

ESG REPORT

2022



ENESSEL S.A.



ENES S.A.

ESG REPORT
2022

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OWNERS' MESSAGE

Dear Valued Stakeholders,

It is our pleasure to present ENESEL S.A.'s ESG report for the year 2022, outlining our progress and ongoing efforts to create long-term value for our stakeholders through responsible growth and authentic advancement. At ENESEL S.A., we cherish our legacy and our purpose, and we remain committed to integrating sustainability into every aspect of our business and enhancing our environmental, social and governance (ESG) goals as a key part of our growing midstream portfolio. For us, sustainability is a strategic imperative that drives our success as a company.

Throughout our strategic repositioning, we remained focused on progressing our ESG goals. In 2022, our absolute greenhouse gas (GHG) emissions and emissions intensity rate increased due to the acquisition of one more tanker ship, which expanded the size of our fleet, while it was also the first post-coronavirus year that our offices operated in full capacity. Despite these increases, we remain resolute in our efforts to reduce our GHG emissions intensity rate as we responsibly grow our business.

As a family-owned company, our ESG strategy is not only an inspirational vision driven by our passion, purpose and values: it is a vital investment for the future that generates sustainable value for our stakeholders.

In 2022, ENESEL S.A. achieved for one more year CarbonNeutral® company certification in accordance with the Greenhouse Gas Protocol Standard, the

GRI Energy Standard and ISO 14064-1. We were also honored with a Silver Award from the Greek Institute of Corporate Responsibility for our company's commitment to responsible business management after its voluntary participation in the Corporate Responsibility Index (CRI). We are determined to continue this unwavering and uncompromising approach to Corporate Social Responsibility as a central facet of the Group's identity and future activities.

Our company continued to demonstrate a robust commitment to social responsibility through a comprehensive and impactful contribution strategy. Focused on addressing pressing global challenges and supporting communities in need, our social initiatives were designed to make a meaningful and lasting difference. In Greece, our engagement with SYN-ENOSIS underscored our commitment to community solidarity. The recent Greek wildfires were a particular focus, and our financial contribution played a crucial role in aiding recovery efforts. Additionally, we supported ALMA ZOIS during the Hellenic 'Race for the Cure,' contributing to the fight against breast cancer and promoting health and wellness within our communities.

Internationally, through the Lemos family, we are proud to be the principal funders of Common Seas, a social enterprise committed to reducing plastic production and preventing pollution in rivers and seas. In 2022, it was decided to renew and extend the funding necessary to enable them to continue their critical work. In addition, further contributions were made to support City Harvest in the UK, an emergency response charity delivering free surplus provisions to those facing

food poverty, and through the Lemos family a significant long term funding commitment has been made to West London Zone, a charity located close to our offices in London and who help at risk children receive the education, learn the skills and build the relationships that they need to grow socially, emotionally and academically.

As we continue to strive for best-in-class sustainability and transparency across our processes and value chain, we are also acutely aware that developments in our ESG credentials count for our customers. This is the beating heart of one of our fundamental values, sustainability. For climate action, in FY22 we continued to make progress towards absolute carbon emissions reductions and to ensure that our office operations remain powered by 100% renewable electricity.

We continued to raise the bar on gender equality in our workplace and nurture our most valuable asset, human capital. Throughout our value chain, people are instrumental in our business and ESG success. We remain deeply thankful to our 480 colleagues (onboard and ashore), the backbone of our creativity and innovation, and passionate champions of sustainability, who have ensured reliable service to our customers through every set of new challenges.

In steering this course, the UN Sustainable Development Goals (SDGs) are a compass that guides our action. This report also supports our implementation of the UNGC's Ten Principles in the areas of human rights, labor, the environment

and anti-corruption. Furthermore, strong sustainability governance is essential. By reinforcing business for good as a distinctive thrust of our ESG strategy, we are ensuring the integration of sustainable value in our financial decision-making, at the intersection of the economic, environmental and social dimensions of our business. Our focus on well-being for people and planet is providing strong competitive advantages in capturing growth opportunities.

We are confident that ENESEL S.A. will continue to make good progress on this front, and we would like to thank our people for the efforts they have made in 2022 – and continue making daily – to realize our ambitions while creating fair and sustainable value, for the benefit of current and future generations.

In outlining our vision at the end of FY22, we do not underestimate the unpredictable and transformational nature of the fast-moving shifts underway in our economic and operating environment, as well as the growing pattern of climate extremes, and their potential adverse impact. Our social contribution strategy for 2022 reflects our belief in the power of corporate responsibility to drive positive change. By aligning our efforts with global and local needs, we aim to create a lasting impact, contributing to a better and more sustainable future for all.

We look forward to sharing more about our ESG journey with you in 2023 and beyond.

Andonis and Filippos Lemos

MESSAGE FROM THE CEO

Dear stakeholders,

Globally, we saw the devastation of the war in Ukraine where the world came together to support those impacted. Nationally, the energy crisis and cost of living crisis have impacted everyone and further highlight the need to address the climate emergency to help mitigate these issues and the need to support the most vulnerable. We also saw the end of COVID-19 lockdown restrictions in early 2022 which meant the return to offices, and support of our employees to do so.

I am pleased to report that ENESEL S.A. has continued to make progress in managing environmental, social and governance factors (ESG) in 2022. This has been a critical factor in ensuring our continued success. As the regulatory environment continues to expand, we have seen numerous developments, including the inclusion of shipping in the EU Emissions Trading Systems (EU ETS). At ENESEL S.A., we support these developments as we see them as enablers for a more balanced sustainability landscape, which corresponds with our commitment to ensuring ESG risks and opportunities remain at the core of our business strategy.

We have maintained a strategic focus on digitization to ensure we have accessible ESG data. This investment allows us to extract relevant vessel performance data from our ERP platform and the other supporting technologies we have

implemented whenever we need it, enabling data-driven decision-making. This permits us to optimize our operations to increase fuel efficiency and reduce emissions. Moreover, it provides our Board of Directors (BoD) with the necessary information to discuss ESG topics at BoD meetings, ensuring that we stay on top of our performance.

Our investment in maintaining a modern, energy efficient fleet enables us to be ambitious in our emissions reduction targets. The strength of our young fleet, with an average age of 2.99 years at the end of 2022 and superior fuel economics, is one of the core environmental pillars of our sustainability strategy.

Our energy efficiency project has provided us with a solid basis for assessing our operations, with a particular focus on how to further optimize our fleet to meet our targets. To this end, our acquisitions strengthen our position, while also increasing the fuel efficiency of our fleet and reducing our emissions profile. As a result, we are making significant progress towards our emission reduction targets.

We will continue to assess our operations, new technologies and alternative fuels as well as investment strategies in light of the EU Taxonomy regulation and its

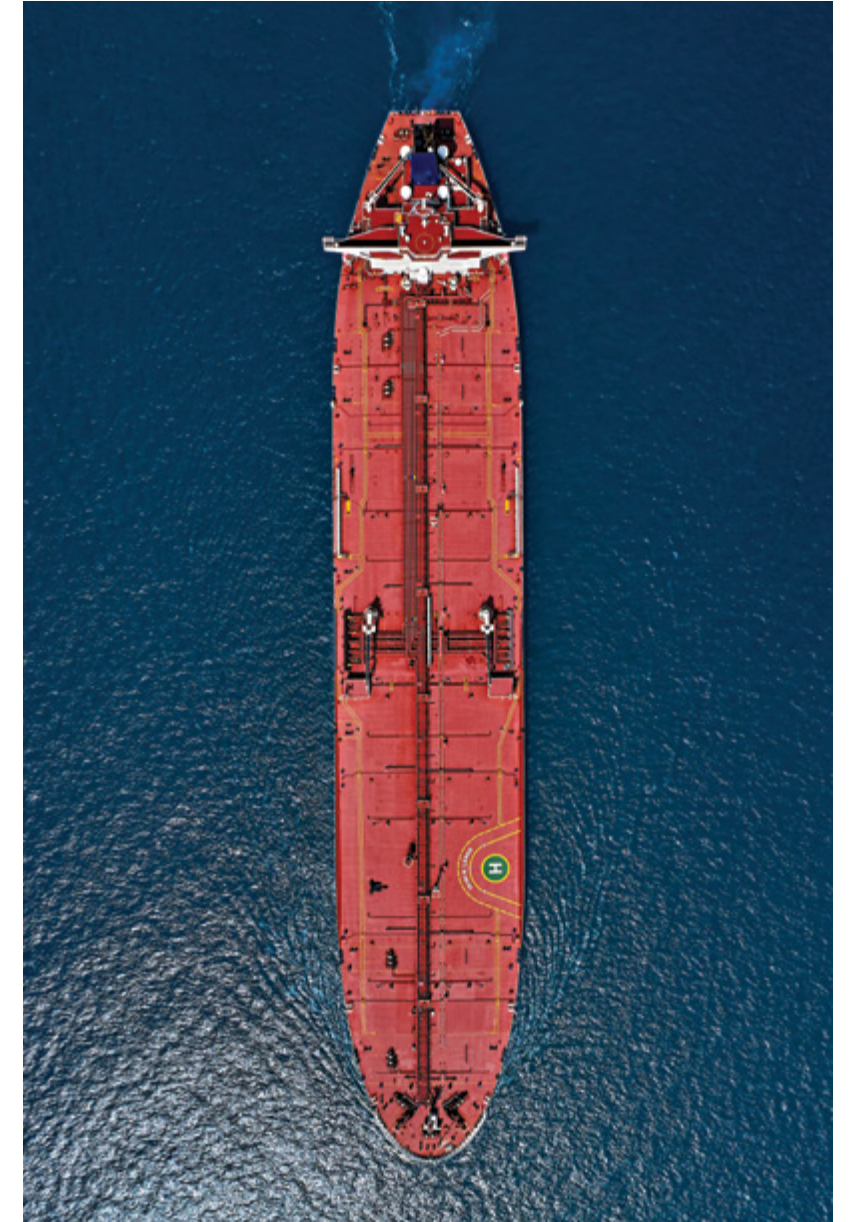
technical screening criteria to ensure that we stay an attractive business partner.

In addition to decarbonization, human rights as well as HSQE related matters remain high priorities within our organization and in collaboration with our business partners. We are committed to ensuring a safe and diverse place to work, where human rights are respected, and all workers have decent working conditions.

Our fourth comprehensive and stand-alone ESG report provides an opportunity to reflect on our ESG journey so far and demonstrate our progress. The disclosures in this report aim to provide our stakeholders with material ESG information.

We invite you to read our report and we welcome any comments or questions you may have on the information presented therein.

Sincerely,
Georgios Poularas
Chief Executive Officer
ENESEL S.A.





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ABOUT ENESEL S.A. AND ITS REPORTING PRACTICES

ABOUT ENESEL S.A. AND ITS REPORTING PRACTICES



ENESEL S.A. (hereinafter referred to as 'our Company,' 'we,' or 'our') is a ship-management company based in Athens, Greece, operating a diverse fleet of modern high specification tankers and is one of the five companies that comprise the ENESEL GROUP. Our Company owns 7 tankers with average age 2.69 years while all existing vessels are constructed to the highest international standards in first-class shipyards.

The entire fleet is chartered to high profile charterers and operators on both a voyage and time-charter basis. Other than ENESEL S.A., the ENESEL GROUP consists of six wholly owned companies: Enesel Dry S.A., Enesel Limited, N.S. Lemos & Co. Ltd., Enesel Pte. Ltd., Enesel ApS and Enesel Bulk Logistics DMCC. With a history spanning over 174 years, the Enesel Group boasts one of the longest continuous presences in the Shipping Industry.

Established in 1848 by the current owners, Andonis and Filippos Lemos' ancestors, the Group has navigated the seas, firmly establishing itself as a leader in the industry¹. Our Company, based in Athens, Greece, operates a diverse fleet of modern, high-specification tankers². We are privately owned by the Lemos Family and operate globally, primarily based on the managed fleet trade.

We provide a customised range of services that focus on managing vessels:

- technical management
- crew recruitment/training/development and retention
- new building consulting
- ticketing
- pre-purchase inspections & reporting
- procurement of spares, supplies, lubricants, paints
- legal services
- vessel commercial management (insurance & chartering)
- claims handling
- accounting, market research & analysis

The diversification may contribute to the overall success and sustainability of the company. More specifically, the choice of our company to have a diverse set of services can potentially assist in risk mitigation, revenue growth, customer retention, competitive advantage, adaptability, cross-selling opportunities, brand strength, as well as long-term sustainability.

Understanding that the shipping industry is facing increasing scrutiny and expectations related to sustainability and responsible business practices we understand that engaging with ESG ratings is a proactive way to address these concerns, enhance your company's reputation, and position it for long-term success in a changing business landscape. Towards this direction in

2022, we significantly increased its engagement with ESG (Environmental, Social, and Governance) standards and we identified gaps and opportunities for improvement. Compared to previous years, our assessments in these ratings have shown notable improvement. Some of the data in our reports has undergone third-party verification, as indicated in the GRI content index. The independent organization Messr DNV serves as the reviewer and verifier. ENESEL S.A.'s facility environmental data is managed through our Enterprise Reporting System (ERP) and other management tools, ensuring a globally consistent approach to measurement and monitoring.

Regarding our reporting practices, in accordance with GRI (Global Reporting Initiative) guidance on boundary setting, the data in this report encompasses all of our wholly and majority-owned operations worldwide, covering the operations and managed fleet for the year 2022. The reporting period aligns with the fiscal year 2022, spanning from January 1st, 2022, to December 31st, 2022, which corresponds to the timeframe used for the Company's financial reports.

Publication date: December 2023

Contact point for the report:

Management Team - Antonia E. Skaraki/CCO

antonia.skaraki@eneselsa.com

¹ For more information about Enesel Group history, you may visit: <http://eneselnet.com/our-history.html>

² For more information on the fleet size and characteristics, you may visit: <http://eneselnet.com/our-fleet.html>

Certifications, Awards and Distinctions

Our managed vessels adhere to a comprehensive set of international codes and standards, ensuring the highest levels of safety, security, and environmental responsibility. These certifications include⁴:

- ISM Code: International Safety Management Code for the Safe Operation of Ships and for Pollution Prevention.
- ISPS: International Ship and Port Facility Security.
- MARPOL: Prevention of Pollution from Ships.
- IMDG Code: International Maritime Dangerous Goods Code.
- SOLAS: Safety of Life at Sea.
- EU MRV: Monitoring, reporting, and verification of CO₂ emissions.
- ISO 9001:2015: Quality Management System.
- ISO 14001:2015: Environmental Management System.

We are proud to announce that for the second consecutive year, our headquarters have achieved certification as Carbon Neutral Offices. In line with our commitment to environmental responsibility, we have offset 126.11 tonnes of CO₂ emissions resulting from our business activities. This year's contribution has been directed to the 'Improved Kitchen Regimes' project, which aims to provide safe water and cooking technologies to rural communities across Sub-Saharan Africa.

Furthermore, we are delighted to report that 3 of our managed vessels, namely M/T, M/T Philotimos, M/T Agios Nikolas, and M/T Pantelis, have received the prestigious AMVER award, recognizing their outstanding commitment to safety and rescue coordination at sea.



At ENESEL S.A., we remain dedicated to upholding the highest standards of safety, environmental stewardship, and quality management. These achievements underscore our unwavering commitment to sustainability and responsible business practices.

⁴ For more information about these certifications, you may visit the following websites: [The International Safety Management \(ISM\) Code \(imo.org\)](https://www.imo.org), [SOLAS XI-2 and the ISPS Code \(imo.org\)](https://www.imo.org), [International Convention for the Prevention of Pollution from Ships \(MARPOL\) \(imo.org\)](https://www.imo.org), [The International Maritime Dangerous Goods \(IMDG\) Code \(imo.org\)](https://www.imo.org), [International Convention for the Safety of Life at Sea \(SOLAS\), 1974 \(imo.org\)](https://www.imo.org), [CL2015R0757EN0010010.0001_cp 1..1 \(europa.eu\)](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015R0757:TOC), [ISO 9001:2015 - Quality management systems - Requirements, ISO 14001:2015 - Environmental management systems - Requirements with guidance for use](https://www.iso.org/standard/54554.html)



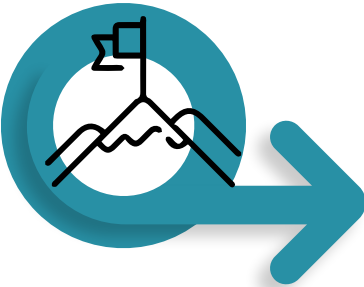


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ACTIVITIES AND WORKERS

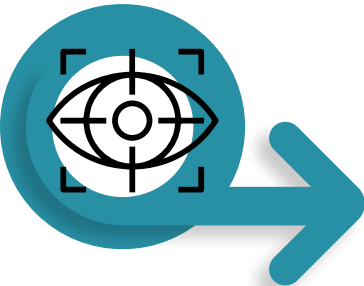
ACTIVITIES
AND WORKERS

Value Chain



MISSION

We are committed to providing world-class ship management services to the ship owners of the managed fleet, charterers including oil major companies and the public, at the highest possible level with respect to SAFETY, ENVIRONMENTAL PROTECTION, HEALTH, SECURITY and PERFORMANCE standards, and to conduct our operations in a manner which protects safety, human health, and service quality.



VISION

To be the leading company of choice for global sea transportation of cargoes. The following table presents the classification of the company according to sector, sub-sector and industry.



The value chain of marine transportation, which includes the shipping and maritime industry, involves a series of stages and activities that play a crucial role in the transportation of goods and passengers via waterways. An overview of the value chain for marine transportation:

The value chain of marine transportation is a complex network of stakeholders and activities, each contributing to the functioning of the global shipping and maritime industry.



Thematic Sector
TR Transportation



Sub-Sector
TR.3 Marine Transportation

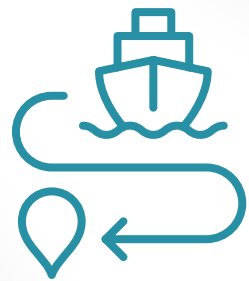


Industry
TR-MT Marine Transportation

Table 1: ENESEL S.A. categorisation based on Sustainable Industry Classification System ® (SICS)

The important components	Value Chain		Positive Impact for
People and our culture	<p>The value chain of marine transportation, which includes the shipping and maritime industry, involves a series of stages and activities that play a crucial role in the transportation of goods and passengers via waterways. An overview of the value chain for marine transportation:</p> <p>1. Raw Material Suppliers: Provide essential materials for ship construction and maintenance, such as steel, fuel, and equipment.</p> <p>2. Shipbuilders and Repair Yards: Build new vessels and provide maintenance, repair, and retrofitting services for existing ships.</p> <p>3. Shipowners and Operators: Own and operate the ships, managing their daily operations, cargo transportation, and maintenance.</p> <p>4. Port and Terminal Operators: Manage and operate ports and terminals, facilitating the loading and unloading of cargo and passenger embarkation.</p> <p>5. Freight Forwarders and Logistics Companies: Coordinate the scheduling, tracking, and organization of shipments, ensuring the efficient movement of goods.</p> <p>6. Shipping Agents and Brokers: Act as intermediaries between shipowners and cargo owners, facilitating vessel chartering, brokerage, and cargo booking.</p> <p>7. Maritime Services Providers: Offer various services, including navigation, safety, security, marine surveying, and classification services, ensuring vessels comply with safety and regulatory standards.</p> <p>The value chain of marine transportation is a complex network of stakeholders and activities, each contributing to the functioning of the global shipping and maritime industry.</p>	<p>8. Cargo Owners and Shippers: The entities that have goods to transport and are the customers of the marine transportation industry.</p> <p>9. Regulatory Bodies and Authorities: Government agencies and international organizations responsible for enforcing maritime regulations, ensuring safety, environmental compliance, and security in the industry i.e. Flag Administrations, Classification Societies, Port State etc.</p> <p>10. Marine Insurance and Finance: Provide insurance services for ships and cargo, as well as financing for ship purchases and operations.</p> <p>11. Technology and Innovation: Technology companies that offer solutions for navigation, communication, vessel management, and safety, contributing to operational efficiency and safety.</p> <p>12. Research and Development: Conduct research and development activities to develop new technologies, safety practices, and sustainability initiatives in the maritime sector.</p> <p>13. Environmental and Sustainability Initiatives: Focus on reducing the environmental impact of the marine transportation industry, including the adoption of cleaner fuels, emission reduction, and sustainable practices.</p> <p>14. Education and Training: Institutions and organizations providing maritime education and training to professionals, seafarers, and maritime personnel to ensure safety and competency.</p> <p>15. End Users and Consumers: The recipients of goods transported by sea.</p>	Employees
Stakeholder engagement			Crew
Natural resources			Customers
Assets			Society
Capital			Planet
Technology and data			Shareholders

Table 2: How we create value



Metric	Number
Metric tons of crude oil transported	13,628,873.68 MT
Seafarers pool	900
Number of voyages	117
Total cargo transferred	13,628,873.68 MT
Number of vessels under management	16
DWT	1,930,775
Ports called	447

Table 3: Value chain in numbers

Supply Chain

At ENESEL S.A., we are dedicated to achieving carbon neutrality by investing in our business to transform our value chain. Our primary focus is on accelerating progress in reducing greenhouse gas emissions, particularly in our managed vessels, operations, and supply chain. Emissions reductions stand as our top priority, and we consider carbon offsetting only in limited cases, such as when viable solutions are unavailable or do not yet exist, exemplified by our carbon-neutral offices certification.

Our overarching goal is to safeguard the rights and well-being of everyone involved in our operations while protecting the environment. We approach our partnerships with suppliers with transparency and a shared commitment to these values.

Our intention is to cultivate long-term relationships, collaboratively address challenges, and identify opportunities for improvement. We also recognize and reward those who consistently strive for best practices.

To ensure alignment with our values and standards, all our suppliers and partners must adhere to our Business Ethics and Policies. We reinforce our commitment to accountability by conducting regular third-party audits of our suppliers' performance.

These audits occur annually and serve as a collaborative effort to identify areas for improvement and uphold the highest standards of excellence.

In 2022, our shore staff saw one departure while welcoming two new hires. On the seafarer front, our team expanded to accommodate the arrival of another vessel in our fleet, with three more vessels expected to join us in 2023. In preparation for this expansion, we are diligently ensuring that our pool is well-prepared in advance to seamlessly accommodate the new additions.









	Female	Male	Total
Employees	24	26	50
Seafarers	0 	967 	967  
Total	24 	993 	1,017  

Table 4: Breakdown of employees (head count) by gender for fiscal year 2022

⁵ More information about our people can be found at: <http://eneselnet.com/the-group/our-people.html>

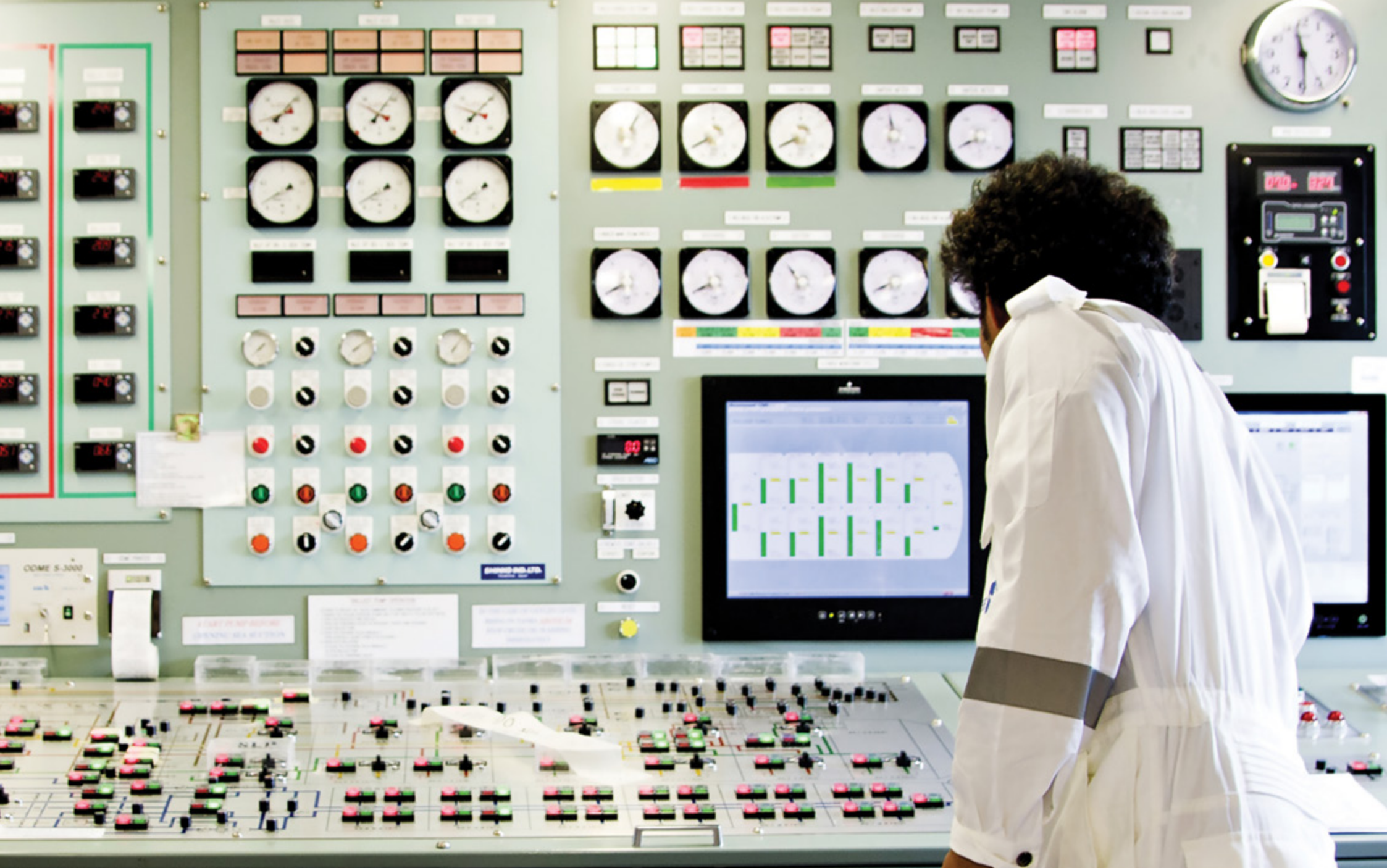
All our employees are based in Athens, Greece and they work on a full-time and permanent basis. While our seafarers may have fixed-term employment due to the nature of their occupation, their retention rate remains exceptionally high, as they frequently return for repeated services. We consider high retention rate very essential for safety, efficiency, cost-effectiveness, and overall operational excellence. While it contributes to the well-being of the crew, regulatory compliance, and customer satisfaction, making it our priority. Specifically, the retention rate for our seafarers in the fiscal year 2022 was estimated to be 96.8%, while office staff retention rate was calculated 100%. It's important to note that our contractors and technicians are not included in these calculations, as their work is not directly controlled by our organization.

Calculations formula that has been used: % Retention Rate (RR) = [100 – {(S – (UT + BT))} X 100]/AE

- RR = Officer Retention Rate
- S = Total Number of terminations from whatever cause (In effect this means the total number employees that have left the company for whatever reason)
- UT = Unavoidable Terminations (i.e. retirements or long-term illness)
- BT = Beneficial Terminations (i.e. sometimes those staff that do leave provide benefit to the company by virtue of leaving, for example under performers)
- AE = The average number of employees working for the company during the same period as calculated, this should be any period of 12 months.

We calculate the seafarers' retention rate using the INTERTANKO corrected (March 2008) formula, which was adapted from the "Abelson adjusted turnover rate" referenced in 'Abelson M 1996 turnover cultures and turnover culture' in Human Resources Management. INTERTANKO's modification ensures that the result represents the company's percentage retention rate rather than a turnover rate. This calculation accounts for employees who left the company for both voluntary and involuntary reasons⁶.

⁶ For more information about the methodology, you may visit: https://www.intertanko.com/images/committees/Vetting_Committee/OfficerRetentionFormula_Corrected_12_March_2008.pdf



3

CORPORATE GOVERNANCE

GOVERNANCE

Governance Goals and KPIs

Below, you'll find the governance commitments, goals, remarks, and KPIs set in 2022. The ESG report for fiscal year 2023 will include the performance against these KPIs.

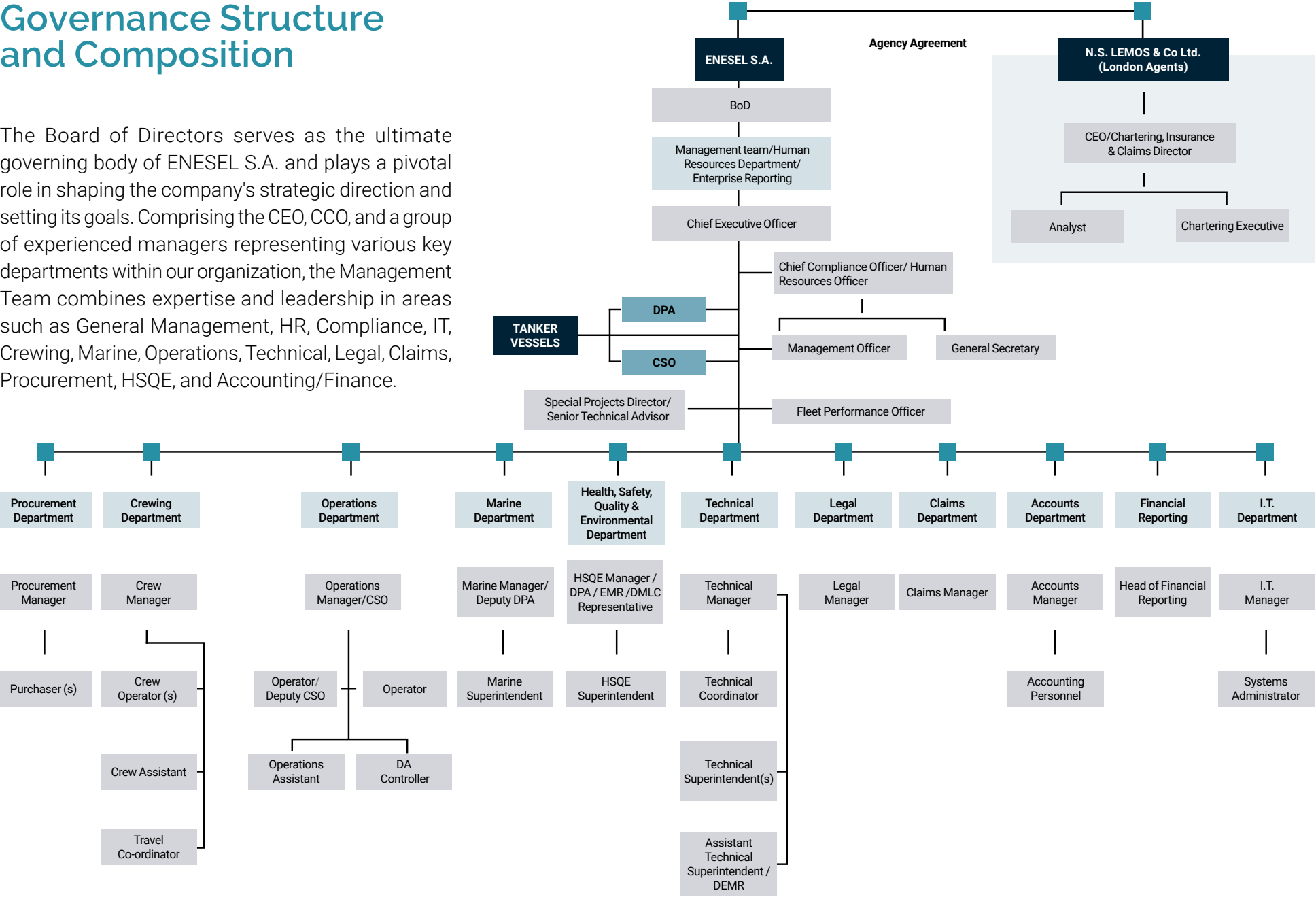


Table 5: Governance commitments, goals and KPIs.

COMMITMENTS	2028 GOALS	REMARKS	KPIs (Annual)
 Diversity, Equity & Inclusion	Improve Diversity and Inclusion in Executives and Staff	Several initiatives have been implemented for improving Diversity and Inclusion in both our executive leadership and staff	50% of Executives be Female
 Promote Transparency with ESG Reporting	Publish an in depth ESG report on an annual basis	Comply fully with GRI and other important ESG standards	Annual ESG Report
 Doing Business Ethically	100% of our Staff and Crew to be educated on Business Ethics and Sustainability	Customized educational program related to Business Ethics and Sustainability available to all Staff and Crew	100% of staff join online program for Ethical Business Conduct and Sustainability per year

Governance Structure and Composition

The Board of Directors serves as the ultimate governing body of ENESEL S.A. and plays a pivotal role in shaping the company's strategic direction and setting its goals. Comprising the CEO, CCO, and a group of experienced managers representing various key departments within our organization, the Management Team combines expertise and leadership in areas such as General Management, HR, Compliance, IT, Crewing, Marine, Operations, Technical, Legal, Claims, Procurement, HSQE, and Accounting/Finance.



The development of our business plan is a collaborative effort between the Board of Directors and the Management Team. As a vital decision-making body within the organization, the Top Management, consisting of the CEO, bears the responsibility for crafting ENESEL S.A.'s business plan and executing strategic decisions.

In addition, the Board of Directors plays a crucial role in overseeing the impact of management decisions within the organization. Their primary responsibility is to provide strategic guidance, exercise oversight, and ensure that the management team effectively addresses the consequences of their decisions and actions.

Management of Impacts and Sustainability Reporting

The business plan is a result of close collaboration between the Board of Directors (BoD) and the Management Team. The Top Management, as a crucial decision-making body within our organization, is responsible for developing ENESEL S.A.'s business plan and executing strategic decisions.

This responsibility encompasses our Company's mission and value statements, strategies, policies, and sustainable development goals. The BoD plays a vital role in overseeing the management's impact on decision-making processes within the organization. Their primary responsibility is to provide strategic guidance, exercise oversight, and ensure that the management team effectively addresses the impacts of their decisions and actions. Additionally, the BoD is responsible for reviewing the adequacy of our internal controls to enhance the integrity and credibility of our sustainability reporting. Lastly, the BoD conducts an annual review of the organization's internal controls to further strengthen the integrity and credibility of our sustainability reporting.

More specifically, the Board's oversight of management in this regard includes:

- 1. Establishing broad policies to guide the organization.
- 2. Implementing these policies by delegating authority and assigning responsibilities to the Chief Executive Officer, Managers, and other appropriate officers or employees.
- 3. Monitoring and evaluating performance to ensure that the stated policies are being followed.

In addition to these responsibilities, the Management Team actively monitors government initiatives, incentives, and business opportunities. This proactive approach allows us to leverage innovative technologies to promote energy savings and explore new energy sources. Ultimately, these efforts contribute to our goal of reducing greenhouse gas emissions.

Conflicts of Interest

To maintain an effective control environment, we have implemented a Conflicts of Interest Policy. This policy outlines our company's approach to managing conflicts of interest⁷. It details the organizational and administrative procedures for identifying and addressing conflicts of interest within our corporate governance and business activities.

The purpose and scope of the policy is to upholds transparency and fair treatment of customers, while it applies to all employees and seafarers, ensuring they act in the best interests of our customers and consider sustainability preferences. The policy outlines procedures to identify and manage conflicts of interest within corporate governance and business activities.

Based on the policy, the conflicts of interest are assessed for materiality based on the risk of harm our company or our customers.

A conflict is deemed material if it could harm customers, result in financial loss or pose reputational risks. To appropriately managing conflicts of interest we strive to prevent, identify, manage, and, if necessary, disclose conflicts of interest.

Preventive measures are prioritized, followed by mitigation actions if full prevention is not possible. Material conflicts are documented and effectively managed.

Employees are encouraged to engage in external activities but must seek approval to ensure no conflicts of interest arise. Unapproved external engagements and offshore structures are prohibited. Roles related to employment are managed according to institutional conflict of interest principles. When full prevention or mitigation is not possible, customers are informed of conflicts of interest. Disclosure includes details of the conflict's nature, source, and mitigation steps. Disclosure may not be possible if it harms customer interests or reveals confidential information.

In addition, we maintain a Conflict of Interest register to record identified conflicts. The Top Management is responsible for maintaining the register. Permanent conflicts of interest⁷ are reviewed at least annually to ensure effective preventive or mitigative measures remain in place. The Board of Directors receives relevant information in quarterly Management Review Meetings to oversee policy implementation.

⁷ Permanent conflicts of interest are those that continue to exist over time and require ongoing monitoring and mitigation measures

Communication of Critical Concerns

All critical concerns are communicated with the BoD through the quarterly or annual Management Review Meetings but in a lower level openly discussed with the team in the daily Morning Meetings.

In 2022, our major concerns were related to the Russian invasion of Ukraine, the safety of our seafarers and their families, and how these conditions might impact our business.

For 2022 COVID-19 were still a major threat for humanity. Port authorities had in place restrictions for ships accessing the ports and about boarding of crew. More than that many charterers in oil market put restrictions on performing crew changes due to COVID-19 threat.

Collective Knowledge of the BoD

As part of the Group’s Safety Committee there is a process in place where lessons learnt are communicated between the different ship management companies of the Group on safety and sustainability development matters. The Group Safety Committee meets twice a year and the MoM/Lessons Learned/ conclusions are shared with both fleets.

The influence of collective knowledge and lessons learned on decision-making within our group, particularly at the level of the highest governance body and ship management companies, is both timely and insightful. We recognize the critical role that shared knowledge plays in shaping our actions and fostering continuous improvement in safety and sustainability practices.

Regular Knowledge Sharing Sessions:

Our organization actively promotes a culture of continuous learning and knowledge sharing. Regular sessions are conducted, where experiences, insights, and lessons learned are shared among team members, both fleet, and the highest governance body. This collective knowledge forms a foundation for informed decision-making.

Post-Incident Analysis and Reporting:

In the unfortunate event of safety incidents or environmental concerns, a thorough post-incident analysis is conducted. This analysis involves all relevant stakeholders and aims to understand the root causes of the incident. Lessons learned from these analyses directly contribute to the refinement of safety protocols and sustainability practices.

Cross-Functional Collaboration:

We emphasize cross-functional collaboration, ensuring that diverse perspectives and expertise are considered in decision-making processes. This collaborative approach enables us to draw from a broad pool of knowledge, leading to more well-rounded and effective safety and sustainability initiatives. Implementation of Best Practices: Lessons learned from successful safety initiatives are systematically integrated into our best practices. These proven approaches become standard operating procedures, contributing to a culture of continuous improvement and setting benchmarks for future endeavors.

Implementation of Best Practices:

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Benchmarking and Industry Standards:

The highest governance body and ship management companies actively engage in benchmarking exercises and monitor industry standards. This proactive approach enables us to stay abreast of the latest advancements and align our practices with global best-in-class safety and sustainability standards.

Investment in Training and Development:

Collective knowledge and lessons learned guide our investment in training and development programs. This includes initiatives to enhance the skills and awareness of our teams, ensuring they are well-equipped to implement and adhere to the latest safety and sustainability protocols.

Regular Performance Reviews:

Periodic reviews of safety and sustainability performance are conducted at both the organizational and individual levels. Lessons learned from these reviews inform strategic decisions and enable us to address specific challenges or areas of improvement in a targeted manner.

As a result of these efforts, we have observed tangible improvements in safety and sustainability practices. Incidents have been reduced, and our environmental impact has been minimized through the integration of innovative technologies and best practices. We are committed to the ongoing integration of collective knowledge and lessons learned to drive continuous improvement in our safety and sustainability initiatives.



4

STRATEGY, POLICIES AND PRACTICES

STRATEGY, POLICIES AND PRACTICES

Strategic Roadmap

Shipping is a significant contributor to global greenhouse gas emissions, accounting for around 2-3% of global emissions. The International Maritime Organization (IMO) has set a target of reducing the shipping industry's greenhouse gas emissions by at least 50% by 2050 compared to 2008 levels. All in all, as a responsible shipping company, reducing the carbon footprint of shipping is a critical target to achieve. Therefore, investing in more energy-efficient technologies and renewable energy sources can significantly contribute towards achieving this goal.

Reducing emissions can also bring cost savings in terms of fuel efficiency and potential regulatory penalties for exceeding emissions limits, making it a financially viable target as well. Additionally, by implementing sustainable and environmentally responsible practices, such as spill prevention and response plans, the company can reduce its environmental impact and demonstrate its commitment to responsible business practices.

As a shipping company, the most formidable future challenges relative to sustainable development are meeting carbon reduction targets, adapting to climate change, and maintaining social responsibility. Addressing these challenges will require significant investment, innovation, and collaboration across the industry, as well as a commitment to sustainability and responsible business practices.

At ENESEL S.A. we are committed to responsible business practices and sustainable development. Our Environmental, Social, and Governance (ESG) targets and commitments were set in 2022 and reflect our dedication to reducing our environmental impact, supporting our employees and communities, and upholding high standards of governance. Below, we outline our specific ESG targets in each category.



Environmental Targets:

- Reduce the carbon footprint of shipping by investing in more energy-efficient technologies and renewable energy sources.
- Reduce headquarters greenhouse gas emissions by 10% by the end of 2050 compared to the baseline 2020
- Minimize the impact of oil transportation on the environment by implementing spill prevention and response plans, reducing emissions of pollutants, and optimizing vessel routing to reduce fuel consumption.
- Adopt sustainable and environmentally responsible practices, such as using biodegradable cleaning products and recycling waste.
- Reduce waste both onboard and ashore.



Social Targets:

- Continuous fair labour practices and ensuring that our people onboard and ashore are treated fairly and equitably, with adequate training, compensation, and benefits.
- Cultivate an inclusive culture with equal opportunities to all our people (onboard and ashore) to grow professionally within a safe and healthy work environment. We shall promote equal opportunities and inclusion among its suppliers and partners.
- We will continue to offer upskilling and reskilling opportunities to 100% of our people (onboard and ashore), especially in areas vital for sustainable growth, such as health and safety, digitalization, and decarbonization.
- We will implement initiatives addressing the physical, mental, social and financial dimensions for wellbeing of our people (onboard and ashore).
- We aim for zero fatalities and for an LTIFR (Lost Time Injury Frequency Rate) performance which consistently places us among the three best in our industry.



Governance Targets:

- We are committed to promote transparency and accountability in all business practices and operations, including financial reporting, risk management, and compliance with regulations and industry standards.
- We are committed to act ethically and comply with all relevant antitrust and fair-dealing laws. We have established clear policies and procedures for ethical conduct, anti-corruption, and whistleblowing.
- We are committed to foster a strong culture of corporate social responsibility and sustainability throughout the organization, with a commitment to continuous improvement and stakeholder engagement.
- We are committed towards the Principle of Accountability. Our cosignatories are committed to use means and tools approved by bodies such as the IMO⁸ to conduct the necessary assessments.
- We are committed to empower our business ecosystems to incorporate sustainability considerations in their business decisions and daily behaviors, while using natural resources responsibly.

⁸ International Maritime Organization, for more details you may visit: <https://www.imo.org/en/About/Pages/Default.aspx>

Policy Commitments

At ENESEL S.A., our Top Management is dedicated to upholding the Company's mission, vision, and policies, while actively supporting the Integrated Management System (IMS). Our commitment is demonstrated through several key actions and policies aimed at ensuring the effectiveness of the IMS and fostering a culture of safety, environmental excellence, and continuous improvement.

We demonstrate our commitment to the IMS by:

- Effectively communicating the importance of meeting customer, statutory, and regulatory requirements within the Company.
- Establishing and regularly reviewing the Company's policies, objectives, and targets.
- Ensuring the availability of necessary resources.

To ensure that our Company's policies and the principles of safety and environmental excellence are widely understood and embraced, we employ the following practices:

- Committing to improving standards and fostering awareness through training.
- Ensuring that all work is adequately supervised, with safety and environmental protection integrated into all planning and procedures.
- Conducting investigations of serious or potentially serious incidents, with recommendations communicated through the management chain.
- Establishing ship/shore communication links to capture best practices and lessons learned, which are communicated throughout the fleet and to relevant third parties.
- Actively engaging all personnel in applying the IMS and being receptive to recommendations for improvements.

⁹ Some information about the policies can be found at our Company's website: <http://eneselnet.com/policies.html>

Lastly, we adhere to the following policy commitments⁹:

- | | |
|---|---|
| <ul style="list-style-type: none"> • Safety policy • Health and hygiene policy • Quality policy • Environmental policy • Drugs & Alcohol policy • Business ethics policy • Energy efficiency management policy • Social media policy • Social responsibility policy • Sustainability policy | <ul style="list-style-type: none"> • Antitrust laws, competitions & fair dealings • Sexual harassment / bullying • Whistleblowing policy • Cybersecurity policy • Equal opportunity employer policy • Privacy policy • Employee remote work policy |
|---|---|

Policy statement contains the high level but long-term goals and aspirations, such as zero spills and zero incidents which are obtained through the following model for continuous improvement.

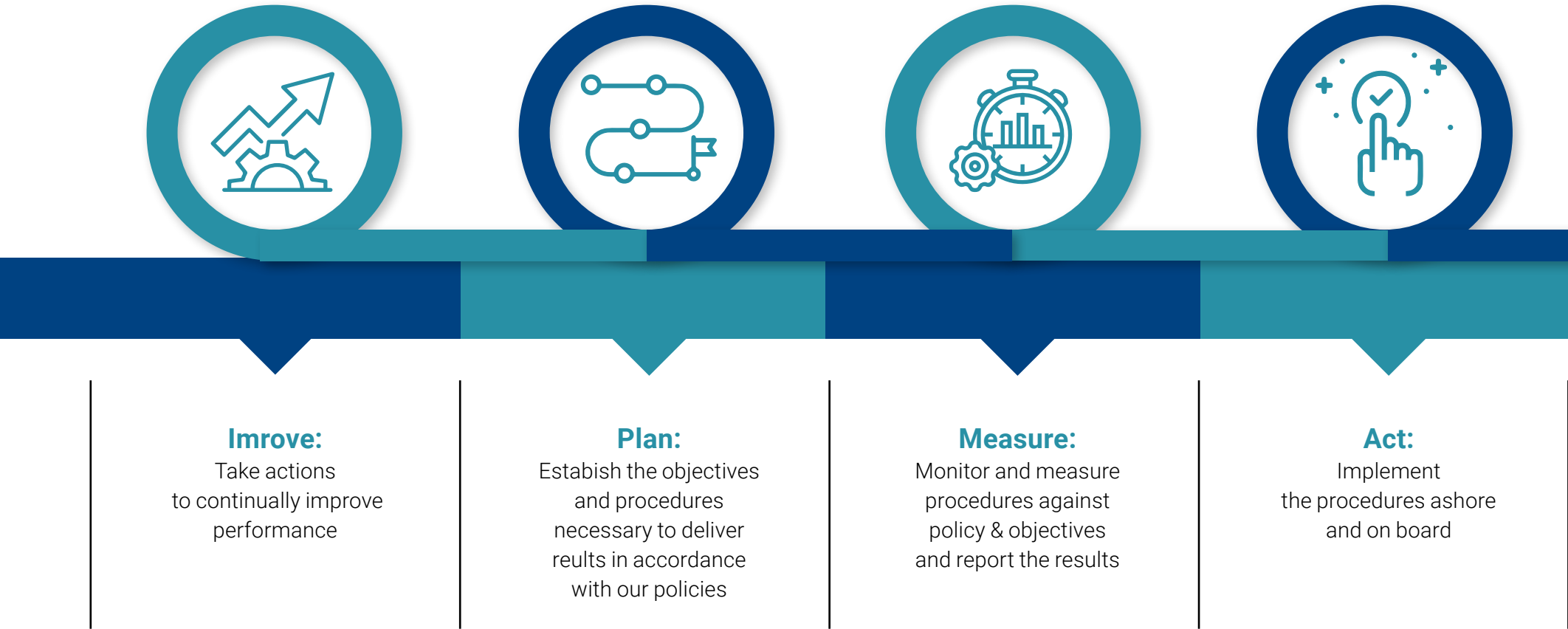


Figure 1: Our plan-do-check-act (PDCA) cycle for continuous improvement

Process to Remediate Negative Impacts

Management Review Meetings are conducted quarterly and annually, serving as a vital channel for ongoing dialogue with our employees and the advancement of our company based on their needs. These meetings play a pivotal role in several ways:

- 1. Communication of Strategic Decisions: We use these meetings to communicate important strategic decisions to our staff, ensuring that everyone is aligned with our company's direction.
- 2. Introduction of New Projects: We take the opportunity to introduce new projects, initiatives, and developments to our team members during these gatherings.
- 3. Open Forum for Questions and Concerns: Management Review Meetings provide a platform for our staff to ask questions, raise concerns, and provide input directly to our management team.

In addition to their role in facilitating communication and engagement with our employees, Management Review Meetings are a critical component of our commitment to addressing and remediating negative impacts. We recognize the importance of identifying and mitigating environmental, social, and governance (ESG) issues that may arise within our operations.

Identification of Negative Impacts:

These meetings serve as a platform to identify and discuss any potential negative impacts resulting from our business activities. Our team members are encouraged to report any concerns related to safety, security and general ESG matters.

Assessment and Remediation:

When negative impacts are identified, our management team conducts a thorough assessment to understand the scope and severity of the issue. Subsequently, we develop and implement action plans for remediation and improvement.

Open Dialogue for Solutions:

Management Review Meetings provide an open forum for employees to suggest solutions and strategies for addressing negative impacts. We value the input of our team members in finding effective remedies.

Regular Monitoring and Reporting:

Following the implementation of remediation measures, we maintain a system of regular monitoring to track progress and ensure that the identified negative impacts are being effectively addressed. Progress reports are shared with our employees/ seafarers to maintain transparency.

Our commitment to remediating negative impacts aligns with our broader sustainability goals and reflects our dedication to responsible and ethical business practices. By actively involving our employees in this process, we harness their insights and expertise to drive positive change within our organization.



Mechanisms for Seeking Advise and Raising Concerns

[GRI 2-26]

All employees have the option to contact our Management team, regarding any potential incidents of violations related to our Company's policies and practices for responsible business conduct.

This includes reporting incidents of discrimination and violations of human rights. Any reported breaches are thoroughly investigated and handled in accordance with our established procedures.

Compliance with Laws and Regulations

Compliance with laws and regulations has both actual and potential impacts, encompassing both positive and negative consequences:

Positive Impacts:

- Legal Protection: Compliance with laws and regulations provides legal protection to shipping companies. It reduces the risk of fines, penalties, and legal actions, helping maintain the company's financial stability.
- Reputation Enhancement: Demonstrating a commitment to compliance enhances a company's reputation. It signals responsibility and trustworthiness to customers, partners, and investors, potentially attracting more business opportunities.
- Safety and Environmental Protection: Regulations often include safety and environmental standards that, when followed, contribute to safer tanker operations and the protection of marine ecosystems and coastal communities.
- Risk Mitigation: Compliance measures can help identify and mitigate risks, such as safety hazards or cybersecurity threats, reducing the likelihood of accidents and operational disruptions.
- Global Market Access: Compliance with international regulations enables shipping companies to access a broader global market by adhering to the standards and requirements of various jurisdictions.



Negative Impacts:

- Financial Costs: Compliance with laws and regulations can entail significant financial costs. Company invests on equipment upgrades, training, audits, and legal consultations to meet regulatory requirements.
- Operational Complexity: Complying with a multitude of regulations can add complexity to operations, potentially leading to administrative burdens and delays.
- Competitive Disadvantage: In some cases, stringent regulations may place companies at a competitive disadvantage compared to those operating in regions with less stringent regulatory environments.
- Liabilities and Penalties: Non-compliance can result in substantial fines, penalties, and legal liabilities, which can significantly impact a company's financial health and reputation.
- Reputation Damage: Failure to comply with regulations can damage a company's reputation, leading to a loss of trust among customers, partners, and stakeholders.
- Operational Disruption: Regulatory changes or non-compliance issues may require operational changes or suspensions, leading to disruptions and financial losses.
- Environmental Impact: Non-compliance with environmental regulations can result in environmental damage, such as oil spills or pollution, which harm marine ecosystems and communities.
- Human Rights and Labor Issues: Non-compliance with labor and human rights regulations may lead to labor rights violations, impacting the well-being and rights of maritime workers.





In summary, compliance with laws and regulations in the shipping industry, including for companies that own tankers, has a range of actual and potential impacts, both positive and negative. Effective compliance measures can enhance legal protection, reputation, safety, and environmental protection. However, compliance can also incur financial costs, operational complexity, and competitive challenges while carrying the risk of liabilities, reputation damage, and environmental impact in cases of non-compliance.

As clearly outlined in our Business Ethics, our company unwaveringly upholds the law, and this commitment is shared by our employees and seafarers. In the event of any violations or related regulatory proceedings, despite our collective dedication to compliance, our legal and/or compliance departments are actively involved.

These dedicated departments work diligently to address violations and implement measures to prevent future incidents. It's important to note that, for legal reasons, we do not provide details of ongoing proceedings. We are pleased to report that there were no fines or non-monetary sanctions imposed on our company during the reporting period.

Membership Associations

ENESEL S.A. is proud to be a full member of the following esteemed associations:



ICS: The International Chamber of Shipping



BIMCO: The world's largest direct-membership organization for shipowners, charterers, shipbrokers, and agents



HELMEPA: Hellenic Marine Environment Protection Association



UGS: Union of Greek Shipowners



INTERTANKO: The International Association of Independent Tanker



MISA: Malta International Shipowners Association



DNV Technical Committee



SYN-ENOSIS: Greek Shipowners Social Welfare Company



5


STAKEHOLDER ENGAGEMENT



STAKEHOLDER ENGAGEMENT




Approach to Stakeholder Engagement

We recognize the significant impact of our operations on the environment, local communities, and markets. In response, we actively collaborate with our stakeholders to ensure that broader sustainability concerns are integrated into our assessment of risks and opportunities. Our stakeholders may be influenced by or influence our actions, whether or not they are directly involved in financial transactions with our company. Therefore, we prioritize the establishment and maintenance of relationships built on mutual trust and collaboration. This enables us to identify, understand, and address their needs and expectations effectively.

A comprehensive overview of our stakeholders, their expectations, and our initiatives to meet those expectations and needs is presented in the following table.

Stakeholders	Expectations	Forms of Engagement / Comms channels	ENESEL's Action
 Customers	<ul style="list-style-type: none">• Lasting collaboration• Service Quality• Contractual obligation• Compliance with legal requirements• Effective cargo transportation• Prevention of Pollution• Innovation• Energy Efficiency• Operational Excellence	<ul style="list-style-type: none">• Directly through dedicated channels• Social media• Website• TMSA and SIRE inspections• Safety Campaigns	<ul style="list-style-type: none">• Work closely to develop active partnerships for broader change.• Endorse and implement initiatives for safety and an incident free industry.• Follow a risk-based approach to manage operational excellence.• Implement international standards and frameworks.• Proactively demonstrate sustainability work to contribute to improved industry practices.• Apply corporate leadership.• Prevention of pollution that involves the integration of stakeholder engagement within core functions.

Stakeholders	Expectations	Forms of Engagement / Comms channels	ENESEL's Action
 Employees and Crew Members	<ul style="list-style-type: none">• Attractive employment terms and conditions.• Provision of professional development and training• Employment security.• Prompt and fair fulfilment of liabilities.• To feel valued and engagement and that their contribution is shaping the company's future.• Purpose and meaning from their work.• Safety at work.• Two-way communication with management.	<ul style="list-style-type: none">• Continuous open communication through daily meetings and annual development meetings.• Employee satisfaction surveys.• Team building activities.• Corporate social responsibility activities.	<ul style="list-style-type: none">• Offer transparency.• Cultivate trust.• Maintain an open and direct communication culture.• Empower middle management.• Provide a whistle blowing policy.• Offer a corporate magazine - HORIZON, "Your voice is heard" section.• On board complaint procedure.• Personnel development action plan - onshore employees.• Social Committee• Quarterly/ Annual management review meetings.• Annual seafarers' forums.
 BoD and Management	<ul style="list-style-type: none">• Be broadly on plan in terms of revenue and profits.• Expansion of service provision.• Quality of service.• Protection of reputation and brand name.	<ul style="list-style-type: none">• Annual General Meeting.• Quarterly / annual OPEX results report.• Daily round up message for the fleet and general company matters.• Direct communication through Slack app and Zoom / SfB platforms.• Quarterly/Annual Management Review Meetings.• Annual Company & Departmental Targets.	<ul style="list-style-type: none">• Design the corporate strategy accordingly.• Adjust the annual Company targets.

Stakeholders	Expectations	Forms of Engagement / Comms channels	ENESEL's Action
 <p>Financial Institutions</p>	<ul style="list-style-type: none"> Financial performance. Credit worthiness. Robust corporate governance. Risk assessment processes. 	<ul style="list-style-type: none"> Loan contracts. Annual financial statement. Corporate presentation. ENESEL Group website. ENESEL Group social media. 	<ul style="list-style-type: none"> Robust management system. Avoidance of unnecessary risks. Prompt fulfilment of contractual obligations. Contraction of ships in reputable and high-quality ship building yards.
 <p>Government</p>	<ul style="list-style-type: none"> Full compliance with obligations. Full compliance with local/ terminal regulations. Prevention of pollution. 	<ul style="list-style-type: none"> Communication with local authorities. Inspections and Audits. Formal dialogue. 	<ul style="list-style-type: none"> Full compliance. Regular inspections and audits. Formal communication.
 <p>Industry organizations and Regulators</p>	<ul style="list-style-type: none"> Full compliance with obligations. Collaboration and support. Prevention of pollution. 	<ul style="list-style-type: none"> Annual ad - hoc meetings. Memberships. Audits. Participation in conferences and forums. Input and collaboration through planning. 	<ul style="list-style-type: none"> Participation and collaboration. Input, feedback and insights. Dispatch of personnel for trainings and workshops.



Stakeholders	Expectations	Forms of Engagement / Comms channels	ENESEL's Action
 <p>Suppliers and service providers</p>	<ul style="list-style-type: none"> Notification on policies Adequacy in communicating applicable procedures and requirements. Prompt fulfilment of liabilities Long term collaboration 	<ul style="list-style-type: none"> Supplier evaluation Procurement policy Annual audits to service providers. On site visits. Compliance with all applicable policies. Highest standards of quality and integrity. 	<ul style="list-style-type: none"> Formal meetings On site visits
 <p>Society and Local Community</p>	<ul style="list-style-type: none"> Pollution free environment Quality on service and operations Compliance with legal implications Career Opportunities 	<ul style="list-style-type: none"> Website Social media Social initiatives 	<ul style="list-style-type: none"> Activities with social impact and contribution Memberships (ie. HELMEPA) Support “Common Seas” to radically reduce plastic waste and prevent ocean pollution.

Table 7: Stakeholder engagement

Collective Bargaining Agreements

All our employees and seafarers are encompassed by collective agreement such as collective labor agreements and wage agreements, based on the requirements of their country of origin either for the seafarers or for onshore employees. Additionally, the employment conditions for individuals not covered by these collective agreements are aligned with prevailing market standards.



5

MATERIALITY ASSESSMENT

MATERIALITY ASSESSMENT

Process to Determine Material Topics

Every other year, we conduct a formal materiality assessment to ensure that we prioritize the issues with the most significant impact on ENESEL S.A., the related communities, and the environment.

These issues also hold utmost importance to our stakeholders.

To maintain complete confidentiality and impartiality, the materiality assessment is conducted by an independent third party.

The Materiality Assessment aligns with one of the core principles of the Global Reporting Initiative (GRI) and plays a pivotal role in our company's operations.

Its purpose is to identify the key topics that carry the most significant economic, environmental, and social impact and then prioritize them to influence our strategic goals.

In determining our material issues, we actively engage with a diverse cross-section of our stakeholder groups, including:

- **Owners & Management**
- **Onshore Employees**
- **Offshore Employees**
- **Customers (Charterers & Oil Majors)**
- **Suppliers (Service Providers, Port Agents, Insurers)**
- **Insurance & Chartering Agent (NS Lemos Co & Ltd)**
- **Manning Agents**
- **Ship building/repair yards**
- **Financial Institutions**

The resulting materiality matrix defines the areas for prioritization and strategic considerations, as suggested by our stakeholders.



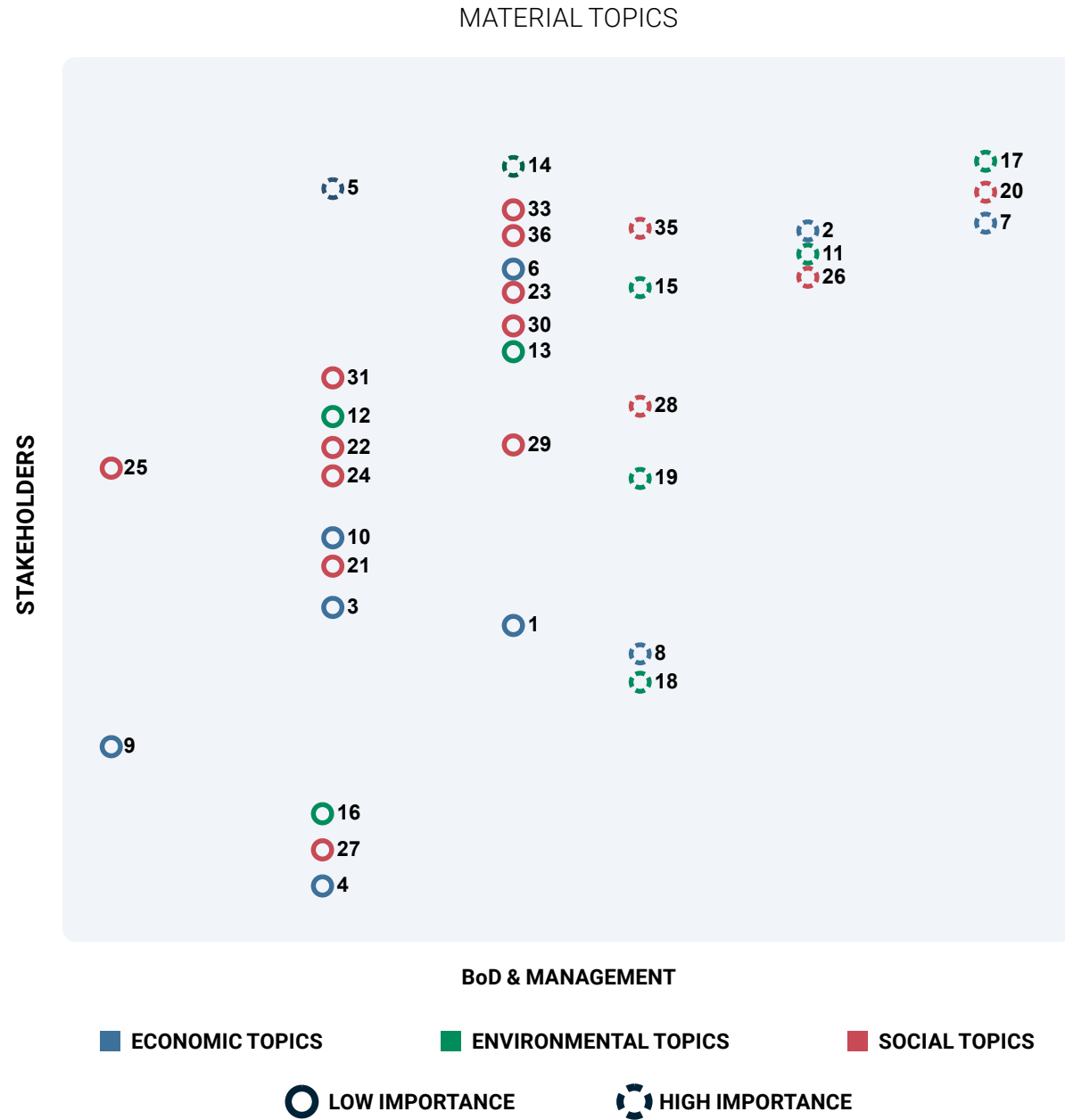


Table 8: Materiality Matrix

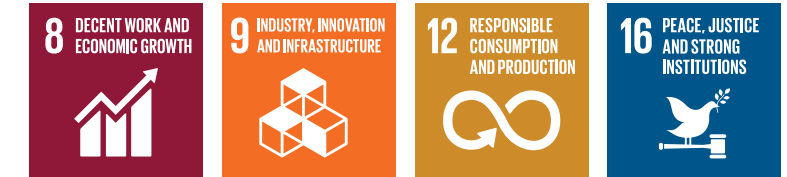
Materiality topics that the assessment revealed:

1. Economic Performance
2. Business Growth
3. Indirect Economic Impact
4. Procurement Practices
5. Anti-corruption
6. Risk assessment
7. Cyber Security
8. Change Management
9. Tax Strategy
10. Governance
11. Energy Consumption Monitoring & Efficiency
12. Biodiversity
13. Water (Inc Ballast) / Clean Water & Sanitation
14. Emissions
15. Waste Reduction & Spills Management
16. Underwater Noise Management
17. Compliance with Environmental Laws
18. Selecting suppliers through environmental criteria
19. Recycling
20. Regulatory Compliance
21. Employment Practices
22. Labour Management relations
23. Occupational Health & Safety
24. Attracting & Retaining Employees
25. Diversity, Equal Opportunities & Non-Discrimination
26. Emergency Preparedness
27. Supplier Social Assessment
28. Security Practices
29. Corporate Responsibility Activities
30. Human Rights Assessment
31. Audits, Inspections & Surveys
32. Innovation & Digitalization
33. Privacy
34. Response to Social Crisis
35. Trust & Transparency
36. Customer Satisfaction

List of Material Topics

Supporting Economic Impact

- Business Growth
- Anti-corruption
- Cyber Security
- Change Management



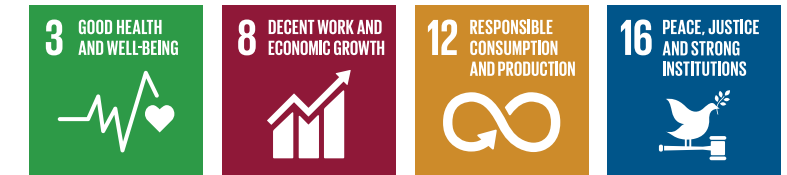
Supporting environmental Impact

- Energy Consumption Monitoring & Efficiency
- Emissions
- Waste Reduction & Spills Management
- Compliance with Environmental Laws
- Selecting suppliers through environmental criteria
- Recycling



Supporting social impact

- Regulatory Compliance
- Emergency Preparedness
- Security Practices
- Response to Social Crisis
- Trust & Transparency





6

SUPPORTING ECONOMIC IMPACTS IN AN ETHICAL MANNER

SUPPORTING ECONOMIC IMPACT IN AN ETHICAL MANNER

Business Growth

At ENESEL S.A., we recognize that business growth in the shipping industry can have various specific impacts on the economy, environment, people, and human rights:



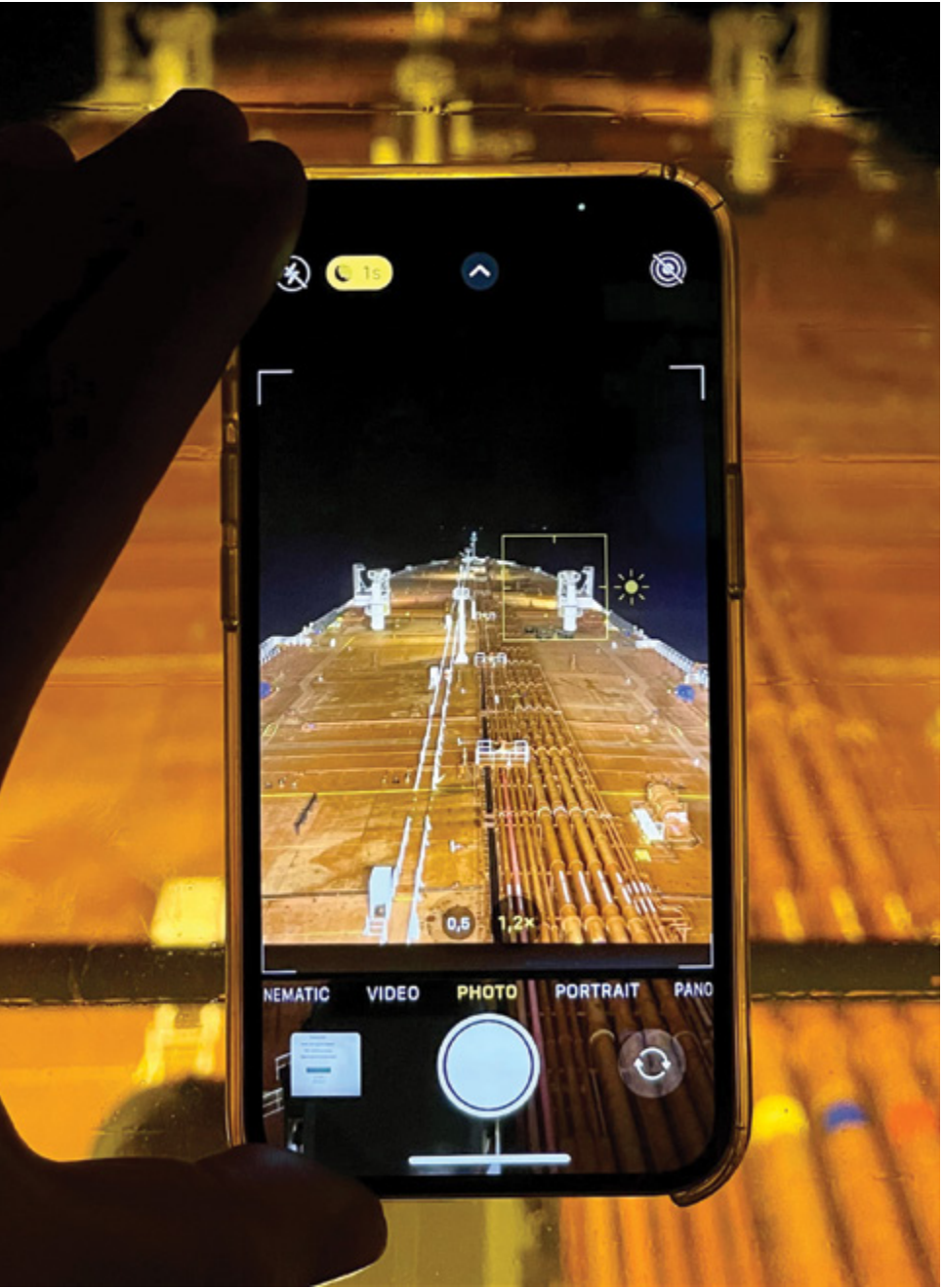
Positive Impacts:

- Economic Growth: Business growth within the shipping industry can stimulate economic benefits by generating employment opportunities in ports, shipyards, and related sectors. It also contributes to revenue through freight charges, vessel operations, and maritime services.
- Trade Facilitation: The expansion of shipping companies plays a vital role in facilitating global trade by providing reliable and efficient transportation of goods. This, in turn, contributes to worldwide economic growth and prosperity.
- Infrastructure Development: As shipping operations expand, investments in port infrastructure and facilities become necessary. These investments enhance transportation efficiency, benefiting local economies and communities



Our legacy in the shipping industry spans 176 years, reflecting a deep commitment to family culture and enduring values. The Enesel Group's journey began in 1848 when Georgios C. Lemos, affectionately known as 'Papa-Lemos,' acquired a small share in a sailing ship. Today, Enesel S.A. operates a modern fleet of tankers, all constructed to meet the highest international standards in top-tier shipyards.

Our entire fleet is chartered to reputable charterers and operators on both voyage and time-charter bases. Understanding our history is crucial to comprehending our company, its culture, and the enduring values that shape our identity. Throughout our extensive history, the Lemos Group has operated various vessel types, including dry cargo vessels, container ships, multipurpose ships, and Oil-Bulk-Ore vessels (OBO). We have had a significant presence in various large crude carrier segments.





Negative Impacts:

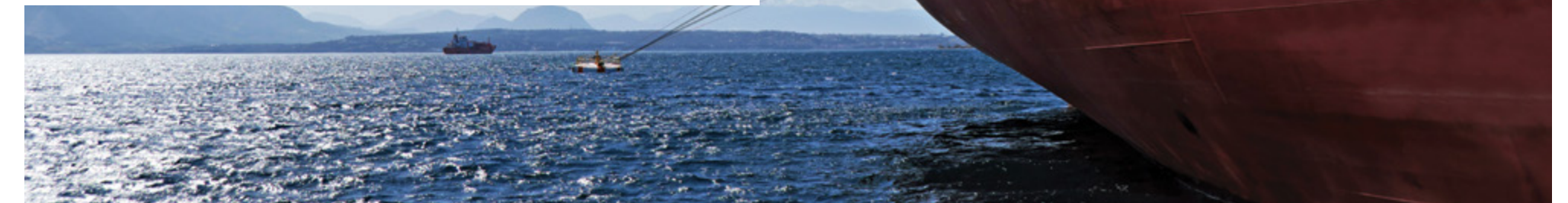
- **Environmental Impact:** The shipping industry's operations can have a substantial environmental footprint, contributing to air and water pollution, greenhouse gas emissions, and the risk of oil spills. Rapid growth without sustainable practices can exacerbate these negative impacts.
- **Labor Conditions:** Growth in the shipping sector can lead to labor rights challenges, especially for seafarers. Issues such as long working hours, inadequate living conditions, and limited access to shore leave can impact the well-being and rights of maritime workers.
- **Human Rights:** In certain cases, business growth in the shipping industry can be associated with human rights violations, including mistreatment of seafarers, such as unpaid wages and inadequate medical care, or forced labor.
- **Resource Depletion:** The shipping industry's demand for fuel and resources, including marine fuels and materials for shipbuilding, can contribute to resource depletion and environmental degradation.

To address these negative impacts, we have intensified our focus on sustainability, environmental regulations, and labor rights standards.

We have also adopted practices aimed at reducing emissions, enhancing working conditions, and ensuring compliance with international maritime regulations, all in the pursuit of promoting sustainable growth.

Since our inception, we have adhered to a philosophy of 'uncompromising commitment to safety, security, quality, and continuous improvement.' This commitment is underpinned by a steadfast focus on financial stability and sustainability, driving our organic growth over the past 174 years.

As our fleet has expanded, so has our team, with many former Captains and crew members leveraging their extensive industry knowledge and experience to lead the company as Managers and key personnel. This loyalty is a testament to our unique position in the shipping industry.





Negative Impacts of Corruption in the Shipping Industry:

Addressing corruption in the maritime industry is crucial for fostering a transparent, fair, and economically sustainable environment. Implementing and enforcing anti-corruption measures can contribute to the long-term economic health and growth of the maritime sector.

Understanding that corruption can have far-reaching negative consequences, our Company has assessed all operations for risks related to corruption:



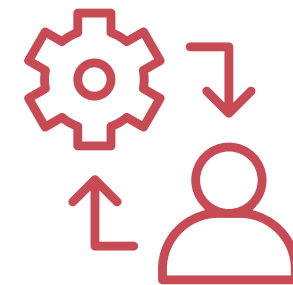
Economic Consequences:

- **Poor Quality and Safety Standards:** Corruption can compromise safety and quality standards within the maritime industry. Bribes may lead to the overlooking of safety regulations or the use of substandard materials in shipbuilding and maintenance. This jeopardizes the safety of vessels, crew, and cargo, potentially resulting in accidents and economic losses.
- **Impact on Trade Facilitation:** Corruption in customs and border control procedures can lead to delays and disruptions in trade facilitation. Bribes may be demanded for the expedited processing of cargo, causing inefficiencies in logistics and affecting the timely delivery of goods.
- **Loss of Reputation:** A reputation for corruption can damage the image of a country or a specific port within the maritime industry. This loss of reputation may lead to a decline in business partnerships, reduced trade volumes, and the diversion of maritime traffic to more transparent and reliable ports.
- **Legal and Regulatory Risks:** Corrupt practices expose companies to legal and regulatory risks. Authorities may investigate and impose fines, leading to financial penalties and potential legal actions against companies involved in corrupt activities. Legal costs and reputational damage further contribute to the economic consequences.
- **Impact on Insurance Costs:** The increased risk associated with corruption in the maritime industry may lead to higher insurance premiums. Insurance providers may adjust their rates to account for the elevated risks of bribery, fraud, or other corrupt activities, contributing to overall cost escalation.
- **Reduced Economic Growth:** Persistent corruption in the maritime industry can have broader implications for the overall economic growth of a region or country. It may deter foreign direct investment, limit job creation, and hinder the development of a robust and competitive maritime sector.



Environmental Consequences:

- **Environmental Damage:** Corruption can result in tax enforcement of environmental regulations, contributing to pollution and oil spills, harming marine ecosystems.
- **Poorly Maintained Vessels:** Corrupt practices, such as bribery in safety inspections or certifications, can result in poorly maintained vessels. Inadequate maintenance contributes to oil spills, leaks of hazardous materials, and accidents that harm marine life and damage coastal ecosystems.
- **Invasive Species and Ballast Water Pollution:** Corruption may result in the inadequate enforcement of regulations related to ballast water management. This can facilitate the spread of invasive species through ballast water discharge, disrupting local ecosystems and outcompeting native species.
- **Resource Depletion:** Overexploitation of resources due to corruption, such as illegal fishing or unauthorized drilling, can deplete marine resources.



Social Consequences:

- **Safety Risks:** Corrupt practices can compromise maritime safety standards, endangering seafarers, coastal communities, and marine environments.
- **Labor and Human Rights Violations:** Corruption can lead to labor exploitation, unpaid wages, poor working conditions, and human rights abuses, affecting maritime workers' well-being.
- **Social Inequity:** Resources diverted due to corruption can worsen income inequality and hinder infrastructure development.
- **Reputation Damage:** Involvement in corruption can harm a company's reputation, eroding trust among stakeholders.
- **Loss of Public Trust and Participation:** Corruption erodes public trust in regulatory processes and environmental management. When the public perceives that decisions are influenced by corruption, it may lead to a lack of engagement, reducing the effectiveness of community-driven conservation efforts and environmental stewardship.

To address these negative impacts, we prioritize anti-corruption measures, transparency, and compliance with global regulations and ethical standards. Our commitment to ethical conduct is overseen by the CEO, Georgios E. Poularas through our comprehensive Bribery and Corruption Policy¹⁰. We maintain a zero-tolerance stance and require all employees to act with integrity, guided by our policy covering gifts, political donations, facilitation payments, and conflicts of interest. The Management Team is responsible for implementing and maintaining anti-bribery systems, educating employees, and conducting internal investigations when needed. Reports of bribery are treated confidentially, and efforts are made to protect whistleblowers. We continually raise awareness among our employees through newsletters. Notably, there were no reported incidents during the reporting period.

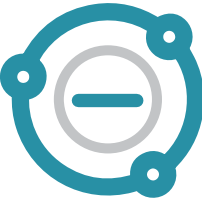
¹⁰ For more details, you may visit: <https://eneselnet.com/policies.html>

Cyber Security



Positive Impacts:

- Operational Efficiency: Effective cybersecurity measures can enhance the efficiency of tanker operations by ensuring that critical systems and processes remain secure and functional. This can result in smoother cargo transportation, reduced downtime, and improved overall productivity.
- Protection of Sensitive Data: Cybersecurity safeguards protect sensitive information related to cargo, vessel schedules, and business operations. This helps maintain confidentiality and prevents data breaches that could compromise competitive advantages.
- Prevention of Cyberattacks: By implementing robust cybersecurity protocols, shipping companies can reduce the risk of cyberattacks such as ransomware, which could disrupt operations, compromise cargo security, and result in financial losses.
- Compliance with Regulations: Cybersecurity measures help shipping companies adhere to international regulations and industry standards, ensuring compliance with maritime cybersecurity guidelines. This not only avoids legal consequences but also enhances the company's reputation.
- Enhanced Reputation: Demonstrating a commitment to cybersecurity can improve a shipping company's reputation among customers, partners, and investors. It signals responsibility and trustworthiness, attracting business opportunities.
- Protection of Crew and Passengers: Cybersecurity measures can safeguard critical vessel systems, contributing to the safety of crew members and passengers. Cyberattacks that compromise navigation or communication systems could pose risks to human lives.



Negative Impacts:

- Financial Losses: Cyberattacks can result in significant financial losses due to ransom payments, business interruptions, or damage to critical systems. These losses can impact a company's profitability and long-term financial stability.
- Cargo Security Risks: Inadequate cybersecurity could lead to cargo-related risks, including theft, tampering, or delays in cargo delivery. This can result in financial liabilities and damage to a company's reputation.
- Environmental Risks: Cyberattacks on tanker systems, such as navigation or safety controls, could lead to environmental disasters like oil spills, harming marine ecosystems and coastal communities.
- Legal Consequences: Failure to protect against cyber threats may lead to legal consequences, including fines, penalties, and legal actions by affected parties.
- Reputation Damage: Cybersecurity incidents can tarnish a shipping company's reputation, leading to a loss of trust among customers, partners, and stakeholders.
- Operational Disruption: Cyberattacks can disrupt tanker operations, leading to delays, rerouting, or the need for emergency responses, all of which can incur additional costs and operational challenges.
- Human Rights Impact: If a cyberattack compromises safety and security systems on a tanker, it could potentially violate the human rights of crew members and passengers who rely on the vessel's safe operation.

In summary, effective cybersecurity measures can positively impact the efficiency, security, and reputation. However, inadequate cybersecurity can result in financial losses, cargo and environmental risks, legal consequences, and damage to a company's reputation, potentially affecting human rights as well. Hence, it is crucial for tanker companies to prioritize and invest in robust cybersecurity practices to mitigate these risks and safeguard their operations and stakeholders.

Our company has developed a comprehensive Cyber Security Manual, which includes our Cyber Security Policy, outlining cybersecurity measures and our incident response plan. This manual is also an integral part of our IMS (Information Management System).

Within the Cyber Security Manual, we have identified systems that may be vulnerable to external threats or inappropriate use, whether on board our vessels or onshore. We have also established a robust training process for cyber security, encompassing shore-based personnel, vessel personnel, and contractors. This training covers essential topics, including securing

unattended workstations, safeguarding passwords, prohibiting the use of unauthorized software, responsible social media use, and controlling and preventing the misuse of portable storage and memory devices. Additionally, our security policy and procedures for shore personnel are regularly audited as part of our internal Audit Program.

To further enhance our cybersecurity measures, our company conducts annual penetration tests conducted by a third-party entity, both on board our vessels and onshore. On the vessel side, we maintain continuous monitoring of onboard business and welfare networks and systems through tools like Navarino Angel. We also exercise strict access and security control over business networks and systems using ManageEngine Desktop Suite and ESET Antivirus. On the office side, we maintain continuous monitoring of networks and systems through SentinelOne, Watchguard Technologies EDR, ESET Security, and the Citrix Analytics Suite (covering Security, Performance, and Usage).

Roles and responsibilities in maintaining information security are distributed as follows:

- Senior Management: They provide management direction and support for information security and formally approve the company's information security policy.
- Information Technology (IT) Manager: Responsible for publishing, distributing, maintaining, and reviewing the policy. Also ensures proper implementation of the policy and supporting procedures.
- Heads of Departments: Actively support and implement the Cyber Security Policy within their respective departments, ensuring staff awareness of their responsibilities and security issues.
- IT Personnel: Accountable for protecting assets in accordance with the information security policy and supporting procedures.
- Users: Expected to act in accordance with the company's Cyber Security Policy and supporting procedures.
- On-Board Users: Also expected to act in accordance with the company's Cyber Security Policy and supporting procedures.

- SSO (Ship Security Officer): In addition to physical security responsibilities per the Ship Security Plan, responsible for implementing the company's Cyber Security Policy and procedures on board.
- Master: Responsible for all security aspects of cyber-enabled systems on board the ship, covering both IT, OT, and communications systems.

Noteworthy cybersecurity measures and tools include ESET Antivirus daily updates, Navarino Spectrum, Active Directory (AD), Navarino Infinity & Angel, network segregation for business, crew, entertainment, and OT networks, USB lock control via AD policies and ManageEngine Desktop Plus, and Daily Veeam backups. Additionally, the company maintains contingency plans for both the office and vessels and relies on tools such as Navarino Angel¹¹ and Furuno Hermace¹² for various aspects of cyber security.

Notably, in the reporting period no substantial complaints were received concerning breaches of customer privacy or per se relevant incidents.

¹¹ For more information, you may visit: <https://www.navarino.co.uk/portfolio/what-is-angel/>

¹² For more information, you may visit: <https://www.furuno.com/en/merchant/hermace/>

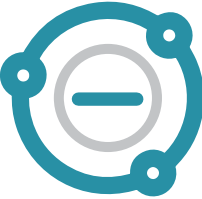
Change Management

Change management in shipping companies can have various actual and potential impacts on the economy, environment, and people, including implications for human rights. These impacts can be both positive and negative:



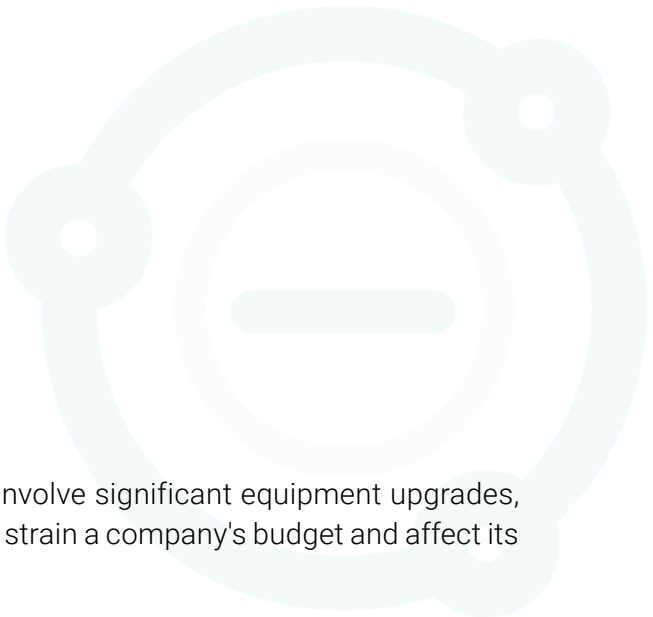
Positive Impacts:

- Operational Efficiency: Effective change management can lead to improved operational efficiency within shipping companies. Streamlined processes, updated technologies, and optimized procedures can reduce costs and enhance productivity.
- Environmental Sustainability: Changes aimed at adopting eco-friendly technologies and practices can have a positive impact on the environment. For instance, transitioning to cleaner fuels and implementing energy-efficient measures can reduce greenhouse gas emissions and limit environmental harm.
- Safety Improvements: Changes in safety protocols, equipment upgrades, and training enhancements can result in safer working conditions for crew members and reduced risks to human life and the environment. This can include measures to prevent accidents, spills, and other safety incidents.
- Compliance with Regulations: Effective change management ensures that shipping companies remain in compliance with evolving maritime regulations and international standards. This not only avoids legal consequences but also contributes to environmental protection and safety.



Negative Impacts:

- Financial Costs: Implementing changes can be costly, particularly if they involve significant equipment upgrades, technology investments, or process overhauls. These financial burdens can strain a company's budget and affect its profitability.
- Operational Disruptions: Managing change can lead to temporary disruptions in operations. This can result in delays, decreased productivity, and revenue loss during the transition period.
- Competitive Disadvantage: Companies that struggle to adapt to changes may find themselves at a competitive disadvantage compared to more agile and adaptable competitors. This can impact market share and revenue.
- Environmental Impact: In some cases, changes related to vessel technology or fuel may have environmental trade-offs, such as the disposal of old equipment or the increased consumption of resources during the transition.





Human Rights and Labor Issues:

- Labor Disruptions: Changes in operations, technology, or crew requirements can lead to labor-related issues. Crew members may be affected by changes in job roles, working conditions, or employment stability, potentially impacting their human rights.
- Training and Skills: Ensuring that crew members receive adequate training and support during changes is essential. Failure to do so can result in safety hazards and labor rights violations.
- Access to Shore Leave: Changes in port operations and regulations can affect seafarers' access to shore leave, potentially impacting their well-being and human rights.
- Safety and Health: Changes that compromise safety standards or health conditions for crew members can have serious human rights implications.



In summary, change management in shipping companies can have a range of impacts, including economic, environmental, and human rights consequences. Effective change management can lead to improved efficiency, safety, and environmental sustainability. However, inadequate or poorly managed change can result in financial costs, operational disruptions, and negative environmental and human rights impacts. It is crucial for shipping companies to carefully plan and execute changes to mitigate potential negative effects and maximize positive outcomes.

The company has established a robust Management of Change procedure with the primary objective of ensuring that all changes affecting the Company's operations are meticulously identified, assessed, and managed to uphold safety, health, quality, and environmental standards. This procedure is critical in preventing potential issues arising from changes and maintaining acceptable risk levels.

Even seemingly minor changes, whether they involve new procedures, personnel, third-party contractors, vessel introductions, equipment installations, regulatory updates, or other factors, can impact safety if not handled systematically.

Therefore, the Management of Change process is a structured approach designed to comprehensively evaluate and oversee proposed changes.

The key objectives of the Management of Change procedure include:

- Ensuring a thorough assessment of safety, health, quality, and environmental implications related to the change.
- Guaranteeing that all changes adhere to relevant regulations and industry standards.
- Identifying and documenting training requirements resulting from changes and ensuring that the necessary personnel receive appropriate training within specified timeframes.

Approved changes must be implemented within defined timeframes. Failure to meet these timelines necessitates seeking re-authorization for the change, accompanied by a reassessment of initial hazard observations and risk assessments. In cases where new or heightened risks are identified, the adequacy of risk reduction measures is subject to review and approval by the CEO. This rigorous process underscores our commitment to maintaining the highest safety and quality standards across all aspects of our operations.



7

SUPPORTING ENVIRONMENTAL IMPACTS

SUPPORTING ECONOMIC ENVIRONMENTAL IMPACTS

Environmental Goals and KPIs

Below, you'll find the environmental commitments, goals, remarks, and KPIs set in 2022. The ESG report for fiscal year 2023 will include the performance against these KPIs.

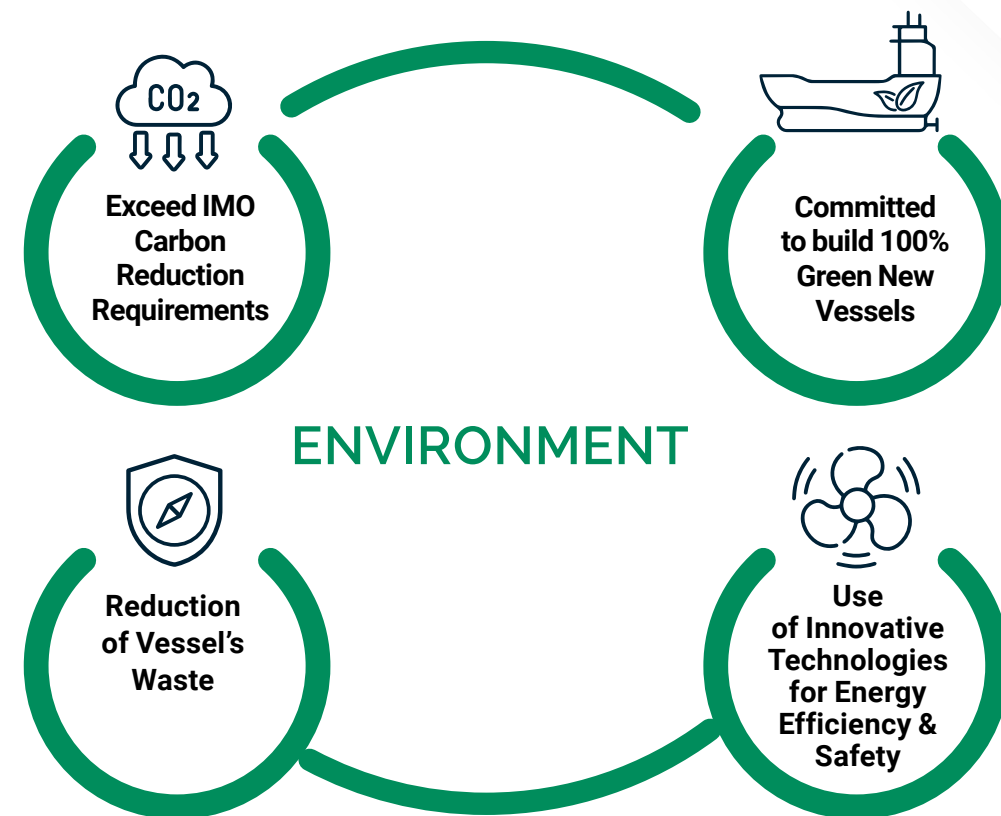



Table 9: Environmental commitments, goals and KPIs

COMMITMENTS	2028 GOALS	REMARKS	KPIs (Annual)
 Exceed IMO Carbon Reduction Requirements	<ul style="list-style-type: none">• 5% reduction of CO₂ emission by 2030 (grCO₂/tones X miles).• Certify our Corporate Office and Crew Travelling as Net Zero	Vessel Commitments	grCO ₂ / tones X miles
 Reduction of Vessel's Waste	Reduction of waste volume onboard vessels by 30% son average three years ahead of schedule	Biodigesters will be installed in all vessels	Tonnage of Waste reused per category
 Use of Innovative Technologies for Energy Efficiency & Safety	Improve Energy and Safety	Empower shipping by incorporating data-driven technologies with the automation needed for navigating the safest voyages with the most efficient operations	Impact of New Technologies Zero incidents

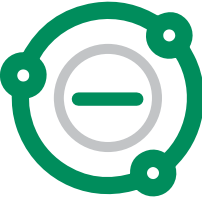
Energy Consumption Monitoring and Efficiency

Energy consumption monitoring and efficiency can have a range of actual and potential impacts on the economy, environment, and people, including implications for human rights. These impacts can be both positive and negative:



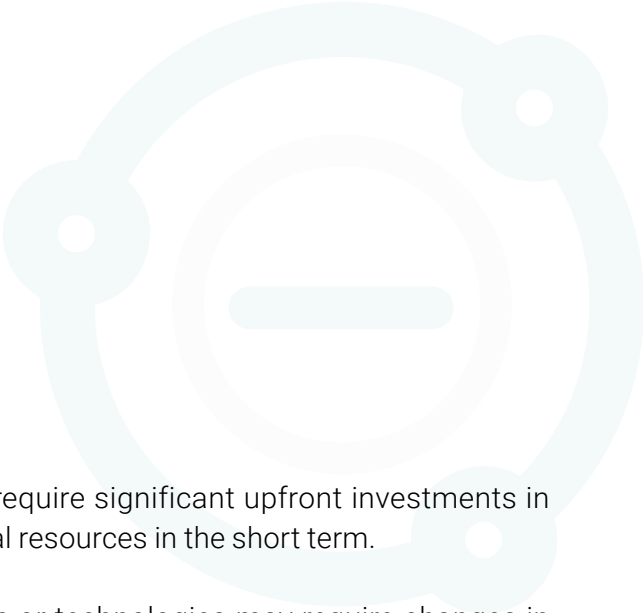
Positive Impacts:

- Economic Savings: Effective energy management can lead to significant cost savings for shipping companies. By optimizing fuel consumption and energy efficiency, companies can reduce operational expenses, which positively impacts their profitability.
- Environmental Benefits: Energy management measures that result in reduced fuel consumption and emissions can contribute to environmental protection. This includes lower greenhouse gas emissions, which can help mitigate climate change, and reduced air and water pollution.
- Compliance with Regulations: Ship management companies that implement energy management practices are more likely to comply with international and regional regulations related to emissions and environmental standards. This reduces the risk of legal consequences and associated fines.
- Improved Reputation: Demonstrating a commitment to energy efficiency and environmental responsibility can enhance a shipping company's reputation. This can attract environmentally conscious customers, partners, and investors.
- Innovation Opportunities: Energy management initiatives may drive innovation within the company, leading to the development of new technologies and practices that can be marketed to others in the industry.



Negative Impacts:

- Initial Investment: Implementing energy management practices may require significant upfront investments in technology, equipment, and training. This can strain a company's financial resources in the short term.
- Operational Changes: Transitioning to more energy-efficient processes or technologies may require changes in operations and crew training, which can disrupt existing workflows and processes.
- Technological Risks: The adoption of new technologies for energy management may introduce technical risks, such as system failures or cybersecurity vulnerabilities.
- Environmental Trade-offs: While energy management can reduce emissions, some measures, such as exhaust gas cleaning systems (SOx scrubbers), may have trade-offs, such as the production of waste and by-products that need proper disposal.
- Resource Constraints: Implementing energy-efficient technologies may require the allocation of resources, such as materials for retrofitting or installing new equipment, which could contribute to resource depletion or environmental degradation.



In summary, energy management in shipping companies can yield substantial economic savings, environmental benefits, and enhanced compliance with regulations, contributing to a positive reputation. However, it may require initial investments, operational adjustments, and pose certain environmental and human rights challenges. Effective energy management strategies should aim to maximize the positive impacts while minimizing the negative ones.

Shipping is a key enabler of international trade, accounting for more than three-quarters of total freight transport activity. Generally, it is also the most energy-efficient way to carry cargo in terms of energy use per tonne-mile transported. Improved energy efficiency in shipping means use of alternative fuel, i.e., biofuel, ammonia etc. with reduced emissions.

Our Energy Efficiency Management Policy dictates:

- regular reviews,
- best practice on all operations,
- promotes energy efficiency awareness via training, campaigns and incentives,
- manages compliance with all related ship energy efficiency legal requirements,
- applies SEEMP to all fleet vessels.

Currently the IMO is well into decarbonizing the shipping sector through their strategy and guidelines. The Ship Energy Efficiency Management Plan (SEEMP) is an operational measure that establishes a mechanism to improve the energy usage in a cost-effective manner.

Energy efficiency is controlled primarily through well-planned and properly managed ship operations. Through planning, monitoring specific metrics, and understanding the energy usage onboard, we are able to maintain an efficient energy plan, which is frequently reviewed and readjusted, to ultimately optimise the vessel's efficiency.

Optimizing operations and achieving energy efficiency helps us manage our emissions. Direct CO₂ emissions from shipping activities have risen since the 2010s, due to higher global demand for seaborne trade. Despite recent policy developments, much stricter measures are needed to achieve a 1.42% average annual reduction in emissions between 2020 and 2030. Along those lines we are monitoring our emissions and aim to reduce CO₂ and other GHG emissions from ship operations.

Metric	2021	2022	Change
Total energy Consumption within the organization			
Total fuel consumption within the organization from non-renewable sources	28952MGO /123472HFO(incl.LFO)	34161MGO /121563HFO(incl.LFO)	5209MGO /-1909 HFO (incl.LFO)
Electricity consumption	17903	17396	-507 Kwh

Table 10: Energy metrics

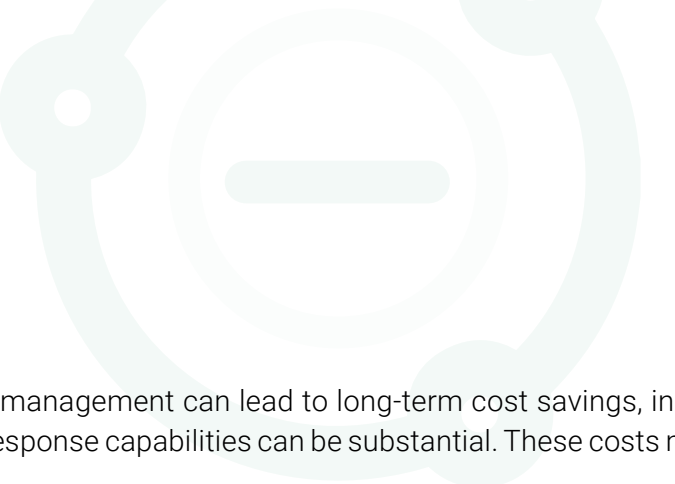
Waste Reductions & Spills Management

Waste reduction and spills management can have various actual and potential impacts on the economy, environment, and people, including implications for human rights. These impacts can be both positive and negative:

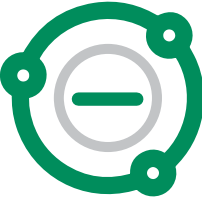
Positive Impacts:



- Economic Savings: Effective waste reduction and spills management can result in cost savings for shipping companies. By minimizing the generation of waste and the occurrence of spills, companies can reduce expenses associated with clean-up, fines, and legal liabilities.
- Environmental Protection: Robust waste reduction and spills management practices contribute to the protection of the environment. This includes preventing pollution of marine ecosystems, coastal areas, and sensitive habitats, which is crucial for biodiversity and ecosystem health.
- Compliance with Regulations: Adherence to waste management and spill response regulations helps shipping companies avoid legal consequences, fines, and penalties. Compliance also ensures that companies meet environmental standards and obligations.
- Enhanced Reputation: Demonstrating a commitment to responsible waste management and spills prevention can improve a shipping company's reputation. This can attract environmentally conscious customers, partners, and investors.
- Human Rights Safeguarding: Effective management of spills and waste can help safeguard the human rights of individuals, especially those living in coastal communities. This includes the right to a clean and healthy environment and the right to livelihoods based on marine resources.



Negative Impacts:



- Financial Costs: While effective waste reduction and spills management can lead to long-term cost savings, initial investments in waste management infrastructure and spill response capabilities can be substantial. These costs may impact a company's short-term finances.
- Operational Complexity: Implementing and maintaining waste reduction and spills management measures can add operational complexity. Companies need to allocate resources, conduct training, and manage waste storage and disposal properly.
- Reputation Damage: Inadequate waste management and spills can lead to reputational damage for shipping companies. Accidents or pollution incidents can erode trust among stakeholders and the public, leading to a negative impact on the company's image.
- Environmental Impact: Poor spills management can result in severe environmental damage, including contamination of water bodies and harm to marine life. This has cascading effects on the ecosystem and can negatively impact the environment for years.
- Human Rights Violations: Spills and poor waste management can potentially violate the human rights of individuals in affected communities, especially those dependent on marine resources for their livelihoods. It can disrupt their access to clean water, food, and a healthy environment.
- Regulatory Consequences: Non-compliance with waste reduction and spills management regulations can lead to legal consequences, including fines, penalties, and potential legal actions by affected parties.

In summary, effective waste reduction and spills management in shipping companies can lead to economic savings, environmental protection, and enhanced compliance and reputation. However, inadequate management can result in financial costs, operational complexity, reputational damage, environmental harm, human rights violations, and regulatory consequences. It is essential for shipping companies to prioritize responsible waste management and spills prevention to mitigate negative impacts and uphold their social and environmental responsibilities.

Although waste management still has a long way to go before, we can consider it mission accomplished, there have been heated discussions over the past few years, that bring forward innovative waste management solutions. We take our wastes seriously and so we have set comprehensive management plans for all our wastes on board as well as sewage, bilge water and refrigerant systems. There are four different areas in a vessel that different types of management are applied.

All are implemented through the existing Health, Safety, Quality and Environmental System (HSQE).

- Sewage, Bilge Water and Refrigerant Systems Management Plan
- Ballast Water System
- Garbage Management Plan
- Recycling

Both our Garbage management plan Sewage, Bilge Water and Refrigerant Systems Management Plan list all types of wastes generated by each vessel, as well as the available equipment and the designated person(s) responsible for carrying out each plan. Several procedures describe the management of different waste streams within a vessel, collection, processing, storage, and discharge and ensure that the operation is in accordance with the requirements under the revised Annex V of MARPOL 73/78.

These include:

- Volume minimization of waste type/stream.
- Shipboard waste stream handling and storage procedures.
- Shipboard equipment for processing specific waste streams.
- Crew training, education, and information.

Wastes related to sewage, bilge water and refrigerant systems are treated as separate waste streams according to the specific manual and procedures as per each vessel.



Metric	2022	2021
Freon		
FREON Supplied Onboard (kg)	432.5	1952
FREON used (kg)	191	779
FREON ROB (kg)	9,518.6	10,056.6

Table 11: Ozone depleting substances (O.D.S) (Refrigerants, A/C) stream handling



Metric	2022	2021
Various chemical		
Chemicals Supplied Onboard (kg)	61,695	123,416
Chemicals used (kg)	44,005	52,118
Chemicals ROB (kg)	288,001	413,929.

Table 12: Chemicals for cleaning purposes (excluded detergent and additives) Engine and Deck use inclusive urea



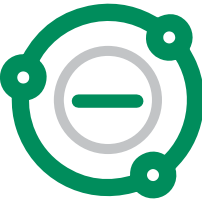
Selecting Suppliers through Environmental Criteria

Selecting suppliers through environmental criteria can have various actual and potential impacts on the economy, environment, and people, including implications for human rights. These impacts can be both positive and negative:



Positive Impacts:

- Environmental Sustainability: By choosing suppliers based on environmental criteria, companies can encourage and support environmentally responsible practices throughout their supply chains. This can result in reduced environmental pollution, lower carbon emissions, and conservation of natural resources.
- Compliance with Regulations: Selecting environmentally responsible suppliers can help companies ensure compliance with environmental laws and regulations. This reduces the risk of legal consequences, fines, and penalties associated with non-compliance.
- Resource Efficiency: Suppliers committed to environmental sustainability may adopt resource-efficient processes, which can lead to cost savings for both the supplier and the purchasing company. Reduced resource consumption can enhance the long-term economic viability of the supply chain.
- Enhanced Reputation: Companies that prioritize environmentally responsible suppliers can improve their own reputation among customers, investors, and other stakeholders who value sustainability. A positive reputation can attract environmentally conscious consumers and partners.
- Innovation and Green Technologies: Collaboration with environmentally responsible suppliers can drive innovation, leading to the development of eco-friendly products, technologies, and practices that benefit the environment and may have competitive advantages in the market.



Negative Impacts:

- Higher Costs: Suppliers that prioritize environmental responsibility may incur higher production and operational costs. This can lead to higher prices for their products and services, potentially increasing costs for the purchasing company.
- Supply Chain Disruptions: Transitioning to environmentally responsible suppliers may disrupt established supply chains, leading to delays in procurement and potential operational disruptions.
- Limited Supplier Options: Depending on the industry and geographic location, there may be a limited number of suppliers that meet specific environmental criteria. This can reduce competition and limit the company's choices, potentially impacting pricing and availability.
- Cost of Compliance: Suppliers adhering to strict environmental standards may pass on compliance costs to their customers. This can result in higher prices for goods and services throughout the supply chain.



In summary, selecting suppliers through environmental criteria can have both positive and negative impacts on the economy, the environment, and people, including their human rights. We are also aware that we should carefully assess these impacts and work to strike a balance between environmental responsibility and economic considerations, while also considering the broader social implications of their supply chain decisions.

Considering the above analysis, we select our suppliers based on:

- Ability to meet required specifications.
- Quality of service.
- Cost considerations.
- Environmental considerations; (packing materials to in compliance with ISO 14001 & asbestos free).
- On time delivery.
- Correct quantity.

We monitor and evaluate their performance continuously. As part of our overall Environmental Management System (E.M.S.) and to comply with our Environmental & Quality Policy¹³ our supplier’s environmental identity is important to us. We follow a specific evaluation procedure with all relevant business partnerships and make specific request as follows:

- A copy of the latest ISO 9001 & ISO 14001 Certificate of Approval.
- All materials need to be environmentally friendly (phosphate free detergents and 100% asbestos free materials), to the best possible grade.
- Minimum plastic packaging material for goods delivered onboard.
- Declaration of Conformity (SDoC) and Material Declaration (MD) of the spare parts upon ordering.
- Maintenance of inventory of hazardous materials (IHM).

¹³ For more information, you may visit: <https://eneselnet.com/policies.html>

Metric	2022
Percentage of new suppliers that were screened using environmental criteria	15%
Number of suppliers assessed for environmental impacts	4
Number of suppliers identified as having significant actual and potential negative environmental impacts	-
Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment.	0
Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment.	6%

Table 13: Selecting suppliers with environmental criteria metrics

In addition, our company has in place the procurement procedure as part of the Integrated Management System. This procedure reflects a structured approach to procurement, ensuring that goods and services meet quality and safety standards while considering environmental and cost-saving aspects. It also delineates responsibilities between shipboard and office staff. It is important to note that Material Safety Data Sheets (MSDS) are required for some deliveries, emphasizing safety and environmental considerations. Also, our company encourages bulk purchases and recycling of packaging materials.

The primary purpose of this procedure is to ensure that purchased goods and services meet the company’s order requirements. It also aims to maintain control and performance records of suppliers and establish clear guidelines for the purchasing process. The procedure applies to various categories of purchases related to shipping operations, including ship equipment, spare parts, lubricants, technical services, ship supplies, stores, provisions, gases, chemicals, paints, and bunkers (in the case of voyage charter) for the vessels and our Company’s headquarters.

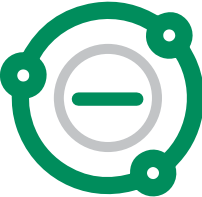
Recycling

Recycling, can have specific impacts on the industry, the environment, and people, including implications for human rights. Here are some of the actual and potential impacts:



Positive Impacts:

- Cost Savings: Recycling materials and equipment can lead to cost savings by reducing the need to purchase new resources. This is particularly beneficial for shipping companies as it can lower operational expenses.
- Resource Conservation: Recycling contributes to the conservation of valuable resources, including metals, plastics, and other materials used in shipbuilding and maintenance. This helps reduce the environmental impact of resource extraction.
- Environmental Compliance: Many countries and international regulations require responsible disposal and recycling of hazardous materials found on ships. Complying with these regulations helps shipping companies avoid legal consequences and penalties.
- Sustainability Commitment: Embracing recycling practices demonstrates a shipping company's commitment to sustainability, which can enhance its reputation and appeal to environmentally conscious customers and partners.



Negative Impacts:

- Operational Challenges: Implementing recycling programs on ships can be operationally challenging due to limited space and resources, especially on older vessels not designed with recycling in mind.
- Initial Investments: Retrofitting ships or implementing recycling facilities onboard may require significant initial investments, impacting a company's budget.
- Regulatory Compliance: Ensuring compliance with recycling regulations, especially when disposing of hazardous materials like asbestos or chemicals, can be complex and time-consuming.
- Human Rights: Workers involved in ship recycling and disposal activities, whether onboard or at recycling facilities, may face poor working conditions, safety risks, and limited labor rights protection.
- Environmental Risks: Improper disposal or recycling of hazardous materials can result in environmental pollution and harm to marine ecosystems, impacting not only the environment but also the livelihoods of coastal communities.
- Supply Chain Complexities: Managing the recycling of equipment and materials can introduce complexities into the supply chain, affecting procurement, logistics, and maintenance processes.

In summary, recycling in shipping companies can have both positive and negative impacts. It offers cost savings, resource conservation, and environmental compliance benefits. However, it also poses operational, financial, and regulatory challenges. It's essential for shipping companies to carefully plan and execute recycling initiatives, ensuring they meet environmental regulations and prioritize the well-being of workers and local communities. Properly managed recycling practices can contribute to sustainable and responsible maritime operations.

We, at ENESEL S.A., are dedicated to embracing sustainability in our day-to-day operations, whether they occur ashore or onboard our vessels. We constantly engage in discussions and remain open to novel ideas. In our efforts to diminish our plastic footprint, particularly onboard our ships, we have been exploring the possibility of installing water filters on our vessels. In response to this new challenge, all our newly constructed vessels come equipped with waste shredders as part of a pilot project. Additionally, we are currently in the process of evaluating the market for food waste biodigesters and compost machines, which could offer innovative waste management solutions for our fleet.

Our commitment to sustainability also extends to our office practices. We have completely phased out the use of plastic, and our entire team operates in a paperless manner, leveraging advanced office technology that we have adopted over the past five years.

Furthermore, when it comes to our office electricity needs, we have established a partnership with HERON, a prominent player in the field of electricity production. HERON presently operates two gas-fueled power plants with a combined capacity of 582 MW. These production units feature unique attributes compared to other domestic facilities, offering a significant advantage in terms of startup speed and technological sophistication. They achieve an efficiency rate of 58%, surpassing the average efficiency of gas-fired power plants in Greece, which typically does not exceed 54%. This high level of efficiency translates into reduced fuel consumption and, consequently, lower carbon dioxide (CO₂) emissions, making HERON's power plants one of the most environmentally friendly options available, ranking just behind renewable energy sources.

Metric	2022	2021
Waste generated		
Total waste	1,114.9	1,281.7
Total hazardous waste	90.9	102.23
Total non-hazardous waste	885.8	1,010.1
Total food waste	138.28	169.32
Total electronic waste	12.04	7.625
Waste diverted from disposal by type		
Total waste	n/a	n/a
Total hazardous waste	n/a	n/a
Total non-hazardous waste	n/a	n/a
Total food waste	n/a	n/a
Total electronic waste	n/a	n/a
Hazardous waste diverted from disposal, by disposal operation		
Total waste incinerated without energy recovery	980.447	2733.902
Total waste landfilled	18.34	124.5

Table 14: Waste generated.

Metric	2022	2021
Shipboard waste by category		
CAT A Plastics (mt)	430.53	554.99
CAT B Food wastes (mt)	138.28	169.32
CAT C Domestic wastes (mt)	384.44	421.97
CAT D Cooking oil (mt)	36.8	4.98
CAT E Incinerator ashes (mt)	21.99	20.59
CAT F Operational wastes (mt)	90.6	102.23
CAT G Animal carcass (es) (mt)	0	0
CAT H Fishing Gear (mt)	0	0
CAT I E-waste (mt)	12.04	7.625
CAT J Cargo Residues (non-HME) (mt)	0.3	0
CAT K Cargo Residues (HME) (mt)	0	0

Reference data (2022-2021) to Table 14: Shipboard waste stream handling

Metric	2022	2021
Shipboard sludge waste		
SLUDGE DISPOSED TO SHORE FACILITIES (m³)	18.34	124.5
SLUDGE INCINERATED ONBOARD (m³)	980.447	2733.902
SLUDGE PRODUCED ONBOARD (m³)	1405.71	3311.88

Table 12: Shipboard sludge stream handling

Metric	2022	2021
Shipboard slops waste		
SLOP DISPOSED TO SHORE FACILITIES (m³)	11,060	3,207
SLOP DISCHARGED AT SEA (m³)	795	386
SLOP PRODUCED ONBOARD (m³)	7,786	2,613

Table 13: Shipboard slops stream handling



8





SUPPORTING SOCIAL IMPACTS

SUPPORTING
SOCIAL IMPACTS

Social Goals and KPIs



Table 16: Social Commitments, Goals and KPIs

COMMITMENTS	2028 GOALS	REMARKS	KPIs (Annual)
 Zero accidents	Zero fatal accidents	2 KPIs (Fatal and Non-Fatal)	Number of accidents/ Number of Fatal Accidents
 Continuous Development and Wellbeing of Staff and Crew	Offer at least 60 hours in average of training per Staff and Crew per year	Provide 100% of Staff and Crew with learning resources	Training Hours per Staff/Year Training Hours per Crew Member/ Year Benefits increase per year
 Apply Sustainability in Supply Chain	Apply Sustainability and decarbonation principles to 100% of our suppliers	Apply a Code of Conduct with ESG criteria	Percentage of Key Suppliers assessed
 Continues contribution to Society (or Local Communities)	Maximize our Social Impact		Number of Social Initiatives per year

Emergency Preparedness

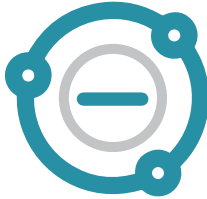
Emergency preparedness in shipping companies has various actual and potential impacts on the economy, environment, and people, including implications for human rights. These impacts can be both positive and negative:

Positive Impacts:



- Safety and Life Protection: Effective emergency preparedness measures prioritize the safety and protection of crew members and passengers. This reduces the risk of accidents, injuries, and loss of life at sea, safeguarding human rights to life and safety.
- Environmental Protection: Preparedness for emergencies like oil spills or hazardous material leaks helps mitigate the environmental impact of such incidents. It ensures a swift and coordinated response to minimize damage to marine ecosystems and coastal communities.
- Regulatory Compliance: Compliance with international and national maritime safety and environmental regulations is essential for shipping companies. Emergency preparedness helps companies meet these legal requirements, avoiding fines and legal consequences.
- Operational Continuity: Being prepared for emergencies minimizes disruptions to shipping operations, ensuring goods and commodities continue to flow smoothly through ports and maritime routes, positively impacting the global economy.
- Reputation Enhancement: Demonstrating a commitment to safety and environmental responsibility through emergency preparedness enhances a shipping company's reputation. It can attract customers, partners, and investors who prioritize responsible business practices.

Negative Impacts:



- Financial Costs: Implementing comprehensive emergency preparedness measures, including training, equipment, and drills, can be expensive for shipping companies. These initial investments may strain financial resources.
- Operational Complexity: Emergency preparedness can introduce operational complexities, especially on older vessels. Crew members need to be trained, equipment maintained, and drills conducted regularly, potentially affecting day-to-day operations.
- Human Rights of Crew: Crew members may experience stress and anxiety associated with emergency preparedness drills and the potential for real emergencies. Shipping companies must ensure that crew rights, including mental well-being, are protected.
- Environmental Liability: While preparedness helps minimize environmental damage, shipping companies may still face environmental liability and reputational damage in the event of a significant incident.
- Resource Allocation: Allocating resources for emergency preparedness may divert funds and attention from other critical areas of a shipping company's operations.
- Community Impact: Coastal communities may experience negative impacts in the event of maritime emergencies, affecting their rights to a clean environment and livelihoods based on marine resources.



In summary, emergency preparedness in shipping companies is essential for safety, environmental protection, and regulatory compliance. While it involves costs and complexities, the positive impacts on human rights, safety, and the environment generally outweigh the negatives. Shipping companies should continue to prioritize and invest in emergency preparedness to uphold their responsibilities to society, the environment, and their stakeholders.

To mitigate the negative impacts, we maintain an Emergency Response Plan (ERP), which we test annually in a major ship-shore exercise. Throughout the year, we conduct drills based on each vessel's Flag Administration drill plan, and we also hold at least one Table-Top exercise involving the vessel, our emergency response team (including our Qualified Individuals, or QIs), Class, the Flag Administration, and the vessel's insurers.

Our goal is to achieve a 100% completion rate for our annual drill plan and to have zero observations during the Table-Top Exercise.

Our ERP is activated when emergencies involve casualties, serious injuries, pollution, significant property damage, or the potential for such consequences. It includes guidelines in the form of checklists for responding to emergencies and a list of essential contact numbers.

In the event of any of these incidents, ENESEL S.A. has established and maintains procedures to identify, analyze, and, when necessary, investigate all system deficiencies, including accidents, occupational diseases, Non-Conformities (NCR), observations (OBS), incidents (including injuries), and Near Misses. Immediate reporting, swift and effective investigation, and follow-up methods are used to facilitate organizational learning and to implement corrective and preventive actions, aiming to reduce relevant risks to the lowest practicable level (ALARP).

In 2022, the total number of medical cases was (26). In addition, we have introduced as of 2021 telemedicine services on board our vessels, allowing direct access to a network of dedicated medical practitioners who offer medical consultations on a case-by-case basis. These telemedicine services have been instrumental in providing assistance and contributing to the reduction of medical cases, despite the additional personnel.

Security Practices

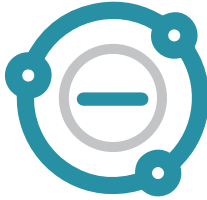
Security practices within can have various actual and potential impacts on the economy, environment, and people, including implications for human rights. These impacts can be both positive and negative:



Positive Impacts:

- Safety and Security: Effective security practices contribute to the safety and security of personnel, vessels, and cargo. This reduces the risk of accidents, piracy, terrorism, and other threats, safeguarding human lives and assets at sea.
- Operational Continuity: Security measures help ensure the uninterrupted flow of goods and commodities through ports and maritime routes. This has a positive impact on the global economy by preventing disruptions in trade.
- Environmental Protection: Security practices can also include measures to prevent environmental incidents such as oil spills or hazardous material leaks. This safeguards the marine environment, marine ecosystems, and coastal communities.
- Regulatory Compliance: Compliance with international and national maritime security regulations is essential for shipping companies. Adhering to these regulations helps avoid fines, penalties, and legal consequences, positively impacting the company's financial stability.
- Reputation Enhancement: Demonstrating a commitment to security and safety through effective practices enhances a shipping company's reputation. This can attract customers, partners, and investors who prioritize secure and responsible business practices.

Despite these positive aspects, it's important to acknowledge the potential challenges and negative impacts associated with security practices.



Negative Impacts:

- Financial Costs: Implementing comprehensive security practices, including personnel training, equipment, and security measures, can be expensive for shipping companies. These costs may strain financial resources.
- Operational Complexity: Security practices can introduce operational complexities, especially on older vessels not originally designed with security in mind. Crew members need to be trained, equipment maintained, and drills conducted regularly, potentially affecting day-to-day operations.
- Human Rights of Crew: Crew members may experience stress, anxiety, or discomfort associated with security drills and the potential for real security threats. It is essential for shipping companies to ensure that the rights and well-being of their crew members are protected.
- Environmental Liability: While security practices aim to prevent environmental incidents, shipping companies may still face environmental liability and reputational damage in the event of a significant security breach that results in environmental harm.
- Resource Allocation: Allocating resources for security practices may divert funds and attention from other critical areas of a shipping company's operations, potentially impacting overall efficiency and competitiveness.
- Community Impact: In the event of security incidents, coastal communities may be affected, potentially impacting their rights to a clean environment and livelihoods based on marine resources.

In summary, security practices in shipping companies play a crucial role in ensuring safety, protecting the environment, and complying with regulations. While they involve costs and complexities, the positive impacts on human rights, safety, and the environment generally outweigh the negatives. Shipping companies should continue to prioritize and invest in security practices to uphold their responsibilities to society, the environment, and their stakeholders.

Efficient security management necessitates the systematic recognition of potential threats across all operational areas. It involves implementing risk reduction strategies to minimize the impact of security breaches that could affect the safety of individuals and the protection of assets in various locations, including both onshore and onboard vessels. We have comprehensive security plans established for our onshore facilities, ships, and personnel, including the Office Security Plan, Ship Security Plan, and Travel Policy.

To oversee security-related matters, we have designated responsible personnel, including a Chief Security Officer (CSO) and a Deputy Chief Security Officer (DCSO), both for onshore and onboard responsibilities. These individuals undergo specific training and hold the necessary certifications, which are regularly renewed every five years.

We have identified and addressed all relevant security threats, integrating corresponding instructions and procedures into our management systems.

Our Ship Security Plans are tailored to each vessel, featuring well-documented procedures for managing various security threats. We conduct periodic reviews of these threats and mitigation measures, ensuring they are up-to-date and effective. These reviews are performed at least annually or whenever deemed necessary.



Response to Social Crisis

Our response to a social crisis as a shipping company can have various actual and potential impacts on the economy, environment, and people, including implications for human rights. These impacts can be both positive and negative:



Positive Impacts:

- Social Stability: Addressing a social crisis, such as labor disputes or worker welfare issues, contributes to social stability. This stability fosters a conducive environment for our business operations, ensuring the smooth flow of goods and services.
- Labor Productivity: Our well-managed response to a social crisis can lead to improved labor relations and increased worker satisfaction. This, in turn, boosts labor productivity, reducing disruptions in our shipping operations.
- Regulatory Compliance: Responding effectively to social crises helps us comply with labor laws and regulations. Adhering to these rules prevents legal consequences, fines, and penalties, contributing to our financial stability.
- Reputation Enhancement: Demonstrating our commitment to fair labor practices and social responsibility enhances our reputation. This attracts socially conscious customers, partners, and investors.
- Community Engagement: Positive responses to social crises can lead to increased community support and goodwill, strengthening our relationship with local communities.

Despite these positive aspects, it's important to acknowledge the potential challenges and negative impacts associated with the company's response to social crisis.



Negative Impacts:

- Financial Costs: Addressing social crises often involves financial costs, such as higher wages or benefits for workers, legal fees, and potential compensation. These costs can strain our financial resources.
- Operational Disruptions: Labor strikes, protests, or disruptions resulting from social crises can halt our shipping operations, leading to delays, losses, and reduced revenue.
- Supply Chain Disruptions: Social crises can disrupt the supply chain, affecting the timely delivery of goods and potentially causing losses for customers and partners.
- Reputation Damage: Poor handling of social crises can lead to reputational damage, impacting our brand and customer trust.
- Human Rights: Failing to address labor-related social crises can result in violations of human rights, including the rights of workers to fair wages, safe working conditions, and freedom from discrimination.
- Environmental Impact: Prolonged social crises can indirectly impact the environment if our shipping operations are disrupted, leading to idling vessels that consume fuel and potentially contributing to emissions.

In summary, our response to a social crisis as a shipping company can have significant economic, environmental, and social implications. While effectively addressing social issues can lead to positive outcomes such as stability, productivity, and reputation enhancement, mishandling these crises can result in financial losses, operational disruptions, and human rights violations. We should prioritize responsible and ethical responses to social crises to minimize negative impacts and uphold our responsibilities to society, the environment, and our stakeholders.

For our Company, the invasion in Ukraine has impacted our seafarers and of course us. We have provided financial assistance, liaised with real estate brokers for our seafarers transfer to other countries and provided unlimited out of charge voice/internet services for those being onboard.

As member of the SYN-ENOSIS, the company has supported several areas, such as:

- Food aid - a food aid programme addressed to disadvantaged families based on pre-determined social and income criteria. The programme provides monthly support packages with basic standardized food and personal hygiene items.
- Health - supporting and funding activities related to health of vulnerable populations groups in cooperation with medical care organizations mainly in regions where access of medical services is difficult or limited (i.e. provision of personal hygiene items to the Greek Association of Alzheimer's Disease and Related Disorders in Xanthi region, provision of medical equipment to the Athens Naval Hospital/Attikon University Hospital).
- Social care - supports organizations devoted in addressing the needs for vulnerable social groups within Attica and beyond by providing special equipment, covering heating needs and other selected actions (i.e. Rest homes of several churches, "To Perivolaki" (Hellenic center of mental health and treatment of children and families) 4) Crisis management - wildfire program, aid in the battle against pandemic, support of earthquake victims in Ellassona.



Trust & Transparency

Trust and transparency practices within shipping companies can have various actual and potential impacts on the economy, environment, and people, including implications for human rights. These impacts can be both positive and negative:

Positive Impacts:

Economic Stability:

- Investor Confidence: Trust and transparency can enhance investor confidence, leading to increased investments and capital flow into the shipping company. This can stimulate economic growth and expansion.

Operational Efficiency:

- Reduced Risks: Transparent reporting and risk management practices help identify and mitigate potential risks, minimizing operational disruptions and financial losses.
- Cost Savings: Transparent procurement and financial practices can lead to cost savings, which positively impact the company's bottom line and potentially reduce prices for customers.

Environmental Sustainability:

- Regulatory Compliance: Transparent reporting of environmental practices ensures compliance with environmental regulations, reducing the risk of fines and penalties.
- Resource Conservation: Transparent disclosure of resource usage and emissions can drive efforts to reduce environmental impact and conserve resources.

Human Rights and Social Benefits:

- Worker Welfare: Transparency in labor practices and wages can lead to improved working conditions, fair wages, and enhanced labor rights protection, benefiting employees.
- Community Engagement: Transparent and socially responsible practices can build positive relationships with local communities, fostering goodwill and potentially reducing social conflicts.



Despite these positive aspects, it's important to acknowledge the potential challenges and negative impacts associated with the company's response to trust and transparency.

Negative Impacts:

Economic Challenges:

- Market Vulnerability: Over-transparency can expose a shipping company's strategies and vulnerabilities to competitors, potentially impacting market competitiveness.
- Financial Costs: Implementing extensive transparency measures may involve financial investments, affecting short-term profitability.

Operational Complexities:

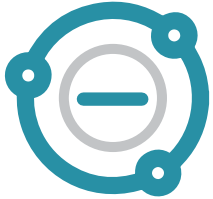
- Resource Allocation: Ensuring transparency often requires resource allocation for reporting, auditing, and compliance, diverting resources from other areas.
- Business Delays: Excessive transparency requirements can slow down decision-making processes and business operations.

Environmental and Social Risks:

- Reputation Risks: Transparency can reveal environmental and social issues that may harm the company's reputation and brand if not adequately addressed.
- Community Expectations: Transparent reporting may raise community expectations for corporate social responsibility, which can be challenging to meet.

Human Rights Implications:

- Privacy Concerns: Excessive transparency regarding employee and crew personal data may raise privacy concerns and potential human rights violations.
- Worker Scrutiny: Transparency in labor practices may lead to increased scrutiny, potentially impacting labor relations and workforce morale.



In summary, trust and transparency in shipping companies can yield numerous benefits, including economic stability, operational efficiency, environmental sustainability, and social advantages. However, it's essential to strike a balance to avoid potential negative impacts such as economic challenges, operational complexities, and reputational risks. Responsible and strategic implementation of trust and transparency practices is key to maximizing their positive impacts while mitigating potential drawbacks.

In our Group, both transparency and trust are deeply ingrained in our culture, forming the bedrock of our operations and the foundation of our relationships with internal and external stakeholders. Through our policies, procedures, and reporting practices, we demonstrate transparency in our decision-making and all activities, regardless of their impact.

We are dedicated to managing our impact, mitigating negative effects, and amplifying positive ones. By doing so, we cultivate trust in ENESEL S.A. as a responsible company firmly committed to the core principles of sustainability.

Transparency plays a pivotal role in fostering strong relationships between our employees (both office and crew) and higher management. We are committed to creating an open and trusting workplace where every team member is empowered to voice their opinions and exercise their 'STOP WORK' authority when necessary. We promote collaboration and teamwork, both ashore and onboard, to uphold equality and respect for human rights.

These values extend throughout our entire Group, where transparency and trust are among the fundamental principles guiding our operations and interactions with stakeholders.



ACTIONS FOR THE SOCIETY

In light of the devastating developments in the Russia-Ukraine war, our company's employees felt compelled to provide financial aid to the suffering people of Ukraine. After exploring various avenues for assistance, we connected with the philanthropic organization "O allos anthropos," which was organizing a mission to the Ukrainian borders. During this mission, they prepared meals for Ukrainian refugees.

Our dedicated employees raised a total of Euro 2,100, which was used to purchase essential items. These items included milk, water, baby creams, baby diapers and wipes, personal hygiene products, and packaged food, among others. The collected supplies were delivered to designated collection points and then transported to the border to aid those in need.

In addition to the efforts of our employees, our Owners demonstrated their generosity by making substantial donations to various charitable initiatives in support of the Ukrainian people. These actions reflect our commitment to providing assistance and support to those affected by the ongoing crisis in Ukraine and other charitable causes.



Furthermore, we made a generous donation of \$10,000 during the M/T Solomos Naming Ceremony to support the workers of DAEHAN Shipbuilding Co. Ltd.










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GRI
INDEX


Statement of use	ENESEL S.A. has reported in accordance with the GRI Standards for the period from 1st January of 2022 to 31st of December 2022, with an annual frequency.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	There is no applicable sector standard.

GRI Standard	Disclosure	Location	Linkage with SDGs	Omission		
				Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-1 Organisation details	p. 12, 13		A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.		
	2-2 Entities included in the organization's sustainability reporting	p. 13				
	2-3 Reporting period, frequency and contact point	p. 13				
	2-4 Restatements of information	There are no restatements of information in the current report				
	2-5 External assurance	This report has not been externally assured				
	2-6 Activities, value chain and other business relationships	p. 18 - 23				
	2-7 Employees	p. 24 - 25	 			

GRI Standard	Disclosure	Location	Linkage with SDGs	Omission		
				Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-8 Workers who are not employees	p. 24 -25				
	2-9 Governance structure and composition	p. 30	 			
	2-10 Nomination and selection of the highest governance body		 			
	2-11 Chair of the highest governance body	p. 30				
	2-12 Role of the highest governance body in overseeing the management of impacts	p. 31, 32				
	2-13 Delegation of responsibility for managing impacts	p. 32				
	2-14 Role of the highest governance body in sustainability reporting	p. 32				
	2-15 Conflicts of interest	p. 33				
	2-16 Communication of critical concerns	p. 34				
	2-17 Collective knowledge of the highest governance body	p. 34				

GRI Standard	Disclosure	Location	Linkage with SDGs	Omission		
				Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-18 Evaluation of the performance of the highest governance body					
	2-19 Remuneration policies			Describe the remuneration policies for members of the highest governance body and senior executives, including: i. fixed pay and variable pay; ii. sign-on bonuses or recruitment incentive payments; iii. termination payments; iv. clawbacks; v. retirement benefits	Confidentiality constraints	
	2-20 Process to determine remuneration			Describe the process for designing its remuneration policies and for determining remuneration, including: i) whether independent highest governance body members or an independent remuneration committee oversees the process for determining remuneration; ii) how the views of stakeholders (including shareholders) regarding remuneration are sought and taken into consideration; iii) whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organization, its highest governance body and senior executives	Confidentiality constraints	


GRI Standard	Disclosure	Location	Linkage with SDGs	Omission		
				Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-21 Annual total compensation ratio			Report the ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual); a) report the ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage b) increase in annual total compensation for all employees (excluding the highest-paid individual)	Confidentiality constraints	
	2-22 Statement on sustainable development strategy	p. 6 - 9				
	2-23 Policy commitments	p. 40, 41				
	2-24 Embedding policy commitments	p. 40, 41				
	2-25 Processes to remediate negative impacts	p. 42				
	2-26 Mechanisms for seeking advice and raising concerns	p. 43				

GRI Standard	Disclosure	Location	Linkage with SDGs	Omission		
				Requirement(s) omitted	Reason	Explanation
GRI 2: General Disclosures 2021	2-27 Compliance with laws and regulations	p. 44 - 46				
	2-28 Membership associations	p. 47				
	2-29 Approach to stakeholder engagement	p. 50 - 53				
	2-30 Collective bargaining agreements	p. 53				

Material Topics





GRI 3: Material topics 2021	3-1 Process to determine material topics	p. 56		A gray cell indicates that reasons for omission are not permitted for the disclosure or that a GRI Sector Standard reference number is not available.		
	3-2 List of material topics	p. 58 - 59				










Anti - Corruption






GRI 3: Material topics 2021	3-1 Process to determine material topics	p. 66				
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	p. 67 - 69				




GRI Standard	Disclosure	Location	Linkage with SDGs	Omission		
				Requirement(s) omitted	Reason	Explanation
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	p. 69		a) Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region. d) Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.	Non available information	
	205-3 Confirmed incidents of corruption and actions taken	p. 69				

Energy Consumption Monitoring and Efficiency

GRI 3: Material topics 2021	3-1 Process to determine material topics	p. 82 - 83	   			
GRI 302: Energy 2016	302-1 Energy consumption within the organization	p. 84 - 85				
	302-2 Energy consumption outside of the organization			Energy consumption outside of the organization, in joules or multiples.	Not available information	
	302-3 Energy intensity			a. Energy intensity ratio for the organization. b. Organization-specific metric (the denominator) chosen to calculate the ratio. c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all. d. Whether the ratio uses energy consumption within the organization, outside of it, or both.	Not available information	

GRI Standard	Disclosure	Location	Linkage with SDGs	Omission		
				Requirement(s) omitted	Reason	Explanation
GRI 302: Energy 2016	302-4 Reduction of energy consumption	p. 85	 			
	302-5 Reductions in energy requirements of products and services		 	a) Reductions in energy requirements of sold products and services achieved during the reporting period, in joules or multiples. b) Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.	Not available information	
Emissions						
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions		 	Gross direct (Scope 1) GHG emissions in metric tons of CO ₂ equivalent.	Not available information	
	305-2 Energy indirect (Scope 2) GHG emissions		  	Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO ₂ equivalent.	Not available information	
	305-3 Other indirect (Scope 3) GHG emissions			Gross other indirect (Scope 3) GHG emissions in metric tons of CO ₂ equivalent.	Not available information	
	305-4 GHG emissions intensity			a) GHG emissions intensity ratio for the organization. b) Organization-specific metric (the denominator) chosen to calculate the ratio.	Not available information	

GRI Standard	Disclosure	Location	Linkage with SDGs	Omission		
				Requirement(s) omitted	Reason	Explanation
GRI 305: Emissions 2016	305-5 Reduction of GHG emissions		   	a) GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO ₂ equivalent. b) Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).		
	305-6 Emissions of ozone-depleting substances (ODS)			a) Production, imports, and exports of ODS in metric tons of CFC-11 (trichlorofluoromethane) equivalent. b) Substances included in the calculation.	Non applicable	The company does not produce ODS emissions from its activities
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions			Significant air emissions, in kilograms or multiples, for each of the following: i. NOx ii. SOx iii. Persistent organic pollutants (POP) iv. Volatile organic compounds (VOC) v. Hazardous air pollutants (HAP) vi. Particulate matter (PM) vii. Other standard categories of air emissions identified in relevant regulations	Non applicable	The company does not produce ODS emissions from its activities
Waste Reduction and Spills Management						
GRI 3: Material topics 2021	3-3 Management of material topics	p. 86 - 87				

GRI Standard	Disclosure	Location	Linkage with SDGs	Omission		
				Requirement(s) omitted	Reason	Explanation
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	p. 86 - 89, 97	  			
	306-2 Management of significant waste-related impacts	p. 88				
	306-3 Waste generated	p. 89				
	306-4 Waste diverted from disposal	p. 97				
	306-5 Waste directed to disposal	p. 97				

Selecting Suppliers through environmental criteria

GRI 3: Material topics 2021	3-3 Management of material topics	p. 90 - 91				
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	p. 93				
	308-2 Negative environmental impacts in the supply chain and actions taken	p. 91, 93				

Security Practices

GRI 3: Material topics 2021	3-3 Management of material topics	p. 108 - 109				
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	p. 110				

GRI Standard	Disclosure	Location	Linkage with SDGs	Omission		
				Requirement(s) omitted	Reason	Explanation

Cyber Security

GRI 3: Material topics 2021	3-3 Management of material topics	p. 70 - 71				
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of income	p. 72 - 73				

NON GRI - Business Growth

GRI 3: Material topics 2021	3-3 Management of material topics	p. 62 - 65				
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NON GRI - Change Management

GRI 3: Material topics 2021	3-3 Management of material topics	p. 74 - 77				
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NON GRI - Compliance with Environmental laws

GRI 3: Material topics 2021	3-3 Management of material topics	p. 44 - 46, 82, 84, 86, 94, 104				
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NON GRI - Recycling

GRI 3: Material topics 2021	3-3 Management of material topics	p. 94 - 95				
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NON GRI - Regulatory Compliance

GRI 3: Material topics 2021	3-3 Management of material topics	p. 67, 87, 95, 104, 108, 112, 116				
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GRI Standard	Disclosure	Location	Linkage with SDGs	Omission		
				Requirement(s) omitted	Reason	Explanation
NON GRI - Emergency Preparedness						
GRI 3: Material topics 2021	3-3 Management of material topics	p. 104, 105, 107				
NON GRI - Response to Social Crisis						
GRI 3: Material topics 2021	3-3 Management of material topics	p. 112 - 114				
NON GRI - Trust and Transparency						
GRI 3: Material topics 2021	3-3 Management of material topics	p. 116 - 119				

This ESG report has been conducted by the Centre for Sustainability & Excellence.





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