

PORT OF ROTTERDAM AUTHORITY'S TAX POLICY

Ever since the Port of Rotterdam Authority became liable to corporate income tax in 2017, taxes have become increasingly important to the organisation. The Executive Board considers taxes an integral component of the Port of Rotterdam Authority's Corporate Social Responsibility Policy. Therefore, the Port of Rotterdam Authority views the payment of taxes not only as an expense, but also as a way to help create socio-economic cohesion, sustainable growth and long term prosperity.

Please find below the Port of Rotterdam Authority's Tax Policy. This policy is updated by the Tax Manager and approved by the Executive Board on an annual basis.

MISSION STATEMENT

The Port of Rotterdam Authority aims to enhance the competitive position of the Port of Rotterdam as a logistics hub and world-class industrial complex, not only in terms of size, but also in terms of quality. The Port of Rotterdam Authority is therefore a pioneer in the transition to sustainable energy and is committed to digitisation, so as to make the port and trade flows even more efficient. We focus on these projects in cooperation with our business partners and clients. We are the enterprising port developer for clients active in the chemical industry, energy production, transport & logistics, and the maritime & offshore industry. We are guided in these activities by our mission to create economic and social value by working with clients and stakeholders to achieve sustainable growth in our world-class port.

The two core tasks of the Port of Rotterdam Authority are the sustainable development, management and operation of the port and ensuring that shipping is handled smoothly and safely.

The Port of Rotterdam Authority and its group entities treat taxes in a manner that complies with the tenets of corporate social responsibility and operate in accordance with domestic and international (tax) laws and regulations. We act within both the letter and the spirit of the laws and regulations. We only apply for fiscal incentives if our objectives are in line with the purpose for which the incentives are offered, and if said incentives are also available to other market participants. For example, we apply for Energy Investment Allowance (Energieinvesteringsaftrek, EIA) on our sustainability investments. However, we never reach the maximum amount available under this allowance.

The Port of Rotterdam Authority disassociates from tax evasion. We are guided by our business interests, and our tax payments are in line with this. We do not use tax havens, and in our international activities, we pay tax in those countries where we create added value. We consistently apply the OECD's arm's length principle with respect to our group entities. In addition, we adhere to the Tax Governance Code. We also apply our tax principles with regard to our employees, and in our contracts with our clients and suppliers.

COMPLIANCE AND GOVERNANCE

We pay tax in accordance with the laws and regulations of the countries in which we are active. We publish the amount of taxes paid in our financial report annually. The Tax Manager is involved in transactions

concerning decisions with regard to taxation, and if we are uncertain about a particular transaction, we will consult an external tax consultant. In addition, we maintain a Tax Control Framework (TCF) in which we record information on our tax audits and risk management procedures. This TCF is audited annually by Financial Control and our accountant.

RELATIONSHIP WITH THE AUTHORITIES AND THE TAX AND CUSTOMS ADMINISTRATION

It is essential to us that we maintain a good working relationship with the tax and customs administration and other government agencies in the countries in which we are active. Our objective is to maintain an open and constructive relationship, based on trust, respect and transparency. If there are items that might be up for debate, we consult the authorities beforehand to the maximum extent possible, while disclosing all the relevant facts and circumstances. We periodically meet with the Dutch Tax and Customs Administration to discuss recent developments and matters such as our TCF and risk management procedure.

EFFECTIVE TAXATION SYSTEMS AND TRANSPARENCY

We believe that it is important that we contribute to efficient taxation systems in the Netherlands and Europe. Given the nature of our business, we focus on port-related activities in general and on expediting the energy transition in particular. We actively seek to inform policy-makers of the impact new and existing laws and regulations will have on the port and the energy transition. In addition, we attend meetings on these subjects through the trade associations of which we are a member.

TAX RISKS WITHIN THE PORT OF ROTTERDAM AUTHORITY

The risks within the tax processes of the Port of Rotterdam Authority have been identified and assigned to two categories: Key risks and non-key risks. Risks were weighed on a likelihood-times-impact basis, with both quantitative and qualitative aspects taken into consideration. Inherent tax risks posed to the Port of Rotterdam Authority that may also have a substantive impact were designated 'key risks'. The tax risks that exist within the Port of Rotterdam Authority were identified in a Risk and Control Matrix (RCM) after having been detailed in a risk identification document. The RCM provides a description of the control measures that have been implemented with regard to the various risks, as well as a description of the monitoring procedure. The risk assessment document is updated annually. Tax developments are continuously monitored and where relevant, discussed with the business. Regular update sessions are also held with relevant departments.

MONITORING AND REPORTING

The Port of Rotterdam Authority's financial risk monitoring procedure is outlined in the RCM pertaining to the TCF. The TCF is monitored jointly by the Tax Manager and Financial Control. A report is submitted to the Executive Board on an annual basis.

LIST OF COMPANIES IN WHICH THE PORT AUTHORITY HAS A HOLDING AND MAJORITY CONTROL AT YEAR-END 2023

Country / Name of company	Main activity	Share %	Geographic scope
The Netherlands			
Havenbedrijf Rotterdam NV	Management, operation and development of the Port of Rotterdam and its industrial zone and ensuring that shipping is handled safely and effectively.	-	The Netherlands. Shareholder in operational ports in Oman and Brazil and international consultancy activities in the rest of the world.
Mainport Holding Rotterdam NV	Holding activities	100	The Netherlands, Indonesia, Brazil and Oman
Mainport Foreign Investments BV	Holding activities	100	The Netherlands, Indonesia, Brazil and Oman
MHR Commanditaire Venoot BV	Silent partner in partnership	100	The Netherlands
MHR Silent Partner BV	Silent partner in partnership	100	The Netherlands
Port of Pecém Participations BV	Holding activities	100	The Netherlands, Brazil
HbR Hydrogen BV	Entity for future hydrogen-related activities	100	The Netherlands
HbR CCS Pipeline LP BV	Silent partner in partnership related to the Porthos project	100	The Netherlands
HbR CCS BD LP BV	Silent partner in partnership related to the Porthos project	100	The Netherlands
HbR CCS BV	Holding activities undertaken as part of the Porthos project	100	The Netherlands
Nextlogic BV	Digital planning tool for the optimised processing of inland container shipping	100	The Netherlands
PortXchange Products BV	Operation of digital products designed to make port operations more efficient	100	The Netherlands, rest of the world
PXP Global Services BV	Operation of digital products designed to make port operations more efficient	100	The Netherlands, rest of the world
Blockchain Fieldlab BV	Development of software	100	The Netherlands
Cruise Port Rotterdam BV	Rendering cruise port activities	100	The Netherlands
Routescanner BV	Development of activities regarding Routescanner software platform	100	The Netherlands
PortShuttle Rotterdam BV	Container transport within the Port	100	The Netherlands
Stichting Wereldhavenfestival Rotterdam	Organisation of the World Port Days	100	The Netherlands
Cruise Port Shore Power BV	Provision of shore power to cruise ships	100	The Netherlands
Distro Energy BV	Development and operation of energy trading platforms	100	The Netherlands
Stichting PXP Escrow Foundation	Promoting the continuity and availability of cloud services provided by PortXchange Products BV	100	The Netherlands
Stichting PXP Data Platform Foundation	Promoting the continuity and availability of cloud services provided by PortXchange Products BV	100	The Netherlands
RAMLAB BV (shareholding sold during FY2023) ¹			



Country / Name of company	Main activity	Share %	Geographic scope
Indonesia			
PT Pelabuhan Rotterdam Indonesia	Port consultancy and business development	100	Indonesia, Malaysia
Brazil			
Port of Rotterdam Participacoes do Brasil Limitada (terminated during FY2023) ²			



¹ HbR has sold its shareholding in RAMLAB BV during FY2023. HbR had majority control in this entity before selling its shareholding during FY2023.

² HbR has terminated Port of Rotterdam Participacoes do Brasil Limitada during FY2023. Until the termination, HbR had majority control in this entity during FY2023.