



Environmental Social Governance Disclosure 2021 Reporting Year 2020




POSEIDON
PRINCIPLES




Key Metrics (See Appendix I for summary of SASB Sustainability Disclosure Topics)

Accounting Metric	Unit of Measure	SASB Code	2020
Greenhouse Gas Emissions			
Gross global Scope 1 emissions	Metric tons (t) CO ₂ -e	TR-MT-110a.1	189,017
Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets		TR-MT-110a.2	Page 3
(1) Total Energy consumed (2) Percentage heavy fuel oil (3) Percentage renewable	Gigajoules (GJ), Percentage (%)	TR-MT-110a.3	2,436.636 100 0
Average Energy Efficiency Design Index (EEDI) for new ships	Grams of CO ₂ per ton-nautical mile	TR-MT-110a.4	EEDI 3.385 EEXI 4.45
Air Quality			
Air emissions of the following pollutants: (1) NO _x (excluding N ₂ O) (2) SO _x and (3) particulate matter (PM ₁₀)	Metric tons (t)	TR-MT-120a.1	Metric collection under discussion
Ecological Impacts			
Shipping duration in marine protected areas or areas of protected conservation status	Number of travel days	TR-MT-160a.1	281.5
Percentage of fleet implementing ballast water exchange / treatment	Percentage (%)	TR-MT-160a.2	3.5 / 96.5
Number / aggregate volume of spills and releases to the environment	Number Cubic meters (m ³)	TR-MT-160a.3	0 / 0
Percentage of fleet using Exhaust Gas Cleaning Systems / Low-Sulphur Fuel Oil	Percentage (%)	Additional disclosure	36 / 64
Employee Health & Safety			
Loss time incident rate (LTIR) for injuries / illness	Rate	TR-MT-320a.1	0.59 / 2.3
Business Ethics			
Number of calls at ports in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	Number	TR-MT-510a.1	0
Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	USD (\$)	TR-MT-510a.2	0
Accident & Safety Management			
Number of marine casualties Percentage classified as very serious	Number Percentage (%)	TR-MT-540a.1	0 0
Number of conditions of class / Recommendations	Number	TR-MT-540a.2	2
Number of port state control deficiencies / detentions	Number	TR-MT-540a.3	15 / 0
Governance			
Board Makeup (M / F)	Percentage (%)	Additional disclosure	100 / 0
Senior Management Makeup (M / F)	Percentage (%)	Additional disclosure	78 / 22
Seafarer Retention Rate	Percentage (%)	Additional disclosure	100



375
Shipboard
Employees
[TR-MT-000.A]




DWT
822,826
Deadweight
Tonnage
[TR-MT-000.D]




672,556
Nautical Miles
Travelled
[TR-MT-000.B]



11
Vessels
in Fleet
[TR-MT-000.E]



3,970.5
Operating
Days
[TR-MT-000.C]



261
Vessel
Port Calls
[TR-MT-000.F]



2
Shoreside
Locations



7.5
Average
Age of Fleet



Environmental

We must work together to face the common environmental challenge.

Having a sound environment policy is now one of the main prerequisites for operating as a leading member of the industry. Our Company has a long tradition, our roots go back to the establishment of Alassia Steamship Company Ltd. in 1965. We pride ourselves in always being a top-quality, risk adverse operator maintaining our vessels to all regulatory and class requirements and well beyond. Further to this, we have voluntarily adopted four ISO standards: ISO 14001 and ISO 50001 for Environmental and Energy Management, ISO 9001 for Quality Management and ISO45001 for Health and Safety, receiving full accreditation from Lloyd's Register.

The vast majority of our ships are modern and Japanese built, and many are equipped with energy saving devices like rudder bulbs, low viscous resistance fins and contra rotating propellers. Three of our vessels have Electronic Main Engines, and all but one of our vessels have been fitted with a Ballast Water Treatment System (BWTS), strongly managing our ecological impact.

We have invested in new machinery and technologies to further manage our environmental impact. Most notably, we retrofitted four of our largest vessels with open loop Exhaust Gas Cleaning Systems (scrubbers). Between these scrubbers and switching to compliant fuel for the rest of the fleet, sulphur oxide emissions produced by our fleet in 2020 amounted to 191 tonnes, reduced by 91% compared to 2019.

We ascribe to emissions programs in accordance with IMO DCS (Data Collection System) and EU MRV (Monitoring Reporting Verification), but our dedication to protecting the environment goes well beyond compulsory regulatory requirements. Our scrubber fitted vessels operate at 0.1% sulphur equivalent fuel level, which is five times lower than the limit imposed by the regulation.

In addition, owing to industry discussion about the quality and environmental impact of effluent water discharges by open-loop scrubbers, we conducted experiments using leading, independent laboratories to understand whether the discussion and concerns were valid. Our testing, which followed EPA and

ISO guidelines and was conducted in accordance to guidelines set by the American Bureau of Shipping, showed very low to undetectable concentrations of the metals of concern.

We believe that the industry must work together to meet the challenges ahead. With this in mind, we are committing a large part of our fleet to long term charters with major charterers where we share a common goal of reducing carbon emissions. We are committed to working closely with them to explore how best to optimise voyages, and cooperate fully with them to trial new technologies and software programmes. These partnerships have enabled us to collect, monitor and analyse the performance of our vessels, including all emissions to the environment, for example using the "Greensteam Platform" – a system which provides a clear picture of the vessel and provides accurate advice on how to optimize fuel consumption.

Once collected, these metrics are benchmarked against industry peers to ensure we are operating consistently in the top strata. Any significant deviations from form are quickly and fully investigated and rectified. We are also in discussions with various organisations (e.g. Marine Traffic, the Signal Group) who are developing operational improvement software.

Our Environmental Strategy is set out and reviewed in an annual Management and Environmental Review Committee Meeting. In this meeting policies, objectives and targets are set, as well as increasing environmental awareness training and education to colleagues both seafaring and shoreside. This Committee also assesses the potential for new technologies in new-builds and retrofitting existing assets in order to improve both EEDI and EEXI.

In late 2021, we are continuing our commitment to progress by holding our first Climate Risk Analysis Session in line with the Task Force for Climate-Related Financial Disclosures (TCFD). This will highlight future risks and opportunities and identify how best to act now in the interest of all stakeholders.



Social

We believe in creating a company that benefits society.

Alassia NewShips Management is a company that genuinely cares about our colleagues. We strive to create a workplace that makes colleagues feel welcome and delivers an environment that ensures that everyone can reach their full potential. We organise team building activities as well as self-improvement and development seminars.

Our safe operations are contingent on the diligent work our seafarers put in, day after day. All seafarers are trained and certified to International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), and we invest heavily in programmes that exceed this level. Through our partnership with Alpha Marine, we have developed a full-suite computer-based training programmes which address all areas of seafaring life – from Risk Assessment and Management, to anti-bullying and personal administration.

Life at Sea is evolving. The increase of technology on-board, and opportunity to communicate with loved ones back home has brought huge benefits. To ensure our seafarers have reliable internet connection on-board we have invested in a High-Bandwidth, High-availability marine communication system, ensuring seamless global mobility.

Our seafarer's safety, well-being and good mental health is an ongoing priority for our company – all our vessels are modern, with gyms, and our recreation and accommodation facilities have been rated as exceeding average. Various competitions are run through the year to encourage team-building and integration.

For those seafarers who need further assistance, we have put in place structures for anonymous outreach. We are in the process of implementing a rigorous mental health and well being campaign, which will exceed the requirements of the upcoming Dry Bulk Management Standard (DBMS) standard – for the preparation of which we were members of the industry working group set up by RightShip and Intercargo.

As a result of these efforts, our retention rate for officers was 100% in 2020. We are always present and happy to respond to all calls made to help our community – we take pride in being a corporate

citizen with strong moral compass. We tackle issues head on, whatever they may be.

In 2018, to promote awareness on environmental issues we funded and ran an Instagram account named “BLUE GREEN JOURNEY.” The idea behind this initiative is to communicate our increased concern about climate change and to raise environmental consciousness in order to help improve quality of life in our planet.

We are a member of the Union of Greek Shipowners and have donated substantial sums to support the Greek National Healthcare System. We have also contributed to the improvement of the accommodation facilities of Papanicolaou General Hospital in Thessaloniki.

For many years we have been contributing to “The Good Samaritan”, a day Care Centre for special-needs children. We are also proud supporters of many other foundations, mostly dedicated to children (Kivotos Tou Kosmou, Child Trauma Treatment Association, Model Nurseries), throughout the years. We also frequently offer internships to university students, as well as organising or participating in conferences/seminars aimed at informing young people about the benefits of a career in shipping.

Finally, we contribute annually an amount to The Overseas Workers Welfare Administration, an initiative of the Philippine Government dedicated to support the children of the seafarers.

In 2020, we took immediate action in response to the COVID-19 crisis in order to protect our seafarers' physical health and mental health. Robust protocols were introduced to perform crew changes and allow on-board visitors during port stays. We established on-demand virtual medical consultations for our crew and increased the availability of telephone and internet systems to keep our crew well looked after and connected with home during this difficult time.

We are a proud signatory of the Neptune Declaration, along with 850 other shipping companies and organisations. This initiative, outlines the main actions that need to be taken to resolve the crew change crisis and focuses on recognising seafarers as key workers by all governments worldwide.



Governance

Alassia has strong governance structures in place.

Our overarching ethos at Alassia NewShips Management is to value and treat all, from partners to colleagues, equally without prejudice or narrow mindedness. We are open-minded and act with respect and fairness as a team where everyone is important and necessary.

This ethos extends to all operations, including hiring potential candidates. We only consider professional qualities and knowledge, and have never rejected or overlooked potential employees or business partners on the basis of their nationality, sexual orientation or beliefs. We employ a diverse workforce with high values and morals, who care about their colleagues, their company, and the environment.

Our business ethos as a company is also portrayed in our policies, which are well known and observed diligently by all our employees, both onshore and onboard ships. In these policies

we state Alassia's ethical rules, beliefs and standards which all employees must follow.

In addition, we rigorously implement all anti-bribery and anti-corruption regulations. Offers, gifts or bribes – in any form – are strongly prohibited in all company's operations. Every supplier with whom we do business is informed of our anti-bribery practices via the "ProcureShip" platform.

We are always keen to adopt and apply new procedures that will increase fairness, create a better workplace and will give more incentives and opportunities to our staff.

To ensure accountability, and that these values and policies are carried through in practice, executive and senior management remuneration is contingent on several KPIs which are related to ESG factors.

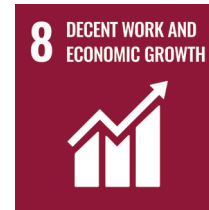
Industry Participation & Accreditations



UN Sustainable Development Goals (SDGs)



We give great significance to the training and education of our on-board and on-shore employees. In this context, we have created a modern training program for our seafarers in safety-related items.



We provide stable employment and health insurance to over 400 seafarers and on-shore employees.



We Cultivate innovation by operating one of the most modern fleets. We invest in new technologies, energy efficiency devices and performance monitoring systems.



We contribute to climate action by investing in SO_x and NO_x abatement technologies. Also, with our periodic fleet upgrade and renewal program, we reduce the carbon footprint of our vessels.



We have invested in water ballast management systems and carried out an extensive water analysis campaign to assess the quality of EGCS washwater discharges at sea.



We are affiliated with HELMPA and CYMEPA, the voluntary association of Greek & Cypriot seafarers and ship owners to safeguard the seas from ship-generated pollution.

Disclaimer

In this report, the Company may make forward-looking statements or provide forward-looking information. All statements other than statements of historical facts should be considered forward-looking statements. Although such statements reflect the Company's current expectations, these statements are not guarantees of future performance, but involve risks, uncertainties, and assumptions which are difficult to predict.

This report is informed by metrics defined by the Sustainability Accounting Standards Board's (SASB) MARINE TRANSPORTATION: Sustainability Accounting Standard Sustainable Industry Classification System® (SICS®) TR-MT Prepared by the Sustainability Accounting Standards Board (October 2018), as well as taking into account relevant disclosure metrics set out by "Reporting for Signatories, United Nations: Principles for Responsible Investing (PRI) 2020." Supplementary disclosure metrics designed by Infrastructure Technical International Ltd (ITI).

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All information is assumed to be correct at time of publication. Some metrics have been calculated through engineering calculations. ITI Network accepts no responsibility for the truthfulness, or validity of the reported metrics.

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Appendix I (SASB Sustainability Disclosure Topics)

Greenhouse Gas Emissions

Marine transportation companies generate emissions mainly from the combustion of diesel in ship engines. The industry's reliance on heavy fuel oil ("bunker fuel") is of material concern due to rising fuel costs and intensifying greenhouse gas (GHG) regulations. The industry is among the most fuel efficient of the major transportation modes in terms of fuel use per ton shipped. However, due to the size of the industry, its contribution to the global GHG inventory is still significant. Recent environmental regulations are driving the adoption of more fuel-efficient engines and the use of cleaner-burning fuels. Fuel constitutes a major expense for industry players, providing a further incentive for investing in upgrades or retrofits to boost fuel efficiency.

Air Quality

Air pollutants such as sulfur oxides (SOx), nitrogen oxides (NOx), and particulate matter (PM10) are significant environmental externalities from the use of fuel by marine shipping companies. These pollutants tend to have localized environmental and health impacts and are especially a concern at port cities. Air pollution regulations are driving the adoption of more fuel-efficient engines and the use of cleaner-burning fuels as companies seek to reduce exposure to fines and environmental remediation costs. A further incentive for fuel efficiency is that fuel constitutes a major expense for industry players, so capital expenditures to upgrade vessels may be offset over the long term from fuel costs savings.

Ecological Impacts

The operations and waste disposal practices of marine transportation companies can create substantial environmental externalities, such as water pollution and damage to marine life. Seagoing vessels routinely discharge ballast water, bilge water, and untreated sewage. Compliance with international regulations intended to manage the ecological impacts of operation can require significant capital expenditures to upgrade or install waste management systems. Illegal dumping of bilge water and other unregulated discharges can lead to hefty fines, negatively affecting a company's risk profile. Operating in areas of protected conservation status, such as Emission Control Areas (ECAs) and Particularly Sensitive Sea Areas (PSSAs), can increase the risk of ecological impact as well as the risk of violating environmental regulations.

Employee Health & Safety

Marine transportation workers face dangers such as hazardous weather and exposure to large machinery and heavy cargo. The greatest health and safety risks stem from loading and unloading cargo at ports. Ships must be loaded and unloaded quickly and on schedule, increasing injury risk, fatigue, and stress. The health and well-being of workers in the industry is also inextricably linked to the safety performance of the company, as a healthy crew is necessary for safe voyages. Companies with inadequate safety management systems that fail to ensure the health and safety of workers may face higher turnover and higher worker-related expenses, including medical expenses such as insurance premiums and worker payouts.

Business Ethics

Facilitation payments at ports are considered standard business practice in some countries to obtain permits, cargo clearance, and port berths. However, anti-bribery laws place pressure on marine transportation companies to alter this practice. Enforcement of these laws could lead to significant one-time costs, higher ongoing compliance costs, or affect a company's social license to operate, affecting its cost of capital. Companies are under increasing pressure to ensure that their governance structures and practices can address corruption and participation—whether willful or unintentional—in illegal or unethical payments or exertion of unfair influence. Operating in corruption-prone countries can exacerbate these risks.

Accident & Safety Management

Accidents or leaks involving large vessels can have significant costs to life, property, and the environment. Negative media attention and massive cleanup costs can severely damage a company's finances. In order to reduce the risk of accidents, companies put extensive safety measures into place, such as employee training programs, periodic dry-docking maintenance periods, and annual class-renewal surveys conducted by classification societies. The reliance of the global marketplace on the shipping industry means that voyages need to be made within precise timeframes, providing further incentive for preventing accidents.

Source: SASB - Marine Transportation Sustainability Accounting Standard, version 2018-10.

Appendix II (Alassia Policies Summary)

1) Code of Ethics and Code of Conduct

The Codes are based on the Company's beliefs and values establishing its commitment to honesty, integrity, professionalism and impartiality. The aim of the Codes is to ensure that we are all united by strong and clear values and the highest standards of behaviour. The Company does not tolerate the engagement in, or concealment of, any humiliating/intimidating or other behaviour which may be interpreted as harassment, abuse/bullying, racism or discrimination.

2) Safety Policy

The Company is committed to provide safe practices in ship operation and a safe working environment for ensuring prevention of human injury or loss of life, welfare of employees and avoidance of any adverse impact on property and its goal is to achieve ZERO accidents through continuous improvement. Safety management objectives also include assessing all identified risks to its ships, personnel and the environment and establishing appropriate safeguards; and continuously improving safety management skills of personnel ashore and aboard.

3) Quality Policy

The Company is committed to provide quality services which consistently and continuously meet the requirements of its customers. By adopting a proactive approach concerning the needs of our clients and by being responsive to their requests, suggestions or complaints, we are always trying to improve the value of our services. The criteria for the quality of our services are established by monitoring, measuring and analysing our objectives and targets, by reviewing our objectives and targets for continual suitability, and by verifying that those processes are effectively implemented.

4) Environmental Policy

The Company is committed to improve environmental performance in all areas of vessels' operation. We are committed to reducing waste oil or other pollutant production, controlling emissions and wastes to below harmful levels, eliminating spills and environmental incidents, and identifying and mitigating key environmental risks from all unplanned waste oil stream releases. Our long-term goals are to achieve ZERO incidents and ZERO spills at sea through continuous improvement. In order to achieve these goals, we review and assess each of the areas of our operations, measure progress and compliance with this policy, evaluate practices from industry leaders in order to continually revise and improve our environmental management system, and provide adequate funds and human resources in order to effectively maintain and repair the systems, equipment and components in the machinery spaces.

5) Health and Hygiene Policy

The Company is committed to always ensure that all employees execute their work under healthy and hygienic conditions and its goal is to achieve the highest standards of health and personal hygiene through continuous improvement.

6) Energy Efficiency Management Policy

The Company is committed to always promote energy efficiency awareness through training to the shore and sea-going personnel and implement energy related Campaigns and other personnel incentive/motivating programs, aiming to a continual energy efficiency improved performance. This is achieved through well-planned and properly managed ship operations and at the same time it needs the personal commitment of everyone involved in the above tasks. In order to achieve these goals, we maintain a set of time-specific targets, which relate to a combination of design optimization, in-service performance monitoring and best-practice operational management processes, and we monitor and comply with all applicable legal requirements related to ship energy efficiency management.

7) Drug & Alcohol Policy

The Company has banned all alcoholic beverages from the managed vessels (ZERO alcohol policy). Also, any form of drug is prohibited except of prescribed drugs, as well as the misuse of legitimate drugs. The policy states that no seafarer, whatever rank, will navigate the vessel or will operate its equipment while impaired by drugs or alcohol or where there is any risk of such impairment.

8) Cyber Security Policy

The Company is committed to monitor and increase employees' awareness, to verify their familiarization with potential threats, focus on security training and train employees on strategies necessary to prevent or respond to threats. To support this Policy, the procedures in place, include incident handling, information backup, system access, antivirus controls, passwords, and encryption.

9) Social Media Policy

This policy aims at assisting our seafarers in making responsible decisions about the way they use the social media. It prohibits postings that might have discriminatory remarks, harassment and threats of violence. It also gives guidelines for a more prudent use of the internet and their postings.

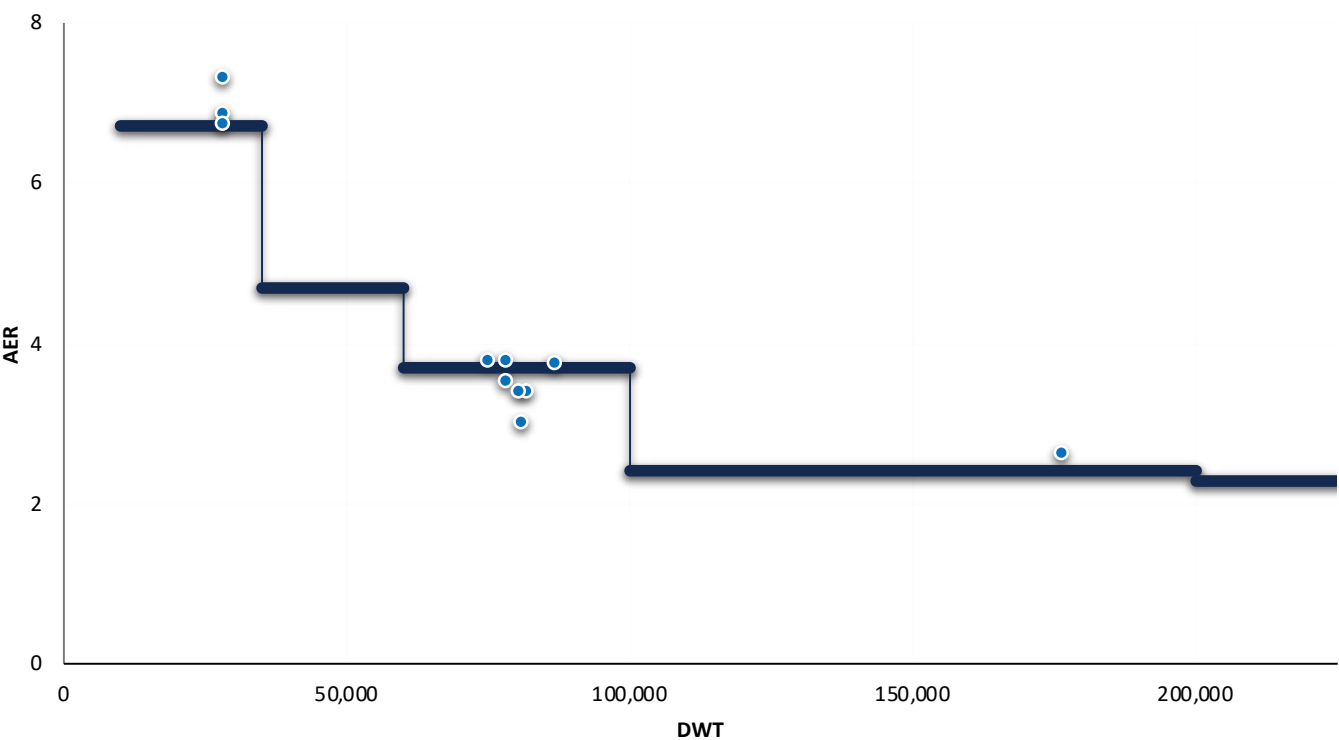
10) Anti-bribery Policy

Our company follows strict rules on anti-bribery, money laundering and corruption. Any kind of offer, gift or bribe in any form direct or indirect, including kickbacks, is strongly prohibited in all company's operations. Furthermore, the company prohibits the use of other routes or channels for provision of improper benefits to, or receipt of improper benefits from agents, contractors, suppliers or employees of any such party or government officials. Procurements are conducted in a fair and transparent way. Also, every supplier with whom we do business, is informed of our anti-bribery practices via the Procureship platform.

11) Data Protection Policy

All information regarding the Company's operations is treated as business confidential to the extent permitted by law and to the extent that such information does not conflict with the Company's policies for safety and environmental excellence. In addition, we only collect the personal information that is provided voluntarily and we recognize and respect the privacy of our applicants, current employees and former employees. We are dedicated to protecting the confidentiality and privacy of information entrusted to us and comply with personal data privacy legislation by informing our shore employees and seafarers, candidates and third parties what information we may collect, and how we collect, store, use, share and protect such information, and informing all such interested parties about their rights over their personal data.

Appendix III (AER Benchmarking)



As is evident from the above chart, the majority of our vessels are below the Poseidon Principles' AER benchmark. The main exceptions are our handysize vessels, which as part of our periodic renewal program have all been sold during 2021.

For all our vessels, in cooperation with external technical consultants and class LR, we have calculated the EEXI and the necessary power reduction to comply with Phase II and Phase III requirements. In addition, we have already installed an Engine Power Limitation (EPL) on board our capesize ship, in order to improve her environmental rating.

Assessing Climate Alignment

For the purposes of the Poseidon Principles, climate alignment is defined as the degree to which a vessel, product, or portfolio's carbon intensity is in line with a decarbonization trajectory that meets the IMO ambition of reducing total annual GHG emissions by at least 50% by 2050 based on 2008 levels

A decarbonization trajectory is a representation of how many grams of CO₂ a single ship can emit to move one tonne of goods one nautical mile (gCO₂/tnm) over a time horizon. The decarbonization trajectories rely on two assumptions:

- Projection of transport demand for different shipping sectors out to 2050, including those available in the Third IMO GHG Study.
- The total CO₂ shipping emissions permitted to be in-line with the IMO's 2050 target.

While these trajectories will be drawn and updated with the latest available research and will be aligned to or equal to the IMO's projections, there are uncertainties within them because of the two assumptions above.

To assess climate alignment of a single vessel, the vessel's annual carbon intensity is compared with the decarbonization trajectory for it respective ship type and size class. To assess climate alignment at the product and portfolio level, the vessel carbon intensities in each product and the portfolio are aggregated.

Source: Poseidon Principles - Assessment of Climate Alignment