

Sustainability Report 2023

**GASSCO BELGIUM - FRANCE** 



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# **Foreword**

Gassco Belgium - France is responsible for the daily operation of the Zeepipe and Franpipe terminal. We conduct our operations in a safe, reliable and efficient way. Daily, we transport major quantities of natural gas from the Norwegian offshore network via the terminals in Zeebrugge and Dunkerque to millions of European customers. We work according to our corporate governance process which gives us regulations and guidance on how to conduct

our business. Ethics and corporate responsible behaviour are part of this process. Looking forward Gassco Belgium - France will operate and maintain the terminals for many decades to come. As a prudent operator, it is utmost important for us to maintain our good HSE results. Management commitment, employee contribution, trust and knowledge form the basis to achieve this goal.

Jens Eldøy Terminal Manager Branch Manager Stefan Everaerd HSE&Q Manager





# List of abbreviations and acronyms

**HSE** Health, Safety and Environmental

HSE&Q Health, Safety, Environment & Quality

**GRI** Global Reporting Initiative

**KPI** Key performance indicator

**ESG** Environmental, social and governance

**UN** United Nations

**HVAC** Heating, Ventilation and Air Conditioning

**OPS manager** Operations manager

**R&D** Research and development

**PPE** Personal Protective Equipment

**CAO** Collective employee agreements

**OECD** The Organization for Economic

Cooperation and Development

**GHG** Greenhouse gas

NOx Nitrogen Oxides

**SOx** Sulfur Oxides

# 1. Key figures

Gassco believes in the zero goal when it comes to harming people, environment and values. Monitoring safety work, sustainable operations and HSE&Q results is key. Therefore, the Board is pleased with the measures that have been established.



€ 4,7 million invested in new office building that uses maximum energy efficiency



A **0,2 U-value roof insulation** is one of the implemented measures.



ISO 9001, ISO 14001 and ISO 45001:
Gassco Belgium – France obtained
ISO recertification in 2023.



**NEW**: introduction of the department 'Modification & Asset improvement'

# 2. About this report

GRI 2-2, GRI 2-12

Gassco Belgium - France are proud to publish the twelfth annual sustainability report. This report has been prepared in reference to the GRI Standards. Our aim is to present you a straight-forward and transparent report. This report is also a platform for dialogues with our stakeholders

In order to operate the pipeline network with minimal climate impact and to mitigate the environmental stressors caused by human activity, Gassco Norway headquarters drew up a climate roadmap. This strategic roadmap serves as a vital tool in identifying the key areas and projects that require the Group's attention. More info: https://gassco.eu/en/sustainability.

The main goal here is to achieve the UN's sustainable development objectives of halting climate change by 2030. Stakeholders engagement is critical to achieve those Sustainable
Development Goals (SDG's). Therefore,
an annual meeting was initiated
between the highest governance body
and various stakeholders (investment
partners, the Norwegian and Belgian/
French authorities, staff and other
interest groups.)
Sustainable targets are thereby
defined as KPI's. By comparing and
monitoring them, Gassco Belgium France analyses the evolution on a
monthly base.

# 3. Our organisation

GRI 2-1

## 3.1 Organisational profile

Gassco Belgium - France oversees the daily operation of the Zeepipe and Franpipe terminal. We conduct our operations in a safe, cost conscious and efficient way. Daily we transport large quantities of gas from the Norwegian offshore network via the terminals in Zeebrugge and Dunkerque to millions of European customers. We conduct our business in line with the ESG-principles - as indicated in this report - and in a way that leads to positive effects regarding people, profit and planet.

## 3.2 Facts about Gassco

- A limited company wholly owned by the Norwegian state;
- Established in 2001;
- Operates **8.877 km** of pipelines;
- Delivered 109.1 billion standard cubic metres (scm) of natural gas in 2023. Corresponding in energy terms to 1207 TWh;
- Employees: 380 in five countries;
- The company's head office is at Bygnes in Karmøy local authority. It also has branches in Germany, Belgium, France and in the UK, which are responsible for day – to – day operation of the receiving terminals.

## 3.3 Our mission and vision

GRI 2-12

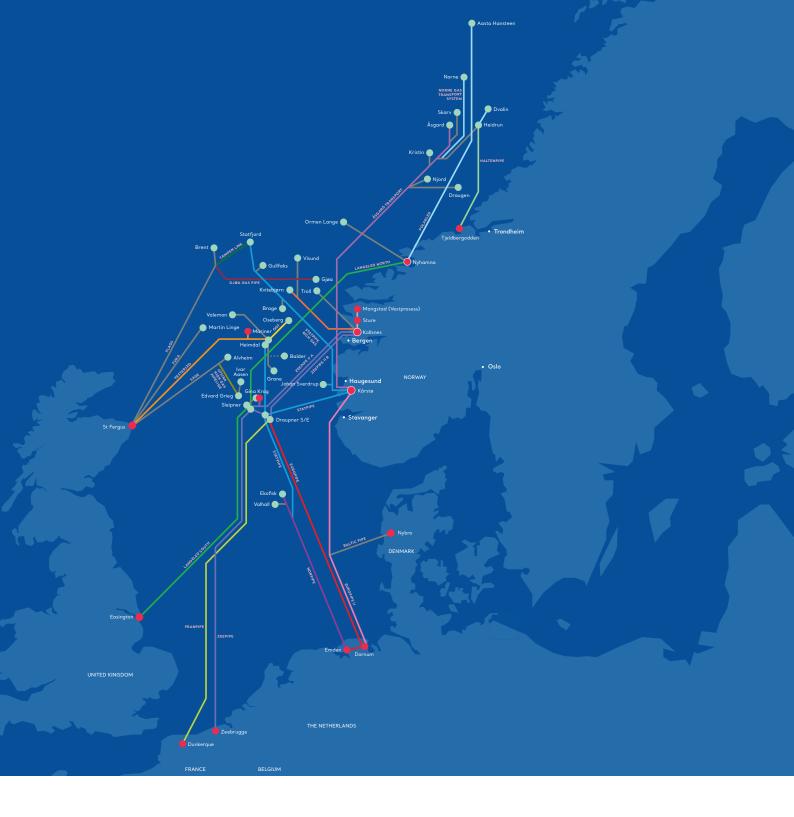
Our mission focuses on 3 key topics:

Safe, reliable and effective.

Create infrastructure for the future.

Reduce climate impact.

With this mission in mind, Gassco's vision is to ensure energy supply through sustainable operation and development.



# 3.3.1. Impacts in the value chain

GRI 2-6, 308, 414

Gassco Belgium - France is offering a service as operator of the Zeepipe and Dunkerque Terminal. The services include daily operations and maintenance of both assets. Daily we transport large quantities of gas from the Norwegian offshore network via the terminals in Zeebrugge and Dunkerque, as coordinated by the company's head office in Norway. Thanks to the cooperation with Fluxys (Belgium) and GRT (France) millions of European customers are served with natural gas.

## 3.4 The ESG team

GRI 2-12, GRI 2-13

Developing an ESG (Environmental, Social, and Governance) strategy is one thing, executing it another. To make sure the strategy has broad support, Gassco Belgium - France opts for a cross-functional ESG team. Only then the chosen path will mean progress. The ESG team will support the board of directors in achieving ESG-goals. Each member of the ESG team plays a key role in overseeing that Gassco Belgium - France operates in the light of ESG related guidelines.

## Our dedicated ESG team - Who's who:

- Stefan Everaerd HSE&Q Manager
- Thomas Gussé HSE&Q Coordinator
- Jan Deckmyn Operations & Maintenance Services Manager
- Jan Cornille Operations Supervisor
   & Assistant HSE&Q Manager
- Fanny Dufour Management
   & Administration Professional &
   Responsible Public Relations

# The ESG-team is in charge of: (not limited)

- Responsible for the flow of communication within the organization
- Nudging staff engagement

The team meets on a regular basis to discuss topics such as:

- Preparation of the annual ESG report
- Keeping track of data and maintaining reporting (daily operations)

## 3.5. Stakeholders

GRI 2-12, GRI 2-13

We expect all our stakeholders to share our goals and values. Everyone has a responsibility to help us reach our objectieve of outstanding HSE&Q results.

Gassco's stakeholders are listed in the infographic beside.



## 3.6. Risk assessment

GRI 3-1. GRI 3-2

Risk assessment plays a key part in Gassco's management processes and is used throughout the business, including decision-making processes relating to projects and modifications. Risk assessment is pursued in each department and project and aggregated to provide an overview of Gassco's most important risks. Combined with associated risk-mitigating and/or risk-eliminating measures, this overview forms part of the 6-monthly

review of the management system. Full risk analyses are also updated in connection to the operation of all operational assets, which are assessed in relation to the established acceptance criteria. Action lists with deadlines for implementation of required actions are drawn up for identified risks. The material topics were determined as a result of the risk assessments carried out (see further).

# 3.7. Sustainable strategy

GRI 2-22

## Sustainable operations and development

The UN's sustainability goals and their 'Global Compact' are interconnected with our efforts towards sustainability and social responsibility. As a state-owned company, Gassco is required to have an overarching plan for sustainable value creation. In Gassco, this plan is an integral part of our overall strategic work. We can contribute to 9 of the UN's 17 sustainability goals. We operate gas facilities onshore and offshore, and transport natural gas to Norway and Europe. Our operations involve inherent risks of accidents and major incidents. While the oil and gas industry we operate in contributes to climate challenges, natural gas plays a significant role in enabling Europe to attain its Paris Agreement targets for reducing emissions.

The sustainable strategy was determined by Gassco's Head Quarter and is endorsed by Gassco Belgium - France.

"The combination of trust, collaboration, skills and knowledge is key. Our innovative efforts will help ensure a sustainable energy supply for the future."

## Our three strategic goals reflect our efforts towards sustainable value creation:

- Safe, reliable and efficient operations
   a prerequisite for good value creation.
- Building the infrastructure of the future

   the infrastructure must be continually
  developed to meet future energy needs.
- Reducing climate footprint

   focus on reducing the climate
  footprint throughout the value chain.

## **Our commitments**

Gassco's sustainability efforts are closely tied to our strategic objectives and vision. We rely on the UN's sustainability objectives to direct our work, adhering to global frameworks and best practices, while engaging in open dialogue and close collaboration with our stakeholders.

# Our approach

Gassco aims to ensure a stable energy supply, with its vision in line with the UN's objective of making clean energy available to everyone.

This aligns with specific targets and priorities that guide Gassco's approach towards achieving the UN's sustainability goals.



# 3.8. ESG goals & objectives

### **HEALTH**

We will have a working environment which is based on our values promoting commitment to the job and productivity – and which prevents occupational illnesses and injuries.

#### **SAFETY**

Our goal is zero accidents and no harm to people, the environment or material assets.

### **ENVIRONMENT**

We will conduct our business in line with the sustainability principles.

### **QUALITY STRATEGY**

Our management system describes our corporate governance and will ensure sustainable development and operation in accordance with applicable legislation, statutory regulations and established goals.

## **Our values**

# TRACK

**T**ransparent

Respectful

**A**ccountable

Challenging

Knowledgable

# **Material topics**

Every year, Gassco Belgium - France strives to improve its environmental, social and governance performance.

- 1. The realisation of our brand new office building in Zeebrugge, with ample attention to energy-efficient measures. For example, investments were made in a high-performance HVAC installation. This guarantees optimal comfort in terms of heating and cooling with minimal energy consumption.
- 2. The company wants to be a good employer. That's why we keep well-being at work in high regard. This reflects into the design of the new business premises in Zeebrugge: in addition to the functional aspects, attention is also paid to relaxation areas for the staff.

These are very important investments, both in terms of sustainability and well-being at work. In the coming year, we will therefore continu our efforts in relation to those material topics. More specifically:

- GRI 203-1 Infrastructure investments and services supported
- GRI 302-4 Reduction of energy consumption

## An overview of the energy-saving measures:

Technical specifications of the building

## Sandwich panel Tatasteel

- Recyclable
- No painting required
- Production: 50% CO<sub>2</sub>
- 30 years of warranty

#### **Rock wool**

- Thickness: 200 mm
- U value: 0,22 W/m².K
- Fire resistant: REI120
- Rc value: 4, 59 m².k/W

## **Windows**

- Fire resistant: REI60
- U value: 1,1 W/m².K
- Blast proof: ER1.S
- 0,1 Barg

## **Roof insulation**

- Thickness: 100 mm
- Rd.value: 4,50 m².K/W

## **Ceiling panels:**

- Fire resistant: REI60
- Recyclable
- CO2: 2,25 kg

### Floor tiles:

- Carpet & vinyl: 60% recycled material
- Produced with 100% of renewable resources

## **Profilesystem**

Fire resistant

#### **HVAC**

- Fire resistant holes
- Detailed study tailored to every room

## **Electricity**

- KNX Attendance light detector for every room
- Led lighting
- Cabling
- Zennio temperature control for every room

## **Gyproc:**

Fire resistant: REI60

## **Sanitary**

Urinals + automatic flush system

# 4. Governance

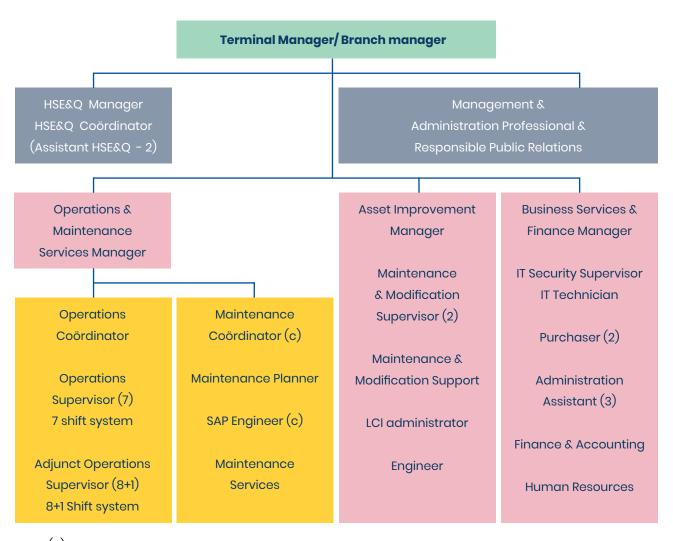
# 4.1. Governance structure

GRI 2-9, GRI 2-10

The Zeepipe Terminal is a joint venture between Fluxys and Gassled. Gassled management committee is selecting the representatives for the various owners. Fluxys is also represented. The ownership is about the assets, not Gassco. The same applies for DT, DTDA Dunkerque Terminal Delt Ansvar - is owned by Gassled and Engie. The organisation held its annual meeting according to the statutes. Gassco Belgium - France takes the chair in the MC meeting, with the Terminal Manager as chairman, the Operations Manager is the depute chair.



# Organization structure Gassco Belgium - France



Note: (c) = contractor

# 4.2. Diversity of governance bodies

GRI 405-1, GRI 2-17

The Board of Directors has 7 members, 4 of whom are men. All are over 50 years old and have Norwegian nationality.

# 4.3. ESG Management

GRI 2-12, GRI 2-14

To ensure the execution of this sustainability strategy, the management of Gassco Belgium - France has the role of guiding and reviewing the ESG development in-house, and keeping the company's employees and other stakeholders well informed. This led to multiple initiatives as reported in this document.

If further steps are required the board of Gassco

Belgium - France, makes recommendations to the company's head office in Norway. In addition, supervision in the form of audits, verifications and managment inspections play an important rol in Gassco's monitoring of its activities. Different types of audits were carried out in 2023, such as:



## **Audits 2023:**

- ISO Management internal audit
   (Zeebrugge (ZT) & Dunkerque (DT) terminal)
- ISO Management external audit (ZT & DT)
- Annual CO<sub>2</sub> verification (ZT & DT)
- Management Review (ZT & DT)
- Internal audit Asset management work permit system (Quarterly)

# **Inspections 2023:**

- Dreal POI inspection Post-Lubrizol (DT)
- Dreal pipeline inspection (DT)
- Dreal security inspection (DT)
- Management inspections (ZT & DT)

# Monitoring critical concerns in real-time

GRI 2-12, GRI 2-14

In order to prevent incidents and to identify (sustainability) risks, we keep a close and excellent supervision on 14 core areas. Automated reporting is built into the system, which allows transfer of information to the board members and the highest governance body in the most efficient way. Critical concerns follow specific procedures. Measures are implemented based on risk.

## Gassco Belgium - France

#### never loses control – 14 core areas:

- 1. Layouts and arrangements
- 2. Containment
- 3. Natural ventilation and HVAC
- 4. Gas Detection
- **5.** Emergency Shutdown
- 6. Open Drain
- 7. Ignition Source Control

- 8. Fire detection
- **9.** Passive fire protection
- **10.** Emergency power and lightning
- 11. Process Safety
- **12.** Alarm and communication system
- 13. Escape, evacuation and rescue
- 14. Human Machine Interface

In 2023, no critical concerns were reported to the highest governance body.

# Collective knowledge of the highest governance body

GRI 2-17

Partnerships and R&D are the keys to acquire knowledge and insight into sustainable development. Therefore, the company has established R&D partnerships both within the industry and within the supply industry. Headquarters' budget on R&D shows that the board attaches great importance to it.

A substantial part was spent on the "Sustainable Development" programme,

which is mainly aimed at reducing climate impact. Gassco's R&D portfolio includes several programmes for low emission technologies that will be pursued over several years. Gassco's work on low emission technologies has led to some tasks being included in the activities for the strategic goal "create the infrastructure for the future".

In cooperation with the authorities, users, owners and other relevant actors, Gassco will assess technology and expertise, challenge current solutions and present innovative approaches to cutting climate impacts in the natural gas value chain.

These developments are mainly conducted by headquaters Norway, but an easy access to the knowledge is assured. This includes, among other things, weekly online meetings, which provide a platform to share lessons learned and to exchange information about the various projects.

# 4.4. Good governance

# 4.4.1. Embedding policy commitments

GRI 2-24

Gassco's management has a clear mission and task to meet our environmental, social and governance commitments.



# The HSE handbook will be updated based on the already existing guidelines, such as:



#### **HSE BASICS**

Life-saving rules, roles and responsibility, first aid, evacuation, etc.



#### SAFETY

General safety principles work at height, flammable substances, PPE's, etc.



#### SOCIAL NORMS IN THE WORKPLACE

Zero tolerance for alcohol, drugs and weapons, nor for acts of harassment or discrimination.

# 4.4.2. Statement on corporate governance

GRI 2-11

The chair of the highest governance body is not a senior executive in the organisation.

The companies within the structure of Gassled, select and asign the representatives. The same applies for Fluxys and Engie. Gassco is not

involved in this process. This general rule avoids potential conflicts of interest and ensures that the Gassco management will be neutral and independent at all times.

## 4.4.3. Conflicts of interest

GRI 2-15

For the same reason, the probability of crossboard membership, cross-shareholding with suppliers and other stakeholders or related parties transactions is as good as zero. Nevertheless, Gassco Belgium - France is taking continuous efforts to avoid conflicts of interest of any kind. Watchfulness is the key to identify potential risks. Gassco Belgium – France ensures that it maintains neutrality in its business policies at all times.

# 4.4.4. Evaluation of the performance of the highest governance body

GRI 2-18

A set of key performance indicators (KPIs) is adopted each year. The KPIs are linked to Gassco's vision, values and strategy, and convert these values into tangible actions and measurable results. They cover sustainability, the environment, health and safety at work, operational conditions, finances, project progress and the company's values. All important parameters related to good governance. Monitoring these KPIs occurs by monthly reviews in order to take corrective actions where required.

### The KPIs were defined as follows:

- Barrier Integrity Indicator
- Production availability (%)
- Asset integrity reporting
- Gas leakages (number)
- Implement agreed initiatives according to benchmark result (%)
- Critical incidents (number)

- Operating cost (kEUR)
- Critical conditions
- Operating investments (kEUR)
- RUE reporting (number)
- Unplanned shut downs
- Implement HSE&Q program according to plan (%)



## 4.4.5. Remuneration policies

GRI 2-19

The annual fixed base salary is the main component of the remuneration of the board members and executive persons in Gassco. In addition, there are 2 variable remunerations per year.

- An annual bonus is granted by the company's head office. The Board of Directors - in close collaboration with trade union representatives - determines how the value of this bonus will be applied.
- **2.** If various objectives were achieved a non-recurring bonus is awarded to the company's employees in Belgium. The value of this bonus is linked to measurable parameters including prevention of workplace accident.

# 4.4.6. Corruption

GRI 2-27, GRI 205-1, GRI 205-3, GRI 408, GRI 409

By applying public procurement procedures correctly, Gassco Belgium - France takes all reasonable steps to prevent fraud or corruption issues. The tendering process ensures that the purchase of goods and services is done in a transparent manner. However, the management remains vigilant for signs of corruption. Any incident will be investigated and rectified by making corrective actions.

## In short:

- **1.** Total number and nature of confirmed incidents of corruption in 2023 : none.
- **2.** Total number of confirmed incidents in which employees were dismissed or disciplined for corruption in 2023: none.
- **3.** Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption: none.
- **4.** Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases: none.

In addition, we confirm our commitment to conduct our business in a manner that meets fundamental human rights, labor, environmental, and anti-corruption responsibilities. There were no complaints on violation of human rights nor other matters mentioned above.

# 4.4.7. Whistleblowing policy

GRI 2-26, GRI 205-2

Gassco strives to achieve transparency and a high level of business ethics. We believe that openness and transparency in the workplace is key to prevent, detect and respond to irregularities and to promote a healthy working environment. We encourage anyone that has a concern to raise it with us. Therefore, Gassco has introduced a whistleblowing policy and channel at group level. Not only available to all employees, but also for contractors, job applicants, third parties who

cooperate with Gassco. The channel is easily accessible via the intranet and is managed by Ernst & Young as an independent partner.

The whistleblowing channel is a supplement to internal and local reporting systems for reports on suspected misconduct or censurable conditions. As described in European legislation, so-called whistleblowers are legally protected against all possible retaliation by the employer.

# 4.4.8. Acquisition of goods and services

GRI 204, GRI 308, GRI 414

#### **Code of Conduct**

Gassco Belgium and Gassco France are proud to be ISO 9001, ISO 14001 and ISO 45001 certified. ISO qualifications are based on high-quality management principles. The implementation of these standards, translates into all of our processes, including the acquisition of goods and services.

Gassco sets requirements for its suppliers through a code of conduct that covers, for example, sustainable aspects (green transport, sustainable products, decent working conditions, etc.). This limits the risk of selecting suppliers that have a negative impact on people or environment.

The guidelines also describe how violations can lead to sanctions including the termination of cooperation between Gassco Belgium - France and the supplier in question. The code of conduct is available on request.

## **Local suppliers**

To apply procurement procedures correctly, strict measures were put in place. This may include giving preference to local suppliers, but only if the local candidate satisfies all the selection criteria. The fact is that, as required for each tender, at least three suppliers will be asked to make an offer. A percentage of products and services purchased locally is not available.



# 4.4.9. Position

GRI 2-28

## Membership associations

Gassco's member collaboration and participation at the board of FEBEG (Federation of Belgian Electricity and Gas Companies), allows us to interact within the industry in order to pave the path to a low carbon society.

The payment of a member contribution is required (per employee). Furthermore, there was no financial support of any kind. No membership was issued for Gassco France.

# 5. Society

## 5.1. Human resources

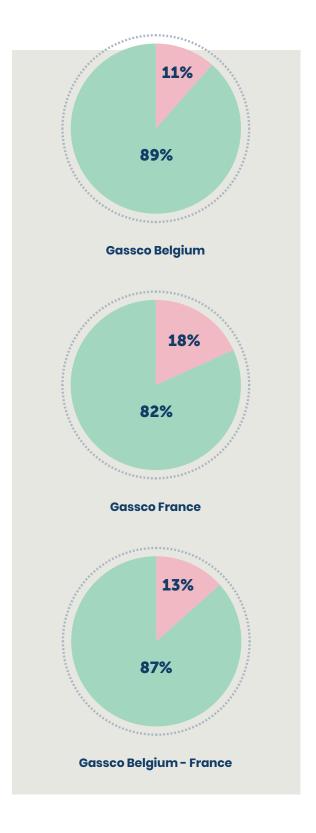
## 5.1.1. Employment

GRI 2-7, GRI 202, GRI 401, GRI 405-2, GRI 405-3, GRI 408, GRI 409

The number of employees (by employment contract) equals 35 for Gassco Belgium and II for Gassco France, which is an increase of one employee in Belgium and equal employees in France. The number of female employees equals four for Gassco Belgium and two for Gassco France. The breakdown of the total workforce by gender and employment type is given in the following graphs. Most male employees in the breakdown of the staff by gender can be related to the type of work performed by these employees. It consists of maintenance/operations tasks which mostly attract male employees.

In Belgium some of the employees do not work fulltime. It concerns six part-time employees, four employees work according to the regime 4/5th, one employee according to the regime 3/5th and two employees work part-time. One employee was absent due to parental leave. Administration services for both sites take place in Belgium and France. The company's job advertisements highlight the desire for a good gender balance, age spread and diversity in the workforce.



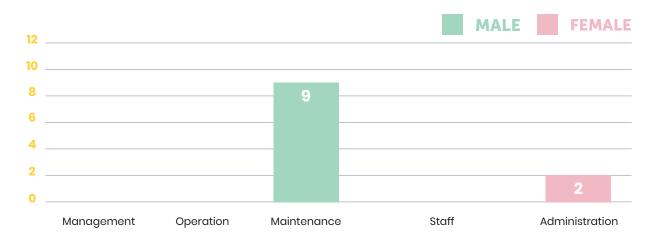


	Female	Male	Total
Belgium	4	31	35
France	2	9	11
Total	6	40	46

# **Employment by type and gender Gassco Belgium**



# **Employment by type and gender Gassco France**



## What we offer:

- Attractive salary package with extra-legal benefits, such as meal vouchers, group insurances like DKV and Europ Assistance, etc.
- 36 vacation days (46 days in case of shiftwork)
- Variable based on organizational goals
- Teambuilding activities

## 5.1.2. Labour/Management relations

GRI 402, GRI 406, GRI 407, GRI 2-30

## Human rights and psychosocial aspects

A general respect for human rights is an integral part of Gassco's value base. Gassco is in full compliance with all topics from human rights and there is full equality between men and women. The company's ethical guidelines conform with the UN's global compact and the OECD's guidelines for multinational companies. The non-discrimination policy is enrolled throughout the full HR process in every country where Gassco operates including Belgium and France. There are mechanisms in place to report deviations and grievances. In addition Gasco Belgium - France decided last year to recruit a talented and motivated person for the position of confidential counsellor. Although the designation of a confidential counsellor is not mandatory unless the company employs more than 50 workers, which is not the case for Gascco Belgium France - we aim the wellbeing of our staff on every level including psychosocial aspects. In 2023, there were no reported grievances related to discrimination.

To conclude, the confidential adviser is the first point of contact for conflicts or discrimination issues at work, and by extension the general health and well-being of the staff. To make sure that our new recreut has the essential skills to react appropriately in situations of stress, mental issues or boundary-crossing behaviour, this person of trust operates under guidance of Liantis. Liantis is recognized by the Federal Public Service on Employment, Labour and Social Dialogue as a training institution for the confidential adviser basis training.

## Collective labour agreements

All employees of Gassco Belgium fall within the same joint committee under sector PC326 (Gas & Electricity). There are no separate collective employee agreements (CAO's) for staff and management; the same agreements are applicable. All collective agreements are made at sector level and approved by a delegation from the unions and employers. All employees are covered by these collective bargaining agreements. All employees of Gassco France are under the petroleum sector. All rules and agreements from the sector are implemented. In both countries there is close collaboration with the relevant sector federations to followup changes and to implement them in the companies. There is no local union, agreements are made on sector level.

# **5.1.3. Safety**

GRI 403-2, GRI 403, GRI 403-5

Facility safety protocols are crucial for preventing critical incidents. Therefore, control systems have been designed to safeguard the gas transport system, the users and the employees and to ensure efficient and prudent operation of the activities. Various inspections took place, such as RBI inspections, ISO audits,

management inspections with stakeholders and checks carried out by the HSE committee. The results of these monitoring activities were reported directly to the HSE&Q Manager, Stefan Everaerd and will be used for continuous improvements to, and further development of the safety control system.



# Health and safety in numbers (2023)

GRI 403-9, GRI 403-10

Number of lost time accidents at work	0	Number of working hours - France	16.300,0
Small personal injuries	1	Absence ratio - Belgium	3,60%
Number of working hours - Belgium	52.121,3	Absence ratio - France	5,30%

## 5.1.4. Health

GRI 403-1, GRI 403-2, GRI 403-3, GRI 403-4, GRI 403-7, GRI 403-8

Gassco is convinced that the health and wellbeing of its staff is a major factor in its cost-effective, innovative and productive process. Healthy, satisfied staff is more engaged, motivated and productive. They are less on sick leave and remain longer within the organisation, saving Gassco money on recruitment and training.

Gassco Belgium is not obliged by legislation to have an official health and safety committee, as there are less than 50 employees working. On the other hand, in France, companies with more than 11 employees must have a CSE.

As this is indeed the case, a HSE Committee was put in place for both branches. There are quartal meetings, with representatives from

management, union, Gassco Work Council and employees. The meetings, hold at facility level, consist of 2 parts; the first part is formed by the HSE meeting, the second part by the union meeting. There are no annual elections of the committee members but union and employee representatives are assigned (mandated) by the employees themselves.

The HSE manager is the person ultimately responsible for safety within the company and, of course, has the necessary qualifications (prevention advisor level 2).

Employees were informed about health and safety in different ways: via the HSE Committee, the HSE policy, etc.

# The health & safety committee (HSE) reflects the diversity of the company and consists of the following members:

- 2 representatives of the trade union (ZT)
- 2 operations representatives
- 5 management representatives
- 1 administrative staff representative
- 2 representatives of Dunkerque terminal (DT)
- The HSE Coordinator of Zeebrugge (ZT) & Dunkerque (DT) terminal

In total, 54% of the employees in Belgium -France are affiliated to a trade union. They have no advantages other than defined in social legislation.

Gassco provides access of employees to non-occupational medical and healthcare services. All employees as well as their family members are free to join a comprehensive health insurance for hospitalization, dental care and medical expenses. Everyone can also enjoy for free an assistance insurance, which provides assistance both at home and abroad,

for example, roadside assistance by car or bicycle, house fire, loss of luggage, repatriation, intervention in medical costs abroad, etc.

Furthermore, the company doctor visits the workplace every year. The aim is to monitor the health and safety of the employees, as well as identify possible health risks.

In addition, all employees who carry out a job with increased safety risks, namely operators and technicians, have an annual medical examination. Everyone has the opportunity to get vaccinated against the flu and tetanus. Employees (in the control room) have access to a treadmill and a bicycle that the operators can use during their shift. The work tables in the control room are all height adjustable to allow a more active working style. Gassco has also been working on the creation of a more dynamic working atmosphere for the other members of staff, who mainly perform

sedentary and administrative work. The use of sit-stand furniture is a major factor in this. To stimulate an active lifestyle of the employees, everyone receives annual sports and culture vouchers worth € 100 that can be used at sports clubs. Every year Gassco organizes different activities for the employees in which active lifestyle is promoted. In the canteen healthy and fresh food (fruit, yoghurt) are offered on a daily basis. Getting to work by bicycle is promoted by giving a bicycle allowance. Employees can also convert part of their annual bonus into a gross amount to lease a bicycle.

# 5.1.5. Training programs

GRI 3-1, GRI 3-2, GRI 3-3, GRI 403-5, GRI 404-1, GRI 404-3

Gassco is convinced that effective training programs increase the wellbeing of its staff and the development and success of the organization. Well trained employees are more efficient and productive. New candidates joining the organization receive training to familiarize themselves with the organizational mission, vision, rules and regulations and working conditions. Existing employees are trained to refresh and enhance their knowledge and to learn about process changes in equipment, technology....



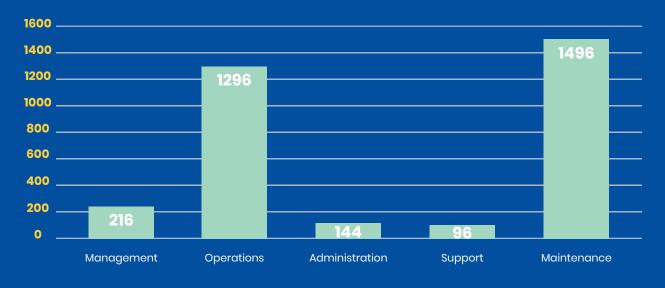
## Below is a list of trainings provided to reduce the risk of health and safety problems (not limitative):

- First aid
- Proactive methodology training
- Maintenance seminar
- Fire fighting
- Hazard awareness course

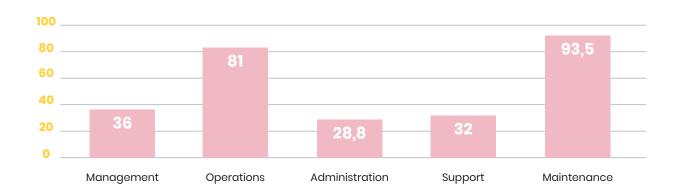
- Breathing apparatus training
- Safety seminar on electrical systems
- Life-saving actions
- Several emergency response exercises

The number of training hours in 2023 equalled 3.248 hours. This is a 7.14% increase compared with 2022.

# Total hours devoted to training within each employee category



# #hours/employee





# 5.2. Impact in the value chain

GRI 308, GRI 414, GRI 410-1

The sabotage of the Nord Stream naturalgas pipelines has put energy security on the national and international agenda. Although security issues have always been a top-tier concern at Gassco, concerns about security risks increased even more. As a result, Gassco Belgium - France took different measures to make the sites even more secure:

- On-site surveillance by security guards
- Identification badges
- Access control system
- Monitoring people who can get out or into the office building
- Preventing access for unauthorized persons
   Etc.

Other measures linked to securing the plant and the environment, to ensure workers's security and by extension the the entire value chain:

- Welcome brochure for visitors
- HSE induction video

# 5.3. Impact on the local population

GRI 411, GRI 413, GRI 416, GRI 417, GRI 418

Gassco operates in close collaboration with local authorities. Within the permitting process, community involvement is foreseen. In order to obtain the permits of the Zeepipe and Zeepipe Terminal in Belgium and the Franpipe and Dunkerque Terminal DA in France local community has been informed about the project and had the opportunity to give remarks. Gassco Belgium - France has its own local policy. The policy is based on the corporate policy set by Gassco Norway. The stakeholder engagement is regulated via the

Gassled management committee and Gassco Led management committee. The Gassco management system focuses on conformity validation. Gassco received no fines nor nonmonetary sanctions for non-compliance with laws and regulations. This includes compliance with the entire range of laws and/or regulations under which Gassco operates.

These measures reduce danger or potential negative impacts to a minimum, both for the local community as for the customers.

## 5.4. Impact on the customers

GRI 417-1. GRI 417-2

# 5.4.1. Product labelling

GRI 417-1, GRI 417-2

Gassco's priority is to transport and handle Norwegian gas safely and efficiently to Belgium and France. The inventory control, product quality and safety mentions are done at the head office level.

# 5.4.2. Marketing

GRI 417-3

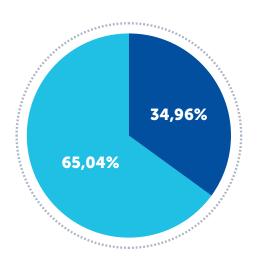
Not applicable as employer branding and marketing are centralized in the head office.

# 6. Planet

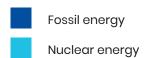
# 6.1. Energy use

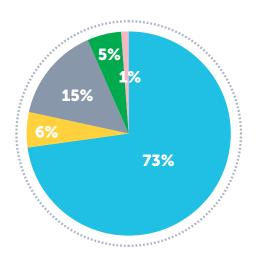
GRI 302-1, GRI 302-3

# **6.1.1.** Share of renewable and non-renewable energy in electricity consumption

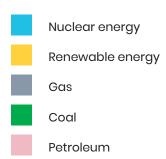








# **Electricity composition Gassco France**



Note: in 2023, substantial efforts were made to reduce energy consumption. See also "Material topics". Total energy consumption from renewable sources (such as producing electricity by means of a solar panel installation), was not in place in 2023, but is currently under review.

# **6.1.2. Energy consumption**

## **Energy consumption Gassco Belgium**

	2019	2020	2021	2022	2023
Electricity (MWh)	2.185	2.151	2.164	2.005	1.896
Natural gas (Nm³)	1.241.144	671.021	848.042	157.556	402.132
Diesel (liter)	1.312	2.772	2.800	2.281	2.452
Electricity (TJprim)	19,67	19,36	19,47	18,05	17,07
Natural gas (TJprim)	46,47	25,11	30,53	5.91	15,18
Diesel (TJ- prim)	0,05	0,10	0,10	0,08	0,08
Totaal (TJ- prim)	66,18	44,56	50,10	24.04	32.33

Note: the higher heating costs (consumption of natural gas) in 2023 is due to external factors over which the company had no influence.



#### **Energy consumption Gassco France**

	2019	2020	2021	2022	2023
Electricity (MWh)	1.692	1.629	1.485	1.315	1.219
Natural gas (Nm³)	1.987.303	1.536.044	1.322.589	1.136.644	1.258.945
Diesel (liter)	3.286	2.441	1.947	1.959	2.077
Electricity (TJprim)	15,23	14,66	13,37	11,84	9,39
Natural gas (TJprim)	73,69	56,70	47,61	40,92	46,66
Diesel (TJ- prim)	0,12	0,09	0,07	0,07	0,07
Totaal (TJ- prim)	89,04	71,45	61,05	52,83	51,12

## **Energy use (TJprim)**





#### 6.2. Reduction of GHG emissions

GRI 305-5

Gassco is working with many actors in several parts of the value chain to achieve reduced climate impact and increased value creation. Various studies of emission cutting measures are centrally coordinated by the company's head office. Identifying and refining emission cutting measures will continue in the future.

## Examples of energy saving measures implemented in 2023 are:

• Gassco has agreed with Fluxys to reduce the temperature of the gas delivered from the Zeebrugge terminal. This has resulted in reduced fuel gas consumption, energy needs and CO<sub>2</sub> emissions in Zeebrugge. A similar reduction in temperature has been tested at GRT gaz in Dunkerque. After evaluation, it was put into service in 2023.

- Our brand new office building in Zeebrugge, was constructed with sustainable materials and with energy efficiency in mind. Such as sustainable lighting solutions: LED lighting, movement or daylight sensors, etc.
- In order to reduce total energy consumption and associated CO<sub>2</sub> emissions in the value chain, the data tool and the process for checking inventory levels in pipelines were improved further. This is used in the roundthe-clock operation of Gassco's transport control centre.

## 6.3. Air emissions

GRI 305-7

Relevant air emissions related to the activities of Gassco are the emission of carbon dioxide,

natural gas (venting), nitrogen oxides (and sulphur oxides).

#### **Greenhouse gas production Gassco Belgium in 2023**

Direct/Indirect Source of GHG	Source of GHG emissions	CO <sub>2</sub> (ton)	CH₄(ton)
Direct	Gas fired burners	851,79	-
	Venting	-	5.66
Indirect	Electricity use	-	-

## **Greenhouse gas production Gassco France in 2023**

Direct/Indirect Source of GHG	Source of GHG emissions	CO <sub>2</sub> (ton)	CH₄(ton)
Direct	Gas fired burners	2.919,46	-
	Venting	-	64,11
Indirect	Electricity use	-	-

Natural gas is used for the heating system, diesel is used for the diesel pumps.

Burning gas typically gives low emissions of sulphur oxides and particulate matter.

	Belgium	France
Amount of gas vented into the atmosphere	5,66 ton	64,11 ton

	Belgium	France
Operation hours main heaters	1.431	4.212
Operation hours FG heaters	1.582	-

Underneath, the emissions amounts of NOx and SOx for the site in Belgium and France.

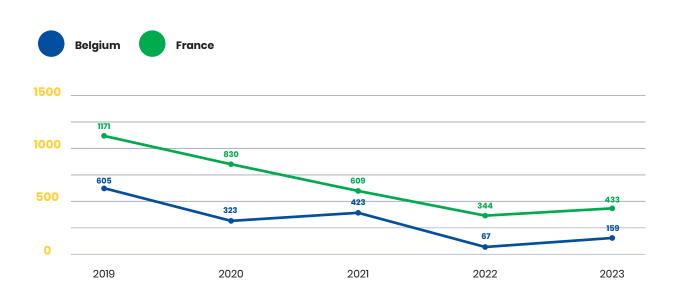
## **NOx emission Gassco Belgium**

	2019	2020	2021	2022	2023
NOx emission	605	323	423	67	159

## **NOx emission Gassco France**

	2019	2020	2021	2022	2023
NOx emission	1.175	830	609	344	433

## NOx emission (kg)



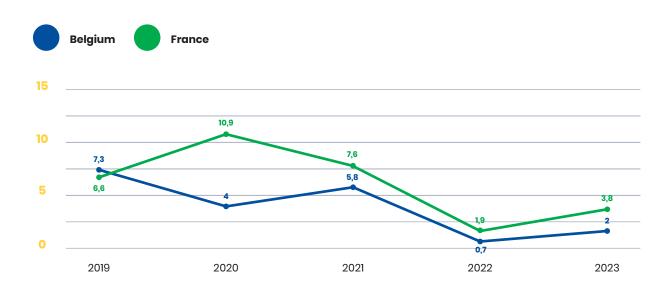
## **SOx emission Gassco Belgium**

	2019	2020	2021	2022	2023
SOx emission	7.3	4	5.8	0.7	2

## **SOx emission Gassco France**

	2019	2020	2021	2022	2023
SOx emission	6.6	10.9	7.6	1.9	3.8

## SOx emission (kg)



## 6.4. Biodiversity

GRI 304

The company's activities have no impact on biodiversity

## 6.5. Water

## 6.5.1. Water consumption

GRI 306

#### Gassco Belgium

Description of the potable water use	2019	2020	2021	2022	2023
Domestic activities (m³)	372	314	341	915	230
Hydraulic testing	5	0	0	0	0
Completion of cooling system (m³)	0	0	0	0	0

#### **Gassco France**

Description of the potable water use	2019	2020	2021	2022	2023
Domestic activities (m³)	297,24	236,38	282,72	1.328	1.305
Hydraulic testing	0	0	0	0	0
Completion of cooling system (m³)	0	0	0	0	0
Completion firewater basin	0	0	0	0	0
Rinsing of infrastructure	18,66	1,56	0	0	0

We note that the consumption is limited to maintenance and sanitary use. Water consumption is not needed during the manufacturing process. At Gassco France the water consumption was higher due to renovation works (IBC tanks were filled with water).

## 6.5.2. Water discharge

GRI 3-1, GRI 3-2, GRI 3-3, GRI 303-4, GRI 306-1, GRI 306-5, GRI 2-25

#### Gassco Belgium

Description of the discharged water	2023
Unpolluted pit rainwater (m³)	16.359,05
Polluted pit rainwater (m³)	58,71

#### **Gassco France**

Description of the discharged water	2023
Unpolluted pit rainwater (m³)	2.333,05
Polluted pit rainwater (m³)	42,45

## 6.6. Materials

GRI 301

## 6.6.1. Waste

GRI 103-1, GRI 103-2, GRI 103-3, GRI 306-1, GRI 306-2, GRI 306-3, GRI2-25

#### Gassco Belgium

		Waste 2022		Waste 2023
	ton	%	ton	%
Paper/carton	1,80	2,99	2,59	7,48
PMD	0,29	0,48	0,30	0,85
Rest	11,29	19,94	3,07	8,88
Polluted rain water	14,46	24,06	11,98	34,65
Electronic equipment	0,82	1,37	0,24	0,69
Iron	1,11	1,84	0,41	1,18
Plastics	2,93	4,88	0,24	0,69
Sludge			9,48	27,42
Cables			0,75	2,18
Sceptic material			5,30	15,32
Electrical			0,22	0,65
Other types of waste	27,40	44,44		
Total	60,12	100	34,57	100

#### **Gassco France**

		Waste 2022		Waste 2023
	ton	%	ton	%
Paper/carton	1,50	3,10	1,50	7,68
Rest	1,62	3,35	3,58	18,33
Polluted rain water	16,68	34,44	13,84	70,88
Sceptic material			0,61	3,10
Other types of waste	28,63	59,11		
Total	48,43	100	19,53	100

# 7. Financial performance

#### 7.1. Process data

GRI 2-6

In 2023 Gassco Belgium delivered 11.352.135,00 tons of natural gas or 14.247.494.105 Nm³. Gassco France delivered 10.155.901 tons of natural gas or 13.109.646.130 Nm³ for use by customers.

This is a light decrease for Gassco Belgium (-0,03%) and for Gassco France (-0,22%), compared to 2022.

## 7.2. Economic performance

GRI 201-2

The financial results for Gassco Belgium - France for the year 2023 are given in the tables below.

#### Financial results in Euro

	Belgium	France
Direct economic value generat	ed	
Revenues	18.252.135	13.274.959
Direct economic value generat	ed	
Operating costs	6.848.868	5.465.020
Employee wages and benefits	3.841.224	3.705.081
Payments to government	319.172	183.388
Community investments	2.000	15.000
Economic value retained		
Investments	8.699.674	8.657.774

#### **Investments for Belgium**

Description	Cost in EUR
Minor investments and modifications	1.472.923
Office refurbishment	3.067.378
Cyclone replacement	810.808
BIR FEED + Investment	3.348.565

#### **Investments for France**

Description	Cost in EUR
Minor investments and modifications	560.347
Replacement valves metering & trains	2.011.843
Upgrade CCTV	644.808
Energy plan	5.440.776

	Belgium Cost (EUR)	France Cost (EUR)
Cost of non-product output (shutdown)	No cost impact	No cost impact
Fines for non-compliance with environmental regulations	Not applicable	Not applicable
Remediation costs		
Treatment of waste (euro)	45.142,27	29.442,69
Treatment of emissions (purchase and use of emissions certificates)	23.642,72	159.698,84
Depreciation of related equipment, maintenance, and operating material and services, and related personnel costs	-	-
Insurance for environmental liability	Not specified – part of the overall insurance polic	
Clean-up costs	-	-
Prevention and environmental managem	nent costs	
External services for environmental management	20.064,29	10.743,00
External certification of management systems (combined audit)	10.972,20	5.067,50
Personnel for general environmental management activities	1,5 FTE	1,5 FTE
Research and development	Allocated to the overall terminal cost, Belgium 396.000,00€, France: 348.000,00€	
Extra expenditures to install cleaner	Both for Belgiun	n and France the safety
technologies	performance standard is applicable, this	
	standard has focus on B	AT, including safety and
	environment. The additional cost is ca. 30% highe	
	tho	an standard equipment

Extra expenditures on green purchases	The additional cost for greener products can		
		be set at +15%	
Other environmental	Not applicable	Not applicable	
management costs			

#### **Table footnotes**

- Gassco Belgium France did not receive any financial assistance nor other funding sources from any government during the reporting period. GRI 201-4
- Gassco Belgium France has no specific tax strategy. GRI 207-1
- Ensuring impartiality in legal proceedings at all times, Gassco's policy is strongly opposed to any form of political contributions.
   Lobbying does not occur in any way. GRI 415-1
- There was no administrative or legal sanction for non-compliance with financial legislation. GRI 2-27

## 7.3. Taxation

GRI 301

Gassco Belgium - France makes its fair and legal contribution to taxes and does not have a specific tax strategy.

## 7.4. ESG Investments

GRI 3, 2-22, 203

At present, it is not possible to give an estimate of the investments because the different possibilities are still being reviewed and evaluated.



# 8. Suggestions or comments

Suggestions and comments with regards to the contents of this report can be sent to:

Gassco AS Barlenhuisstraat 1 8380 Zeebrugge – Belgium

Contact person for this report: Stefan Everaerd +32 50 461 624 stev@Gassco.no

Reporting is done in close collaboration with DENKESG, sustainability reporting.



# 9. GRI Content Index

This sustainability report has been prepared in reference to the guidelines of the Global Reporting Initiative (GRI), the global standard in the field of sustainability reporting.

GRI Standard	Disclosure	Page reference
	2-1 Organizational details	Page 8
	2-2 Entities included in the organization's sustainability reporting	Page 7
	2-3 Reporting period, frequency and contact point	Page 6 & 47
	2-4 Restatements of information	Not applicable
	2–5 External assurance	Not applicable
	2-6 Activities, value chain and other business relationships	Page 9
	2-7 Employees	Page 26
	2-8 Workers who are not employees	Not applicable
	2-9 Governance structure and composition	Page 15
	2-10 Nomination and selection of the highest governance body	Page 15
	2-11 Chair of the highest governance body	Page 20
GRI 2: General	2-12 Role of the highest governance body in overseeing the management of impacts	Page 7
Disclosures 2021	2-13 Delegation of responsibility for managing impacts	Page 10
	2-14 Role of the highest governance body in sustainability reporting	Page 17
	2-15 Conflicts of interest	Page 20
	2-16 Communication of critical concerns	Page 18
	2-17 Collective knowledge of the highest governance body	Page 18
	2-18 Evaluation of the performance of the highest governance body	Page 21
	2-19 Remuneration policies	Page 22
	2-20 Process to determine remuneration	Not applicable
	2-21 Annual total compensation ratio	Not applicable
	2-22 Statement on sustainable development strategy	Page 11
	2-23 Policy commitments	Not applicable
	2-24 Embedding policy commitments	Page 19
	2-25 Processes to remediate negative impacts	Page 14
	2-26 Mechanisms for seeking advice and raising concerns	Page 23
	2-27 Compliance with laws and regulations	Page 46

GRI Standard	Disclosure	Page reference
GRI 2: General	2-28 Membership associations	Page 25
Disclosures 2021	2-29 Approach to stakeholder engagement	Page 10
D1301030103 2021	2-30 Collective bargaining agreements	Page 28
	3-1 Process to determine material topics	Page 11
GRI 3: Material	3-2 List of material topics	Page 14
Topics 2021	3-3 Management of material topics	Page 14
	201-1 Direct economic value generated and distributed	Pages 44-46
GRI 201: Economic	201-2 Financial implications and other risks and opportunities due to climate change	Pages 44-46
Performance 2016	201–3 Defined benefit plan obligations and other retirement plans	Pages 44-46
	201-4 Financial assistance received from government	Pages 44-46
GRI 202: Market	202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Not applicable
Presence 2016	202-2 Proportion of senior management hired from the local community	Not applicable
GRI 203: Indirect	203-1 Infrastructure investments and services supported	Page 14
Economic Impacts 2016	203-2 Significant indirect economic impacts	Not applicable
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	(*)
	205-1 Operations assessed for risks related to corruption	Page 22
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	Page 22
	205-3 Confirmed incidents of corruption and actions taken	Page 22
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti- trust, and monopoly practices	Not applicable
	207-1 Approach to tax	Page 46
	207-2 Tax governance, control, and risk management	Page 46
GRI 207: Tax 2019	207-3 Stakeholder engagement and management of concerns related to tax	Page 46
	207-4 Country-by-country reporting	Page 46
	301-1 Materials used by weight or volume	Page 43
CDI 201; Mesteviele 2016	301-2 Recycled input materials used	Page 43
GRI 301: Materials 2016	301-3 Reclaimed products and their packaging materials	Page 43
	302-1 Energy consumption within the organization	Page 36
GRI 302: Energy 2016	302-2 Energy consumption outside of the organization	Page 36
	302-3 Energy intensity	Page 36
	302-4 Reduction of energy consumption	Pages 14 & 36
	302-5 Reductions in energy requirements of products and	Pages 14 & 36
	services	
		Page 42
GRI 303: Water and Effluents 2018	services	Page 42

GRI Standard	Disclosure	Page reference
GRI 303: Water and	303-4 Water discharge	Page 42
Effluents 2018	303-5 Water consumption	Page 42
	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	
GRI 304: Biodiversity	304-2 Significant impacts of activities, products and services on biodiversity	The company's activities have
2016	304-3 Habitats protected or restored	no impact on biodiversity
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	Biodivorsity
	305-1 Direct (Scope 1) GHG emissions	Pages 38-40
	305-2 Energy indirect (Scope 2) GHG emissions	Pages 38-40
	305-3 Other indirect (Scope 3) GHG emissions	Pages 38-40
GRI 305: Emissions 2016	305-4 GHG emissions intensity	Pages 38-40
	305-5 Reduction of GHG emissions	Pages 38-40
	305-6 Emissions of ozone-depleting substances (ODS)	Pages 38-40
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Pages 38-40
	306-1 Waste generation and significant waste-related impacts	Page 43
ODI 200 W	306-2 Management of significant waste-related impacts	Page 43
GRI 306: Waste 2020	306-3 Waste generated	Page 43
	306-4 Waste diverted from disposal	Page 43
	306-5 Waste directed to disposal	Page 43
GRI 308: Supplier	308-1 New suppliers that were screened using environmental criteria	Page 24
Environmental Assessment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	Page 24
	401-1 New employee hires and employee turnover	Page 26
GRI 401: Employment 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Page 26
	401-3 Parental leave	Page 26
GRI 402: Labor/ Manage- ment Relations 2016	402-1 Minimum notice periods regarding operational changes	Page 28
	403-1 Occupational health and safety management system	Page 30
	403-2 Hazard identification, risk assessment, and incident investigation	Page 30
	403-3 Occupational health services	Page 30
GRI 403: Occupational	403-4 Worker participation, consultation, and communication on occupational health and safety	Page 30
Health and Safety 2018	403-5 Worker training on occupational health and safety	Page 31
	403-6 Promotion of worker health	Page 31
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Pages 30 & 31

GRI Standard	Disclosure	Page reference
GRI 403: Occupational	403-8 Workers covered by an occupational health and safety management system	Pages 30 & 31
Health and Safety 2018	403-9 Work-related injuries	Page 29
	403-10 Work-related ill health	Page 29
	405-1 Diversity of governance bodies and employees	Page 26
GRI 405: Diversity and	405-1 Diversity of governance bodies and employees	Page 26
Equal Opportunity 2016	405-2 Ratio of basic salary and remuneration of women to men	Page 26
GRI 406: Non- discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Page 28
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	Not applicable
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	Not applicable
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Not applicable
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	Page 33
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	Not applicable
GRI 413: Local	413-1 Operations with local community engagement, impact assessments, and development programs	Page 34
Communities 2016	413-2 Operations with significant actual and potential negative impacts on local communities	Page 34
GRI 414: Supplier Social	414-1 New suppliers that were screened using social criteria	Page 24
Assessment 2016	414-2 Negative social impacts in the supply chain and actions taken	Page 24
GRI 415: Public Policy 2016	415-1 Political contributions	Page 46
GRI 416: Customer Health	416-1 Assessment of the health and safety impacts of product and service categories	Page 34
and Safety 2016	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Page 34
	417-1 Requirements for product and service information and labeling	Page 34
GRI 417: Marketing and Labeling 2016	417-2 Incidents of non-compliance concerning product and service information and labeling	Page 34
	417-3 Incidents of non-compliance concerning marketing communications	Page 34
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Page 34





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