delivered to Acta Marine at the end of December 2025 is fitted with such technology. Finally, also particulate matter emissions are estimated using fuel consumption-based calculations. The methodology relies on key assumptions, including consistent fuel type, standardized emission factors, ensuring comparability over time while acknowledging a degree of estimation uncertainty. This approach enables Acta Marine to quantify its direct pollution impacts, assess regulatory and operational risks, and identify opportunities for emission reduction through technical and operational improvements. The company recognizes the limitations of using averaged emission factors and is actively working towards more granular monitoring and improved data accuracy over time.

Policies

E2-1 Policies related to pollution

Acta Marine's policies address the avoidance of incidents and emergency situations, and the control and limitation of their impacts on people and the environment, primarily through its QHSSE Policy Statement and Safety Rules. Our QHSSE Policy Statement states that Acta Marine is committed to creating a healthy and safe working environment, providing the necessary facilities, equipment, tools, procedures and training, and requiring employees to adhere to applicable health and safety rules and instructions and to make appropriate risk assessments for each task. It also states that operations are to be conducted with respect for the marine environment, including compliance with applicable laws and regulations regarding emissions such as IMO-MARPOL and SEEMP, discharge of pollutants and waste disposal.

In addition, the Safety Rules support incident prevention by requiring personnel to wear appropriate PPE, discuss risks through toolbox talks before starting work, carry out a last-minute risk assessment, give and accept feedback on safety behaviour, and exercise stop-work authority where working conditions are considered unsafe. These measures contribute to both preventing incidents and limiting their consequences where hazardous situations arise.

Actions

E2-2 Actions and resources related to pollution

At site level, Acta Marine has implemented a range of operational and technical measures to reduce air pollutant emissions from its fleet. All vessels are operating in European Emission Control Areas (ECAs) and use Low Sulphur Marine Diesel Oil (LSMDO), ensuring compliance with strict sulphur limits and resulting in a

significant reduction of sulphur oxides (SO_x) emissions. The use of LSMDO is applied consistently over our fleet and is embedded in standard fuel procurement and operational procedures.

In addition, the fleet is equipped with engines certified under IMO NO_x emission standards. Currently, three vessels operate with IMO Tier II-compliant engines, while one vessel is fitted with IMO Tier III-certified engines (an additional 3 vessels are under construction fitted with the same Tier III setup that will be delivered in 2026). The latter significantly reduces nitrogen oxide (NO_x) emissions through use of Selective Catalytic Reduction which achieves over 70% NO_x reduction compared to Tier II engines.

Acta Marine will, over the next reporting period, further evaluate the operational performance and emission reduction effectiveness of its IMO Tier III engine installations under real operating conditions. This includes monitoring and assessing NO_x reduction performance to validate expected efficiency levels and identify potential optimization opportunities.

To address particulate matter (PM) emissions, Acta Marine is actively investigating and testing technical optimization measures on its newer vessels. These include enhancing turbocharger performance and engine tuning to improve combustion efficiency, thereby reducing PM formation at source.

In parallel, the company is preparing for the gradual introduction of alternative fuels, including methanol, which is expected to further reduce sulphur oxides (SO_x) emissions due to its low- or zero-sulphur content. The effectiveness and operational feasibility of methanol as a marine fuel will be evaluated as part of future fleet developments.

Acta Marine is also assessing the performance of Battery Energy Storage Systems (BESS) installed on our newbuild vessels, with the objective of increasing electrification of onboard operations. This includes evaluating opportunities to expand battery capacity to support hybrid sailing configurations, thereby reducing reliance on conventional fuel consumption and associated emissions.

All vessels operate in full compliance with applicable international and regional regulatory frameworks, including IMO MARPOL Annex VI requirements and EU Emission Control Area (ECA) regulations. These measures collectively form part of Acta Marine's site-level pollution prevention and control approach, aimed at minimizing the environmental impact of vessel operations while maintaining safe and efficient performance.

Metrics and targets

E2-3 Targets related to pollution

As described above, air pollutant emissions from the Acta Marine's fleet, including nitrogen oxides (NO_x), sulphur oxides (SO_x) and particulate matter (PM), are regulated in accordance with the International Maritime Organization's framework under MARPOL Annex VI. This framework does not establish forward-looking reduction targets but instead applies a compliance-based regime through binding emission limits and technical standards.

SO_x emissions are controlled via fuel sulphur content, with a global limit of 0.50% m/m and a stricter limit of 0.10% m/m applicable in Emission Control Areas (ECAs), such as the North Sea and Baltic Sea, where Acta Marine operates.

NO_x emissions are regulated through engine certification standards (Tier I–III) under the IMO NO_x Technical Code, with Tier III requirements applying in designated NO_x ECAs and resulting in significantly lower emission levels for newer engines. Diesel engine NO_x emissions are controlled through survey and certification requirements, including issuance of an Engine International Air Pollution Prevention (EIAPP) Certificate and ongoing in-service compliance. Emission limits are structured in Tiers based on the ship's construction date, with specific limits determined by engine rated speed. Tier III standards apply only to ships operating within designated Emission Control Areas (ECAs), while Tier II standards apply outside these areas. All Acta Marine vessels have operated inside European ECA zone over the reporting year 2025.

There is currently no direct global limit for particulate matter emissions; however, PM is effectively reduced through the application of low-sulphur fuels and operation within ECAs. Consequently, the company's approach to managing air pollution is based on compliance with MARPOL Annex VI requirements, supported by the use of certified engines, low-sulphur marine fuels and operational practices aligned with ECA standards. In addition, the company implements Ship Energy Efficiency Management Plans (SEEMP) across its fleet in accordance with MARPOL Annex VI. While SEEMP is primarily aimed at improving energy efficiency and reducing greenhouse gas emissions, it also contributes indirectly to lowering air pollutant emissions through reduced fuel consumption and optimised vessel operations.

Performance

E2-4
Pollution of air, water and soil

Acta Marine collects pollution-related accounting and reporting data through the vessel-specific EU MRV Monitoring Plans. These plans define the required data, including fuel consumption, distance travelled, time at sea and CO₂ emissions, and identify the underlying information sources such as logbooks, bunker delivery notes, tank soundings/flow meters, noon reports and machinery records.

As described before, Acta Marine does not use direct measurement of emissions but calculates emissions on the basis of fuel consumption data in accordance with the methodologies set out in the vessel-specific EU MRV Monitoring Plans and corresponding maritime reporting requirements based on emission factors. This approach has been chosen because it is the recognised and legally accepted methodology for its operations and is proportionate to the technical configuration of the fleet. Continuous direct emissions measurement is not installed onboard the vessels. Where estimates are necessary, these are made in accordance with the approved monitoring methodology. Acta Marine recognises that such methods involve a degree of measurement uncertainty, particularly where manual measurements or tank-based calculations are used; this uncertainty is controlled through standardised procedures, internal review and external verification where applicable.

Pollutant emissions to air [mt] ¹		
	N-1 (2024)	2025
Total fleet SO _x	10	11
Total fleet NO _x	144	161
Total fleet particulate matter	12	14

¹ On the basis of three vessels full year in service over reporting year 2025 (Scope 1 based)

ESRS E4

Biodiversity and ecosystems

Basis for preparation

IRO-1
Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities

Acta Marine identifies and assesses biodiversity-related impacts through a combination of its internal double materiality process and the environmental management systems required by its clients in offshore wind projects. First, the company conducts a structured assessment of biodiversity pressures—such as disturbance of species, invasive alien species, and operational marine pollution—using its ESG Universe and stakeholder-validated IRO definitions, which map these impacts across upstream suppliers, own fleet operations, and downstream activities. In parallel, biodiversity impacts are evaluated through client-mandated procedures, where Environmental Protection Plans (EPP) and impact assessments are developed by the end client for a particular project. Acta Marine’s role is to supply operational information and ensure its own procedures align with these requirements. This applies particularly to Natura 2000 considerations, noise-related impacts on marine mammals, and species-protective measures. Within a project-specific framework, Acta Marine must comply with biodiversity-related obligations embedded in the EPP, including the identification of risks to ecosystems, implementation of mitigation measures, and adherence to permit conditions regarding noise, discharges, and wildlife protection. These requirements specify that biodiversity risks must be avoided or minimised, and their mitigation effectiveness is monitored through the operator’s environmental monitoring programme. Consequently, Acta Marine does not perform formal ecological impact assessments itself but integrates client environmental requirements into its operational risk controls, ensuring its activities remain compliant while feeding accurate data into project-level biodiversity impact assessments performed by our client.

Biodiversity and ecosystems risk identification and assessment

Acta Marine identifies and assesses transition and physical risks and opportunities related to biodiversity and ecosystems through its existing risk management framework, rather than through

dedicated biodiversity-specific assessment procedures. This framework is anchored in the (Dutch) Occupational Health Survey (Risico Inventarisatie en Evaluatie or RI&E), which is conducted across all office locations and vessels and provides a structured basis for identifying operational and environmental risks. Material and frequently occurring risks are further analysed using the BowTie methodology, enabling a structured evaluation of causes, consequences, and control measures. Operational risks at vessel level are assessed through Task Risk Assessments (TRAs), supported by vessel-specific TRA databases. Project-related risks, including those with potential environmental or biodiversity implications, are evaluated using the HAZID (Hazard Identification) process. Through these combined methodologies, biodiversity-related impacts, risks, and opportunities can be identified if relevant within broader operational and project risk assessments, although no separate or biodiversity-specific risk assessment process is currently in place. The risk management methodology applied is generic in nature and uniformly implemented across Acta Marine’s operations, supporting the identification and assessment of risks in the areas of safety, security, and environmental impacts, including biodiversity and ecosystems.

Biodiversity-sensitive areas

As a key partner in European offshore wind and offshore energy projects, our fleet operates across several sensitive maritime zones, primarily in the North Sea and coastal European waters. Sensitive areas are defined as those where our activities may overlap with protected habitats or species' migratory paths. Through our clients mostly, our operational footprint in and adjacent to biodiversity-sensitive areas are monitored and managed. This includes legally protected areas such as Natura 2000 sites, UNESCO World Heritage sites (e.g., the Wadden Sea), and areas identified by the Marine Strategy Framework Directive (MSFD).

To determine whether Commissioning Service Operation Vessel (CSOV) activities are located in or near biodiversity-sensitive areas, it is customary by our clients to apply a geospatial assessment methodology aligned with ESRS E4 requirements. Within this context, “sites” are defined as the geographical boundaries of offshore wind farm (OWF) projects where vessels are deployed. Acta Marine itself does not carry out such assessments but relies on the efforts made by its clients on these construction or operational sites.

Necessity to implement biodiversity mitigation measures

Operating within these sensitive zones necessitates the implementation of mitigation measures to minimize the ecological footprint of our fleet.

- Underwater noise & DP operations** – Our CSOVs rely heavily on Dynamic Positioning (DP) to maintain a safe and stable position alongside wind turbines or other offshore structures. The continuous operation of thrusters generates underwater noise that can interfere with the communication and navigation of marine mammals. Although these noise levels are of a much lower level than most of the other offshore activities during offshore wind installation activities such as piling activities for WTG foundations, installation of offshore cables or installation of large transformer stations, we recognize that this topic is becoming more and more important for our clients and other stakeholders. Especially in newbuild vessel discussions, low-noise propulsion and station-keeping capabilities are considered and are set as requirements.
- Seabed integrity** – In contrast to traditional vessels that require anchoring, CSOVs minimize direct contact with the seafloor using DP and "walk-to-work" gangway systems. This approach is beneficial when operating in areas with protected benthic habitats, such as the sandbanks of the Dogger Bank, where preserving the integrity of the seabed is a priority.
- Emission management** – To limit nitrogen deposition in coastal Natura 2000 areas (such as Doggerbank and the North Sea Coast Zone 1 near the Wadden Sea), we see in particular cases a higher requirement of emission restriction than what is currently the norm in European ECA area. Use of normal Clean Shipping technologies (Tier III engines to reduce NO_x and LSMDO to reduce SO_x emissions) is not enough and clients are looking for ways to further limit NO_x deposition for instance through ultra-low NO_x emission technology in line with on-land road transportation. Although that these innovations significantly reduce the local impact on air quality and biodiversity, we take note that these requirements currently are limited to a handful of specific locations. Acta Marine therefore aims to maintain an active dialogue with its clients and other stakeholders on requirements that go beyond those already necessary for operations within the European ECA zones.



Social information

Safety & security and durable employability are two fundamental pillars of Acta Marine’s ESG strategy and are closely interconnected in supporting sustainable business performance. Operating in an offshore marine environment — characterized by dynamic conditions, complex vessel operations, and use of heavy equipment — requires a strong and continuous focus on protecting people, ensuring operational integrity, and enabling long-term workforce resilience.

Acta Marine recognizes that safe operations and a healthy, engaged workforce are prerequisites for delivering high-quality marine support services. The company therefore invests in strong safety frameworks, risk management practices, and a proactive safety culture, while simultaneously developing a supportive working environment that promotes employee well-being, development, and long-term employability.

By integrating safety, security, and employability into its core business practices, Acta Marine aims to protect its people, enhance operational excellence, and create long-term value for its stakeholders. These pillars reflect the Acta Marine’s commitment to responsible business conduct and its CARE values, ensuring that employees are able to perform their work safely, effectively, and sustainably, both onshore and offshore.

Safe and secure operations

Acta Marine recognizes safety and security as a core pillar of its ESG strategy and an essential prerequisite for operating in an inherently volatile and high-risk offshore environment.

Our activities involve complex marine operations, the use of heavy equipment, and exposure to changing weather and sea conditions. As a result, safety is important in all aspects of decision-making and operational execution.

Acta Marine is committed to providing a safe and secure working environment by protecting its employees, contractors, and all stakeholders it engages with from operational, environmental, and security-related risks. This commitment is embedded across all activities and is fundamental to delivering reliable, high-quality marine support services under demanding offshore conditions.

To address the risk profile of offshore operations, Acta Marine continuously strengthens its Quality, Health, Safety, Security, and Environment (QHSE) framework. Policies, procedures, and processes are designed to manage risks associated with vessel operations, lifting activities, personnel transfers, and the handling of heavy equipment. These are systematically implemented, monitored, and improved to ensure safe execution of operations.

The QHSE Policy Statement remains the foundation of the Acta Marine's integrated management system, which aligns with applicable legislation, regulatory requirements, and relevant international standards. This includes compliance with the International Safety Management (ISM) Code, which provides a structured framework for the safe management and operation of ships, and is fundamental to ensuring consistent safety practices across all vessel operations. All employees are required to adhere to this framework, with clear accountability assigned to management, captains, and operational leaders to ensure effective communication, implementation, and compliance across all levels of the organization, both onshore and offshore.

With a more long-term vision, Acta Marine applies its CARE principle across all aspects of its operations, including

its people, clients, business partners, assets, and the environment in which it operates. The company places strong emphasis on a proactive safety culture, recognizing that in a high-risk offshore context situational awareness and open reporting of near misses and incidents are critical to preventing harm.

Acta Marine is committed to creating a healthy and safe working environment, including a strong focus on physical safety and psychosocial well-being. Employees are supported through the provision of appropriate equipment, structured procedures, targeted competency-based training, cybersecurity awareness programs and ISPS Code (International Ship and Port Facility Security) related procedures and training needs. Risk management practices, including systematic and task-specific risk assessments, are embedded at all organizational levels and are particularly critical in planning and executing offshore operations. Against this background, Acta Marine has, over recent years, actively promoted and encouraged the reporting of incidents, accidents and safety observations to maintain a healthy and effective safety pyramid and to support a sustained focus on a Lost Time Injury Frequency Rate (LTIFR) below 1, in line with industry standards. In parallel, employees have been trained and educated in cybersecurity to further increase awareness and resilience in this area. While risk assessments were not historically conducted in a fully structured manner or consistently across all organisational levels, this has been systematically addressed and significantly improved in recent years. The company maintains certification against internationally recognized standards, including ISO 9001, ISO 14001, and ISO 45001, and ensures compliance with industry-specific frameworks such as ISM (International Safety Management Code), ISPS and IMO-Cybersecurity regulations. In addition, Acta Marine continues to enhance its integrated management system, including digital accessibility and continuous improvement mechanisms, ensuring that safety and security considerations remain integrated into daily offshore operations.

Durable employment and development

Since the publication of our 2022 Sustainability Report, Acta Marine has made steady progress on our targets related to durable employment and development.

In 2022 we committed to establishing a Works Council, and this target was met with the installation of our first council in May of that year. To ensure continued and representative employee participation, a new election process was held in 2025, resulting in the installation of a newly elected Works Council in July 2025. This reinforces our commitment to structured dialogue and employee involvement across the organisation.

Another important target concerned the implementation of a leadership training program. This program concluded in 2025, with all employees in managerial positions and the executive board successfully participating in the program. With this, we strengthened leadership capabilities across our shore-based organisation.

In line with our ambition to monitor employee well-being, we continued to perform employee satisfaction surveys on a regular basis. Preparations are currently underway for the next survey, scheduled for 2026, ensuring that we continue to collect valuable insights into employee engagement and workplace satisfaction.

Finally, we made progress in refreshing our approach to performance management and talent development. For office staff, the performance cycle will be updated in 2026 to ensure greater alignment across the organisation. Acta Marine continues to demonstrate its commitment to talent development and employee-driven learning by offering relevant and appropriate training opportunities. This reflects the ongoing evolution of our people strategy and provides a solid foundation for the next phase of HR objectives outlined later in this report.



Durable employment and development

ESRS S1

Own workforce

Basis for preparation

SBM-3
IRO interaction with strategy and business model

Acta Marine operates its fleet and onshore activities exclusively within Europe, and the company therefore does not have direct operations in countries classified as having a high incidence of forced or compulsory labour. Based on the value chain due diligence approach described in the 2025 Sustainability Statement, material labour-rights impacts—including child and forced labour—are primarily considered within upstream supply chains rather than within Acta Marine’s own workforce.

Vessel construction activities in Turkey form part of Acta Marine’s current upstream value chain. While no severe labour-rights incidents were identified in the reporting period, Turkey is recognised by several international benchmarks as a geography where structural risks of labour-rights violations may be higher than within the EU. Consistent with ESRS S2, these activities are therefore considered to present a potential risk area. Supplier guarantees against forced and child labour have been embedded in Acta Marine’s shipbuilding contracts and reinforced through supplier integrity screening.

Policies

S1-1
Policies related to own workforce

Human rights policy commitments relevant to own workforce

Acta Marine’s operations rely on a diverse offshore and onshore workforce that is exposed to various operational, safety-related and well-being-related impacts inherent to vessel operations and offshore energy projects. These operations create dependencies on robust labour practices, safe working conditions, and effective procedures that protect the rights, dignity, and

welfare of personnel. Our current human-rights-related commitments are embedded primarily in our Code of Conduct, which articulates expectations regarding ethical behaviour, respect for individuals, and responsible employment practices. Acta Marine recognises that its human rights commitments are embedded across a range of existing policies and operational processes. However, these elements have not yet been consolidated into a single, comprehensive human rights policy. The company therefore continues to assess opportunities to further align its approach with internationally recognised frameworks, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, in a more structured and centralised manner.

Over the coming years, Acta Marine is committed to strengthening and formalising its human rights approach for its own workforce, expanding beyond the current Code of Conduct to establish clear commitments, structured due-diligence processes, monitoring mechanisms and remediation pathways. This development is intended to mitigate regulatory and contractual risks, reinforce workforce resilience, and ensure alignment with international expectations for responsible business conduct.

Respect for human rights of people in our own workforce

Acta Marine’s human rights and labour-rights requirements are governed by our Code of Conduct, which sets out the standards expected of all employees and partners. The Code of Conduct outlines our commitment to responsible and ethical business conduct and establishes clear expectations in relation to equal treatment, non-discrimination, respect for personal dignity and privacy, and the prohibition of forced labour, child labour and any form of coercive or abusive behaviour. These commitments apply to all members of the workforce, both onshore and offshore, and extend to the organisations and individuals with whom Acta Marine conducts business. Acta Marine ensures that employees understand these responsibilities through internal communication and management oversight, supported by

the company’s CARE values, which reinforce a culture of integrity, respect, and accountability.

Our approach is supported by the Disciplinary Procedure, which provides a clear framework to support managers and senior leadership in addressing behaviour that does not meet our standards. The procedure covers misconduct, harassment, and breaches of health and safety rules, ensuring fairness through transparency, the right to respond and the possibility of appeal. Through this framework, Acta Marine demonstrates its commitment to a safe, respectful and supportive working environment, standing firmly behind its people across all operations.

Although Acta Marine has not yet formally endorsed international frameworks such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration or the OECD Guidelines, its existing policies and governance structures demonstrate alignment with their underlying principles and will be further strengthened as these commitments are formalised in the future.

Engagement with people in its own workforce

Providing a healthy and safe working environment, with the well-being of our workforce at the centre, is fundamental to Acta Marine. We ensure a safe and secure workplace by protecting our employees and all people we work with from potential threats, and we continuously enhance the framework of policies, procedures, and processes that guarantee safe, high-quality marine support services. Our safety culture is firmly rooted in our CARE values—Collaborative, Accountable, Reliable, and Expertise—which guide how we engage with our workforce and define expectations for safe, respectful, and responsible conduct. This commitment is reinforced by our long-standing ISO 45001 accreditation, ensuring a certified occupational health and safety management system across both fleet and shore operations. Safety culture development is further supported by our We Care about Safety booklet and mandatory Basic Safety & Risk Management training, which ensure that all personnel understand our core values, risk awareness, and their responsibilities regarding safe working practices. Building on this foundation, Acta Marine promotes healthy working conditions and active workforce participation through mechanisms such as the Works Council, leadership development initiatives, and well-being programs. Our governance and people policies embed non-discrimination, equal treatment, and protection of worker rights, including the explicit prohibition of forced and child labour and accessible channels for raising concerns. These elements collectively complement our broader QHSSE framework and sustainability ambitions as defined in our ESG pillars.

Human trafficking, forced or compulsory labour, and child labour

Acta Marine recognises that the nature of its offshore operations creates a responsibility to uphold the highest standards of human rights across its workforce and supply chain. The company’s operational model depends on the safe deployment of offshore vessels, the mobilisation of technical and seagoing personnel, and close engagement with subcontractors and suppliers. These activities rely on fair, safe and ethical working conditions that enable operational continuity and safeguard reputation and long-term value. In this context, any occurrence of human trafficking, forced or compulsory labour, or child labour would pose a severe operational, legal and ethical risk. As part of Acta Marine’s Integrated Management System, the company has integrated the Code of Conduct (which describes our basic principles with regards to respect for the Basic Human Rights of Employees). In this document Acta Marine commits to prohibiting all forms of trafficking, forced or compulsory labour, servitude and child labour within its own operations and those conducted on its behalf. This commitment applies to all employees, contracted personnel, temporary workers and other non-employees present onboard vessels or within shore-based operations.

In addition, Acta Marine is compliant to the Maritime Labour Convention 2006 (as amended) and has drawn up measures, named in the Maritime Labour Certificate, to ensure ongoing compliance (Declaration of Maritime Labour Compliance Part II). In this Acta Marine declares not to employ anybody under the age of 18 years old, to service on board of their vessel (Minimum Age Regulation 1.1 of the MLC2006). This is ensured by process steps that new employees have to present their original identity document prior to signing their contract. Temporary employed seafarers, who embark without visiting the office first, will have their identity and age checked by the master.

Elimination of discrimination, harassment, promotion of equal opportunities and advancement of diversity and inclusion

Acta Marine’s operational activities rely on a diverse and internationally sourced workforce operating in both offshore and shore-based environments. These activities expose employees to complex working conditions, including multicultural team dynamics and extended deployments at sea, making protection of personal dignity and equal treatment essential to safe and efficient operations. The company’s Code of Conduct establishes the foundational principles that govern behaviour across all functions and locations, setting clear expectations regarding non-discrimination, respect for individual rights, and the prevention of harassment and unacceptable conduct. Employees are explicitly protected

from discrimination on the basis of race, nationality, social background, disability, sexual orientation, political or religious belief, sex or age, and the organisation affirms the right to personal dignity, privacy and equal opportunity. The Code of Conduct further prohibits all forms of mental cruelty, sexual harassment, coercive behaviour and discriminatory treatment.

The Personnel Manual for Seafarers and Office Employees establishes the behavioural and ethical framework that governs interactions on board and in the office and sets out Acta Marine’s expectations for preventing discrimination, harassment and other forms of undesirable conduct. Unwanted behaviour is defined as actions or expressions directed against an individual against their will, which may create an unpleasant, threatening or hostile atmosphere. The manuals recognise that such behaviour, including sexual intimidation, bullying, discrimination and alcohol- or drug-related misconduct, compromises the well-being and safety of seafarers and office personnel and may interfere with the efficient execution of vessel operations. The employer is empowered to implement disciplinary measures when breaches occur, and a formal complaints procedure and a confidential counsellor are available to support affected crew members and office personnel.

Acta Marine’s disciplinary procedure provides the formal mechanism through which such behaviours are addressed. It forms a critical component of the governance framework that safeguards a respectful and compliant working environment, thereby underpinning our ability to conduct safe offshore vessel operations. The disciplinary procedure is structured as a progressive system designed to correct behaviour and restore professional standards.

S1-3
Processes to remediate negative impacts and channels for own workforce to raise concerns

Acta Marine considers it essential that all employees feel supported when raising concerns or seeking guidance on matters that affect their well-being at work. The organisation acknowledges that its operations rely on the professionalism of both seafaring and shore-based personnel and therefore maintains clear and accessible pathways for reporting any work-related issues. In both personnel handbooks, employees are informed that they may turn directly to Human Resources or contact the external confidential advisor, who offers an independent and discreet point of support for concerns relating to behaviour, working relationships, or other sensitive matters. This advisor is available to all employees across the fleet and office locations, providing a consistent and reliable means for individuals to speak up in a safe environment.

These channels play an important role in safeguarding the integrity of the working environment and ensure that issues are addressed at an early stage. Acta Marine promotes open communication and ensures that appropriate support mechanisms are in place, thereby contributing to trust within the organisation and supporting the fair and respectful treatment of all employees.

Actions

S1-4
Taking action on IRO’s in relation to own workforce

Safe and secure vessel operations
Acta Marine has established a comprehensive Safety & Security framework aimed at preventing and mitigating negative impacts on its workforce. The company commits to providing a healthy and safe working environment by equipping employees with the necessary facilities, procedures, training and tools to work free of injuries and in good physical and mental condition. This approach is embedded in the QHSSE Policy and supported by the Integrated Management System, which is continually improved and made increasingly accessible in the office as well as on board our vessels, including through mobile availability. Incident prevention is promoted by stimulating transparent incident reporting and maintaining a logical ratio in the Safety Pyramid, supported by improved feedback loops and incentive schemes. Acta Marine aims to keep the Lost Time Injury Frequency Rate (LTIFR) below 1 and has achieved improvements through enhanced reporting and safety awareness. Risk Assessment practices—including updated RI&E assessments and Bowtie methodology—are rolled out across the organizational. Safety culture development is supported through the *We Care about Safety* booklet, Basic Safety & Risk Management training, and dedicated leadership programs. Acta Marine is committed to continuous improvement by systematically advancing its position on the Safety Culture Ladder. To ensure operational excellence, Acta Marine maintains ISO 9001, 14001 and 45001 certifications, OVID Level 1 compliance, ISPS, ISM certification and Flag State requirements, underpinned by annual audits and emergency response exercises that train employees and strengthen preparedness.

Metrics and targets

S1-5
Targets related to safe and secure vessel operations

To monitor our safety performance and assess the effectiveness of our health, safety and security policy and related initiatives, Acta Marine has established annual LTIFR (Lost Time Injury Frequency Rate) targets for all shipping activities. These targets apply to the financial year 2025. LTIFR performance is monitored on a continuous basis to ensure timely insights and corrective actions where needed.

LTIFR is calculated as the number of Lost Time Incidents (LTIs) multiplied by 1,000,000 and divided by the total number of hours worked during the reporting period. This normalised metric allows for consistent comparison across vessels, projects and reporting years. In 2025, our LTIFR was 2.2, which is significantly above our target of 1. In contrast, our vessel operations reported an LTIFR of zero in both 2023 and 2024. The increase from zero to the 2025 level is fully attributable to one LTI onboard one of our vessels.

Lost time incident frequency rate	2023	2024	2025
LTIFR	0	0	2.2

Because of the relatively limited number of operational working hours within our fleet, the LTIFR is highly sensitive to even a single incident. This means that the occurrence of just one LTI immediately pushes the LTIFR above our target value of 1. The 2025 LTIFR performance therefore reflects not only the number of incidents but also the structural characteristics of our operational scale, where a single event drives a disproportionately high LTIFR outcome.



Performance

S1-6
Number of employees by gender

Acta Marine operates in an offshore sector that traditionally shows a strong gender imbalance. Within our fleet operations, four employees are women, representing 5.3 per cent of our offshore workforce. Among shore-based staff, 35.4 per cent are female. Acta Marine’s policies emphasise equal opportunities and prohibit any form of discrimination, including based on gender.

Number of employees by gender	Number of employees (head count) (2025)
Male	112
Female	21
Other	0
Not reported	0
Total employees	133

Number of employees by contract type & gender	Female	Male	Total
Number of employees	21	112	133
Number of permanent employees	15	80	95
Number of temporary employees	6	32	38
Number of non-guaranteed hours employees	0	0	0

Age groups of employees	Number (2025)	Percentage (2025)
Under 30 years old	24	18 %
30-50 years old	84	62 %
Over 50 years old	25	20 %

Gender employees at top management level ¹	Number (2025)	Percentage (2025)
Female	0	0%
Male	4	100%
Grand Total	4	100%

¹ Note: Employee information is formulated using Acta Marine Management Services employee information. Non-employees such as agency crew have not been included in these numbers.

The women employed at Acta Marine show a strong retention rate, reflecting supportive working conditions and an organisational culture that enables long-term engagement. Acta Marine is also represented in WISTA International, the global network promoting women in maritime, reinforcing our commitment to improving female representation across the industry. To further support this ambition, our recruitment process increasingly focuses on broadening candidate pools and encouraging female applicants, ensuring that equal opportunities are embedded from the earliest stage of employment.

S1-10
Adequate wages

Adequate wages of employees

Our approach to remuneration is embedded within its broader HR policy framework, which aims to support durable employment, employee well-being and long-term workforce retention. Employee feedback collected through regular employee satisfaction surveys is incorporated into HR policy development and review processes. These insights support evaluation of employment conditions, including remuneration, and help ensure that compensation practices remain fair, competitive and responsive to workforce expectations. In accordance with ESRs S1-10, Acta Marine confirms that all employees within its own workforce are paid an adequate wage that meets or exceeds applicable benchmarks in the countries where the company operates. Remuneration practices are aligned with national legal requirements, including statutory minimum wages and applicable collective labour agreements, and are assessed using internal and external benchmarks. For specific crew segments where market pressure is higher, such as non-European seafarers, Acta Marine has conducted dedicated salary benchmarks using external agency data and internal cross-checks. Based on these findings, a revised salary proposal above previous levels was developed and reviewed in management and budget discussions, with additional validation actions agreed to strengthen data reliability.

Based on Acta Marine’s approach to periodically monitor the salaries in the offshore market, in 2023-2024 a comprehensive benchmark was conducted. Revised crewing salary scales were implemented in April 2025 with retroactive effect to 1 April 2024, decided by management in consultation with company stakeholders. Salary governance is embedded in formal procedures, with defined salary scales for seafarers, discretionary management decision-making, and the use of benchmarks as decision-support rather than automatic adjustment mechanisms. For scarce crew groups, benchmarking is repeated frequently and includes

secondary benefits, while for other roles benchmarking is trigger-based. No cases were identified during the reporting period where employee wages fell below applicable adequacy benchmarks.

Embedding Employee Insights into HR Strategy

Employee feedback collected through the employee satisfaction survey is structurally incorporated into Acta Marine’s overall HR policy approach, reinforcing our long-term focus on durable employment. The survey outcomes provide strategic direction for shaping HR priorities and ensuring that the organisation remains responsive to the evolving needs of its workforce. Key insights are translated into policy adjustments and form part of our continuous improvement cycle, enabling HR to embed employee perspectives into objectives, governance, and follow-up actions.

S1-14
Health and safety metrics

All employees, payroll crew and agency crew are covered by the Acta Marine’s integrated health and safety management system, which is aligned with applicable legal requirements and internationally recognised standards, including ISO 45001.

During the reporting year, no fatalities occurred within the own workforce as a result of work-related injuries or work-related ill health. A total of four recordable work-related incidents were reported. One case of recordable work-related ill health was identified.

The total number of days lost due to work-related incidents adds up to 168 days. These outcomes are monitored through the integrated QHSSE framework and are used to inform targeted preventive measures, training initiatives, and risk management actions aimed at further reducing incidents and supporting workforce well-being.

S1-17
Incidents, complaints and severe human rights impacts

During the reporting period, Acta Marine did not record any severe human rights issues or incidents connected to its own workforce, and this outcome is consistent with previous years. No cases were identified that constituted non-respect of the UN Guiding Principles on Business and Human Rights or the OECD Guidelines for Multinational Enterprises. Accordingly, no fines, penalties or compensation related to severe human rights issues were incurred in either year.

Health and safety metrics 2025	Own workers ¹
Percentage of own workers who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines	100 %
Number of fatalities in own workforce as result of work-related injuries	0
Number of fatalities in own workforce as result of work-related ill health	0
Number of recordable work-related incidents for own workforce (TRI=FAT+LWC+RWC+MTC) ²	4
Rate of recordable work-related accidents for own workforce (TRIFR=TRI*10%/man hours)	8.9
Rate of Lost Time Incidents for own work force (LTIFR=LTI*10%/man hours)	2.2
Number of days lost to work-related injuries and fatalities from work-related incidents	168

Human rights issues and own workforce incidents	Comparative (2024)	Year N (2025)
Number of severe human rights issues and incidents connected to own workforce	0	0
Number of severe human rights issues and incidents connected to own workforce that are cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises	0	0
Number of fines, penalties, and compensation for severe human rights issues and incidents connected to own workforce	0 €	0 €

¹ Own workers includes both Acta Marine payroll employees and crew as well as agency crew
² Total recordable incidents (TRI) = Sum of all fatalities (FAT), Lost Workday Cases (LWC), Restricted Workday Cases (RWC) and Medical Treatment Cases (MTC)

ESRS S2

Workers in the value chain

Basis for preparation

Our business model depends on long-term collaboration with a diverse network of suppliers and service providers, and on maintaining trust with customers, partners and other stakeholders. Managing sustainability within the value chain is therefore key not only to meet regulatory requirements and stakeholder expectations, but also to safeguard our reputation.

As an offshore maritime service provider with a mostly operational workforce and a fleet that is designed, built, maintained and ultimately recycled through global supply chains, Acta Marine recognises that its activities can have a material impact on the working conditions and human rights of people beyond its own workforce. Our value chain is extensive and multi-layered, including shipyards for vessel construction, maintenance and recycling, waste handling, bunker providers, crewing and catering subcontractors, technical and maintenance service providers, equipment manufacturers, and IT and digital service partners. While these relationships enable our operations, they also expose Acta Marine to risks related to labour standards, health and safety practices, and respect for human rights in different regulatory contexts.

Acta Marine takes its responsibility to identify, prevent and address adverse impacts on value chain workers seriously. The most significant risks relate to working conditions at shipyards involved in vessel construction and dry-docking activities, as well as to labour rights risks associated with suppliers operating on or in support of our vessels. These risks can include unsafe or exploitative working environments and inadequate protection of fundamental labour rights. Addressing these risks is an important element of Acta Marine’s approach to responsible business conduct and sustainability. While we take this responsibility seriously and actively seek to improve working conditions within our sphere of influence, further embedding these considerations into our processes and procedures remains an ongoing focus. As a relatively small organisation operating through complex global supply chains, our direct impact

is strongest within our own projects and contractual relationships; influencing suppliers beyond these boundaries or ensuring that standards applied to Acta Marine projects are consistently upheld across their wider operations, remains a recognised challenge.

Policies & actions

S2-1 & 4 Policies related to value chain workers and actions on material IROs

Human rights relevant to value chain workers
Acta Marine operates within a highly interconnected maritime ecosystem as a service provider in offshore wind and related sectors, relying extensively on a diverse upstream value chain whose workers are essential to the continuity, safety, and quality of its vessel operations. This value chain includes personnel engaged through crewing agencies responsible for sourcing qualified maritime crew, technical service providers and equipment suppliers supporting vessel maintenance, shipyards involved in vessel design and construction, catering subcontractors contributing to onboard welfare, bunkering supply personnel enabling vessel operations, port service providers such as pilots and terminal operators facilitating safe and efficient port activities, and IT and connectivity providers ensuring critical communication and digital infrastructure.

The conditions under which these workers operate directly influence operational reliability, safety performance, and service delivery. Given the global and multi-jurisdictional nature of these activities, value chain workers may be subject to varying labour standards and regulatory environments, exposing them to differing risks related to working conditions, health and safety, equal treatment, and labour rights.

Stakeholder engagement has identified working conditions and fair treatment in the value chain as

material topics, with particular concern noted among vessel design and construction partners and suppliers. Acta Marine recognizes that inadequate practices among upstream partners—such as insufficient health and safety measures or weak labour protections—can create operational disruptions, reputational damage, legal exposure, and reduced customer trust. Accordingly, Acta Marine is committed to strengthening oversight and due diligence across its value chain through supplier engagement, contractual expectations, and alignment with internationally recognized frameworks such as the Maritime Labour Convention.

Acta Marine's general approach in relation to respect for human rights, including labour rights, relevant to value chain workers is reflected in our General Purchasing Conditions. The company expects its suppliers and their personnel to comply with ethical and Corporate Social Responsibility standards, including refraining from discrimination, child labour, and other unacceptable working conditions. These requirements are explicitly set out in the Acta Marine General Purchasing Conditions.

By adhering to this, the supplier warrants that, in the delivery of goods or services to Acta Marine, it complies with all applicable Dutch and foreign laws and regulations, and that it maintains adequate internal quality controls to ensure the integrity and responsible conduct of its business operations. These measures support adherence to ethical standards and legal requirements, thereby mitigating potential adverse impacts on value chain workers.

Human rights policy commitments
In general human rights policy commitments relevant to value chain workers include the supplier's guarantee that it and the third parties engaged by it will not become involved in discrimination, child labour, and any other inadequate working conditions. Additionally, the supplier guarantees that it complies with ethical and Corporate Social Responsibility standards. However, our procedures do not detail specific mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and

Rights at Work, or the OECD Guidelines for Multinational Enterprises. In the near future we intend to update our procedures in order to include such mechanism to monitor value chain compliance. As of 2026, Acta Marine will incorporate Corporate Social Responsibility (CSR) compliance criteria into its key supplier evaluations, to ensure alignment with Acta Marine’s standards

Supplier code of conduct
The general purchasing conditions function as Acta Marine's de facto supplier code of conduct for our value chain by defining the behavioural, ethical, legal and operational expectations applicable to all suppliers. The document emphasises strict compliance with applicable laws, adherence to safety and quality standards, and full cooperation with audits and inspections. A key responsibility is the requirement for suppliers to maintain adequate internal controls ensuring the integrity of their operations and to hold all necessary licences for performing contractual work. The general purchasing conditions include explicit social safeguards: suppliers must avoid involvement in discrimination, child labour, and inadequate working conditions, and they remain responsible for the conduct of subcontractors. Acta Marine may conduct on-site checks to verify compliance, with a focus on shipyards and crewing agents. Violations may lead to immediate termination and recovery of damages. Confidentiality, data protection, and responsible handling of materials and personnel are also mandatory, underscoring the expectation that suppliers operate ethically and transparently throughout the contract lifecycle.

During the reporting period, Acta Marine conducted human rights due diligence procedures, including supplier integrity screening, risk assessments, and the application of contractual ESG and human rights requirements, particularly in relation to shipyards. Based on the information reviewed, no severe human rights impacts or incidents connected to the undertaking’s upstream or downstream value chain were identified during the period. Acta Marine will continue to strengthen its due diligence processes and supplier engagement to support ongoing alignment with CSRD requirements.

Governance information



ESRS G1

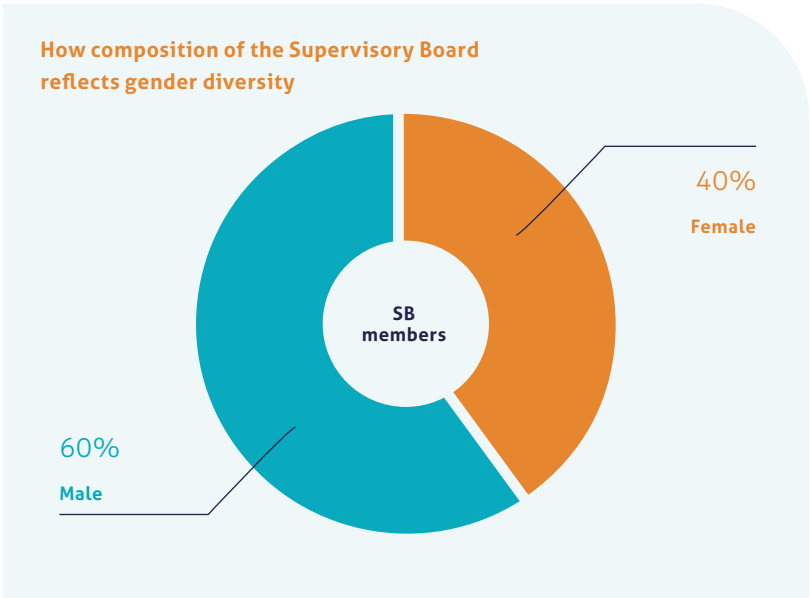
Business conduct

GOV-1
The role of the administrative, management and supervisory bodies
Acta Marine operates under a two-tier board structure in accordance with Dutch corporate law. This governance model ensures a clear separation between management and supervision, whereby the Supervisory Board operates independently from the Board of Directors.

The sole shareholder of Acta Marine is MerweOord, the family office of the Van Oord family. In this capacity, MerweOord represents the ownership interests of the Van Oord family and maintains an active relationship with the company through its representation on the Acta Marine Supervisory Board. The Supervisory Board of Acta Marine consists of five members. Currently two members are affiliated with the Van Oord family and three members are independent. All members bring relevant industry expertise, contributing to balanced and objective oversight. The chair of the Supervisory Board also holds a formal role within MerweOord and facilitates the relationship between Acta Marine and its shareholder.

The composition of the Supervisory Board reflects gender diversity, comprising three male and two female members.

The Acta Marine Board of Directors consists of two statutory directors forming the statutory board. The Board of Directors forms part of the Acta Marine Executive Team that consists of four members, including two statutory directors and two non-statutory directors. The Executive Team is responsible for the day-to-day management and execution of the company’s strategy. The Supervisory Board oversees and advises the Board of Directors in the performance of its duties. The Supervisory Board also oversees Acta Marine’s sustainability-related impacts, risks, and opportunities (IROs). In this capacity, the Supervisory Board has been actively involved as a stakeholder in the company’s IRO identification and assessment processes. This includes reviewing and challenging management’s approach to sustainability matters to ensure alignment with regulatory expectations and long-term value creation.



Policies

G1-1 Business conduct policies and corporate culture

Corporate culture

Acta Marine establishes its corporate culture through the formal articulation of its Vision, Mission and CARE values, which define the behaviours and principles expected across the organisation. These values emphasize collaboration, accountability, reliability and expertise, creating a shared cultural foundation across our operations. This cultural framework is further reinforced by the Acta Marine Leadership Compass, which translates these values into concrete leadership behaviours such as accountability, team orientation, ownership, and integrity, ensuring that expectations are understood and applied across both our onshore and offshore activities.

In 2025, this framework was further strengthened through the completion of a dedicated leadership development program with our management team. This program focused on integrating the Leadership Compass principles into day-to-day leadership practices, improving consistency in decision-making, and reinforcing a culture of ownership and accountability across organizational levels.

In addition, the Acta Marine Code of Conduct sets out the fundamental principles governing the company’s responsibilities toward its stakeholders and the

environment, and which is promoted both internally and throughout the supply chain. The Code of Conduct translates cultural expectations into behavioural standards and guides how employees and suppliers are expected to act. The organisation promotes this culture by embedding these principles, alongside the Leadership Compass, in daily operations, stakeholder engagement and responsible decision-making.

Unlawful or unethical behaviour

Acta Marine identifies, reports, and investigates concerns about unlawful or unethical behaviour through a formal Complaint Procedure including a whistleblowing policy which provides access to an external confidential advisor. Complaints may be raised verbally, in writing or via email, and are assessed and investigated by a designated complaint owner, who ensures findings, actions and follow-up are recorded and communicated without exposing the complainant to negative consequences. For seafarers, an onboard complaint process aligned with MLC requirements provides hierarchical reporting options, timelines for resolution, and escalation to Acta Marine or relevant Flag State authorities when internal resolution is not achieved.

In parallel, the whistleblowing policy enables employees, contractors, suppliers and other professional partners to report serious concerns confidentially or anonymously, including issues such as criminal activity, non-compliance with legislation or company procedures, malpractice, fraud, safety risks or deliberate concealment. Safeguards ensure protection against retaliation, and disclosures are assessed by management with investigations

launched where necessary. If internal reporting does not yield adequate feedback, whistleblowers may escalate concerns directly to competent external authorities, including the Netherlands Shipping Inspectorate (NSI). Together, these mechanisms demonstrate that Acta Marine accommodates reporting from both internal personnel and external stakeholders in a structured, confidential and safeguarded manner.

Training on business conduct

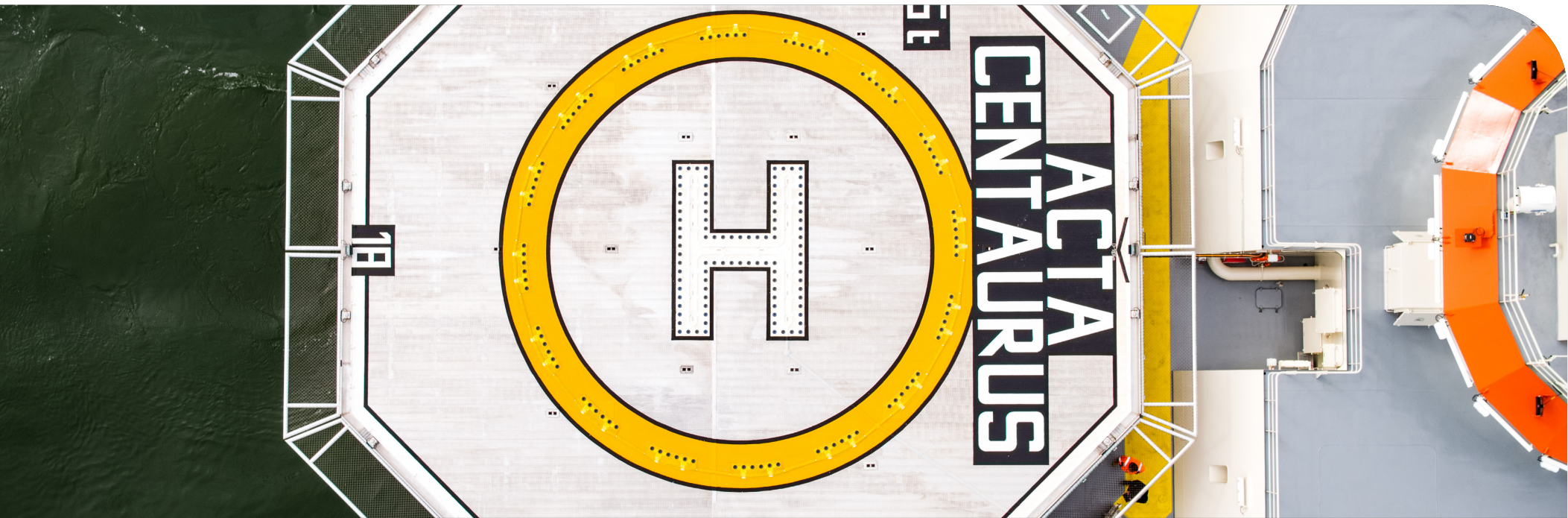
Acta Marine has integrated business conduct expectations into its formal onboarding process, ensuring that all new employees receive structured training on the organization’s values, culture, rules, and ethical standards from the start of employment. The onboarding procedure familiarizes employees with Acta Marine’s mission, vision, values, organizational structure, and Integrated Management System, including QHSSE rules and applicable policies. As part of this induction, HR introduces new employees to the company’s expectations regarding safety, health, environment, quality, culture, and ethics, ensuring awareness of behavioural norms and responsible decision-making. The program also includes an induction presentation addressing Acta Marine’s corporate culture and policies, enabling employees to understand the standards they are expected to uphold. Together with subsequent role-specific training, this onboarding approach is setup to support all personnel in commencing their employment with an understanding of Acta Marine’s conduct expectations, thereby forming the foundation of the organization’s internal business conduct training framework.

G1-2 Management of relationships with suppliers

Acta Marine collaborates with approximately 1,500 suppliers globally each year, of which around 450 represent significant spend and therefore higher relevance to its operational performance. The company maintains a supplier segmentation model distinguishing between critical, preferred and approved suppliers, ensuring that those with the strongest influence on operational continuity are regularly evaluated through formal performance reviews. Supplier selection emphasizes quality, safety, delivery reliability and appropriate accreditation, while additional occupational health, safety and environmental requirements apply to critical and preferred suppliers whose performance is directly linked to Acta Marine’s ability to deliver safe and efficient marine support. We manage supply chain risks by applying our Code of Conduct, asking main suppliers to demonstrate compliance with ethical, social and environmental standards. Supplier relationships are also relevant to Acta Marine’s sustainability strategy, recognizing that upstream partners play a key role in achieving cleaner fleet operations. To that end, Acta Marine engages with suppliers on the development and implementation of clean technologies, alternative fuels and operational efficiency improvements. These efforts support that supply chain risks linked to sustainability—such as human rights concerns, insufficient HSE practices, or technology readiness—are mitigated while enabling Acta Marine to progress toward its long-term sustainability goals.

G1-3 Procedures to address corruption and bribery

Acta Marine’s commitment to preventing corruption and bribery is formally articulated in its Code of Conduct and governance framework. The company maintains a strict prohibition on any form of corruption or bribery. Our governance framework emphasizes transparency, segregation of duties, and regular reporting to senior management and the board. These elements serve as preventative controls against misconduct. Annually the Acta Marine’s management performs a fraud risk assessment. In this assessment the company evaluates general and specific fraud risks, including bribery, and the internal controls in place to address these risks. The outcome of this annual assessment is presented to and discussed with the Supervisory Board and the company’s auditors. While Acta Marine does not detail specific investigative procedures for corruption allegations, the combination of mandatory compliance with the Code of Conduct, ongoing internal audits, the annual fraud risk assessment, the annual independent auditor procedures and structured governance oversight provides an internal control system designed to prevent, identify, and act on potential incidents.



Abbreviations

Abbreviation	Full term
AMF	Acta Marine France
ALARP	As Low As Reasonably Practicable
AMOS	Acta Marine Offshore Services
AMUK	Acta Marine UK (United Kingdom)
BESS	Battery Energy Storage System
BP	Basis for Preparation
BV	Bureau Veritas
CARE	Collaborative, Accountable, Reliable, Expertise
CAT	Category
CDP	Carbon Disclosure Project
CO ₂	Carbon dioxide
CO ₂ eq	Carbon dioxide equivalent
CSOV	Construction Service Operation Vessel
CSRD	Corporate Sustainability Reporting Directive
DEFRA	Department for Environment, Food & Rural Affairs (UK)
DMA	Double Materiality Assessment
DP	Dynamic Positioning
DPR	Daily Progress Report
D&A	Drugs and Alcohol
ECA	Emission Control Area
EBITDA	Earnings Before Interest, Taxes, Depreciation and Amortisation
EFRAG	European Financial Reporting Advisory Group
EIAPP	Engine International Air Pollution Prevention
EMP	Environmental Management Plan
EXIOBASE	EXIOBASE Environmentally Extended Input–Output Database
NCOR	Environment & Corporate Responsibility (ENCOR risk framework)
EPC / EPCI	Engineering, Procurement, Construction / Installation
EPP	Environmental Protection Plan
ESRS	European Sustainability Reporting Standards
ESG	Environmental, Social, Governance
ETS	Emissions Trading System
EU MRV	EU Monitoring, Reporting and Verification
GHG	Greenhouse Gas
G+	Global Offshore Wind Health & Safety Organisation
HAZID	Hazard Identification
HSE / QHSE / QHSSE	Health, Safety, Environment (and Quality, Security)
HVO	Hydrotreated Vegetable Oil
ILO	International Labor Organization
IMCA	International Marine Contractors Association

Abbreviation	Full term
IMO	International Maritime Organization
IMO DCS	IMO Data Collection System
IRO	Impact, Risk and Opportunity
ISM	International Safety Management Code
ISPS	International Ship and Port Facility Security
ISO	International Organization for Standardization
KVNR	Koninklijke Vereniging van Nederlandse Reders (Dutch Shipowning Ass.)
LSMDO	Low Sulphur Marine Diesel Oil
LTI	Lost Time Incident
LTIF / LTIFR	Lost Time Injury Frequency / Rate
MARPOL	Marine Pollution Convention
MCA	Maritime and Coastguard Agency
MEPC	Marine Environment Protection Committee
MGO	Marine Gas Oil
MLC	Maritime Labour Convention (2006)
MSCI	Morgan Stanley Capital International
MSFD	Marine Strategy Framework Directive
NACE	Statistical Classification of Economic Activities
NO _x	Nitrogen oxides
NSI	Netherlands Shipping Inspectorate
OEM	Original Equipment Manufacturer
O&M	Operations and Maintenance
OWF	Offshore Wind Farm
PM	Particulate Matter
PPE	Personal Protective Equipment
RI&E	Risico-Inventarisatie en -Evaluatie
SASB	Sustainability Accounting Standards Board
SB	Supervisory Board
SCR	Selective Catalytic Reduction
SEEMP	Ship Energy Efficiency Management Plan
SO _x	Sulphur oxides
SOV	Service Operation Vessel
STCW	Standards of Training, Certification and Watchkeeping
T&I	Transport and Installation
TRA	Task Risk Assessment
UN	United Nations
UNESCO	United Nations Educational, Scientific and Cultural Organization
VC	Value Chain
WISTA	Women's International Shipping & Trading Association
W2W	Walk-to-Work
WTG	Wind Turbine Generator



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Design
Schuttelaar & Partners

Print
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Photography
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