



Environmental Social Governance

Disclosure 2022
Reporting Year 2021



Our Story

Our predecessor Alassia Steamship Company Ltd. was established in London in 1965. Respecting our long history in the industry and with the aspiration to maintain a good reputation for our company in the future, we maintain our fleet to a high standard, and manage it in a risk averse manner. Throughout the years we preserved and continuously build long and strong relationships with top class, highly respected, counterparties.

Our mission is to combine experience with innovation in creating long term relationships with corporate partners and with motivated, professional and well-trained seafarers and shore personnel, while proactively promoting safety at sea, protection of human life and of the environment.

Our vision is to be one of the leading companies of choice for global sea transportation.

In order to deliver our mission, we endeavour to utilise new technologies that are consistent with our strategic goals of achieving efficiency through detailed management. Our strategy involves a 24/7 comprehensive management system of the operation and technical departments of the company, while our crew management concentrates in assembling a pool of loyal seafarers who are trained over and above the STWC requirements.

All our actions are subject to constant and prudent financial monitoring and reporting while we focus on safe trading through our conservative commercial management.

In addition, we are committed and focused on our ESG performance whose continuous improvement is a priority for us.



About Us

We are pleased to disclose that our strategy is producing very positive results. In 2021, our EEOI improved across our fleet by an average of 7.7% as compared to 2020 data, with a fleet average EEOI of 7.4. Our performance across other key environmental indicators was also positive in 2021, with zero bunkering spills or discharge of sludges at sea, zero air pollution violations, and an 8.4% reduction in the quantity of chemicals used. Additionally, we are also increasingly engaging with our suppliers to ensure

consistency with our own high environmental standards. As a result, we achieved a 6 percentage-point increase in the number of our suppliers that are ISO 14001 certified.

Alassia NewShips Management also maintain our own ISO 14001 (Environmental Management), ISO 50001 (Energy Management), ISO 9001 (Quality Management) and ISO 45001 (Health and Safety) certifications.



394
Shipboard
Employees
[TR-MT-000.A]



1,072,102
Deadweight
Tonnage
[TR-MT-000.D]



684,757
Nautical Miles
Travelled
[TR-MT-000.B]



14
Vessels
in Fleet
[TR-MT-000.E]



4245
Operating
Days
[TR-MT-000.C]



251
Vessel
Port Calls
[TR-MT-000.F]



2
Shoreside
Locations



9.3
Average
Age of Fleet



+7.7%
Fleet
EEOI

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

Accounting Metric	Unit of Measure	SASB Code	2021	2020
Greenhouse Gas Emissions				
Gross global Scope 1 emissions	Metric tons (t) CO ₂ -e	TR-MT-110a.1	206,456	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	2,733,205 100 0	2,436,636 100 0
Average Energy Efficiency Design Index (EEDI) for new ships and EEXI	Grams of CO ₂ per ton-nautical mile	TR-MT-110a.4	3.385 4.320	3.385 4.450
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	n/a 212 n/a	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	339.0	281.5
Percentage of fleet implementing ballast water exchange / treatment	Percentage (%)	TR-MT-160a.2	5.0 / 95.0	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	0 / 0
Percentage of fleet using Exhaust Gas Cleaning Systems / Low-Sulphur Fuel Oil	Percentage (%)	Additional disclosure	28.6 / 71.4	36 / 64
Employee Health & Safety				
Loss time incident rate (LTIR) for injuries (LTIF) / sickness (LTSF)	Rate	TR-MT-320a.1	1.57 / 2.14	0.59 / 2.30
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	0
Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	USD (\$)	TR-MT-510a.2	0	0
Accident & Safety Management				
Number of marine casualties Percentage classified as very serious	Number Percentage (%)	TR-MT-540a.1	0 0	0 0
Number of conditions of class / Recommendations	Number	TR-MT-540a.2	0	2
Number of port state control deficiencies / detentions	Number	TR-MT-540a.3	16 / 0	15 / 0
Governance				
Board Makeup (M / F)	Percentage (%)	Additional disclosure	100 / 0	100 / 0
Senior Management Makeup (M / F)	Percentage (%)	Additional disclosure	70 / 30	78 / 22
Seafarer Retention Rate	Percentage (%)	Additional disclosure	100	100



Environmental

For over 50 years, Alassia has been driving innovation in the maritime industry. Now, more than ever, we must persevere to address the environmental challenges in front of us.

In August 2021, the UN Intergovernmental Panel on Climate Change (UNIPCC) published its 6th Assessment Report¹ describing the current state of the climate, how it is changing, the role of human influence, and possible climate futures. This has provided a serious catalyst for national, and international, governing bodies and industry peers alike. Transparency is agreed to be an integral facilitator of progress on this front, which is why the EU published a proposal for the Corporate Sustainability Reporting Directive this year, demanding greater disclosure of Environmental, Social and Governance performance. By continuing our history of innovation and working with our peers, we hope to build on this momentum to the benefit of our planet.

Our plan to act as responsible stewards of the environment is characterised by two means.

The first is through investments and trials of new machinery and technologies. In 2020, we retrofitted four of our largest vessels with scrubbers to reduce the emitting of harmful greenhouse gases. Furthermore, in 2022, we are looking to test biofuels on some of our vessels, which will provide us and the industry with learnings on how these fuels may be better integrated over time. More retrofits of energy saving devices are also scheduled for 2022, including mewis ducts, rudder surf bulbs and propeller boss cap fins. Those vessels undergoing a dry dock will also receive full hull blasting and application of new anti-friction paints.

The second is via our long-standing Ship Energy Efficiency Managements Plans (SEEMP). This applies to all vessels in our fleet, providing information on best practices regarding energy management under various operational modes of the vessel. These plans are reviewed at least annually, with various alternative platforms having been tested in 2021. These SEEMPs are also subject of discussion at annual Management and Environmental Review Committee Meetings (MRM), where the need for further changes and improvements is assessed.

As noted, we acknowledge the need for our industry to act in unison when tackling environmental challenges. Progression toward a climate-neutral industry will rely significantly on the ability of all the different entities in the maritime transportation industry to collaborate on matters ranging from fuel adoption, to target setting, to port infrastructure development. That is why we engage with numerous peers, industry bodies and initiatives to accelerate progression in this regard.

This ambition is reflected in our decision to commit large portions of our fleet on long-term charters with major charterers that share our values concerning the reduction of emissions. We are currently running several trials of various route optimisation and data gathering software with our charterers, as well as engaging in in-person discussions regarding retrofits, anti-friction paints and long-term solutions such as wind assisted propulsion and carbon capture. We are also working with classification societies, shipyards and engine manufacturers in the development of ammonia and methanol technologies to advance the possibility and understanding of the future viability of these options in our industry.

We are also a member of both the Hellenic Marine Environment Protection Association (HELMEPA) and Cyprus Marine Environment Protection Association (CYMEPA) organisations. We work actively within these organisations to help safeguard the seas from ship-generation pollution.

Beyond 2022 we will look to continue working with various external consultants, financiers, charterers, shipyards and other key stakeholders on the adoption of a range of potential solutions to accelerate decarbonisation in the industry. For example, we are testing together with our charterers, a number of advanced weather routing and route optimization software (eg Zero North), in order for our vessels to operate more efficiently to reduce CO₂ emissions, supporting the industry's drive towards more sustainable development. We also trialling the installation of various data gathering software programmes (eg Metis, Synthetica) in order to better monitor the performance of critical equipment on board our ships.

Realizing the that a major factor in the performance of a vessel and therefore on her CO₂ emissions is the cleanliness condition of her hull, another action we have taken during this year has been the use of robotic underwater services in one of our vessels. A complete inspection was made and the hull was cleaned without operational impact by a cleaning robot that can clean 90% of the hull of a vessel using high pressure waterjets and can navigate in zero visibility and can adapt cleaning pressure to the type of fouling, minimizing fouling damage.

¹ <https://www.ipcc.ch/assessment-report/ar6/>



Social

Prioritising people is central to our ambition to operate in a sustainable way, bringing benefit to our employees and the communities we touch.

Alassia NewShips Management acknowledges people are central to our success. We owe it to our employees and seafarers to provide an environment for them to work in which not only keeps them safe but also promotes their wellbeing. To do this, we aim to eliminate fatalities and serious incidents within our operations.

We believe that ensuring our employees are provided with the tools, mechanisms, and training to undertake their roles in a safe and responsible way is paramount in creating an optimal work environment. That is why we invest heavily in training programmes that go beyond the International Convention on Standards of Training Certification and Watchkeeping for Seafarers (STCW). All our seafarers are certified to STCW and receive additional training tailored to their roles, covering areas from risk assessment and management skills to wellbeing and personal administration. We provide this training in partnership with external consultants, like Alpha Marine.

In 2021, we achieved an LTIR of 1.57, thus hitting our target of maintaining an LTIR less than 2. In 2022, we will again be targeting an LTIR of less than 2 for crew. Regarding our shoreside staff in 2021, an LTIR of zero was achieved, a record we aim to maintain in 2022.

In addition to recording incidents that have occurred, we also work to identify and analyse near misses. The analysis of both incidents and near misses provides us with a wealth of information that proves invaluable in the development of strengthened health and safety procedures and trainings. To build on this, we are campaigning for a “no blame” culture and are looking to establish awards for the reporting of such near miss-incidents to promote the identification of potential hazards.

Wellbeing and mental health is a key area of focus for Alassia. We have invested significantly in making our vessels places that staff can enjoy, with great attention paid to gyms and quality of accommodation facilities. These have been rated as above-average by the relevant class societies. Additionally, by holding an array of seminars, competitions, and teambuilding activities, we hope to foster an open and supportive network.

Furthermore, Alassia has also commenced a collaboration with Tritan. Tritan is the industry's top provider of Health and Safety software and services. These services are available to our

seafarers on a continuous basis. Through its Medical Services Team, which is available 24/7 and can be contacted for any medical queries/guidance or emergencies, our seafarers can feel the security of being properly looked after in regards to any health issues they may face when at sea.

On top of that, they provide professional and confidential mental support services that can help solve a wide range of problems and challenges in the lives of the seafarers, in a wide array of global languages to help manage all of life's complexities.

Beyond the boundaries of our direct operations, we take pride in taking an active role as a corporate citizen via a number of programmes and initiatives.

The Good Samaritan continues to be an organisation to which we are proud to contribute. *The Good Samaritan* is an organisation established that supports special-needs children and their families. Other foundations which we continue to support include the *Child Trauma Treatment Association*, *Model Nurseries*, *The Christodoulou Foundation* and, *The Overseas Workers Welfare Administration (OWWA)*. OWWA is an initiative of the Philippine Government dedicated to support the children of seafarers.

Alassia NewShips Management also actively engage in initiatives with our peers in the maritime industry. Alongside over 850 of our peers, we are signatories of the Neptune Declaration. This initiative outlines the main actions that need to be undertaken to resolve the crew change crisis, and focuses on recognising seafarers as key workers by all governments worldwide. We will continue to work with our peers to pressure more countries to classify seafarers as key workers and reduce the number of stranded crew members.

Finally, Alassia shows continuous interest in sponsoring young athletes who do not receive sufficient state funding, in order to support their athletic performance but also to promote a disciplined and healthy role model for young people in Greece, Cyprus and around the world. We believe that by supporting young athletes, like Pavlos Kontides and Emmanuel Karalis, who dedicate their life in a sport, their international accomplishments can only help and encourage people to concentrate on noble causes and sets a positive example for all.



Governance

Our governance practises are based on our values of honesty, integrity, professionalism, and impartiality. We aim to ensure that we are all united by strong values and the highest standards of behaviour.

As a company, we endeavour to act with respect and fairness towards all our employees and partners. We also expect our employees to echo these values in their own work. Expectations of employees are described in our company policies, in which all employees are trained, including both those onshore and onboard ships. This helps to ensure everybody acting under the Alassia NewShips Management name, do so in keeping with our set of shared values.

Impartiality in our hiring and promotion processes are of paramount importance to make sure we procure, retain, and develop the best talent in the industry. Our processes are designed to guarantee that only professional qualities and competency are considered, so that nobody is discriminated against based on their nationality, sexual orientation, or beliefs.

In addition to our Code of Ethics and Code of Conduct, we have established distinct, advanced, policies relating to safety, Quality, Environmental, Health and Hygiene, Drug and Alcohol, Cyber Security, Social Media, Data Protection and Anti-bribery and Corruption. Regular training on these policies and procedures helps us to maintain compliance with both regulatory and market expectations.

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.

Regarding remuneration, we consider a range of ESG-related KPIs. This applies specifically to the remuneration for Senior Management and Executives, promoting accountability, thus helping to uphold Alassia NewShips Management's values.

As previously mentioned in other sections of this report, we are eager to work with our peers and all stakeholders to improve our operational activities. Should any individual or organisation have suggestions as to the improvement of our governance practises, we always welcome the opportunity to improve.

Industry Participation & Accreditations





Task Force on Climate-Related Financial Disclosures

Below, we will summarise our evolving approach to Environmental, Social and Governance issues, sustainability and, the identification and mitigation of climate risks.

Alassia NewShips Management has a commitment to stakeholders to be a responsible operator in the shipping industry. As a result, we have chosen to bolster our interaction by integrating elements of the Taskforce for Climate-related Financial Disclosure into our strategy and reporting.

TCFD was established in 2015 by the Financial Stability Board (FSB) to increase the ease and relevance of climate-related reporting to promote more informed investment, value alignment across, and ultimately assist companies in better managing climate risks.

The taskforce centres on four pillars which have been deemed to be relevant across all industries and geographies: Governance, Strategy, Risk Management and, Metrics and Targets.

Alassia NewShips Management operates solely in the maritime transportation of dry bulk cargoes. The Company has a long tradition of operating in the industry: roots go back to the establishment of Alassia Steamship Company Ltd. in 1965.

The company is considered to be a top-quality, risk adverse operator who maintains vessels to all regulatory and class requirements and well beyond.

Further to this, the company has voluntarily adopted four ISO standards: ISO 14001 and ISO 50001 for Environmental and Energy Management, ISO 9001 for Quality Management and ISO 45001 for Health and Safety, receiving full accreditation from Lloyd's Register.

This initial report serves as an entry point on what we believe will

be an ever developed and refined pathway to greater efficiency, business resilience and sustainably.

Governance Structure

The Alassia NewShips Management Board has ultimate responsibility for the Company's environmental agenda, which includes climate change and climate-related risks.

The Board in collaboration with our shareholders is committed to ensuring that Alassia remains a well-regarded operator in the industry, focusing on the safe and timely fulfilment of contractual obligations by well-trained and resourced employees. This ethos to continually better our reputation to investors, business partners and other stakeholders, has contributed to Alassia's current standing.

The Board gathers information, including relevant upcoming regulations, trends, and opportunities, from senior management, external advisors, and industry peers.

The Board is also engaged with senior management in crisis management and training, incident response and mitigation.

Environmental Performance Indicators (EPIs) are used to assess adherence to strategy and are reviewed annually at a Management Meeting. The company intends to increase the frequency of these reviews and continue to strengthen the ways in which we assess climate related risks and opportunities. Any identified development areas will be incorporated into our already robust governance structure and applicable channels.

Task Force on Climate-Related Financial Disclosures

Climate Risk Management

Shipping is an inherently risk-heightened industry. Successful companies are therefore attuned to constant risk minimisation.

Climate risks are material to the business, and the industry is already feeling the material effect of changing weather patterns, and the increasing frequency and severity of weather events.

The responsibility for the identification, assessment, and management of climate risks is held by the Board, informed by Senior Management and external consultants. This risk oversight function is not limited to climate risks, instead ESG and climate risks are integrated into well developed and robust risk management procedures.

We have established processes to systematically identify and inform Alassia employees of any climate or operational risks as they occur, managed by our well developed and rehearsed mitigation strategies.

With regards to near-term and acute current climate risks, in all commercial agreements we include exclusions clauses to protect our assets from entering areas of known variable or severe weather when applicable.

Regarding unforeseen issues, third-party weather mapping specialists are used to inform the most accurate picture of climate risks. Our management systems revolve around assessing these risks, executing diversions if deemed necessarily.

For longer-term climate risks, we are currently in the process of identifying and articulating what these may be, and how best to develop robust contingency plans to mitigate them. This includes scenario planning sessions that are intended to better prepare the company for possible future business interruptions or asset-level events.

Primary Risks: Policy and Legal & Market

Increased and variable implementation of regulations around the world in response to environmental issues presents a key risk to the company. Indirect regulations may also affect the company through our relationship with financiers, charterers and other business partners via their own exposure to regulations.

Market expectations may be a greater influence than hard regulations and, therefore, must be considered and monitored as stringently.

Alassia NewShips Management trades worldwide, therefore our business as normal operations are dictated by the continued ability to access worldwide markets, and adherence to all relevant national and international regulations and market expectations.

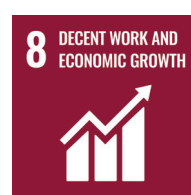
Variable policy and business partner expectations are risks that the company has been exposed to over our lifetime. We have deep experience in managing these risks and, as such, are confident that we will continue to be abreast of all developments in good time to make changes if necessary.

The company engages with specialist external consultants who provide updates on regulatory changes. We continue to discuss expectations with various market participants to inform our strategy and are actively engaging by committing capital to facilitate the increased expectation of environmental data capture. This engagement will assist our resilience in the face of uncertainty or potential regulatory divergence between nations, as well as responding to the market's increased requirement for standardised and demonstrable environmental governance.

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.

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.

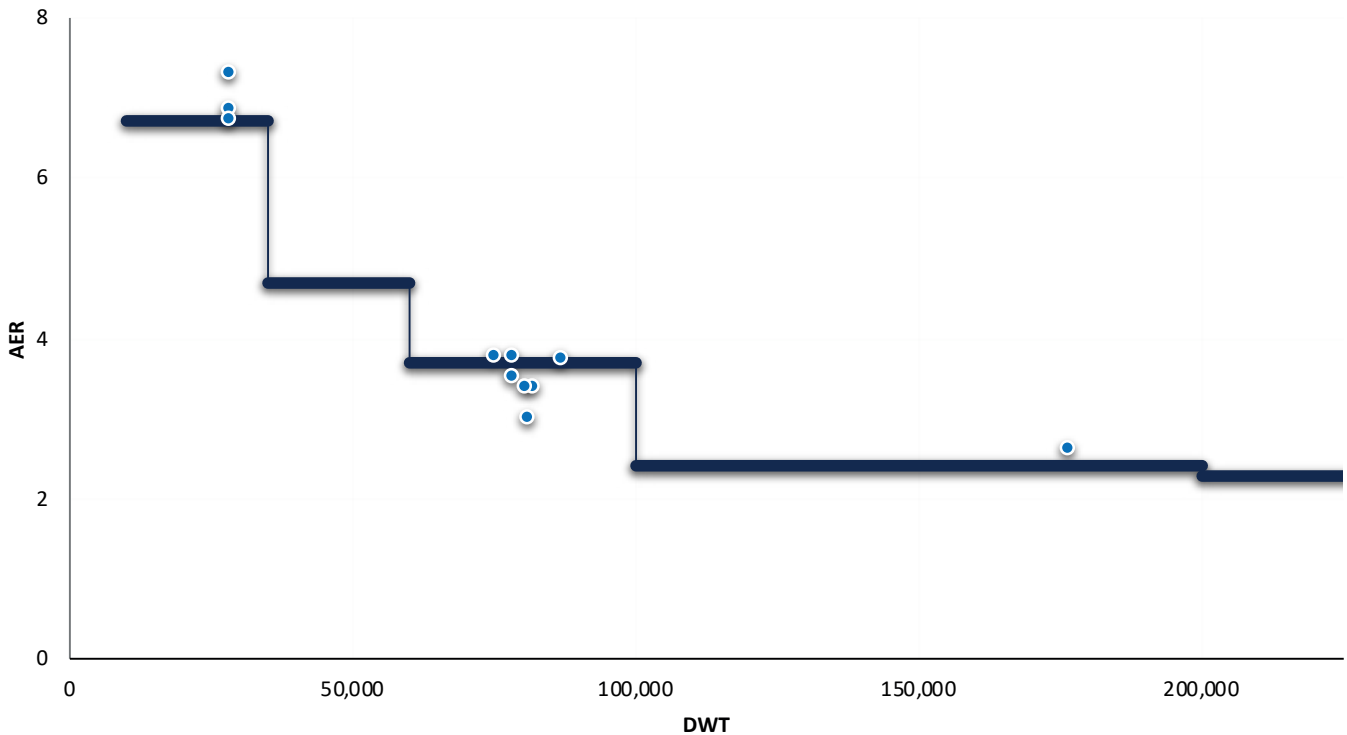
10) Anti-bribery Policy

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 – 2020 Data)



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

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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