

# Neptune Lines

# ESG Report 2022-23

Wake forward.

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# 1. Introduction

Neptune Lines is one of the most recognized shipping corporations, providing fully integrated services, focusing on the transportation of industrial vehicles and the provision of logistics services.



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## 1.1 About this Report

The Neptune Lines Shipping and Managing Enterprises S.A. (“Neptune Lines”) ESG Report for 2022 & 2023 marks our sixth report, offering a comprehensive overview of our Environmental, Social, and Governance (ESG) performance and our broader commitment to sustainable development.

This report outlines our strategic sustainability priorities, policies, and initiatives, aimed at fostering awareness and building trust among our stakeholders.

For further information, please contact Dimitris Balamatsias, ESG Senior Manager. The report is effective from 17th March 2025.

### Reporting period

Our ESG report covers the calendar years 2022 and 2023, from January 1, 2022, to December 31, 2023. It offers valuable insights to both our internal and external stakeholders regarding our values, performance, progress, and strategy as we work toward a promising and prosperous future.

For further details about Neptune Lines and this report, please visit our website: [www.neptunelines.com](http://www.neptunelines.com).

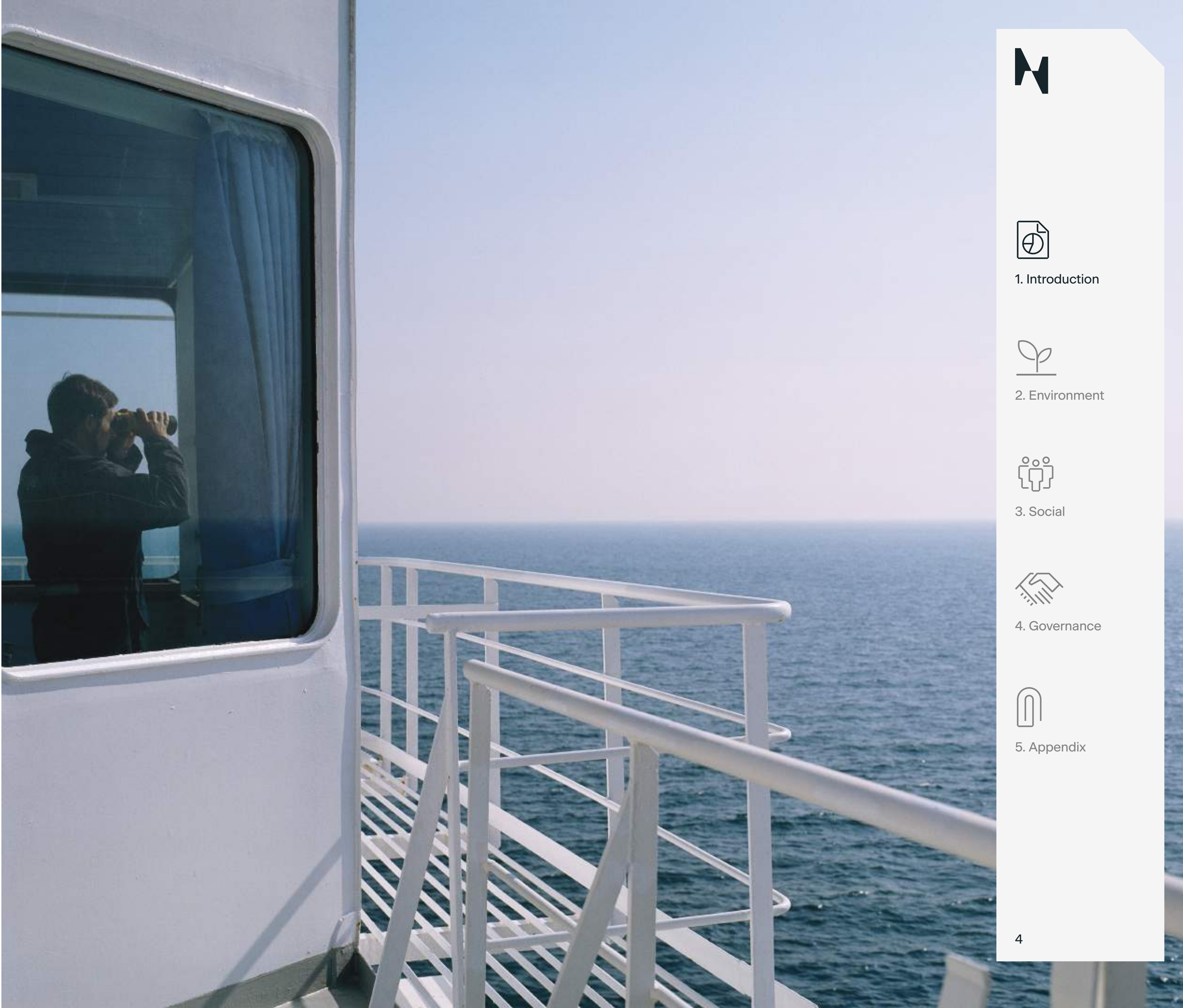
### Reporting standards

This report is prepared in accordance with the Global Reporting Initiative (GRI 2021 Standards). We have also considered the Marine Transportation Sustainability Accounting Standard (v.2023-12) from the IFRS Foundation’s Sustainability Accounting Standards Board (SASB). Additionally, we have disclosed our alignment with the applicable Sustainable Development Goals (UN SDGs).



### External Assurance Statement

We are pleased to inform our stakeholders that we have sought and received external limited assurance from Ernst & Young (EY) over the information presented in this Environmental, Social, and Governance (ESG) report. EY’s independent assesment provides an additional layer of credibility and transparency, reinforcing our commitment to accurately and responsibly reporting on our ESG performance.



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1.2 Message from CEO

Our “People First” principle drives our approach to creating a safe, diverse, and inclusive working environment



Dear Stakeholders,

I am honored to present Neptune Lines’ 2022 & 2023 Environmental, Social, and Governance (ESG) Report, which underscores our unwavering commitment to sustainability, responsibility, and excellence. As a global leader in maritime transportation, we recognize the critical role we play in the shipping industry’s transition towards a more sustainable future. This report captures our progress in 2022 and 2023 and highlights our vision for creating long-term value for all our stakeholders, while reducing our environmental impact, fostering social responsibility, and adhering to the high standards of governance.

Leading the Charge in Environmental Stewardship

At Neptune Lines, environmental sustainability is not merely a goal, it is a core element of our operational strategy. In 2023, we continued to advance our decarbonization initiatives and improving the Energy Efficiency Operational Index (EEOI) of our fleet. Our overall CO<sub>2</sub> emissions increased slightly due to fleet expansion, but our investments in advanced energy efficiency technologies have allowed us to make meaningful progress toward reducing the environmental footprint of our operations.

Key highlights of our environmental performance include:

- A 12.02% improvement in our Energy Efficiency Operational Index (EEOI), demonstrating significant progress in reducing carbon intensity in real-world operating conditions.
- The continued implementation of Exhaust Gas Cleaning Systems (EGCS) on 11 vessels, with additional installations planned by 2026, aligning with global targets for sulfur oxides (SO<sub>x</sub>) and nitrogen oxides (NO<sub>x</sub>) emissions reduction.
- The successful deployment of biofuel blends in selected vessels, reducing annual CO<sub>2</sub> emissions and positioning us to meet future regulatory requirements under the FuelEU Maritime regulation.
- Investment in dual-fuel LNG vessels will further enhance our emissions reduction capabilities in the coming years.

Commitment to Social Responsibility

At the heart of Neptune Lines is our people. Our “People First” principle drives our approach to creating a safe, diverse, and inclusive working environment, both onshore and at sea. In 2023, we expanded our efforts to promote diversity, equity, and inclusion by maintaining 45% female representation among onshore employees and providing equal opportunities for career growth through robust training and promotion programs.

Key social achievements this year include:

- A retention rate of 96% among our crew members, demonstrating our commitment to employee engagement and well-being.
- Significant investments in health, safety, and welfare initiatives, with zero incidents of human rights violations reported, reflecting our strong focus on maintaining an ethical and supportive workplace.
- The continuation of our community investment programs, aimed

at supporting educational, cultural, and environmental initiatives, further strengthening our bond with local communities.

We are also deeply committed to supporting the United Nations Sustainable Development Goals (SDGs), particularly in promoting gender equality, decent work, and economic growth. We are proud of our achievements in this area, including receiving the Gold Award for the “Best Initiative/Practice - Gender” at the Diversity and Inclusion Awards 2022.

Governance: A Foundation of Integrity

Corporate governance remains at the forefront of our sustainability strategy. We have strengthened our governance framework to ensure that we meet the evolving regulatory landscape and stakeholder expectations. Our ESG Committee, comprised of senior leadership and overseen by the Board of Directors, plays a pivotal role in guiding our sustainability efforts and ensuring that our decisions align with long-term value creation.

In 2023, we achieved significant milestones in governance:

- We participated in multiple ESG assessments, including CDP, EcoVadis, and the Drive Sustainability initiative, where we maintained a Gold rating for sustainability excellence and earned recognition for our leadership in responsible business practices.
- We implemented a comprehensive cybersecurity and data protection strategy, ensuring compliance with emerging regulations and protecting the privacy of our customers and business partners.

Our strong governance framework was further validated by maintaining a clean record of zero incidents of bribery, corruption, or anti-competitive behavior, underscoring our commitment to ethical business conduct.

The Road Ahead

As we look to the future, Neptune Lines is well-positioned to navigate the evolving challenges and opportunities presented by the global sustainability agenda. We remain committed to reducing our carbon emissions by investing in new technologies, optimizing our operations, and collaborating with stakeholders to drive innovation in the maritime sector.



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- Our plans for 2024 and beyond include:
- Delivering four new LNG dual-fuel vessels by 2027, which will enhance the environmental efficiency of our fleet while increasing cargo capacity by 36%.
  - Expanding our use of alternative fuels and renewable energy sources, including the installation of photovoltaic solar panels and battery systems on newbuilds.
  - Further reducing our CII by 3.8% by 2026, achieving a 53.8% reduction in carbon intensity compared to the 2008 baseline.

Our long-term vision is clear: to lead by example in promoting sustainable, responsible, and ethical maritime operations. We will continue to push boundaries, leverage innovative technologies, and remain steadfast in our dedication to safeguarding the environment, empowering our people, and upholding the highest standards of governance.

On behalf of the entire Neptune Lines team, I extend my deepest gratitude to our employees, customers, partners, and stakeholders for their trust and collaboration. Together, we are shaping a sustainable future for Neptune Lines and the broader maritime industry.

Sincerely,



Craig Jasienski  
  
Chief Executive Officer  
**Neptune Lines**



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### 1.3 Company Profile

Neptune Lines is a prominent operator in the transportation and logistics sector, specializing in the movement of finished vehicles and industrial cargo. Established in 1975 by Nikolaos Travlos in Piraeus, Greece, as a family-owned business, the company now boasts nearly five decades of experience and expertise.

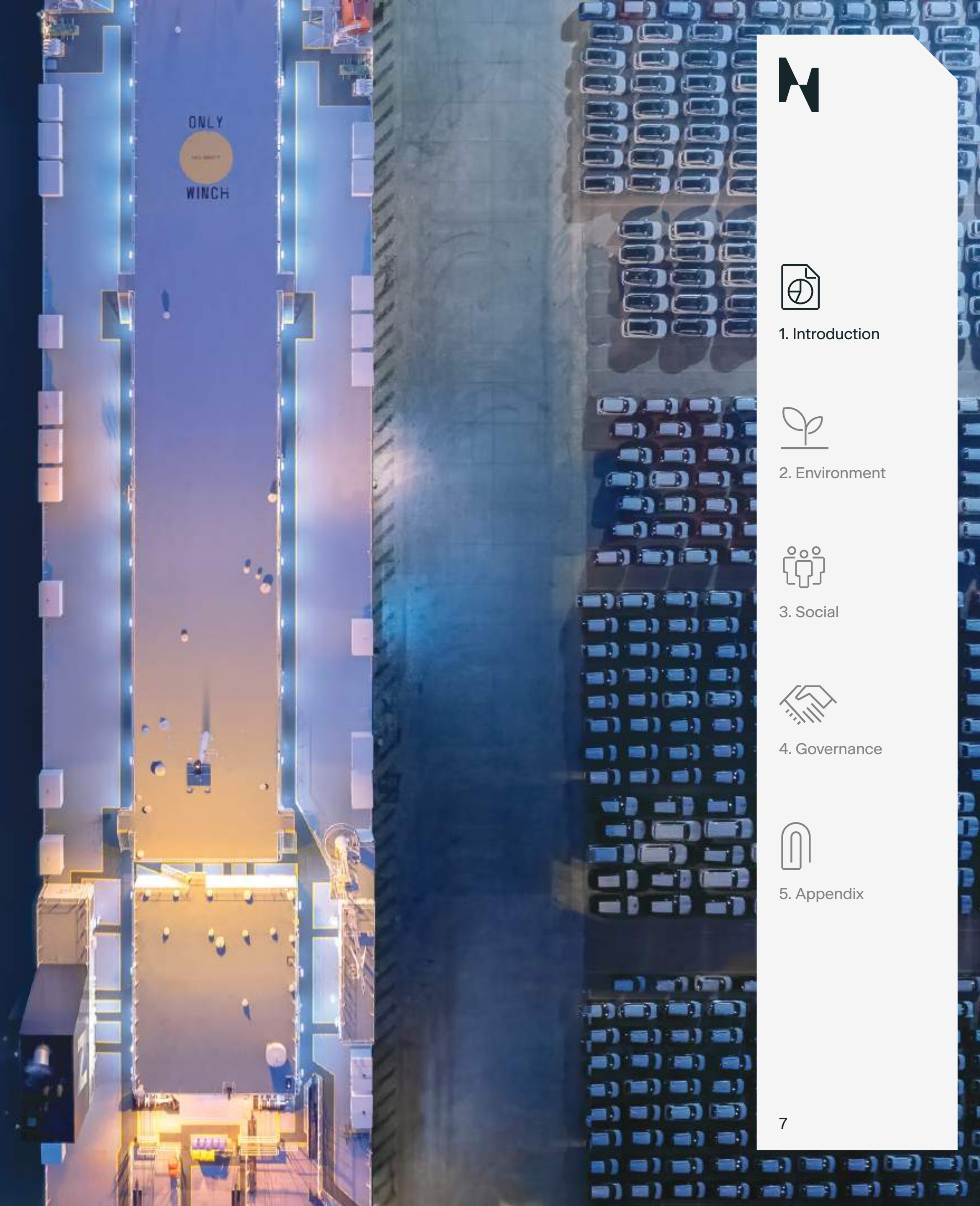
Renowned throughout the shipping and logistics industry, Neptune Lines has earned a strong reputation for delivering customer-centric solutions and high-quality services. Our clientele includes some of the world’s largest automotive manufacturers, and we maintain close collaborations with our extensive network of port agents to ensure the highest standards of service.

Neptune Lines is specialized in the transportation of vehicles across an expansive network covering Europe, the Far East, and the United States.

Our comprehensive service portfolio includes:

- ➔ **Maritime transportation of:**
  - Finished vehicles of all types, including passenger cars, SUVs, light and heavy commercial vehicles, buses, coaches, and caravans
  - Rolling cargo such as tractors, excavators, bulldozers, cranes, and other high and heavy machinery
  - Static cargo, including construction and energy equipment, agricultural machinery, boats, pipes, mobile homes, freight pallets, boxed cargo, and project cargo
- ➔ **Ship management services**
- ➔ **Supplementary port and logistics operations**

Neptune Lines works closely with leading shipyards, shipbuilders, and marine technology providers to ensure the operational efficiency of its fleet. We are committed to continuous investment in cutting-edge technologies and innovative solutions to enhance our operational efficiency while minimizing our environmental footprint.



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## 1.4 Our Moral Compass

### Our Direction

**Wake forward.**  
A wake forms behind when vessels move through water, without it there is no motion. Our business is the same, we keep moving forward and at the same time, we care about what we leave behind, our footprint – our reputation – who we are.  
Wake Forward, derived from our direction, is about looking forward to the future and being passionate to leave a positive impact.

### Our Values

**Personal**  
We take it personally. We really care about our relationships, the people we connect with, the assets we deploy, and our reputation

**Flexible**  
We flex to an ever-changing marketplace. We adapt to our customers’ needs and requirements

**Confidence**  
We do what we say and honor our commitments. Integrity, reliability, fairness this is how we act.

**Improve**  
We want to improve ourselves, our work, and our impact on the environment and society. We act with honesty, open-mindedness, and willingness.

### Our Vision

To be the finished vehicle logistics partner of choice, across the world. Our people work personally with our customers and business partners to offer sustainable, efficient, and bespoke solutions.  
Our work in Neptune Lines centers around our customers. Deep-seated in our heritage, we adapt, change, and progress, delivering excellence to our customers. We continue to expand further across the finished vehicle value chain, at the same time embrace our responsibility towards the environment and communities in which we work.



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1.5 Company Snapshot

50yrs

Experience in industrial transportation

€408m\*

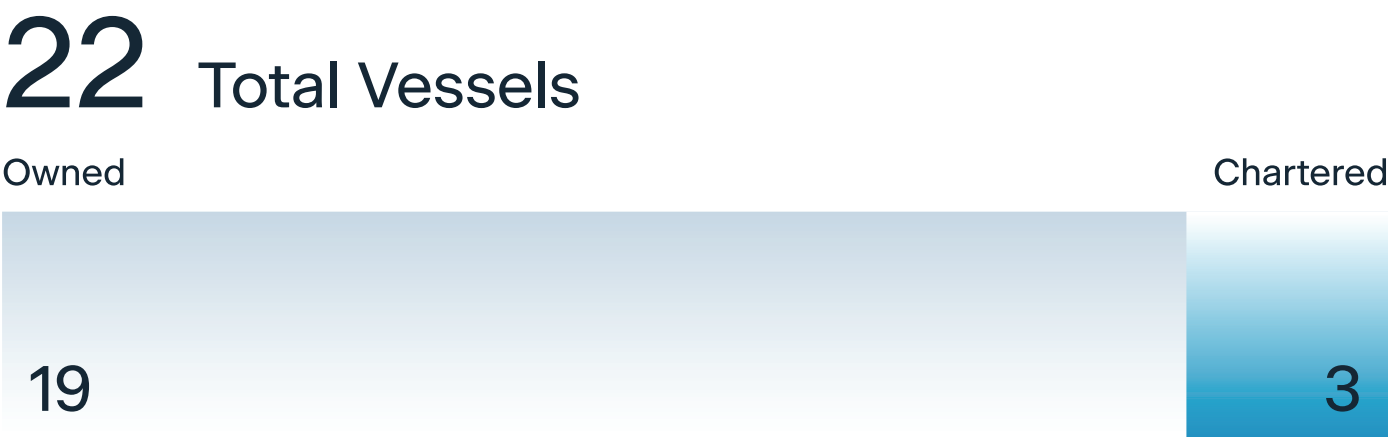
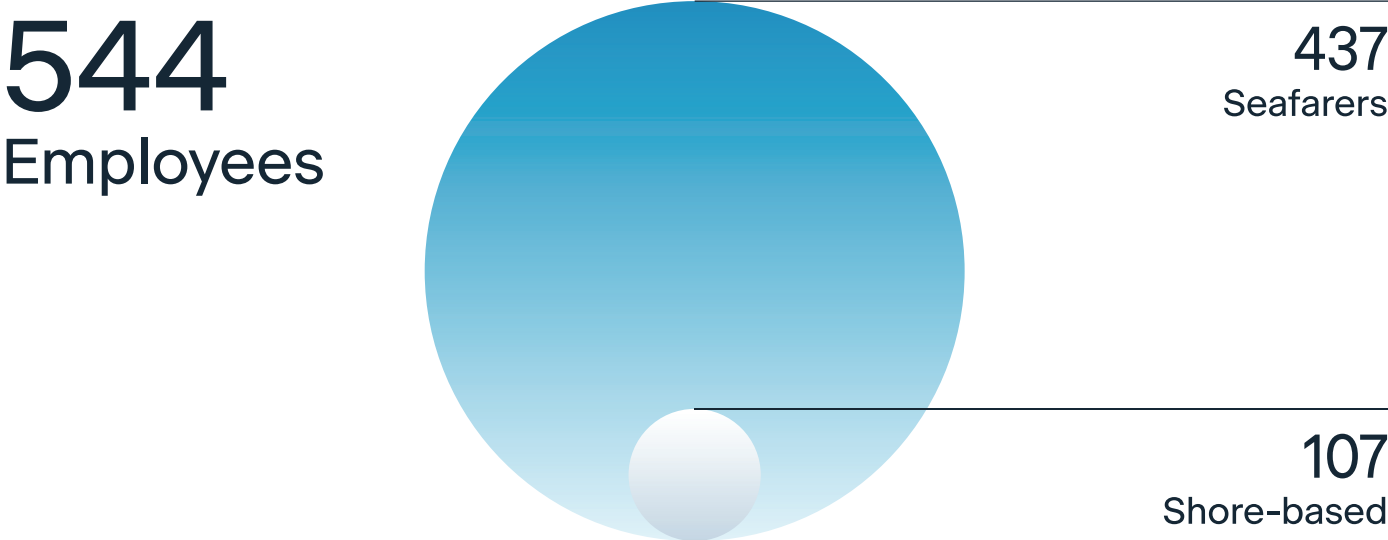
Sales per Annum

45\*

Major Customers

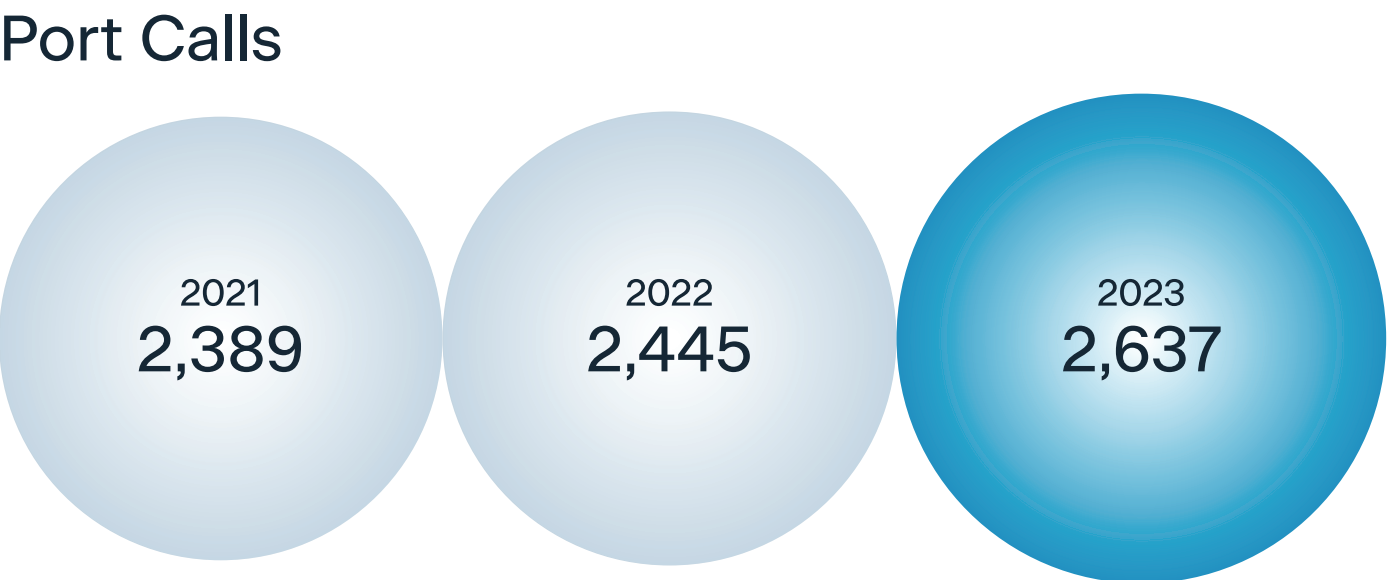
52Bn\*

Transport Work



\* figures referring to year 2023

**Note:** Cargo transported with chartered tonnage is included in the calculation.



Our Customers are all major OEMs & shippers of vehicles and high & heavy cargo, shippers of vehicles and high & heavy cargo, as well as, leading 3PL & 4PL companies.

Management System

At Neptune Lines, we prioritize the implementation of management systems required to meet rigorous quality requirements and increase our company's efficiency and reputation.

We are accredited with the following ISO standards:

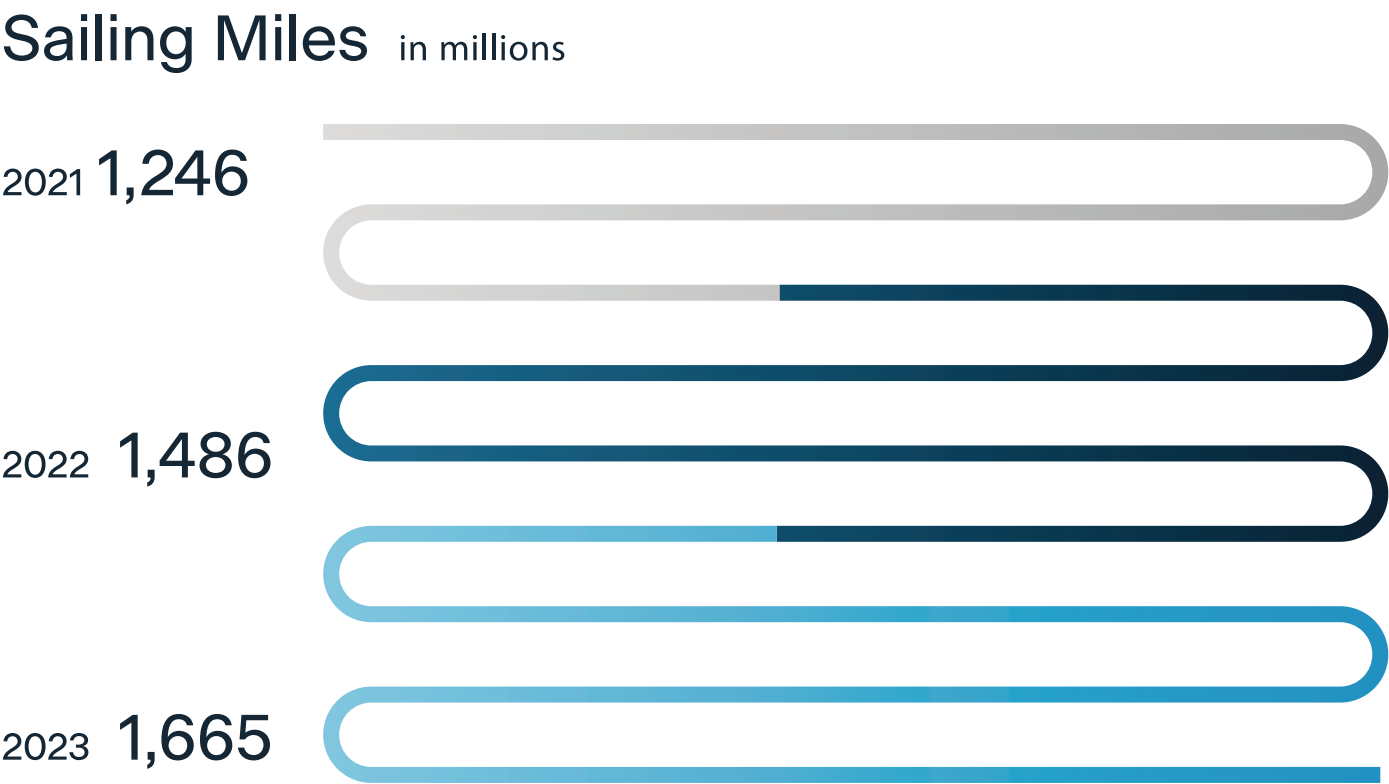
ISO 9001:2015  
Quality Management System

ISO 14001:2015  
Environmental Management System

ISO 45001:2018  
Occupational Health and Safety Management System

- Memberships and Associations:
- Piraeus Chamber of Commerce & Industry
  - The Association of European Vehicle Logistics
  - Propeller Club
  - International Maritime Employees Council

- Syn-enosis
  - General Commercial Register
  - Maritime Anti-Corruption Network (MACN)
  - Hellenic Marine Environment Protection Association



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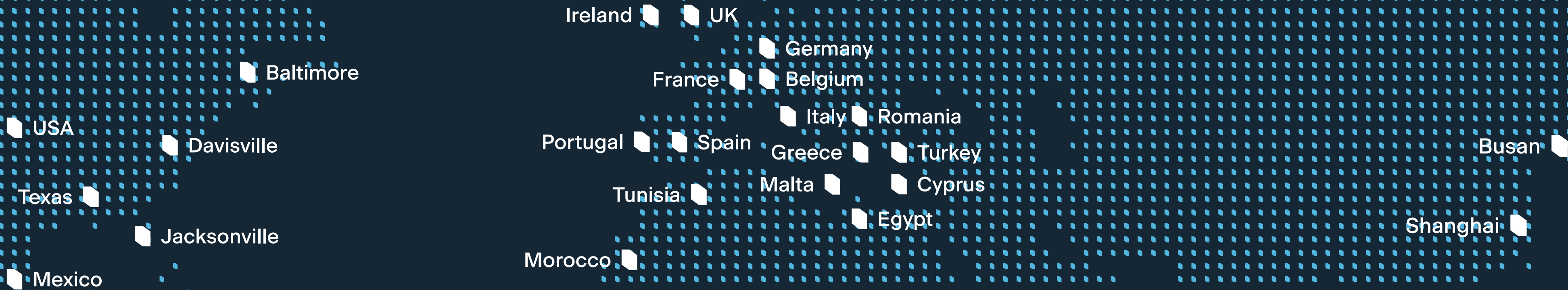
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1.6 Areas of Operation



Our fleet operates efficiently, responsibly and safely around the world. For 2023, we had 2,637 port calls in 42 countries, covering 1,664,925 million nautical miles and transporting 1.67 million units.

As a leading provider of cutting-edge logistics services and solutions, Neptune Lines maintains an extensive network of business partners spanning around the world.



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1.7 Our Business & Value chain

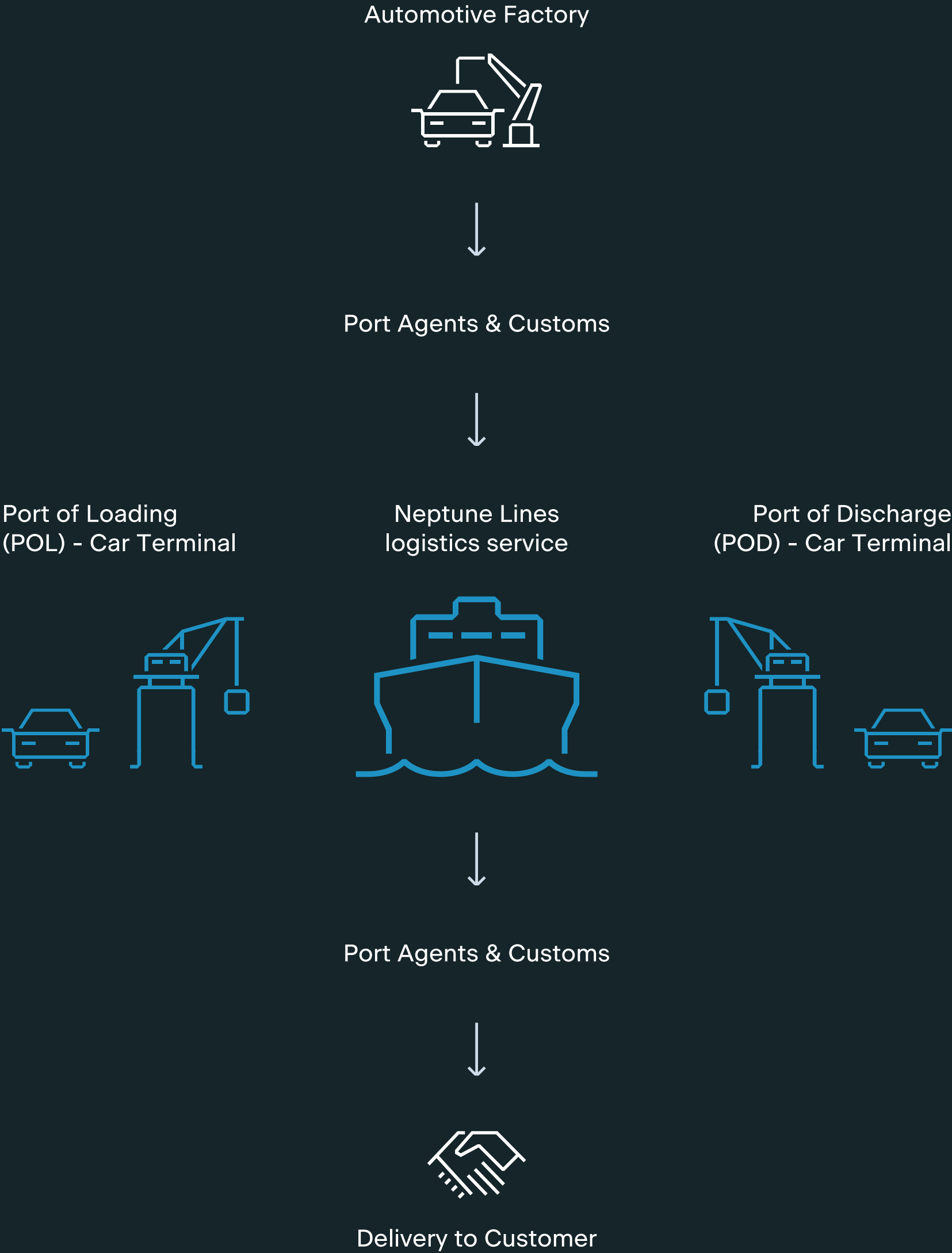
Customer Service  
Communication Network  
(Involved Parties)



Main Business Cooperators



Finished Vehicle  
Delivery Process



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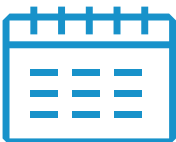

## 1.8 Operational Excellence & Provision of Service

Flexibility is a cornerstone of Neptune Lines’ operational strategy. We provide our customers with tailored, adaptable solutions, ensuring that our services align with their specific requirements and commercial needs.

### Operational Performance

We collaborate closely with a diverse range of stakeholders, including suppliers, customers, and regulatory bodies, to ensure seamless, efficient logistics and to enhance responsible operations. These long-standing partnerships are built on mutual trust, transparency, and a shared commitment to excellence.

During the reporting period, we successfully maintained business continuity and delivered strong operational performance. In our ongoing efforts to improve operational efficiency, we continue to prioritize speed optimization and minimize vessel idle times. Additionally, we are focused on optimizing port operations by accounting for weather conditions, port capacity, congestion, and other relevant factors. By continually refining our processes, adopting new technologies, and utilizing telemetry, we are committed to providing the highest levels of service quality and reliability to our customers.

| During 2023 <sup>5</sup>  |                             |   |                         |
|---|-----------------------------|---|-------------------------|
|  | 1,664,925<br>Nautical Miles |  | 42<br>Countries Visited |
|  | 7,921<br>Operating Days     |  | 2,637<br>Port Calls     |

<sup>5</sup> Chartered vessels are included

### Service Quality and Customer Focus

Our customers are leading automotive manufacturers and shippers requiring the highest standards of quality and value with great flexibility. In this context, our main driver for excellence is not only to meet their requirements, but also to support them through proactive problem solving.

#### Our key objectives are:

|                   |   |
|-------------------|---|
| Fleet Planning    | Maximizing vessel operational performance to ensure tonnage availability and reduced lead times   |
| Cargo Quality     | Ensuring cargo safety and minimizing cargo damages and accidents.                                 |
| Customer Services | Offering professional and supportive customer service to both prospective and existing customers. |

### Fleet Planning

Through our Commercial-Operations (COOP) meetings, we develop vessel schedules aimed at maximizing utilization while ensuring compliance with our contractual obligations for on-time delivery and the frequency of port calls. Vessel rotation plans are closely monitored and adjusted as necessary to accommodate last-minute changes and unforeseen events, such as port closures due to adverse weather conditions.

### Cargo Quality

To safeguard the quality of cargo during transport, we monitor the damage ratio of transported vehicles on a monthly basis. Maintaining our high performance in this area requires strict adherence to the quality standards set by each automotive company, as well as our internal policies. We also emphasize continuous training and retention of our experienced crew.

Independent certified surveyors have been appointed at our operational ports to inspect all vehicles prior loading. Any defects or damages identified are classified in accordance with each customer’s specific standards.

### Customer Service

At Neptune Lines, we believe in providing tailored solutions for each customer, avoiding a ‘one size fits all’ approach. Every customer is assigned a dedicated Customer Service Coordinator (CSC) to ensure personalized attention, timely response to requests, and continuity of service. This personalized approach helps us gain deeper insight into our partners’ needs, benefiting both parties. Feedback from CSCs is carefully considered, allowing us to better understand the specific expectations of each customer and adapt our strategy and services to support their goals.



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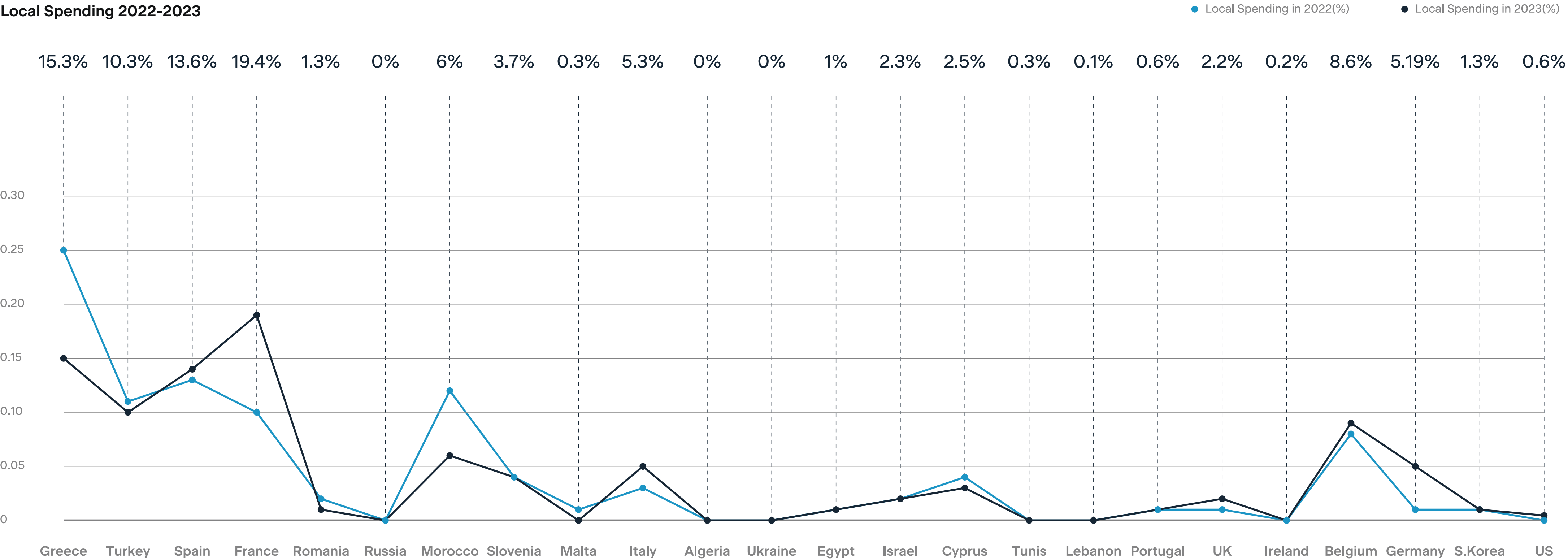
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Economic Value generation

Local Spending 2022-2023



Value creation is fundamental to Neptune Lines’ continued success. By maintaining strong financial performance, we are able to sustain growth, attract investment, and continue providing services across global trade networks. We place significant importance on the timely payment of our providers, as we believe this reflects our practical commitment to responsibility. On-time payments contribute to

sound financial management, fostering close relationships with our suppliers. This ensures consistent access to high-quality products and support services essential for operational excellence. We prioritize spending on local suppliers at key locations, which are determined by the frequency of port calls and the volume of cargo handled. Major cost drivers for our vessels include port call

expenses (such as port dues and tugboat services), cargo handling, waste disposal, and bunker costs. In 2023, the leading country for local spending was France, followed by Greece and Spain. We also focus on maintaining strong partnerships with reputable customers by consistently delivering high-quality services and meeting their evolving needs.



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1.9 ESG Strategy and Governance

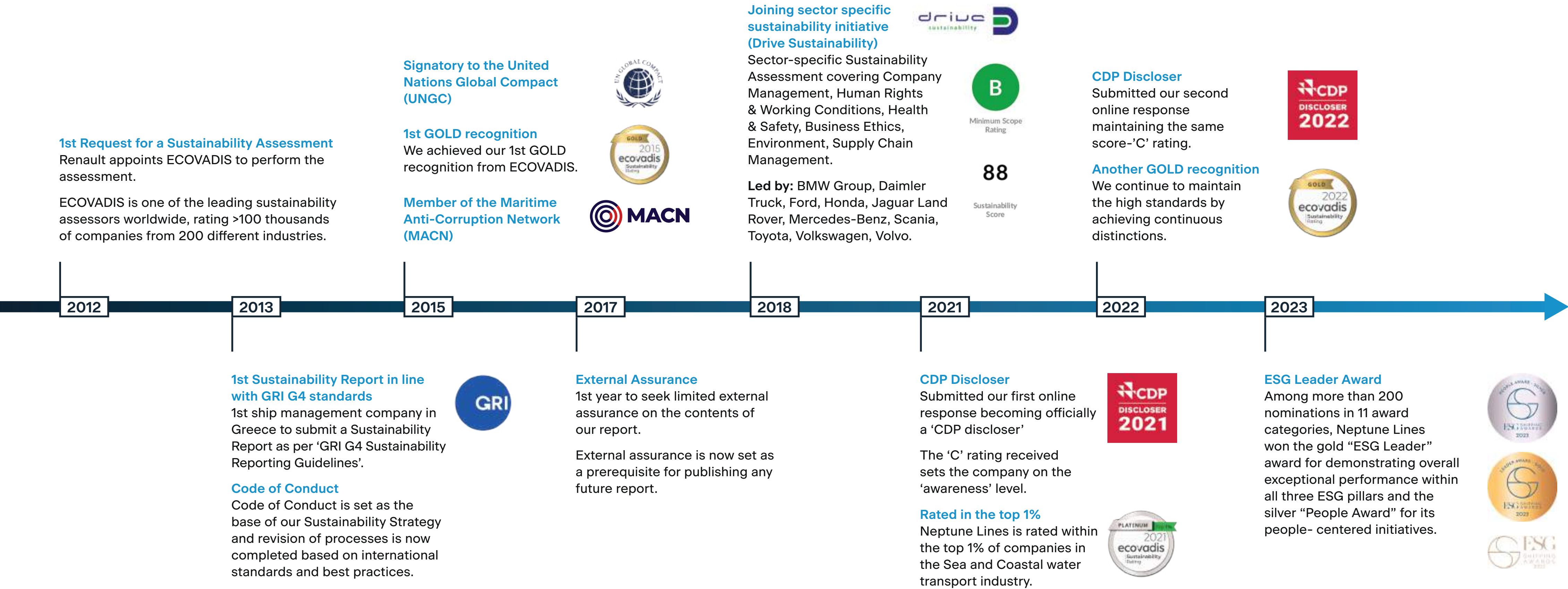
Neptune Lines is committed to **Sustainable Development** for more than a decade now.

Our sustainability strategy underscores our dedication to environmental stewardship, social responsibility, and economic resilience. We align our efforts with the United Nations Sustainable Development Goals (SDGs) that are most relevant to our operations, fostering a culture of sustainability and innovation across all areas of our business.

We are committed to growing our business sustainably by minimizing our environmental impact, enhancing the well-being of the communities we engage with, and maintaining integrity in all interactions with our stakeholders.

ESG Road Map

Neptune Lines has been dedicated to sustainable development for over a decade. By embedding Environmental, Social, and Governance (ESG) principles into our strategic decision-making and operational processes, we aim to create long-term value, mitigate risks, and contribute positively to both the global maritime industry and society as a whole.



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ESG Progress

| ENVIRONMENT <sup>3</sup>  | 2022         | 2023         |
|---|--------------|--------------|
| Carbon Intensity Indicator (CII) (gCO <sub>2</sub> / gross tonnage-nm)  | 7.55         | 7.64         |
| Energy Efficiency Operational Index (EEOI) (gCO <sub>2</sub> / cargo tons -nm)  | 106          | 93           |
| CO <sub>2</sub> total emissions (scope 1) (tonnes)  | 380,839      | 395,872      |
| CH <sub>4</sub> total emissions (scope 1) (tonnes) CO <sub>2</sub> eq*  | 153          | 158          |
| N <sub>2</sub> O total emissions (tonnes) CO <sub>2</sub> eq*   | 6,570        | 6,781        |
| CO2+CH4+N2O Total emissions (tonnes) CO <sub>2</sub> eq*  | 387,562      | 402,811      |
| Shore based CO <sub>2</sub> emissions (scope 2) (tonnes)  | 196.84       | 159.52       |
| Vessels CO <sub>2</sub> emissions (scope 2) (tonnes)  | 87.05        | 51.02        |
| Total CO <sub>2</sub> emissions (scope 2) (tonnes)  | 283.89       | 210.54       |
| SOx emissions (tonnes)  | -            | 897          |
| NOx emissions (tonnes)  | 8,957        | 8,791        |
| Total fuel consumption from non-renewable sources (GJ)=<br>Fuel consumption from vessels + Natural gas consumed at the office | 4,788,975.6  | 5,105,820.2  |
| Total electricity consumption (GJ)= Electricity consumption fleet (dry-dock)+<br>Electricity consumed at the office           | 2,370.29     | 1,908.01     |
| Total energy consumption (GJ)*  | 4,791,345.89 | 5,107,728.21 |
| Water withdrawal (megaliters)*  | 0.03330      | 0.03700      |
| Water discharge (megaliters)*   | 0.03330      | 0.03700      |
| Water consumption (megaliters)*   | 0.24035      | 0.30119      |
| Non-hazardous waste at sea (m <sup>3</sup> per vessel per month)  | 0.136        | 0.098        |
| Plastic waste discharged to facilities (m <sup>3</sup> per vessel per month)  | 3.0          | 3.4          |
| Oily Bilge Water Generated (m <sup>3</sup> per vessel per month)  | 0.35         | 0.48         |
| Sludge Generated (m <sup>3</sup> per vessel per month)  | 0.41         | 0.49         |
| Paints Consumed (liters per vessel per month)   | 93           | 114          |
| Chemicals Consumed (liters per vessel per month)  | 146          | 184          |
| Onboard Paper Consumption (packets per vessel per month)  | 4            | 5            |
| Cooking Oil (liters per vessel per month per crew)  | 0.066        | 0.061        |
| E-Waste Generation (m <sup>3</sup> per vessel per month)  | 0.06         | 0.059        |
| Vessels equipped with EGCS (scrubbers)  | 11           | 11           |
| Number of Conditions of Class or Recommendations  | 19           | 34           |
| Number and volume of spills and releases to the environment   | 0            | 2            |

\* Biogenic CO<sub>2</sub> emissions are reported zero (0)  
\* Source of the emissions factors: FuelEU Regulation (Directive EU 2018/2001, Paragraph 4 Part C Annex V)  
Global Warming Potential rate: GWP100  
Consolidation approach for emissions: Operational Control  
\* Reporting Standard: The energy consumption data is reported in accordance with

FuelEU Annex II.  
Conversion Factor: The conversion factor used to convert kWh to GJ is 1 kWh = 0.0036 GJ, as per the guidelines provided by the International Energy Agency (IEA), the U.S. Environmental Protection Agency (EPA), and the Intergovernmental Panel on Climate Change (IPCC).  
As per GRI 302-1d, electricity is used for the needs of heating and cooling. No sale of

| SOCIAL   | 2022  | 2023 |
|--|-------|------|
| Number of seafarers on board                                       | 437   | 437  |
| Crew promotions  | 43    | 52   |
| Crew retention rate (%)  | 95.2% | 96%  |
| Number of onshore employees  | 95    | 107  |
| Female employees (%)   | 46%   | 45%  |
| New hires onshore  | 19    | 19   |
| Employees' turnover rate (%)                                       | 11.8% | 6.7% |
| Internships  | 5     | 6    |
| Near misses  | 92    | 191  |
| PSC inspections  | 51    | 65   |
| PSC deficiencies per inspection                                    | 1.41  | 0.62 |
| PSC detentions   | 1     | 0    |
| Observations/non-conformities per audit                            | 0.62  | 0.25 |
| Drug and Alcohol incidents   | 1     | 2    |
| Lost Time Injury Frequency rate (LTIF) per million manhours worked | 1.23  | 1.31 |
| Total number of recordable injuries (work related) per year (TRI)  | 5     | 8    |
| Incidents of human rights violations                               | 0     | 0    |

| GOVERNANCE  | 2022 | 2023           |
|---|------|----------------|
| Port calls in countries that have the 20 lowest rankings in the CPI (%)                         | 3%   | 0.3%           |
| Incidents of non-compliance with laws and regulations   | 0    | 2 <sup>4</sup> |
| Bribery, corruption, and fraud incidents  | 0    | 0              |
| Financial assistance received from government   | 0    | 0              |
| Amount of legal and regulatory fines and settlements associated with<br>bribery or corruption   | 0    | 0              |
| Legal actions for anti-competitive behavior, anti-trust, and monopoly practices                 | 0    | 0              |
| Substantiated complaints concerning breaches of customer privacy and<br>losses of customer data | 0    | 0              |
| Number of whistleblowing incidents  | 0    | 0              |

electricity, heating, cooling, or steam occurs in the organization.  
\* Water withdrawal : Fresh water produced (from seawater) through Fresh Water generator and fresh water received from shore (stored in drinking water tank)  
\* Water discharge: Fresh water produced (from seawater) through Fresh Water generator + Fresh water received from shore ( stored in drinking water tank)  
\* Mineral water in plastic bottles ( 1.5 liters)

<sup>3</sup> Emissions figures are related only with our managed vessels  
<sup>4</sup> Both incidents were of minor importance as described in the Environmental Compliance Section of the present report.



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ESG Governance Structure

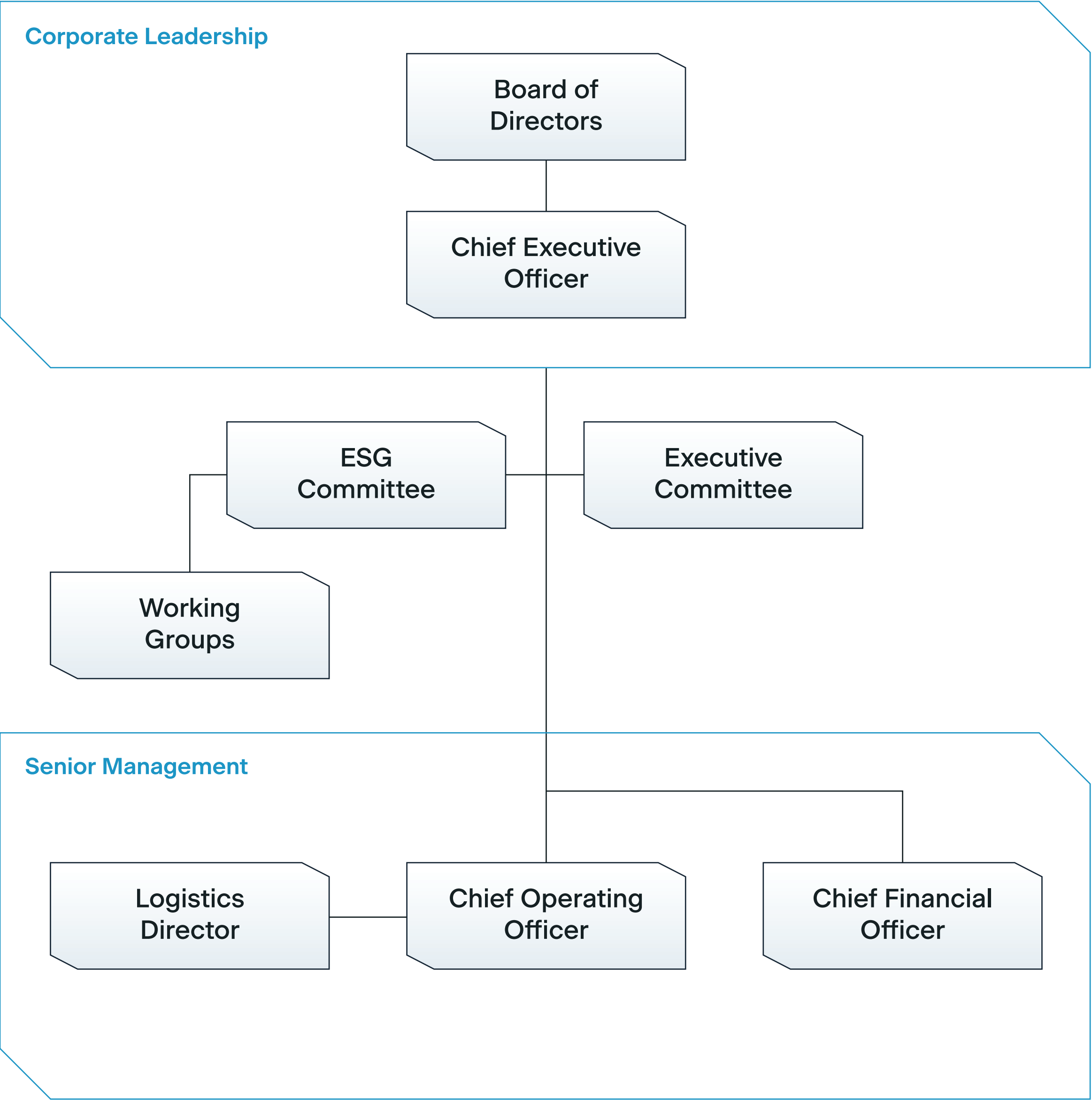
At Neptune Lines, our goal is to foster a secure and sustainable global operation. To support this commitment, we have established an ESG Committee tasked with guiding the development of our ESG strategic direction and overseeing policies, practices, and performance related to sustainability. The ESG Committee is composed of the Compliance Officer—who reports directly to the Board of Directors—members of the Executive Committee, and the ESG Senior Manager. These members assist the Executive Committee in decision-making on environmental, social, and governance matters.

The ESG Committee plays a vital role in identifying, developing, and recommending strategic plans and measures to the Board of Directors to address various risks. Its operational responsibilities include:

- ➔ Reviewing policies related to the ESG pillars.
- ➔ Reviewing and approving information disclosed in the annual ESG reports in accordance with frameworks such as GRI, SASB, UNGC, and other relevant regulations.
- ➔ Providing formal reports to the Board on material ESG issues that significantly impact Neptune Lines.

The committee monitors the progress of the company’s sustainability initiatives to ensure alignment with our established sustainability goals. This is achieved through regular internal meetings involving senior management and the Compliance Officer. By actively engaging in internal consultations, the Board of Directors and the CEO seek diverse perspectives, promoting a responsible and thoughtful approach to decision-making in line with sustainable development.

Additionally, the ESG Committee continuously monitors the evolving regulatory landscape and provides guidance on how Neptune Lines can effectively navigate and prepare for new and complex requirements, such as the Corporate Sustainability Reporting Directive (CSRD). Companies subject to the CSRD will be required to report in accordance with the European Sustainability Reporting Standards (ESRS), which also mandate assurance on reported sustainability information.



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Stakeholders Engagement

At Neptune Lines, we recognize the importance of engaging with our stakeholders in the development of our Environmental, Social and Governance (ESG) report. More specifically, we recognize that stakeholders, including our customers, employees, providers, the government, and society, play a vital role in designing our ESG strategy.

Neptune Lines ESG committee, in collaboration with department managers, identified and mapped key stakeholders through a three-step process: identifying relevant groups, analyzing their perspectives, and mapping their relationships to the company’s objectives. The company recognizes both internal and external stakeholders as vital to its sustainability efforts. Stakeholder engagement is prioritized based on factors such as contribution, legitimacy, willingness to engage, influence, and necessity of involvement. We use various communication channels to gather feedback and foster effective dialogue with stakeholders, tailoring engagement frequency and methods to maximize value for all parties involved.

The involvement of stakeholders in the report development process enables the integration of a wide range of perspectives and address concerns directly related to our operations.

By fostering collaboration and the active participation of our stakeholders, we can enhance our credibility, strengthen our relationships, further improve our reputation, and effectively implement sustainable shipping practices while mitigating our environmental impact.

Our focus, at Neptune Lines, is to align with the latest sustainability standards and frameworks. During this reporting period, in adherence with all the guidelines and requirements established by the Global Reporting Initiative (GRI), the Sustainability Accounting Standards Board (SASB) for Marine Transportation, and the European Sustainability Reporting Standards (ESRS) under the CSRD scope, we adopted the concept of the double materiality.

The process of double materiality is based on two main pillars: **Impact materiality & Financial materiality.**

Impact materiality captures the extent to which our business activities and operations influence or are likely to influence the environment, the community, and the economy while the financial materiality corresponds to the assessment of the opportunities and risks that exist or may arise and that affect Neptune Lines’ business continuity.



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Engagement events

ECG Annual Conference - 2022

This Annual Conference, being the largest event for Finished Vehicle Logistics professionals in Europe, took place in Vienna on October 13th-14th. During these two days, ECG members and other participants had the opportunity to exchange insights and ideas on future opportunities of the automotive sector and discuss standard emissions reporting for the automotive supply chain.

General Assembly & Spring Congress - 2022

Hosted on May 12th-13th in Malaga, the General Assembly and Spring Congress was yet another stakeholder engagement and networking opportunity with the presentation and discussion of various topics such as: handling of AFVs in maritime transport, emissions reporting, load securing on car transporters (i.e. a safety topic) and negotiation management.

ECG Annual Conference - 2023

Held on 12th-13th of October in Copenhagen, The ECG Conference brought together near 500 delegates under the theme “The best is yet to come: unveiling opportunities, embracing change, steering sustainability”. Through insightful panel discussions and presentations, attendees gained valuable knowledge and inspiration for the future of finished vehicle logistics. Among topics discussed where: emissions reporting standardization and Greening Freight Package & Count Emissions EU (presented by the Deputy Head of Unit, DG MOVE, European Commission).

General Assembly & Spring Congress - 2023

On May 11th -12th, the ECG General Assembly and Spring Congress took place in Thessaloniki. Guest speakers presented various topics of the automotive industry such as the European market outlook, emissions reporting, and forecasting methodology. There was also a panel discussion with OEMs on the Capacity Crisis faced in our sector.

ECG Academy

Supporting our employees’ growth and development and in the context of our multi-annual cooperation with ECG, each year,

colleagues from relevant departments represent our company in the ECG Academy aiming to gain industry-specific knowledge, keep up with industry trends and obtain an insight of global logistic networks. During the reporting period, 3 colleagues attended ECG’s courses providing specialist training in finished vehicle logistics (i.e. one colleague for the academic year 2022-2023 and two for 2023).

Agents Conference 2022

In December 2022, Neptune Lines hosted its biennial Agents Conference. Convened at our headquarters in Greece, this full-day event brought together all major port agents from across our global network to exchange ideas, updates and insights on various topics concerning our industry and business cooperation.

- Among the topics discussed, were:
- ➔ the existing and emerging global challenges calling for corporate resilience, innovative thinking, and collaboration to make a positive impact; (e.g. pandemic aftermath, war in Ukraine, commercial and operational hurdles faced etc.)
  - ➔ automotive industry trends (presented by an industry expert invited for this purpose)
  - ➔ company’s growth steps (i.e. new trade routes and vessels,

- service expansion beyond short sea trade etc.) and a new corporate visual identity to reflect this
  - ➔ new environmental regulations
  - ➔ digitalization: new cargo booking system, information and data security
- Concluding with roundtable discussions involving all company departments, we had the opportunity to delve into various critical issues arising from our daily interactions and business relationship.

Transport Logistic 2023

Neptune Lines, have successfully participated in the transport logistic 2023 exhibition, held from May 9–12, 2023 at Messe München, Munich, Germany. The event, recognized as the world’s largest t trade fair for logistics, mobility, IT, and supply chain management, welcomed over 75,000 industry professionals and exhibitors from around the globe. The exhibition offered an excellent opportunity to share Neptune Lines’ vision for sustainable growth, innovation, and customer-centric solutions that address the evolving needs of the logistics industry. “The four-day event underlined Neptune Lines’ commitment to delivering reliable, efficient, and sustainable maritime logistics services while strengthening relationships with its customers and partners”.



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ESG Assessments, Ratings & Awards

Since 2015, Neptune Lines has actively participated in ESG assessments to continuously evaluate, improve, and highlight our ESG initiatives, including CDP, EcoVadis, and Drive Sustainability – Supplier Assurance – Automotive Logistics Chain ESG Framework. These assessments enable us to move beyond mere reporting, fostering a strong commitment to ESG excellence.

As demand for responsible investment grows, the importance of having reliable and transparent data to evaluate sustainability efforts becomes critical. Through these ratings, we ensure a high level of transparency and trust in our sustainability and ethical performance.

CDP

The Carbon Disclosure Project (CDP) is a global disclosure platform for investors, companies, cities, states, and regions to manage their environmental impact, with a particular focus on climate change risks and opportunities. CDP seeks to enhance corporate awareness through the measurement and disclosure of environmental data, enabling effective management of carbon emissions and climate-related risks.

In 2023, Neptune Lines submitted its second online response for the 2022 reporting year, maintaining a C-rating for the second consecutive year.



EcoVadis

EcoVadis provides a platform for organizations to assess their sustainability performance and that of their supply chains, covering a broad range of ESG indicators across four key pillars: Environment, Human Rights, Ethics, and Sustainable Procurement. Organizations are rated based on evidence provided for each indicator under these pillars. This rating process allows us to measure our ESG performance, identify areas for improvement, and ensure alignment with the latest ESG practices.

In 2022, we successfully maintained our GOLD rating, a recognition we have held since 2015.

EcoVadis scorecard



72 / 100  
Overall score  
96th Percentile

Publication date: 21 Dec 2022 / Valid until: 21 Dec 2023



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Poseidon Principles

We actively support the Poseidon Principles, which provide a framework for integrating climate considerations into lending decisions to promote international shipping’s decarbonization. Financial institutions must assess how their portfolios align with IMO’s climate targets.

This requires calculating the carbon intensity of ships in their portfolios using industry-accepted methodologies, such as the Annual Efficiency Ratio (AER) or Energy Efficiency Operational Indicator (EEOI).

The Marine Environment Protection Committee (MEPC) has allowed the use of Gross Tonnage (GT) as an alternative to Deadweight Tonnage (DWT) in calculating transport work for specific ship types, such as vehicle carriers, under the EEOI framework.

Since vehicle carriers typically transport large numbers of vehicles (which are bulky but not particularly heavy), DWT might not provide an accurate representation of their transport capacity. Gross tonnage, which measures the volume of the vessel, is considered a better metric for this ship type.

This adjustment applies to vehicle carriers or other vessels that primarily transport vehicles and similar goods, where the internal volume (GT) better reflects their operational characteristics than the traditional deadweight.

Based on the above we calculate AER using the CII calculation method.



Drive Sustainability - Suppliers Assurance

As part of the Drive Sustainability initiative, automotive industry customers—including BMW Group, Daimler Truck, Ford, Geely, Honda, Jaguar Land Rover, Mercedes-Benz, Scania, Toyota, Volkswagen Group, Volvo Group, and Volvo Cars—invite their suppliers, such as Neptune Lines, to complete a comprehensive questionnaire. Suppliers are required to provide supporting evidence to substantiate their responses, enabling a thorough evaluation of their performance across key human rights and sustainability themes.

The progress of suppliers’ submissions can be tracked in real time, and existing questionnaire results are made accessible to buyers as suppliers share their data.

Neptune Lines has been an active participant in the Drive Sustainability initiative since 2017, undergoing continuous assessment of its sustainability performance. For 2023, Neptune Lines achieved a commendable B88 score in the latest SAQ 5.0 rating.



ESG Awards

We are privileged and deeply honored to have been awarded the Gold “ESG Leader” distinction at the inaugural ESG Shipping Awards, in recognition of our exemplary performance across all three ESG pillars in 2023.

In 2023, Neptune Lines was also honored with the Silver “People Award” for our people-centered initiatives. We are deeply pleased with this achievement, which motivates and inspires us to continue our efforts with even greater dedication and enthusiasm, always striving to do what is right for our people.

We fully endorse the 5th United Nations Sustainable Development Goal, which asserts that “gender equality is not only a fundamental human right but also a necessary foundation for a peaceful, prosperous, and sustainable world.” In line with this commitment, we are proud to have received the Gold Award in the “Best Initiative/Practice - Gender” category at the Diversity and Inclusion Awards 2022.



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Double Materiality Process

1. Validation & identification of ESG topics

During the first stage of the procedure, under the framework of Impact materiality, a benchmarking analysis was performed, in alignment with the provisions of the GRI taking into consideration the newly developed ESRS guidelines. This assessment enabled the determination of the actual and potential impacts of our operating model, our business network, and our established partnerships, on the ecosystem, the community and the economy. Simultaneously, a supplementary assessment with regards to the Financial materiality was performed aiming at identifying the risks and opportunities deriving from the broad environment and affect our financial performance.

2. Engagement with our Stakeholders

Throughout the second phase, within the context of the Impact materiality a survey was conducted, gathering feedback from key stakeholders, aiming at the evaluation of the scale of the identified impacts, positive or negative, on people, the society and on the environment, along with their scope, the irremediable character and the likelihood of the impact occurring. More specifically, appropriate questionnaires were distributed to both our internal and external stakeholders identifying their perspective on each impact. Each stakeholder was required to perform an evaluation based on the following criteria:

- For all impacts:
  - ➔ **Scale:** How beneficial or detrimental the impact is.
  - ➔ **Scope:** How widespread the impact is on populations, economies and ecosystems affected.
  - For negative impacts:
  - ➔ **Irremediable Character:** How hard is to counteract or make good the resulting harm.
  - For potential impacts:
  - ➔ **Likelihood:** What is the possibility of the impact occurring
- The assessment of the impacts was performed using a five-point scale from 1 (very low significance) to 5 (very high significance). Through this methodology, the opportunity to comprehend the perspective of our stakeholders, as well as to identify and acknowledge our impacts, was provided.

In parallel, with regards to the **Financial materiality** we engaged with key internal stakeholders who provided their insights regarding the size of the potential effect of identified risks and opportunities, along with the chance of occurring.

3. Topic Prioritization and Data Analysis

Following the receipt of the stakeholders and experts’ feedback, we gathered all relevant information, we identified the most significant results based on the Impact materiality assessment, the Surveys and Financial materiality assessment and proceeded with the analysis of the results. For the prioritization process, we calculated the average score for each topic and set a significance threshold to determine the list of topics that are most material to us and our stakeholders.

4. Outcome of the double materiality assessment

Compared to our previous ESG report, and after conducting both internal and external stakeholder surveys, we have identified additional material topics that are now prioritized. These new issues reflect evolving stakeholder concerns and broader sustainability trends. Through our thorough analysis and engagement with stakeholders, we have updated our list of material topics to better align with their perspectives and expectations. This ensures that our sustainability efforts remain relevant, comprehensive, and responsive to the changing landscape, while continuing to drive value for both the company and its stakeholders.

A total of 14 ESG issues, categorized into 4 environmental, 6 social and 4 governance issues, were assessed in the 2023 double materiality assessment. For a detailed overview of our findings, the following table provides a comprehensive summary of the significance and scope of each impact, along with the connection between our material topics and the United Nations Sustainable Development Goals (SDGs). The analysis of the material topics guide Neptune Lines in its further efforts to pursue strategic choices.



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Our material topics

The following table presents the impacts and nature of the impacts of the 7 material topics identified through the double materiality analysis, along with their alignment with the Sustainable Development Goals (SDGs).

| Environment   |  |                      |   |
|---|--|----------------------|---|
| Material Topics                                     | Impacts  | Nature               | SDG's   |
| Emissions, Energy Efficiency & Climate Change       | Enhancement of energy efficiency and improved carbon footprint through the continuous investment in R&D programs (e.g. use of biofuels) and the implementation of existing energy efficiency technologies. | Positive / Potential | <div><div>9INDUSTRY, INNOVATION AND INFRASTRUCTURE</div><div>13CLIMATE ACTION</div><div>15LIFE ON LAND</div></div>  |
|   | Contribution to air pollution and emission of greenhouse gases due to the use of fossil fuels across the company's fleet.  | Negative / Actual    |   |
| Environmental pollution                             | Contamination of marine ecosystems due to accidental oil spill incidents (i.e. oily bilge water & oil residues).   | Negative / Potential | <div><div>14LIFE BELOW WATER</div></div>  |
| Social  |  |                      |   |
| Material Topics                                     | Impacts  | Nature               | SDG's   |
| Occupational health, safety & wellbeing             | Promotion of health, safety and wellbeing through the implementation of strict safety protocols and several welfare initiatives.   | Positive / Actual    | <div><div>3GOOD HEALTH AND WELL-BEING</div></div>   |
|   | Increased risk of accidents and incidents due to limited provision of awareness seminars for work-related hazards.   | Negative / Potential |   |
| Equal treatment and opportunities for all           | Increased productivity and employee engagement through the adoption of initiatives that support diversity (i.e. signing of the Diversity Charter for Greek businesses).                                    | Positive / Actual    | <div><div>5GENDER EQUALITY</div><div>8DECENT WORK AND ECONOMIC GROWTH</div><div>10REDUCED INEQUALITIES</div><div>16PEACE, JUSTICE AND STRONG INSTITUTIONS</div></div> |
|   | Risk of discrimination incidents due to the lack of an established diversity and inclusion policy covering all workplace aspects.  | Negative / Potential |   |
| Customer Focus & Service Quality                    | Enhanced customer satisfaction through the maximization of vessels' operational performance and the provision of exceptional professional services.  | Positive / Actual    | <div><div>9INDUSTRY, INNOVATION AND INFRASTRUCTURE</div></div>  |
|   | Customer data breach incidents due to the lack of cybersecurity and data protection protocols.   | Negative / Potential |   |
| Governance  |  |                      |   |
| Material Topics                                     | Impacts  | Nature               | SDG's   |
| Corporate Governance - Compliance & Business Ethics | Maintenance of high ethical standards through the implementation of transparent disclosure practices and anti-corruption measures.   | Positive / Actual    | <div><div>8DECENT WORK AND ECONOMIC GROWTH</div><div>16PEACE, JUSTICE AND STRONG INSTITUTIONS</div><div>17PARTNERSHIPS FOR THE GOALS</div></div>                      |
|   | Code of Conduct violations due to the lack of awareness raising among employees with regards to the company's business values and operating practices.   | Negative / Potential |   |
| Business Continuity - Safe & Secure Operations      | Enhanced business resilience through the establishment of effective contingency and recovery plans.  | Positive / Actual    | <div><div>8DECENT WORK AND ECONOMIC GROWTH</div><div>9INDUSTRY, INNOVATION AND INFRASTRUCTURE</div></div>   |
|   | Risk of business disruption due to the lack of clear roles and responsibilities for the uninterrupted execution of the company's operations.   | Negative / Potential |   |



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# 2. Environment

Environmental protection is of paramount importance for our organization’s long-term vision. We firmly believe that it is our responsibility to safeguard our ecosystem. As a result, we strive to minimize any potential negative impact, by reducing fuel consumption and emissions, investing in new technologies and providing guidance and education to our team members towards a more sustainable future.

This section provides information on our performance and specific actions aimed at protecting the natural environment through conservation and sustainable practices.

Related SDGs

9

INDUSTRY, INNOVATION  
AND INFRASTRUCTURE



12

RESPONSIBLE  
CONSUMPTION  
AND PRODUCTION



13

CLIMATE  
ACTION



14

LIFE  
BELOW WATER





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## 2.1 Environment Overview

Every company uses energy and resources, and every company both impacts and is impacted by the environment. At Neptune Lines, environmental protection is central to our long-term vision. We are committed to ensuring environmental compliance and contributing to the achievement of relevant Sustainable Development Goals (SDGs) and industry-specific environmental objectives imposed by shipping regulations.

We strive to minimize negative environmental impacts. While risks exist at the shore-based level, they are less significant than those arising from vessel operations. Key risks include:

- ➔ Accidental spills (oil, hazardous materials)
- ➔ Discharges (effluents, waste water)
- ➔ Hull fouling and ballast water management (introducing invasive species)
- ➔ GHGs Emissions (CO<sub>2</sub>, SO<sub>x</sub>, NO<sub>x</sub>, particulate matter)
- ➔ Noise pollution (disrupting marine species)
- ➔ Port congestion (delays due to unavailable berths)

For over a decade, Neptune Lines has implemented a robust Environmental Management System, certified under ISO 14001, to address these risks. In line with ISO 14001’s principle of “continual improvement,” we regularly monitor and evaluate the system’s effectiveness, taking corrective action as needed. Updates and audit results are communicated across the company, including fleet vessels, via our annual Management System Review, circular instructions, and safety bulletins.

We focus on:

- ➔ Compliance with environmental rules and ship energy management requirements
- ➔ Monitoring vessel performance and energy efficiency using KPIs
- ➔ Reducing our operational environmental footprint
- ➔ Ensuring proper material handling, storage, and disposal
- ➔ Ongoing assessment and mitigation of environmental risks
- ➔ Preparedness and swift response to pollution incidents
- ➔ Considering environmental criteria (EU ETS, CO<sub>2</sub> emissions, fuel efficiency) in chartering decisions

- ➔ Investing in environmental technologies for new vessels and retrofits
- ➔ Promoting initiatives in key environmental areas
- ➔ Continuously improving environmental awareness and responsible practices among both onshore and seagoing personnel through training
- ➔ Engaging stakeholders on environmental measures and progress

Neptune Lines requires all providers, subcontractors, and business partners to comply with legislation and regulations on environmental protection and handling hazardous materials.



To ensure onboard environmental compliance, Neptune Lines:

- ➔ Develops plans to meet regulatory requirements (SEEMP, MRV, BWMP, Garbage Management Plans, etc.).
- ➔ Invests in environmental and energy efficiency training for seafarers through Computer-Based Trainings and onboard visits by the Office Energy Efficiency Team.
- ➔ Establishes dedicated office working groups to monitor fleet environmental performance and communicate results to vessel masters and chief engineers.
- ➔ Implements ship-specific energy efficiency programs, monitored daily through dedicated dashboards.



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The Precautionary Principle

The precautionary principle addresses situations where a known risk exists, but the probability and magnitude of harm are uncertain or unknown. The principle asserts: “Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.”

- In line with this principle, Neptune Lines takes the following actions:
- ➔ Utilizes the best available technology and environmental practices, where technically and economically feasible (i.e., technology approved by legislators or regulators for meeting output standards).
  - ➔ Actively seeks additional information to allow for a more objective assessment of environmental risks.
  - ➔ Conducts post-decision monitoring to evaluate outcomes and adjust practices as needed.
  - ➔ Communicates and collaborates effectively with all involved parties—such as providers, charterers, vessels, recognized organizations, and regulatory bodies—to minimize potential environmental risks.

Neptune Lines also participates in various stakeholder working groups within the shipping industry, playing an active role in shaping regulatory frameworks. Through consultations and technical committees, experts, shipping companies, and other maritime stakeholders share knowledge and provide feedback to regulatory bodies, helping to shape sector strategies and regulations.

Compliance

The International Maritime Organization (IMO) adopted its initial strategy for the reduction of greenhouse gas (GHG) emissions from ships in April 2018. This strategy sets ambitious targets, including a 40% reduction in carbon intensity (gCO<sub>2</sub> per transport work) by 2030 compared to 2008 levels, and a 70% reduction by 2050. Additionally, it aims to reduce total annual GHG emissions by 50% by 2050 relative to 2008 levels.

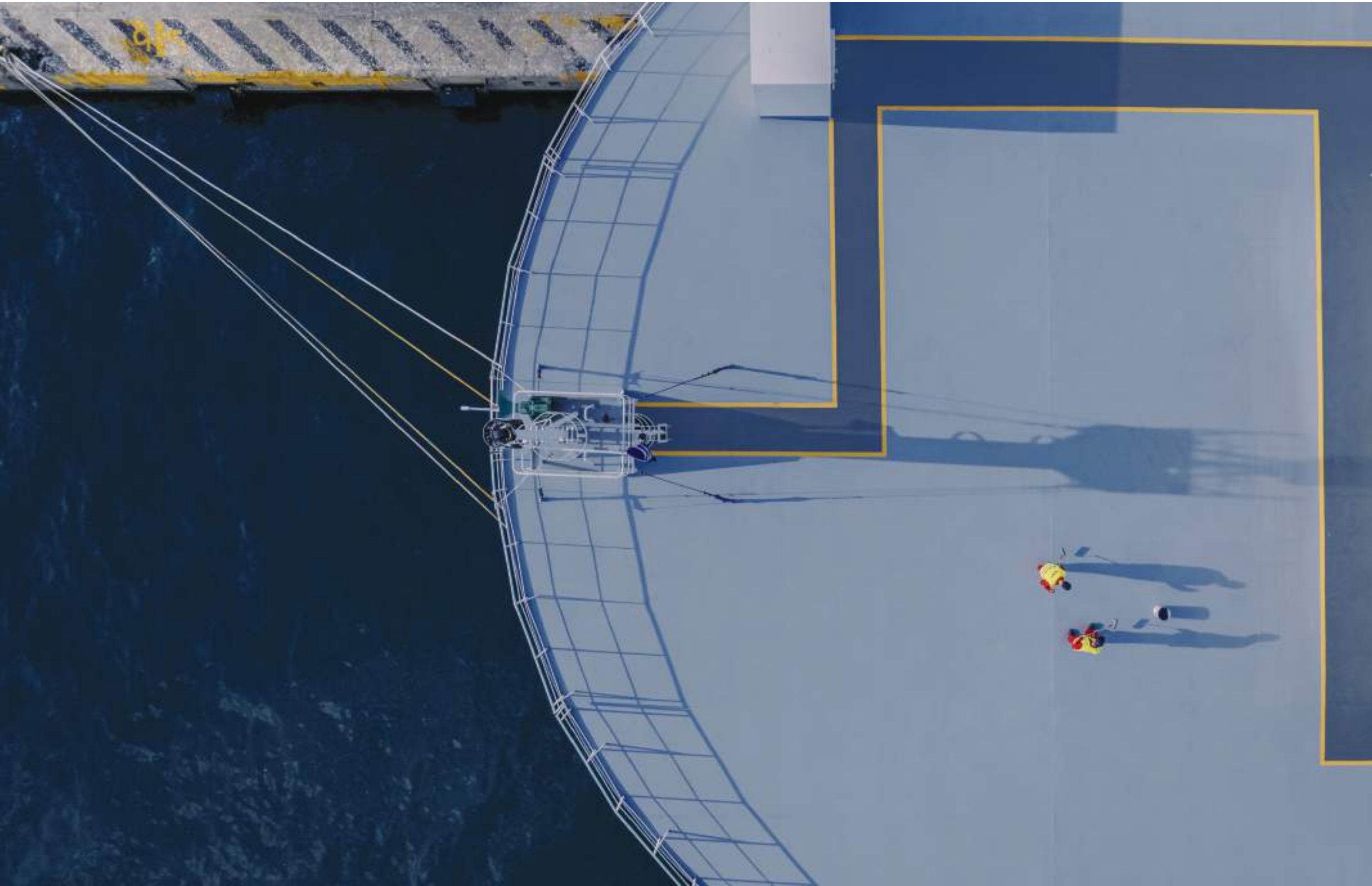
To meet these targets, the IMO has introduced both technical measures (EEDI, EEXI) and operational measures (CII) as short-term actions. These new statutory requirements came into effect on January 1, 2023.

EEDI & EEXI

The Energy Efficiency Design Index (EEDI) is a key component of the IMO’s regulations aimed at reducing the carbon intensity of ships. EEDI primarily applies to newly built vessels, requiring the calculation of CO<sub>2</sub> emissions (gCO<sub>2</sub>/ton nm) using a specific formula based on the technical design characteristics of each ship. The Energy Efficiency Existing Ship Index (EEXI) follows a similar

approach for existing vessels, with the EEXI framework applicable to vehicle carriers.

Neptune Lines’ fleet complies with the EEXI regulation by calculating the required and attained EEXI values, evaluating the impact of Engine Power Limitation (EPL) or Shaft Power Limitation (ShaPoLi), and preparing the EEXI technical file. This file is then submitted for approval to the appointed recognized organization.



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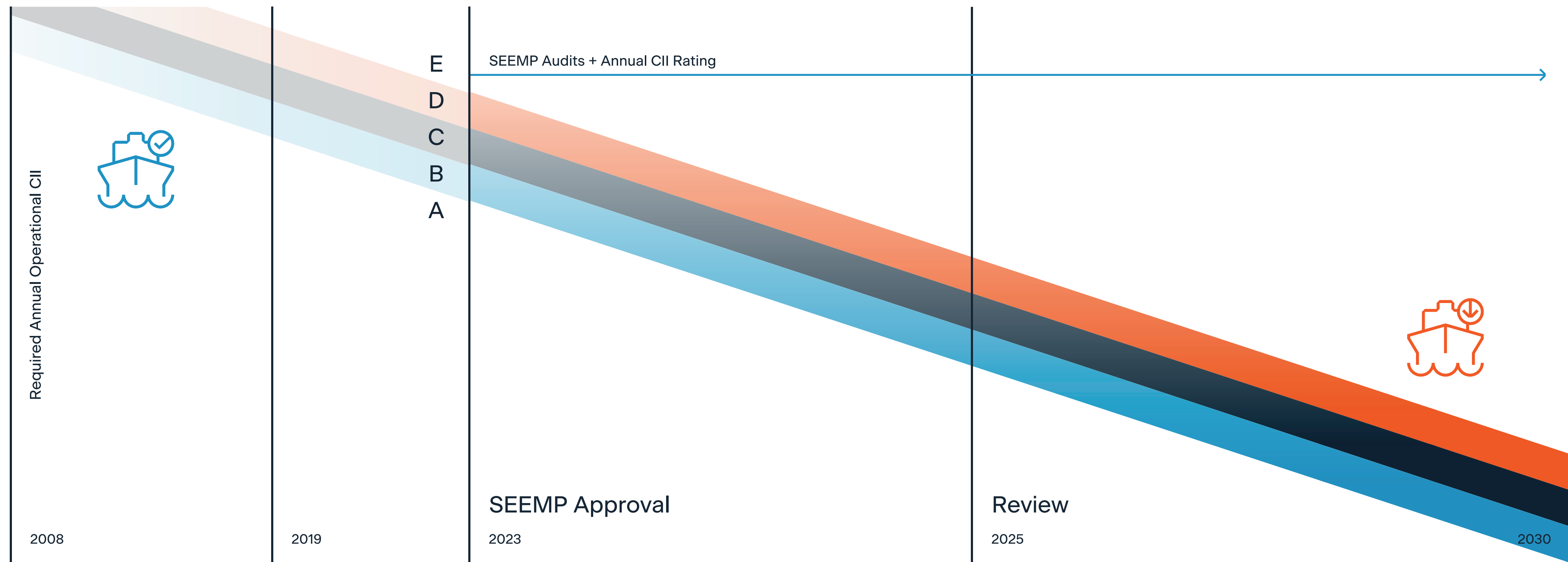


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## CII

The Carbon Intensity Indicator (CII) is a measure of a ship's energy efficiency, expressed in grams of CO<sub>2</sub> emitted per cargo carrying capacity per nautical mile. The first reporting year for the attained annual operational CII will be 2024, based on performance data from 2023. Vessels will be assigned an environmental rating (A, B, C, D, or E), with stricter standards being implemented toward 2030. A corrective action plan must be submitted and verified if a vessel

receives a D rating for three consecutive years or an E rating in any year.

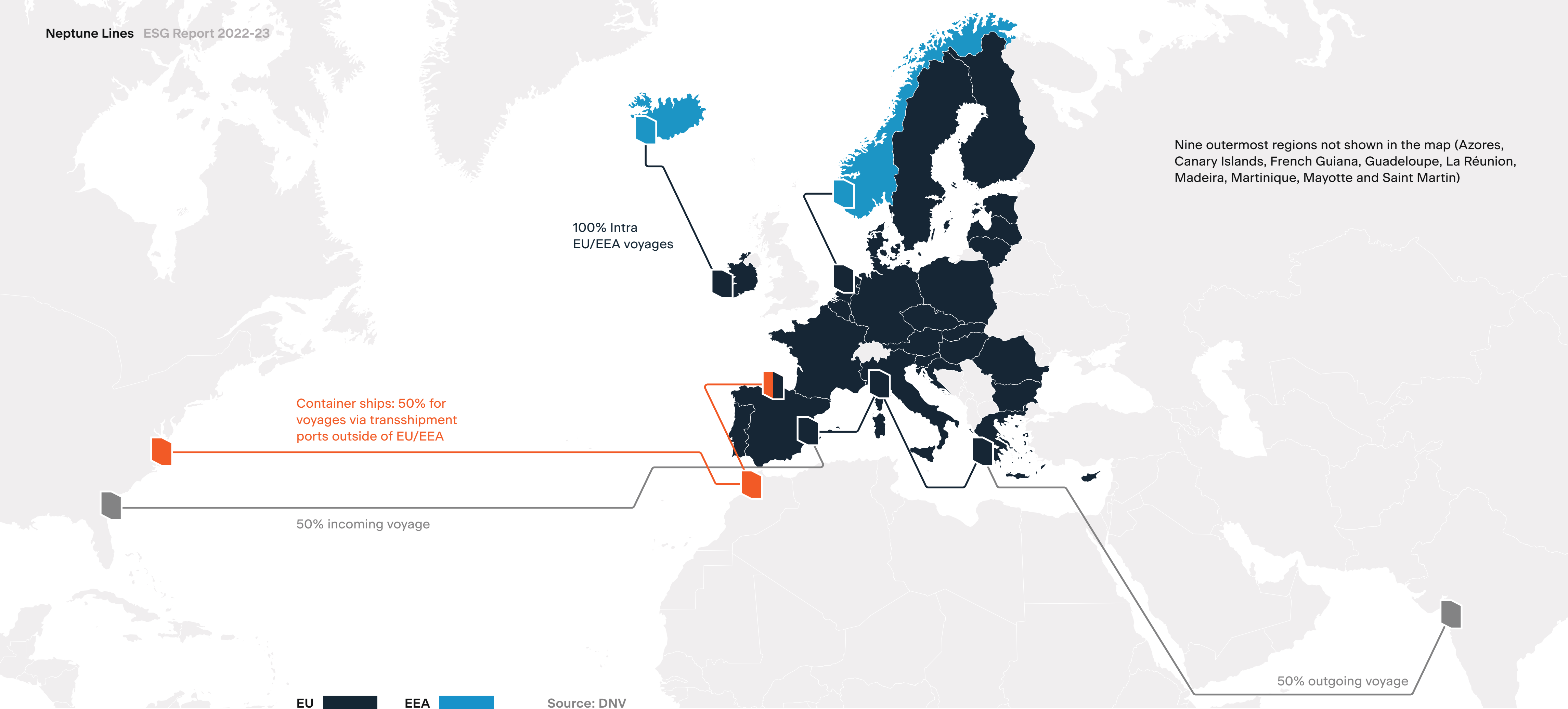
For vehicle carriers, the transport work is measured using the vessel's gross tonnage rather than deadweight, which is commonly used for other vessel types, such as bulk carriers.

To monitor CII performance across its fleet, Neptune Lines has established an in-house, interdepartmental Energy Efficiency Working Group. This group meets regularly to review vessel energy

performance and implement corrective actions to meet set goals. Business intelligence tools are utilized to develop real-time data monitoring platforms, providing the group with timely and accurate information for decision-making.







EU ETS

The European Union Emissions Trading System (EU ETS), launched in 2005, was further revised in 2023 following the release of the European Green Deal. The EU’s first target is to reduce net emissions by at least 55% by 2030 compared to 1990 levels, with the ultimate goal of achieving net zero by 2050. The EU ETS operates on a “cap and trade” principle, where a cap is set on the total amount of greenhouse gases (GHG) that can be emitted by installations and operators. This cap decreases annually, ensuring a gradual reduction in EU emissions over time.

The system allocates emission allowances, with each allowance granting the right to emit one tonne of CO<sub>2</sub> equivalent. As the cap decreases, the supply of allowances to the EU carbon market is reduced accordingly. Under the EU ETS, 100% of emissions from voyages and port calls within the EU/EEA, and 50% of emissions from voyages into or out of the EU/EEA, are subject to the scheme.

In 2024, the EU adopted a revision of the ETS directive to include shipping. In response, Neptune Lines has proactively implemented

environmental risk management policies and is actively monitoring and managing the carbon emissions of our fleet. We continuously seek ways to optimize fuel efficiency and reduce our environmental impact.

The costs associated with EU ETS compliance will be incorporated into our pricing structure, reflecting the industry-wide shift toward sustainable practices. This approach ensures transparency with our customers while contributing to the EU’s decarbonization goals and meeting our own environmental targets.



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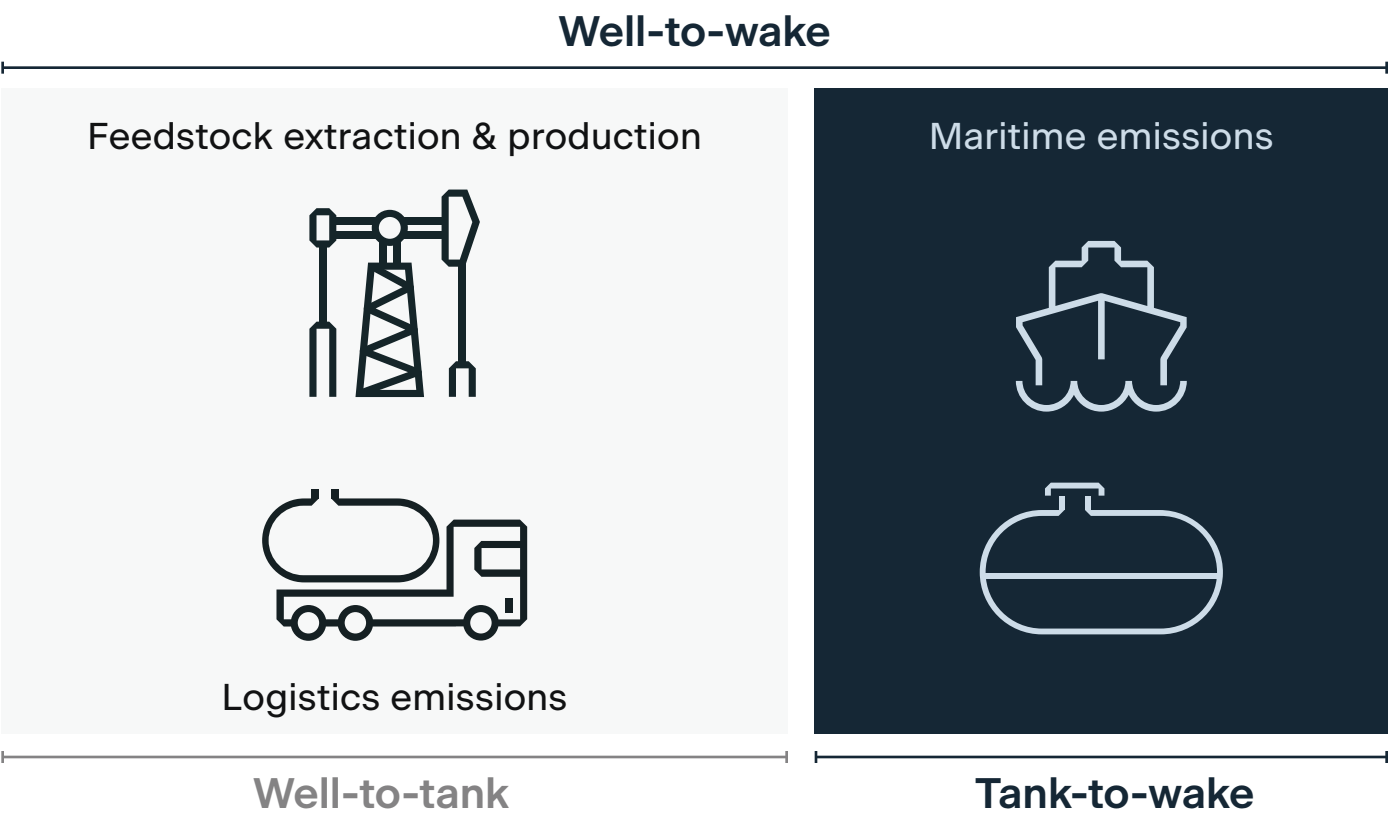
FuelEU Maritime

The FuelEU Maritime regulation will come into effect on January 1, 2025. This regulation aims to increase the use of renewable and low-carbon fuels in the fuel mix of international shipping within the EU. It sets requirements for the annual average GHG energy intensity (gCO<sub>2</sub>e/MJ) of ships operating within the EU and EEA, based on a well-to-wake perspective.

The baseline for calculation is the 2020 average well-to-wake GHG intensity of the fleet, set at 91.16 gCO<sub>2</sub>e/MJ. The regulation mandates a 2% reduction in 2025, rising to 6% by 2030, with an accelerated trajectory after 2035, culminating in an 80% reduction by 2050. Similar to the EU ETS, FuelEU Maritime applies to 100% of energy used during voyages and port calls within the EU/EEA, and 50% of energy used on voyages into or out of the EU/EEA.

Neptune Lines is proactively preparing for these requirements. FuelEU monitoring plans are being developed for submission to accredited verifiers, and our fuel data monitoring platforms are being adjusted accordingly. We are also enhancing our fuel monitoring systems, exploring alternative fuels, and investing in energy-efficient technologies to ensure compliance.

As with the EU ETS, the costs associated with FuelEU Maritime compliance will be incorporated into our service pricing, ensuring transparency with our customers and aligning with future regulatory changes that promote environmental responsibility.



Incidents

Two environmental incidents occurred during the reporting period (2022–2023). The first involved a small fuel oil overflow from the air vent piping during bunkering operations, both at berth and at sea. Immediate clean-up actions were taken by the vessel’s oil pollution emergency team, port contractors, and authorities, resulting in zero environmental damage. The spill was contained with floating barriers, and the fuel was collected using absorbent materials. An



investigation was conducted, corrective actions were applied fleet-wide, and a fine was imposed by authorities of €15,000.

The second incident involved a violation of the fuel sulphur content limit while sailing in the English Channel, detected by a remote sensing device. Upon arrival at port, MARPOL inspectors boarded the vessel, collected samples, and confirmed the violation. Corrective actions were taken, and authorities were informed with action plans submitted to their satisfaction. A fine of €40,000 was also imposed in this case.



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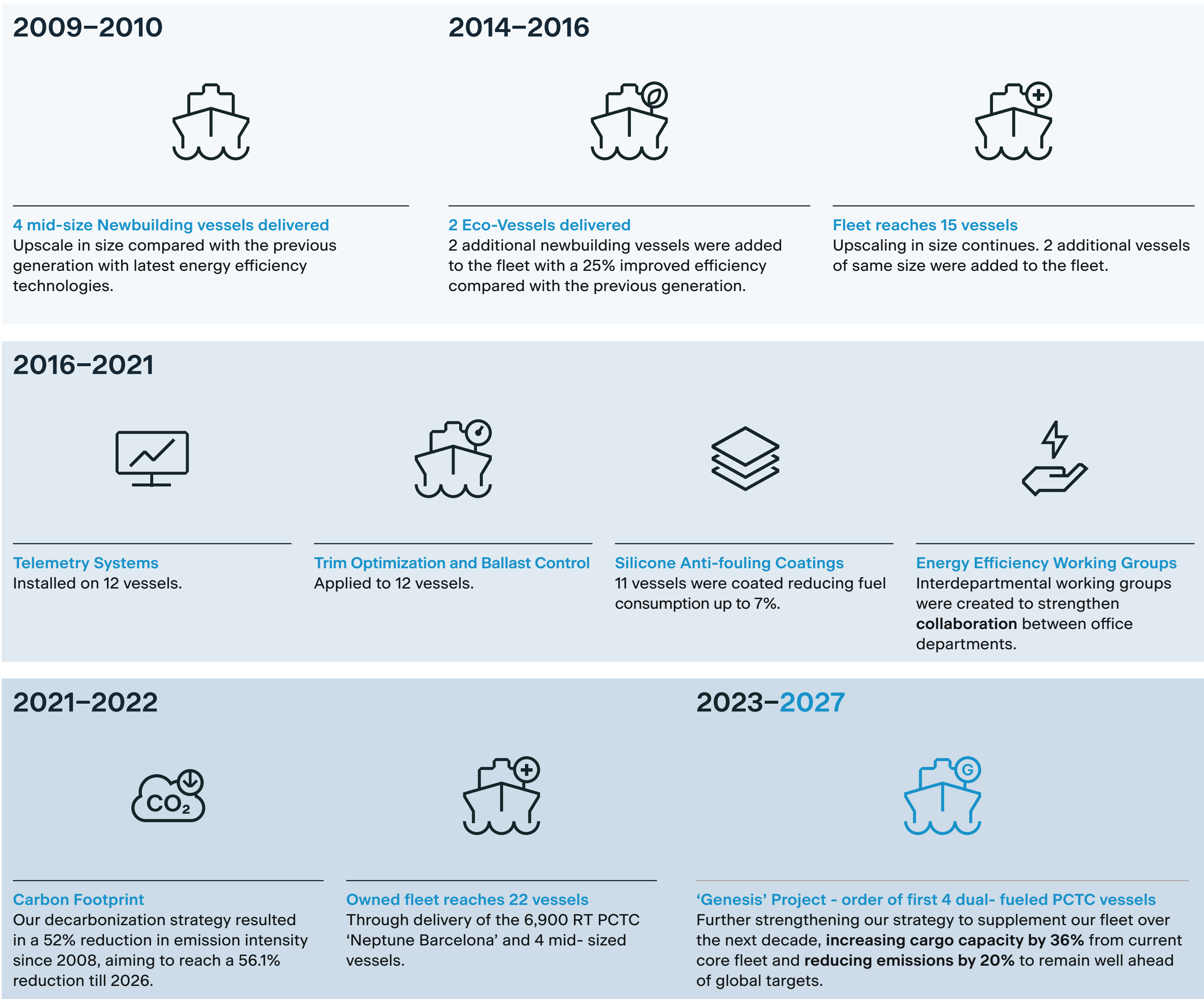
2.2 Decarbonization Strategy & Air Pollution <sup>6</sup>

While shipping is essential to the global transportation industry and one of the most energy-efficient modes of transport, it is also a contributor to greenhouse gas (GHG) emissions and climate change. In response, Neptune Lines is committed to going beyond regulatory requirements, setting a strategic environmental mission, and reaffirming its dedication to sustainable operations.

Decarbonization strategy

- ➔ Participating in the formulation of new regulations and the revision of existing ones through recognized membership channels (e.g., Classification Society Technical Committees, Union of Greek Shipowners).
- ➔ Proactively identifying the impact of new regulations coming into force and take appropriate action, such as forming working groups for timely implementation.
- ➔ Engaging in sector-specific initiatives to share and gain knowledge aimed at addressing energy efficiency issues (e.g., initiatives to create a common emissions calculation method within the Ro-Ro community).
- ➔ Investing in dual-fueled newbuild vessels of appropriate capacity, equipped with the latest technological advancements.
- ➔ Investing in research and development projects (e.g., carbon capture, methanol).
- ➔ Utilizing alternative fuels (e.g., biofuels).
- ➔ Continuously enhancing the technical performance of the existing fleet by installing energy-efficient technologies tailored to trading patterns.
- ➔ Implementing operational measures in daily operations, including timely port arrivals, minimizing port stay and idle time at anchorage, while optimizing onboard activities to achieve optimal results.
- ➔ Establishing interdepartmental shore-based working groups to monitor fleet energy performance daily using AI and advanced business intelligence tools.

Neptune Lines recognized early on the need to formulate a decarbonization path, beginning with investments in energy-efficient vessels as part of its first newbuild program in 2009.



<sup>6</sup> Air Pollution. Air pollution refer to the presence of substances in the atmosphere that have a detrimental effect on humans and other living organisms such as nitrogen oxides (NOx), sulphur oxides (SOx) and particulate matter. On the other hand, greenhouse gases (GHGs) such as carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxides (N<sub>2</sub>O) are gases that can absorb and trap heat. This causes a greenhouse effect on the earth



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GHG emissions – Scope 1

Scope 1 greenhouse gas emissions are those released directly into the atmosphere as a result of our operations, primarily stemming from fuel combustion in vessel engines. These emissions include Carbon Dioxide (CO<sub>2</sub>), Methane (CH<sub>4</sub>), and Nitrous Oxide (N<sub>2</sub>O).

CO<sub>2</sub> emissions

Since 2016, the implementation of telemetry systems, advanced anti-fouling coatings, trim optimization programs, re-blading projects, fleet expansion, and other measures have enabled Neptune Lines to further reduce its Scope 1 Carbon Intensity Indicator (CII - gCO<sub>2</sub>/GTnm) by 52.1% by the end of 2023, using 2008 as the base year. This surpasses the 40% CO<sub>2</sub> per transport work reduction target set by the IMO GHG strategy.

With an approved budget of €7.5 million through 2026 for retrofitting energy-efficient technologies during upcoming dry dockings and the planned use of alternative fuels (e.g., Biofuel B30), Neptune Lines aims to further reduce Scope 1 CII by 3.8% by 2026. A 53.8% reduction in CII is projected by 2026, compared to the 2008 baseline.

Looking ahead to 2030, the delivery of four new LNG dual-fuel Pure Car & Truck Carriers (two in 2026 and two in 2027), along with the phased withdrawal of older vessels and continued investment in retrofitting advanced technologies, will allow us to reduce the fleet’s average CII by 31.7% compared to 2023 levels.

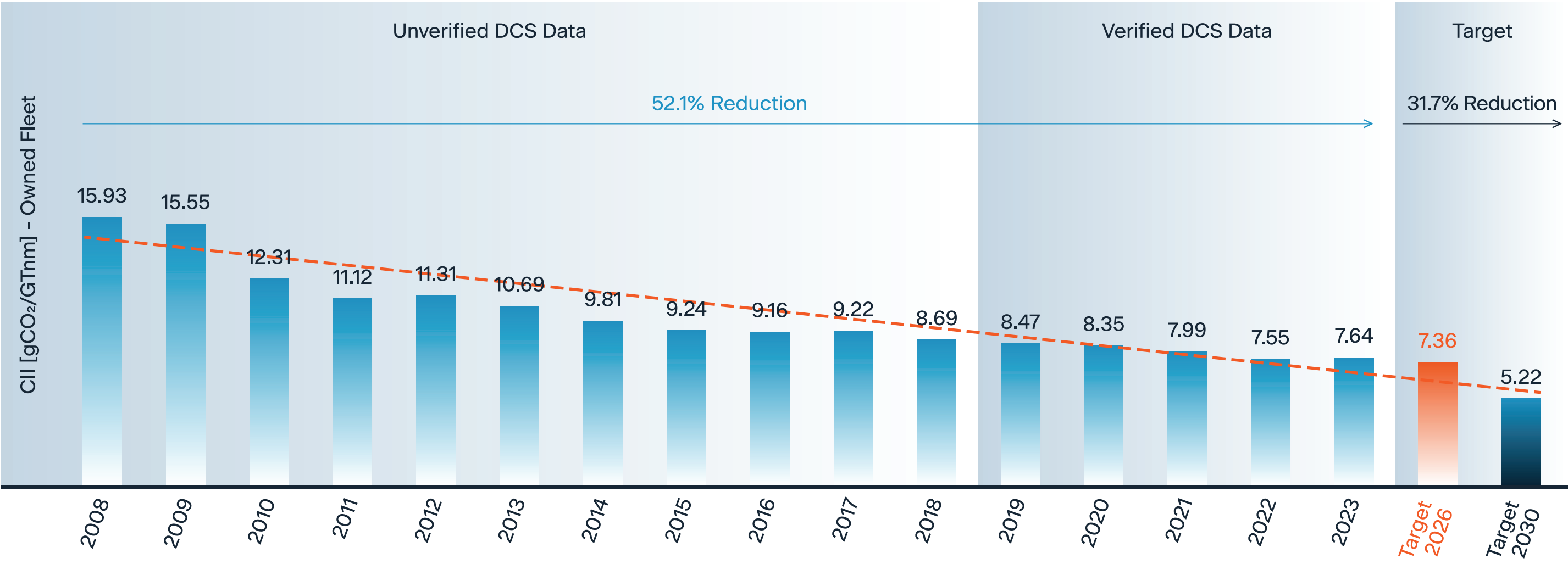
A slight 1.2% increase in CII was observed in 2023 compared to 2022, primarily due to many vessels approaching their five-year repair cycles scheduled for 2024 and 2025. During these cycles,

several energy efficiency measures, such as reapplying hull silicone coatings, will be refreshed, and new technologies (e.g., Seamflow) will be installed to enhance performance.

The five second-hand vessels acquired in 2022 are currently undergoing optimization, with retrofitted technologies aimed at improving their energy efficiency profiles. In 2023, the Energy Efficiency Operational Indicator (EEOI - DCS) improved by 12.02% compared to the previous year, reflecting enhanced carbon intensity in real operating conditions, thanks in part to the increased carrying capacity from the newly acquired vessels.

Total CO<sub>2</sub> emissions for Neptune Lines increased by 4% in 2023 compared to 2022, due to the full-year utilization of the five vessels purchased in the second half of 2022.

Decarbonization Metrics



EEOI [gCO<sub>2</sub>/ton nm] - Owned Fleet



Total CO<sub>2</sub> emissions (tons) - Owned Fleet



<sup>7</sup> Scope 1. Includes owned fleet direct intensity emissions, in accordance with the IMO Data Collection System (DCS - CII) as per IMO Resolution MEPC 281 (70) as amended and MEPC.308(73) for indicating emission factors. A quality data check on the calculated scope 1 emissions as from 2019, led to a minor revision of the previously reported CII figures. Data are duly verified from a recognized external verifier.

<sup>8</sup> EEOI. Energy Efficiency Operational Indicator. EEOI is the total carbon emissions in a given time per unit of revenue tonne-miles. A lower EEOI means a ship is more energy efficient in its operations.



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CH<sub>4</sub> & N<sub>2</sub>O emissions

Methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O) are key greenhouse gases associated with fossil fuel use. Methane is produced when fuel hydrocarbons are not fully combusted, while N<sub>2</sub>O forms during combustion when nitrogen in the air or fuel is oxidized at high temperatures. Emissions of both gases are influenced by fuel type, engine design, and combustion efficiency.

Starting in 2026, CH<sub>4</sub> and N<sub>2</sub>O emissions will be included in the EU ETS for shipping, and from 2024, they will be monitored, reported, and verified under the EU-MRV scheme. In preparation, we have begun tracking and reporting these emissions.

In 2023, methane emissions remained stable compared to 2022, while N<sub>2</sub>O emissions increased by 3.2%, due to the rise in operating days following the addition of five new vessels in 2022.

|                           | 2022  | 2023  |
|---------------------------|-------|-------|
| CH <sub>4</sub> (tonnes)  | 171   | 177   |
| N <sub>2</sub> O (tonnes) | 5,842 | 6,030 |

GHG emissions – Scope 2

This includes indirect emissions, specifically those generated by energy providers to supply ready-to-use energy. Indirect emissions from purchased electricity, heat, and cooling primarily relate to our shore-based facilities. Occasionally, fleet vessels are supplied with shore power during major repair periods, such as dry dockings.

| Scope 2 - CO <sub>2</sub> | 2022   | 2023   |
|---------------------------|--------|--------|
| Vessels (tonnes)          | 87.05  | 51.02  |
| Shore-based (tonnes)      | 196.84 | 159.52 |

\*2022 SOx emissions has not been reported due to insufficient data

Air Pollution

As our fleet travels vast distances across the world’s oceans, it releases air pollutants such as nitrogen oxides (NOx) and sulfur oxides (SOx) into the atmosphere. These pollutants are combustion byproducts emitted as smoke. Air emissions are regulated by MARPOL Annex VI, which we strictly adhere to in order to keep pollution within controlled limits.

Neptune Lines implements emission control technologies and sustainable operating practices to minimize environmental impact and ensure compliance with regulatory standards.

SOx emissions

SOx emissions primarily result from the combustion of sulfur-containing fuels used to power the fleet, contributing to acid rain and affecting coastal habitats and communities. As of January 1, 2020, the global limit on the sulfur content of ships’ fuel oil was reduced from 3.50% to 0.50% m/m (mass by mass). This limit, mandated by the International Convention for the Prevention of Pollution from Ships (MARPOL), is compulsory for all vessels operating outside designated Emission Control Areas (ECAs), where the limit is stricter at 0.10%.

Neptune Lines has implemented several measures to reduce SOx emissions, including the installation of hybrid-ready exhaust gas cleaning systems (scrubbers) on board. To date, eleven vessels have been fitted with scrubbers, with four additional units scheduled for installation by 2026.

In 2023, Neptune Lines recorded a total of 897 tons of SOx emissions.

|              | 2023* |
|--------------|-------|
| SOx (tonnes) | 897   |

NOx emissions

Nitrogen oxides (NOx) emissions are produced during the combustion of fossil fuels on board ships, forming when nitrogen reacts with oxygen at high temperatures. NOx emissions can have adverse effects on human health and the environment.

Unlike sulfur oxides, which can be controlled by reducing the sulfur content in fuel, NOx emissions are a result of the combustion process itself. To regulate NOx emissions, MARPOL 73/78 introduced Regulation 13, which limits NOx emissions under the IMO Tier III standard. This standard requires all marine engines built after 2016, with an installed main engine power greater than 130 kW, to reduce NOx emissions by 80% compared to Tier I levels.

Reducing NOx requires modifications to engine design and/or exhaust treatment. Scrubbers help remove contaminants such as particulate matter, nitrogen, and sulfur oxides, while also recirculating exhaust gas, lowering combustion temperatures and thereby reducing NOx emissions.

In 2023, Neptune Lines’ managed fleet emitted a total of 8,791 tons of NOx, remaining at similar levels to 2022.

|              | 2022  | 2023  |
|--------------|-------|-------|
| NOx (tonnes) | 8,957 | 8,791 |



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2.3 Technical & Operational Energy Efficiency Measures



As Built Technical Retrofit Energy Efficiency Measures

- Propulsion and Maneuvering System (promas Lite)
- Controllable Pitch Propeller (CPP)
- Shaft Generator
- De-rated Main Engine
- E-controlled Main Engine
- Engine Part-Load Optimization
- DG Economizer
- Advanced Antifouling System
- Ultrasonic Propeller AFS
- Variable Frequency Drives (VFD)
- Exhaust Gas Cleaning System (EGCS)
- Pre-Shrouded Vane (PSV) & Propeller Boss Cap Fin (PBCF)

Operational Measures

- Telemetry System
- Use of biofuels
- Capacity Utilization
- Route Optimization using Artificial Intelligence (AI)
- Weather Routing
- Trim & Ballast Optimazation



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Advanced Antifouling Systems

Silicone antifouling systems enhance vessel efficiency by reducing hull resistance and creating an exceptionally smooth surface. The estimated efficiency improvement from the application of silicone-based antifouling can reach up to 6%. By the end of the reporting period, 14 vessels have been coated with silicone-based antifouling systems, with plans to cover the entire fleet by 2026. This policy will also be applied during all future re-coatings at scheduled dry docks after the initial application on each vessel.

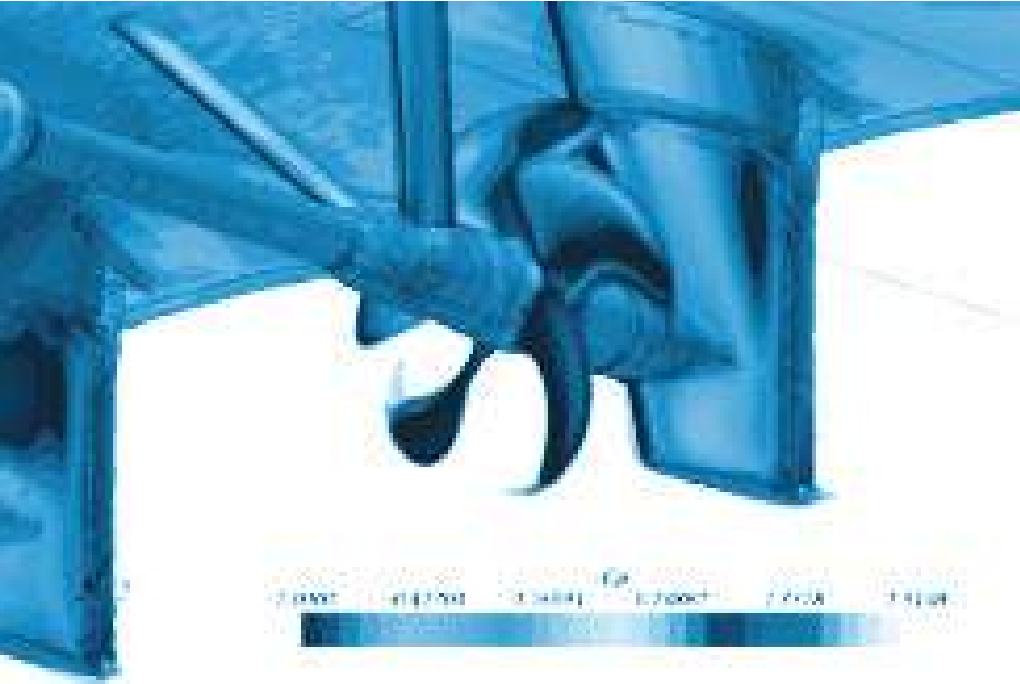


Green Hull Advanced Antifouling Systems

The underwater coating, free of silicone oil and biocides, creates an ultra-smooth surface. In addition to reducing friction, the coating offers excellent mechanical and anti-abrasion properties, helping to minimize speed loss over the five-year dry dock cycle. It has been applied to one vessel and is currently under close evaluation to validate its benefits.

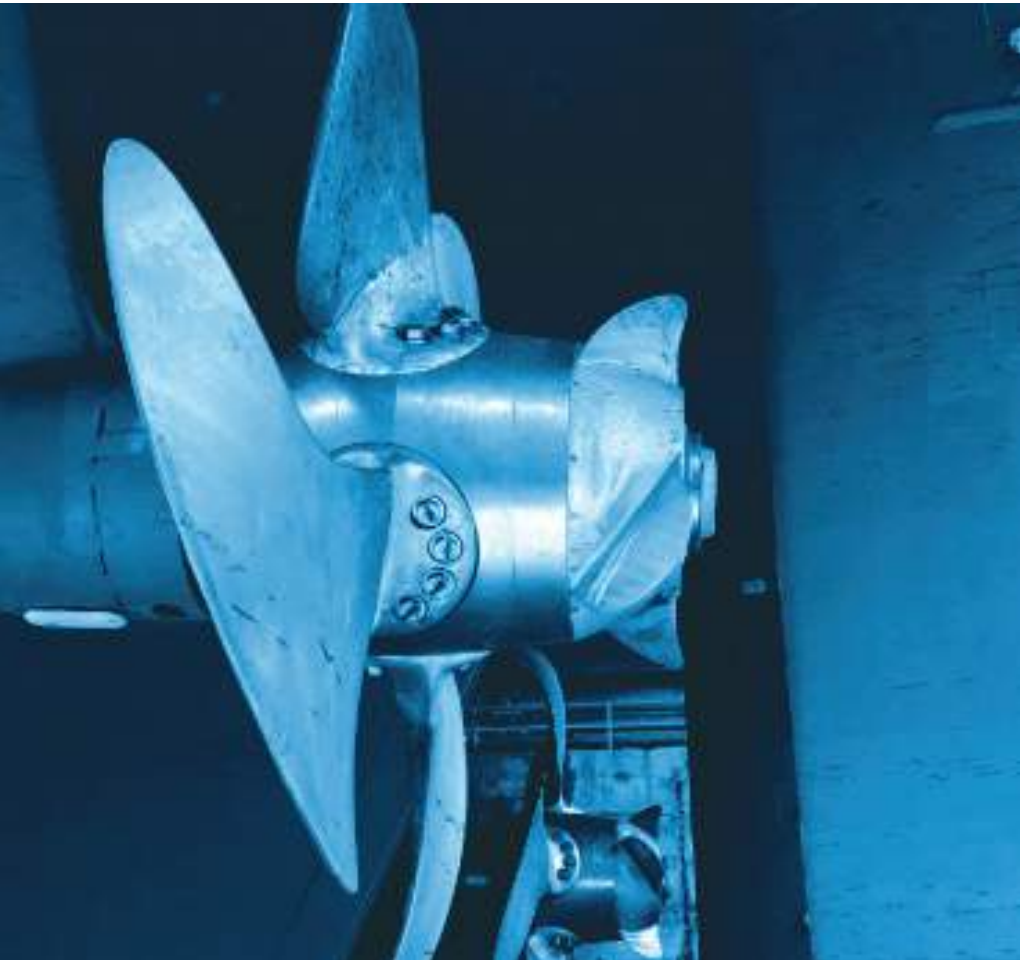
Propulsion & Maneuvering System (Promas Lite)

PROMAS Lite is an upgrade solution for propulsion systems on existing vessels. It consists of an optimized propeller, propeller cap, and rudder bulb, improving efficiency by 8% to 10%. Currently applied to two vessels, the system is scheduled for installation on an additional four vessels by 2026.



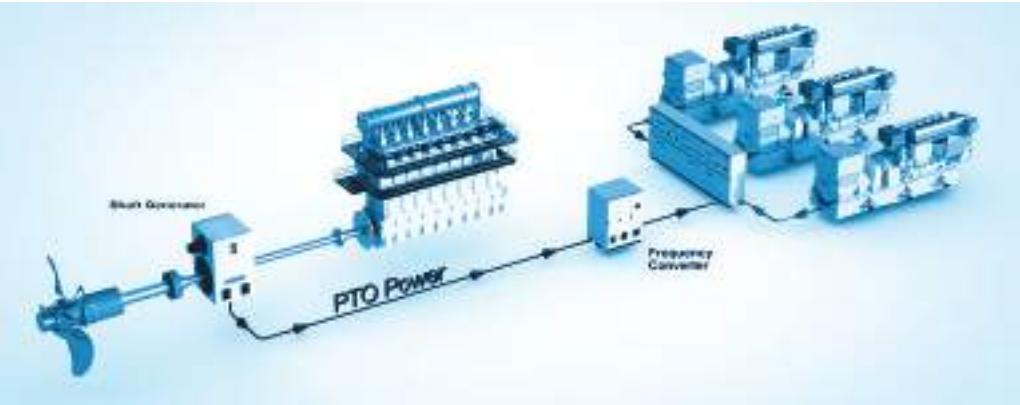
Controllable Pitch Propeller (CPP)

A controllable pitch propeller (CPP) allows the blade angle to be adjusted, optimizing efficiency under different speeds and loads. By varying the pitch, the propeller can absorb the maximum power the engine can produce, making it efficient across the full range of rotational speeds and load conditions. When a vessel is fully loaded, it requires more propulsion power, and adjusting the propeller blades to the optimal pitch improves efficiency, resulting in fuel savings. Vessels equipped with variable pitch propellers (VPP) can accelerate faster from a standstill and decelerate more effectively, enhancing safety by enabling quicker stops. Additionally, a CPP improves vessel maneuverability by directing a stronger flow of water onto the rudder. This technology is applicable to 12 vessels.



Shaft Generators

Shaft generators on board ships are powered by the main engine to supply electrical power. By utilizing the main engine to generate electricity instead of auxiliary engines, shaft generators improve the vessel's energy efficiency and reduce emissions. This technology is applied to 13 vessels.



De-rated Main Engines

Main engines are typically designed and optimized to operate at a specific speed and load profile. However, practices like on-time arrival or slow steaming can reduce the vessel's speed below optimal levels, causing engines to run at less efficient loads. Engine derating—adjusting the maximum speed and continuous rating—can increase efficiency by lowering specific fuel oil consumption at the new optimal speed and load profile. Currently, two of our vessels have been optimized, with four more scheduled for optimization by the end of 2025.



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Variable Frequency Drives (VFD)

A variable frequency drive (VFD) is a device that adjusts the speed and output of a pump or fan based on the specific needs of the system. This allows the motor to operate at lower speeds when less power is required, reducing overall energy consumption.



Exhaust Gas Cleaning Systems

An Exhaust Gas Cleaning System (EGCS) is used to purify exhaust gases on diesel-fueled marine vessels by removing sulfur oxides (SOx) and solid particles before they are vented into the atmosphere. This is achieved through a seawater washing process. Neptune's fleet is equipped with ten open-loop systems and one hybrid system.



Seamflow

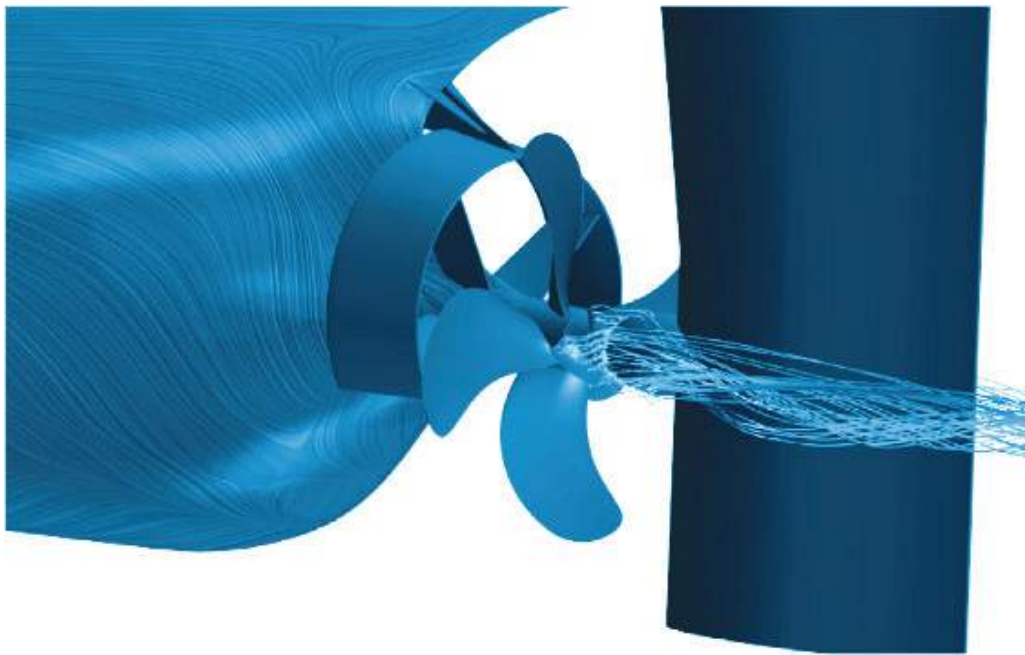
This technology involves applying a special putty to smooth out the surface of welding seams, reducing hull friction. It was applied to two vessels in 2023 and is scheduled for application on four additional vessels by the end of 2026. The expected efficiency gain is approximately 1%.



Pre-Shrouded Vane (PSV) & Propeller Boss Cap Fin (PBCF)

Pre-Shrouded Vanes (PSV)

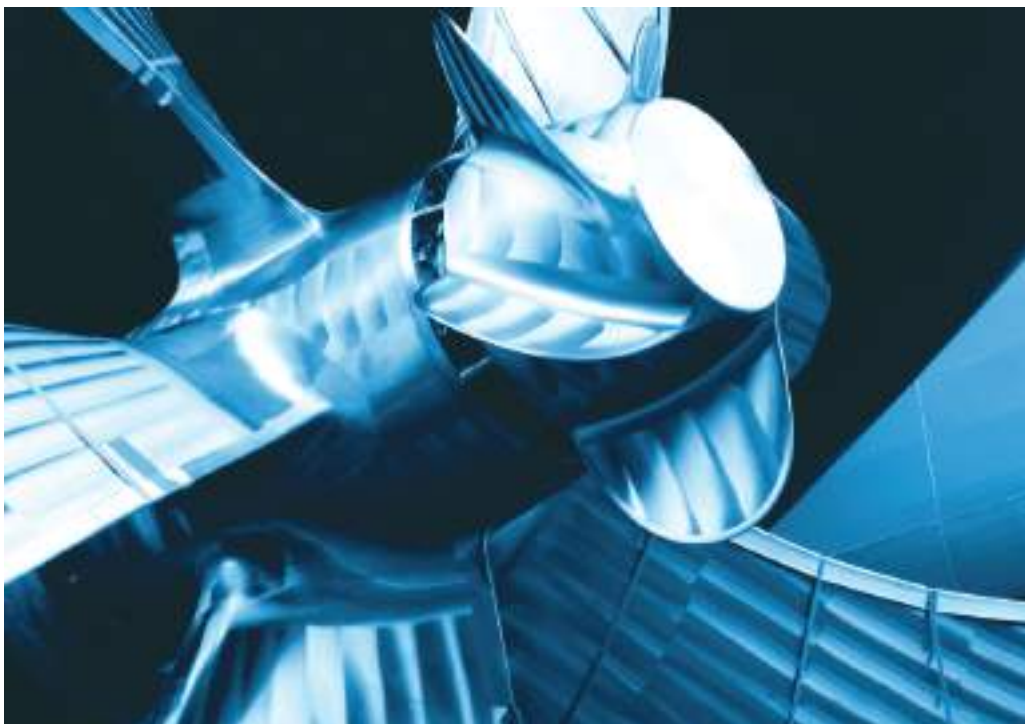
Pre-Shrouded Vanes (PSV) are energy-saving devices designed to reduce the rotational energy loss of the propeller slipstream by generating pre-swirl flow in front of the propeller. Full-scale comparative tests have demonstrated PSV's effectiveness in improving propeller inflow uniformity, increasing hull efficiency, and reducing propeller wake energy loss, resulting in energy savings of 3% to 8%.



Propeller Boss Cap Fin (PBCF)

The Propeller Boss Cap Fin (PBCF) is another energy-saving device that enhances propeller efficiency, requiring less power to propel the vessel at a given speed. The PBCF consists of a hub with small fins attached to the propeller cap, improving power efficiency.

The installation of PSV and PBCF is scheduled for the upcoming drydocks on four vessels by the end of 2025, with an expected efficiency gain of approximately 5%.



Electronically Controlled Main Engines

Electronically controlled main engines use sensors to monitor engine performance, including speed, load, and fuel injection rates, to deliver the required power efficiently. This technology is currently implemented on three of our fleet vessels.



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Engine Part – Load Optimization (EPLO)

EPLO (Engine Power Limitation Optimization) is a cutting-edge technology designed to identify the optimal power range for engines, improving combustion efficiency and reducing maintenance costs. Following the implementation of the EEXI regulation and the application of EPL (Engine Power Limitation), main engines now operate within a lower, non-optimal range. EPLO fine-tunes the engine to perform efficiently in this new range by adjusting turbocharger matching. Neptune Lines plans to install EPLO on four vessels by the end of 2025, aiming for a 3% efficiency improvement.



DG Economizer

A heat exchanger is installed in the exhaust gas piping of the diesel generator to produce steam from the waste heat of the exhaust gases. This installation minimizes the auxiliary boiler usage while at port. Neptune Lines plans to conduct its first installation in 2024 and, based on the measured outcomes, aims to proceed with five additional installations by the end of 2026, targeting an efficiency improvement of up to 2%.



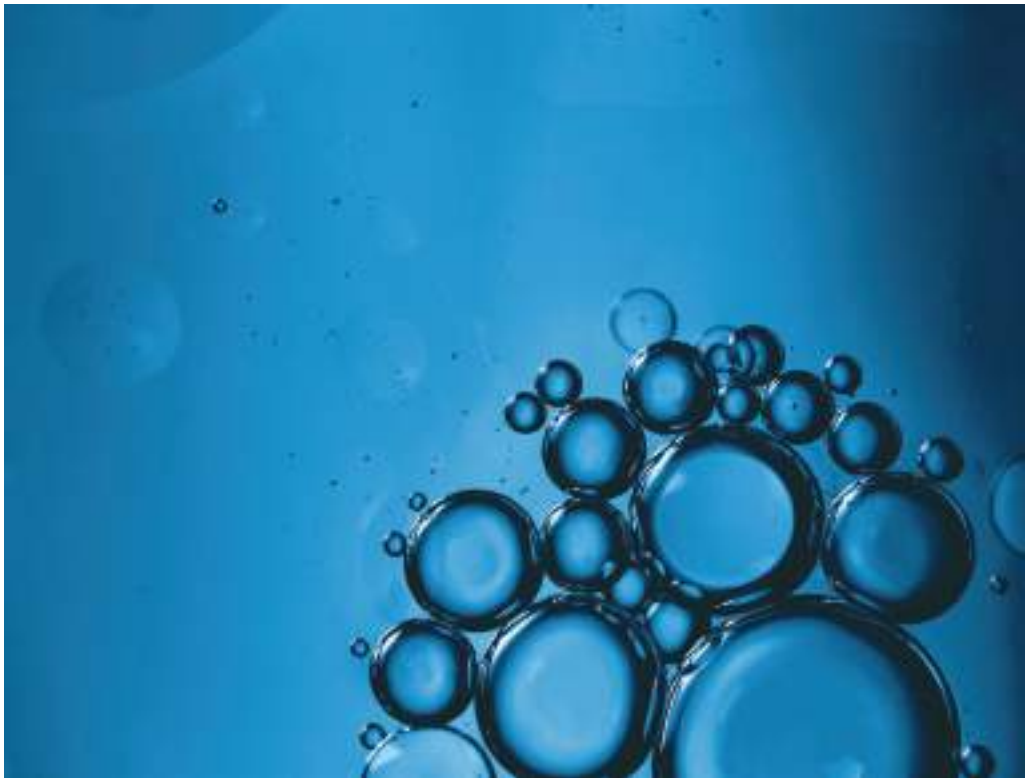
LED Lights

Conventional fluorescent lighting tubes have been upgraded to LED technology, significantly reducing energy consumption and waste due to the longer lifespan of LED lamps. From 2022 to 2023, we continued replacing fluorescent tubes with equivalent LED fixtures on five additional vessels.

Use of Alternative Fuels

The use of biofuels or biofuel blends is a key pillar in Neptune Lines’ decarbonization strategy. The Fatty Acid Methyl Ester (FAME) biofuel is the most widely used type in marine applications, available either in blends with traditional petroleum fuels or as a 100% biofuel. The use of certified biofuels can significantly impact the reduction of the Carbon Intensity Indicator (CII) and lower the annually reported CO<sub>2</sub> emissions under the EU Monitoring, Reporting, and Verification (MRV) framework.

In 2023, Neptune Lines purchased its first B30 biofuel blend, resulting in a 2% reduction in overall annual CO<sub>2</sub> emissions for one of its fleet vessels. The vessel’s trading patterns, combined with the implementation of the new FuelEU Maritime regulation starting January 1, 2025, will further enhance biofuel usage in the coming years. A feasibility study was conducted to explore alternative pathways for biofuel utilization, ensuring compliance with legislation and estimating potential transition costs.



Ultrasonic Propeller AFS

Ultrasound is an increasingly popular and environmentally friendly alternative to traditional propeller cleaning methods. This ultrasonic technology utilizes high-frequency sound waves to protect propeller surfaces, preventing microbes from adhering without the need for harsh chemicals or abrasives. The sound waves propagate along the propeller’s surface, causing deposits and fouling to detach while also preventing new growth from sticking. Plans are underway to install the first device on one vessel in 2024 and evaluate the results before proceeding with installations on the remaining vessels.



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E-Course Pilot

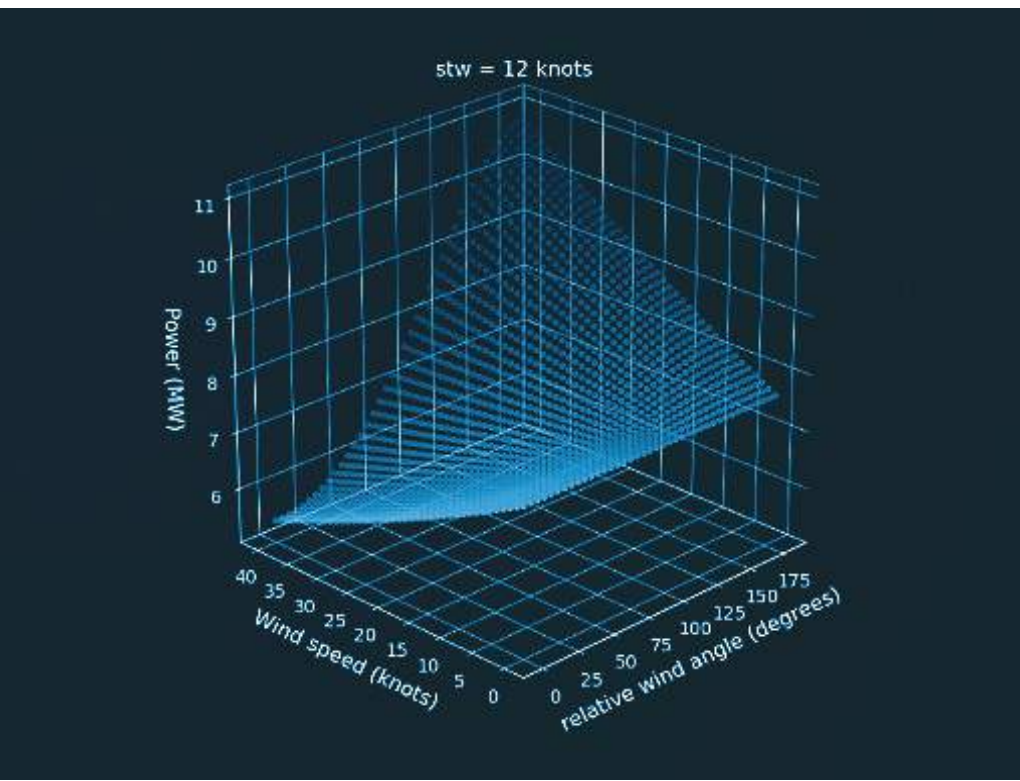
E-Course Pilot measures the Cross Track Distance (XTD) caused by sea currents or wind, generating a virtual course line to guide the vessel along this path, thereby reducing track distance. Currently, ten vessels are equipped with E-Course Pilot technology.



Route Optimization using Artificial Intelligence (AI)

Powerful AI models can accurately assess vessel behavior under various weather and fouling conditions by analyzing 19 critical parameters. This technology can achieve fuel and emission savings of up to 8% per leg. AI-generated performance models track changes in performance profiles over time, calculating the optimal voyage for selected vessels.

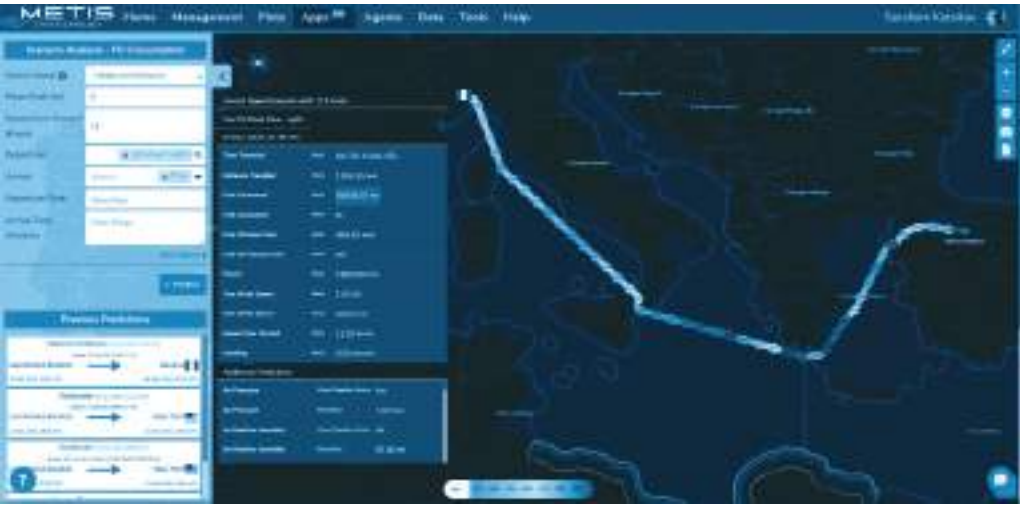
In 2023, this system was installed on two vessels, with plans to install it on two more in 2024, focusing on our deep-sea trade routes, such as Far East Lines.



Telemetry Systems

Telemetry systems have been deployed across the fleet following a significant investment in METIS technology from 2020 to 2023. All ships are equipped with METIS telemetry systems of varying sophistication, and two vessels use the MARORKA system to monitor 24 parameters in real time, including performance and energy consumption.

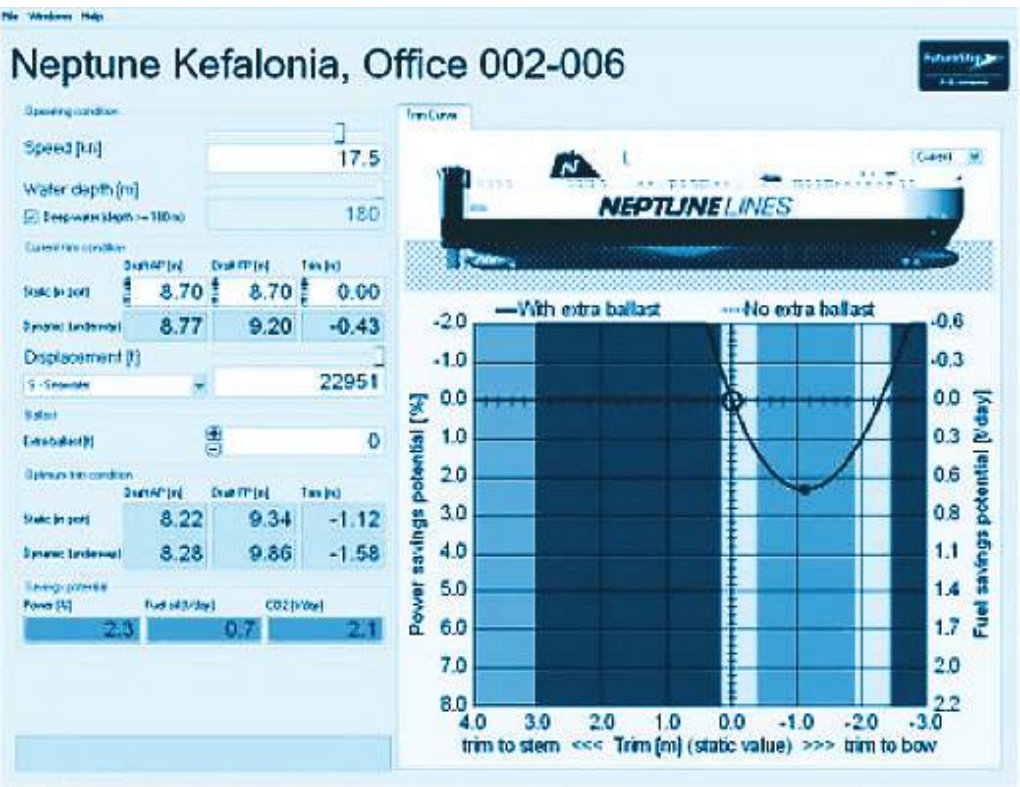
METIS specializes in integrating IoT and NLP technologies to process vessel log data from various systems, which is then forwarded to the office.



Trim and Ballast Optimization Software (SEMT - ECO Assistant)

Trim optimization and ballast control have been implemented on 14 vessels in the fleet. These systems enable ships to minimize ballast and optimize trim when departing from port.

By reducing ballast to the lowest safe level and properly adjusting the vessel's trim, hull resistance and fuel consumption are minimized, leading to lower emissions. These tools utilize 3D modeling software and computational fluid dynamics (CFD) to adapt to various operating conditions.



Weather Routing

All fleet vessels utilize weather routing services to plan and determine the safest, most fuel-efficient routes, taking into account weather patterns, forecasts, currents, and various operational and environmental factors.



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2.4 Green Innovation



Fleet Expansion Project Genesis

Neptune Lines Genesis  
High Pressure LNG Dual Fuel Powered PCTC

Neptune Lines is deeply committed to advancing research and development (R&D) initiatives and fostering green innovation. We continually invest in cutting-edge technologies and sustainable practices to improve the environmental performance of our fleet.

- ➔ 4 dual-fueled vessels
- ➔ 4,200-car capacity
- ➔ Hybrid, LNG/VLSFO Dual Fuel
- ➔ Delivery 1H26-1H27

- +35% car capacity 130% LCV capacity
- +1 Hoistable deck (2 total) 2 car decks (12 total)
- +25-50% deck strength for EV cargo
- +25% ramp capacity for H&H cargo
- ➔ controllable pitch propeller (CPP) with shaft generator and 3 thrusters for maximum efficiency and maneuverability

Advancing the Green Agenda

- ➔ Dual Fuel LNG reducing WtW CO<sub>2</sub> emissions by 25-90%  
Hybrid energy system with battery providing excess energy during maneuvering
- ➔ Solar panels
- ➔ LED lights
- ➔ Cold-ironing
- ➔ Onboard and remote monitoring
- ➔ Low-friction hull paints
- ➔ CLEAN/ENVIRO notation



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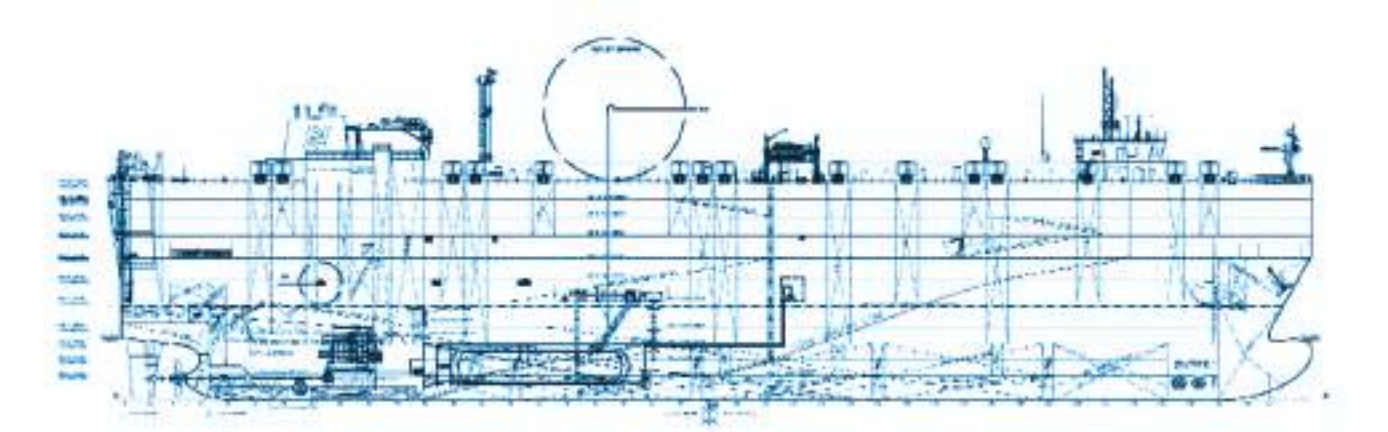


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Dual Fueled Vessels

The Genesis Project exemplifies Neptune Lines’ role as a pioneer in the maritime sector, driving positive change through technological innovation and a strong commitment to the environment. This initiative solidifies our dedication to leading the maritime transport sector into a new era of sustainability and technological advancement.

The addition of two 4,200 CEU LNG DF PCTC (Pure Car and Truck Carrier) vessels is a key component of Neptune Lines’ strategic plan to strengthen its fleet over the next decade. These vessels will increase cargo capacity by 36% compared to our current core fleet while aligning with global emission reduction objectives.

Equipped with dual-fuel high-pressure engines that can operate on both diesel and LNG, these vessels will achieve significant emission reductions thanks to their minimal methane slip and high fuel efficiency.



Cold Ironing

Cold ironing, also known as shore connection, shore-to-ship power (SSP), or alternative maritime power (AMP), provides electrical

power to a ship at berth while its main and auxiliary engines are turned off. This anti-pollution measure reduces air emissions from diesel generators by using shore power instead. During cold ironing, the ship connects to the shore power source, transferring its electrical load without interrupting on-board services, ensuring that vital devices and equipment remain powered while cargo is loaded or unloaded. This technology will be installed on our four new vessels scheduled for delivery in 2026 and 2027.

Batteries

All four new-building vessels will be equipped with a battery pack charged by the shaft generator while sailing. This system will provide a power boost to one of the thrusters during maneuvering operations, significantly reducing energy consumption during mooring and unmooring.



Photovoltaic (PV) Solar Panels

PV solar panels are installed on weather decks to generate electrical energy during sunlight, reducing the load on auxiliary engines. Solar panels have already been installed on one vessel, with four more set to be added during upcoming dry dockings.



Organic Rankine Cycle Engine

An Organic Rankine Cycle (ORC) system is a closed thermodynamic cycle designed for power production from low to high-temperature heat sources, ranging from 80°C to 400°C, and suitable for small to medium applications at any temperature level. This technology efficiently utilizes low-grade heat that would otherwise be wasted.



Carbon Capture System (CCS)

Onboard carbon capture encompasses various technologies to capture carbon dioxide emissions from ships during operation. CO<sub>2</sub> is extracted from exhaust gases through scrubbing or by bubbling the gas through an absorber column filled with liquid solvents. Once captured, the CO<sub>2</sub> is compressed into a liquid state and stored in cryogenic tanks on board until the ship reaches a port with appropriate transfer and storage infrastructure. At that point, the CO<sub>2</sub> can be stored underground in geological formations, isolating it from the atmosphere. A study is underway to evaluate the installation of a carbon capture and storage (CCS) system as a pilot project by 2025.



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**ABS Carbon Capture and Storage Technology Group**

While the shipping industry waits for future fuels to be developed and scaled up – requiring sufficient renewable energy sources to produce carbon-free fuels, carbon capture and storage (CCS) technology is increasingly considered a sensible step towards decarbonizing shipping. To this end, ABS has developed a distinguished working group comprised of global maritime leaders to share expertise and explore solutions around onboard carbon capture technologies. The collective knowledge and resources of the partners will play a key role in addressing the technical, regulatory, and economic challenges associated with CCS technology.

The study’s 5 areas of focus are:

- ➔ Technologies
- ➔ Regulations
- ➔ Operational parameters
- ➔ Financial impacts
- ➔ Infrastructure

Neptune Lines offers their vessels for R&D purposes to lay the foundations for improving the sustainability of maritime transport.



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Participation in initiatives, projects and working groups

|  |   |  |
|--|---|--|
| <h3>Clean Shipping Alliance</h3> <p>The Clean Shipping Alliance (CSA) represents a group of leading companies from the commercial shipping and cruise industries that have been at the forefront of emissions reduction efforts and have made significant investments in research and analysis and funding to meet 2020 fuel requirements through the development and deployment of exhaust gas cleaning systems (EGCS) and to achieve common environmental and sustainability initiatives across all shipping sectors.</p>  | <h3>CarEsmatic</h3> <p>CarEsmatic is a project that aims to improve the service of maritime highways by increasing the transport of electric cars through the development of specific infrastructures in the Port of Barcelona and the Port of Koper.</p>     | <h3>Diversity Charter Greece</h3> <p>The Diversity Charter, an initiative of the European Commission to promote diversity in Greek businesses, was established in Greece in 2019. Its aim is to serve as a means of commitment for the implementation of equal opportunities and diversity in every working environment in Greece. Several countries have already started the implementation and continuous reinforcement of the European project for the dissemination of the “Charter”.</p>  |
| <h3>Forma’t al Port</h3> <p>The “Forma’t al Port” program is oriented towards the United Nations Sustainable Development Goals (SDGs). Its main objective is to provide students with the tools and knowledge needed to quantify the environmental impact of transport operations, while familiarizing them with the European Union’s policy on sustainable logistics in Europe.</p>    | <h3>Isalos.net</h3> <p>The Isalos.net initiative aims to connect the shipping community with the younger generation while providing a platform to share knowledge about developments and experiences in the shipping industry and everyday life at sea.</p>  | <h3>Poseidon MED II</h3> <p>Poseidon Med II was launched in 2015 with the goal of advancing enhanced technical and economic studies on ships, major ports, bunkering operations and LNG facilities. Poseidon Med II aims to help reduce the negative impacts of heavy fuel oil and facilitate the implementation of the requirements of a number of EU Directives on alternative fuels for a sustainable future in the shipping industry.</p>   |



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## 2.5 Energy Efficiency

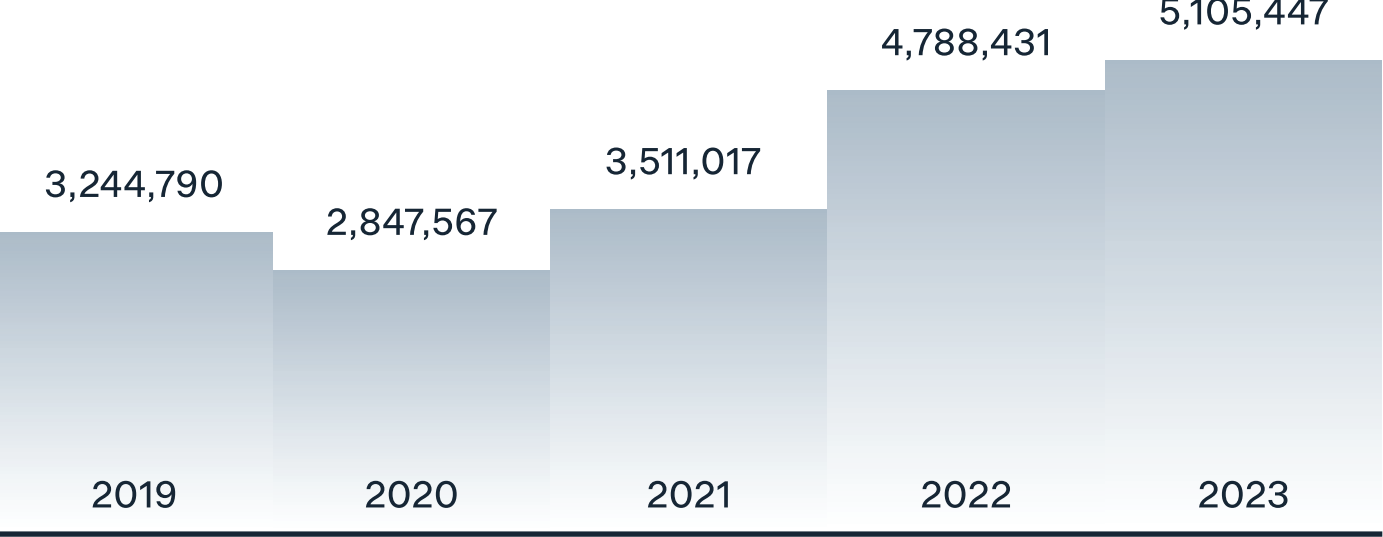
Reducing energy consumption is essential for meeting emissions reduction targets and remaining competitive. Energy efficiency measures must be safe, technically feasible, and compatible with our business model. Balancing regulatory requirements (IMO DCS, EU MRV, FuelEU Maritime, EU ETS) with profitable operations is crucial.

Our energy sources include:

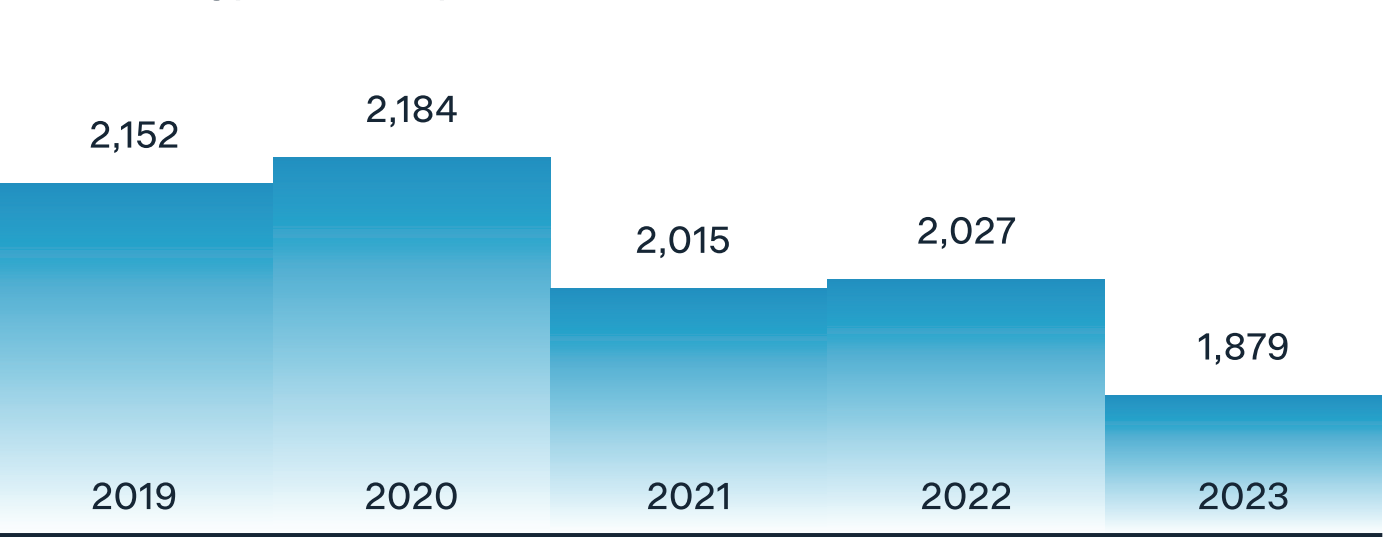
- ➔ Electricity (produced on board for vessels and purchased for shore-based offices)
  - ➔ Fuel oil (for vessels)
  - ➔ Natural gas (for shore-based offices)
- Implementing effective energy efficiency measures requires changes in awareness and adherence to routines among management and crew. We calculate energy consumption for shipboard operations to identify fleet needs and manage efficiently. To achieve significant energy savings, we monitor and evaluate energy efficiency measures through:
- ➔ **Performance Monitoring Systems:** Utilizing business and AI technologies, including onboard telemetry systems that provide real-time data for decision support. Our in-house platform offers validated consumption and emissions reporting in line with CII, ETS, and FuelEU frameworks.
  - ➔ **Transparent Communication:** Ensuring accurate reporting between office, vessel, port, and agents.
  - ➔ **Technical Expertise:** Leveraging the knowledge of our onshore technical management.
- Our Energy Efficiency Working Group has established Key Performance Indicators (KPIs) to monitor implemented measures and facilitate corrective actions. Results are communicated across departments and vessels through training and onboard visits.

- Voyage planning and route optimization using AI technology support timely arrivals, but factors such as port congestion and last-minute changes can disrupt these efforts. Consequently, Neptune Lines invests in:
- ➔ Upgrading the fleet with energy-efficient technologies
  - ➔ Designing new building programs based on future business needs and regulations
  - ➔ Providing advanced training ashore and onboard
  - ➔ Conducting R&D projects
  - ➔ Participating in funded initiatives
- Energy consumed ashore (electricity, heating, cooling) is sourced externally. Ongoing energy-saving measures at office premises include:
- ➔ LED lighting
  - ➔ Efficient printing policies
  - ➔ Paperless initiatives
  - ➔ Energy-saving settings on computers
  - ➔ Upgrading servers and screens to energy-efficient technologies
  - ➔ Implementing hibernation policies
  - ➔ Adjusting heating/cooling system temperatures to prevent misuse
- In 2023, shipboard energy consumption increased by 6.2% compared to 2022 due to more operating days after acquiring five additional vessels. However, shore-based energy consumption decreased by 7.3% following the implementation of energy efficiency policies and upgrades to office equipment.

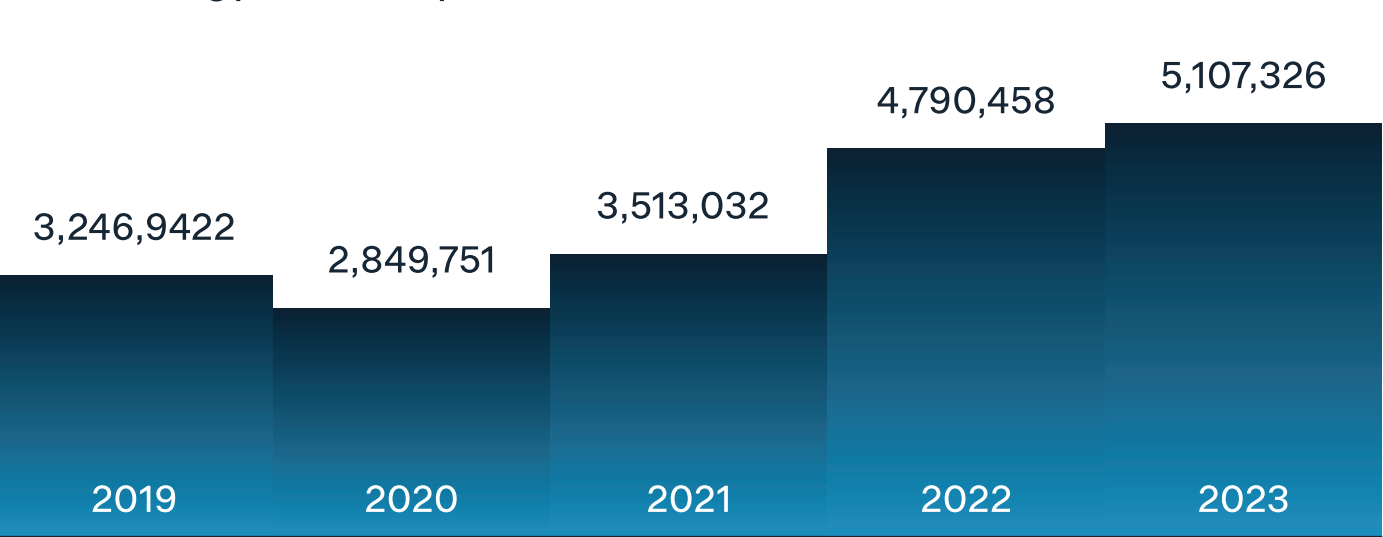
Total Energy Consumption - Vessels (in GJ)



Total Energy Consumption - Office (in GJ)



Total Energy Consumption - Vessels & Office (in GJ)



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## 2.6 Natural Capital & Biodiversity

By prioritizing the protection of fragile ecosystems and biodiversity, Neptune Lines demonstrates its commitment to environmental responsibility and contributes to the resilience of marine ecosystems.

### Prevention of Oil Spills

We recognize the significant environmental and social consequences of oil spills, particularly their harmful effects on marine ecosystems, coastal communities, and water resources. Preventing oil spills is a core component of our operational strategy. As part of our broader environmental management approach, we assess water-related risks and impacts, focusing on identifying potential threats, the scope and timeframe of potential incidents, and the tools used for these evaluations. To mitigate oil spill risks and minimize water-related impacts, we follow stringent safety protocols across our fleet, ensuring compliance with international regulations such as the International Convention for the Prevention of Pollution from Ships (MARPOL).

- Our proactive, zero-discharge policy includes the following key initiatives:
- ➔ **ISO 14001 Certification:** We implement a certified ISO 14001 environmental management system throughout our fleet and shore-based operations. This system includes comprehensive water-related risk assessments that address both oil spills and routine discharges.
  - ➔ **Impact Assessments:** We regularly conduct risk assessments to identify potential water-related impacts, with a particular focus on oil spill scenarios and their potential effects on water quality and surrounding marine ecosystems. These assessments are performed annually, incorporating long-term environmental monitoring.
  - ➔ **Oil Spill Drills and Training:** Periodic ship-to-shore exercises simulate oil pollution incidents, incorporating water impact scenarios. Our crew members undergo regular, hands-on training to ensure they are prepared to take immediate response actions and prevent water contamination in the event of a spill.
  - ➔ **Emergency Response and SOPEP Manual:** In the event of an oil spill, we engage qualified professionals to manage the response,

ensuring the protection of water resources. Our Shipboard Oil Pollution Emergency Plan (SOPEP) outlines detailed procedures for oil spill response. This manual guides the crew through the appropriate actions to prevent or minimize water contamination during an emergency.

### Water Management

Recognizing the importance of clean water and sanitation, Neptune Lines implements freshwater management and production policies for its fleet. All vessels are equipped with freshwater generators that produce water from seawater for sanitation and technical needs, with minimal reliance on external sources stored in dedicated tanks. To ensure health and wellbeing onboard and meet the water needs of the crew, mineral water in plastic bottles is used for drinking. We are currently exploring environmentally friendly solutions to replace single-use plastic water bottles with a certified water filtration system. This system will be connected to the freshwater tank, improving water quality and significantly reducing plastic consumption. Filters will be replaced biannually, with samples of filtered water collected for analysis and certification. Reusable bottles will be provided to crew members. A trial of the equipment has been sent to one vessel, and we await feedback from seafarers to evaluate the project’s effectiveness for potential wider implementation.

|                                  | 2022    | 2023    |
|----------------------------------|---------|---------|
| Water withdrawal (in megaliters) | 0.0230  | 0.0260  |
| Water discharged (in megaliters) | 0.0333  | 0.0370  |
| Water consumed (in megaliters)*  | 0.24035 | 0.30119 |

\*Water consumption in the table refers to onboard consumption for drinking purposes.

### Water Use in Our Offices

We closely monitor drinking water quality through certified laboratory analyses every six months. Our offices are equipped with water cooler filters certified by 3M, complying with NSF standards and EPDWA conditions for drinking water coolers.

### Ballast Water Management

Oceans play a vital role in Earth’s ecosystems, and effective ballast water management is essential to prevent the spread of invasive species. In line with the Ballast Water Management (BWM) Convention and IMO guidelines, Neptune Lines employs robust practices to minimize the transfer of harmful organisms. All fleet vessels are equipped with ship-specific ballast water management systems and approved treatment systems that effectively remove and destroy potentially invasive species before discharge. We currently do not monitor or report the volume of ballast water withdrawn or discharged. This omission is due to there is no significant impact on local water resources. While our ballast water management practices ensure compliance with international standards and mitigate the risk of invasive species, we recognize the importance of transparency in water reporting and plan to address this aspect of our operations in future reporting cycles.

### Ship Recycling

Responsible ship recycling is a cornerstone of our environmental sustainability and social responsibility efforts. We prioritize safe disposal of end-of-life vessels and comply with the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships and the EU Ship Recycling Regulation (EU SRR), which mandates a valid and certified Inventory of Hazardous Materials (IHM) subject to Port State Control inspections.



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## 2.7 Climate Change

“Climate change is the single greatest threat to a sustainable future but, at the same time, addressing the climate challenge presents a golden opportunity to promote prosperity, security and a brighter future for all.”

**Ban Ki-Moon, Former Secretary-General of UN**

Sudden and extreme changes of weather, out-of-season storms, rise in temperature, as well as increasingly high winds and abnormal sea-waves raising to unexpected heights, tend to be even more frequent - rendering our crew’s working and living conditions more difficult as the years go by and increasing the need for more efficient operational processes.

Climate related risks can have significant financial, reputational and business continuity impacts on our company, either in a direct or indirect way:

- ➔ Direct: affecting directly the company itself (e.g. losing customers due to disruptions/delays in service, damage to corporate assets, injury or loss of life in extreme weather conditions);
- ➔ Indirect: affecting its customers (e.g. decarbonization of car industry), business cooperators & providers (e.g. the port terminal, port agents, stevedores, travel agents, stores & spares providers etc.) - hence affecting subsequently the company itself;



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Risks

**Physical Risks:** risks related to the physical impacts of climate change;

**Transition Risks:** risks related to the transition to a lower-carbon economy; Physical risks are either acute or chronic:

- ➔ Acute physical risks refer to those that are event driven, including increased severity of extreme weather events, such as cyclones, hurricanes, or floods;
- ➔ Chronic physical risks refer to longer-term shifts in climate patterns (e.g., sustained higher temperatures) that may cause sea level rise or chronic heat waves.

Physical Risks

Neptune Lines’ direct operations as well as its customers’ (downstream value chain) and service providers’ operations (upstream value chain) may be severely affected from the acute physical risks, such as the severe and frequent extreme weather events (i.e. cyclones, hurricanes, floods).

For the direct vessel operations, the existence of such weather phenomena may lead to human injury or loss of life, property (vessel/cargo) damage or loss and marine pollution incidents.

To deal with such extreme phenomena, Neptune Lines implements several measures which include:

- ➔ advanced weather routing and forecasting services able to monitor the weather conditions for the intended voyage;
- ➔ enforcement of special cargo securing arrangements when heavy weather conditions are expected to minimize the possibility of cargo damages;
- ➔ implementation of onboard crew training programs and emergency response plans to respond efficiently to critical situations identifying the corrective actions to be taken on each case (step by step approach);
- ➔ post incident investigation analysis allowing to identify possible areas of improvement;

Except from the impact on direct vessel operations, the acute physical risks may significantly affect Neptune Lines’ business cooperators/providers (upstream value chain) - such as the port operators, who may face significant infrastructure damages/port closures due to extreme weather conditions.

This will increase the operating costs due to the prolonged stay of vessels at ports, subsequently derailing vessels’ schedule.

The acute physical risks may also affect our customers (downstream value chain) since factory production may eventually be reduced, or even stopped, because of infrastructure damages or reduced sales.

To minimize these impacts inherited from its business cooperators/providers and its customers, the company monitors very closely vessels’ rotation schedules and in cooperation with all relevant parties, makes appropriate changes and adjustments.

Transition Risks

Transition risks are associated with:

- ➔ current and emerging regulations;
- ➔ emerging technologies supporting the transition to a lower-carbon, energy efficient economic system;
- ➔ legal implications through climate related litigation claims;
- ➔ market changes due to shifts in supply and demand for certain services;
- ➔ reputation impacts related with shifts in consumer preferences, negative feedback or sector stigmatization;

Neptune Lines identifies transition risks in its direct operations through the current and emerging regulations related with the carbon pricing mechanisms and the enhanced emissions reductions and reporting obligations.

Carbon pricing mechanisms may potentially increase the direct costs through the possible establishment of a carbon market - while the even more demanding emissions reduction obligations may decrease the asset value or assets’ useful life leading to write offs, asset impairment or early retirement of existing assets.

The company sets action plans to respond effectively in the above-mentioned transition risks by:

- ➔ setting up an internal carbon pricing policy;
- ➔ monitoring closely the performance of existing fleet using also AI-driven optimization tools;
- ➔ exploring low-carbon and alternative zero-emissions technologies for our existing vessels and those in the design

phase (e.g. alternative fuels and biofuels, rotor sails, hydrogen, ammonia, synthetic fuels etc.);

- ➔ considering to up-size or replace tonnage;
- ➔ working with customers and providers to optimize supply chain design from an emission-efficiency standpoint;
- ➔ exploring possibilities to invest in carbon capture and sequestration equipment;
- ➔ exploring other offsetting actions for the unavoidable emissions;
- ➔ optimizing vessels’ speed and on-time arrival using advanced applications and weather routing services;
- ➔ optimizing vessels’ rotation plans considering the cargo capacity utilization figures.



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Opportunities

- Efforts to mitigate and adapt to climate change also presents opportunities for companies.
- ➔ Improved efficiency throughout operations (i.e. in relation to energy but also including broader materials, water usage, waste management and recycling etc.) and direct cost savings/reduced operating costs resulting from that.
  - ➔ The shift towards low emission energy sources and potential savings on annual energy costs.
  - ➔ Participation in carbon markets.
  - ➔ New and/or improved products and services through the development and expansion of low emission goods and services as a result of R&D processes; shifts to consumer preferences towards ‘greener’ service offerings creating competitive advantage and reputational benefits for companies with such orientation.
  - ➔ Access to new markets.
  - ➔ Building resilience through:
    - participation in renewable energy programs and ‘green’ projects,
    - timely adoption of energy efficiency measures
    - strategic partnerships within the supply chain (e.g. involving business partners in technology investments and sharing the costs of innovation to reduce environmental footprint of operations).

Neptune Lines has acknowledged the opportunities that low-carbon transition offers for efficiency, innovation and growth and undertakes various corresponding actions (in addition to those mentioned in the previous paragraph):

- ➔ consults with specialized ship design houses to find the most suitable solutions in terms of new technologies and advanced ship design to increase efficiency and reduce the overall emission footprint;
- ➔ carefully follows industry updates and relevant input expressed by its leading organizations;
- ➔ participates in sector discussions/working groups, as well as international projects;
- ➔ promotes Short Sea Shipping (SSS) in international discussions, as a vital and distinctive sector of the EU carrying goods and people across Europe and to its closest neighbors with a significantly lower carbon footprint than road transport;

- ➔ monitors closely consumer preferences and trends regarding the demand for low or zero carbon vehicles (i.e. subsequently increasing the sales on alternative fueled vehicles and, hence, respective business opportunities for our company).

Financial Implications

There are various costs and expenses rising from climate change risks and impacts. These range from smaller or medium-scale costs such as:

- ➔ investments in emergency response and weather routing training & systems for weather-forecasting;
- ➔ costs from minor vessel damages or minor injuries;
- ➔ costs of tug-boats assisting the vessels in heavy weather during port arrival and departure;



- ➔ fuel consumption costs due to the fact vessels consume more fuel in bad weather;
- ➔ costs created due to disruptions and delays (e.g. in vessel operations, flights of crew members or technicians joining the vessels, maintenance and dry dock works etc.); to greater-scale costs and implications such as:
  - insurance costs;
  - claims from external parties (e.g. due damages to customers’ cargo, costs arising from vessels’ deviation and delays due to weather etc.); costs due to vessels’ structural damage;
  - costs deriving from a casualty.



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## 2.8 Environmental Pollution, Effluents, Waste and Materials Used

Waste management is a critical aspect of environmental responsibility, involving the proper handling and disposal of various waste types generated both onboard our ships and ashore.

To improve our environmental footprint, Neptune Lines has adopted a comprehensive set of waste management strategies to ensure compliance with international regulations and best practices.

- Our waste management policies focus on:
- ➔ Minimizing non-hazardous waste disposal at sea, even where permitted by regulations.
  - ➔ Implementing environmentally sound practices, including proper waste separation, reuse, recycling, and onboard processing of paper, batteries, lamps, and electronic equipment.
  - ➔ Reducing waste at the source by minimizing packaging materials and using durable materials.

Neptune Lines adheres to MARPOL Annex V, which establishes stringent requirements for preventing pollution from ships. We implement robust waste protocols onboard to ensure compliance, including proper segregation, storage, and disposal of ship-generated waste. Additionally, we maintain a zero-discharge policy for short sea trade routes and ensure responsible disposal and treatment at shore-based facilities.

We closely monitor various ship-generated and shore-based waste types to minimize environmental impact, including oily bilge water, sludge, sewage, plastics, food waste, cooking oil, incinerator ashes, and e-waste.

### E-Waste

As vessels increasingly rely on electronic equipment for navigation and communication, significant amounts of e-waste accumulate. Therefore, it is essential to monitor e-waste generation onboard and implement effective management practices.

### Bilge & Sludge Generation

We pay special attention to waste from ship operations, such as oily bilge water and sludge, produced through maintenance activities and engine operation. Proper management is crucial for environmental protection and regulatory compliance, as improper disposal can pollute marine ecosystems.

Oily bilge water must be treated through an Oily Water Separator (OWS) to ensure the oil content meets regulatory limits. The treated water can then be discharged in compliance with regulations, while remaining sludge is retained onboard for incineration or disposal at onshore facilities.

### EU Ship Recycling Regulation and Inventory of Hazardous Materials (IHM)

The EU Ship Recycling Regulation, effective December 31, 2020, applies to any in-service ship of 500 GT or more calling at EU ports, regardless of flag. It mandates that vessels maintain a valid and certified Inventory of Hazardous Materials (IHM), subject to Port State Control inspections.

IHM is a structured system for controlling hazardous materials onboard ships, ensuring compliance with the EU Ship Recycling Regulation and the Hong Kong Convention for safe and environmentally sound ship recycling. Neptune Lines has developed an electronic control system to manage material declaration certificates and suppliers’ declarations of conformity for our fleet vessels.

| Waste generated onboard  | 2022  | 2023  | 23vs22 |
|--|-------|-------|--------|
| Non-hazardous waste at sea (m³ per vessel per month)             | 0.136 | 0.098 | -39%   |
| Plastic waste discharged to facilities (m³ per vessel per month) | 3.0   | 3.4   | 12%    |
| Oily Bilge Water Generated (m³ per vessel per month)             | 0.35  | 0.48  | 27%    |
| Sludge Generated (m³ per vessel per month)                       | 0.41  | 0.49  | 16%    |
| Paints Consumed (liters per vessel per month)                    | 93    | 114   | 18%    |
| Chemicals Consumed (liters per vessel per month)                 | 146   | 184   | 21%    |
| Onboard Paper Consumption (packets per vessel per month)         | 4     | 5     | 20%    |
| Cooking Oil (liters per vessel per month per crew)               | 0.066 | 0.061 | -8%    |
| E-Waste Generation (m³ per vessel per month)                     | 0.06  | 0.059 | -2%    |

| On shore   | On board                                       |
|--|--|
| Recycling (e-waste, batteries, paper)                  | Zero Waste Disposal At Sea Policy Enforcement  |
| Paperless office                                       | Onboard Waste Segregation and Waste Recycling  |
| E-processes  | Control of paints and chemicals consumption    |
| Reduced packaging                                      | Reduced packaging policy                       |
| Use of filtered water                                  | Waste compactors                               |
| Electronic invoices control and approval process       | E-processes for paper and ink reduction        |
| Printers' setup to automatically print both sides      | E-manuals and ship drawings                    |
| Office provides own cutlery (dishes, spoons, cups etc) | Control of fuel consumption                    |
|  | Implementation of e-planned maintenance system |



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# NEPTUNE OKEANIS

## VALLETTA

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### 3. Social

At Neptune Lines, our people are the driving force behind our success. We firmly believe that the uniqueness of our workforce is what distinguishes us in the industry. Their dedication, commitment, and hard work significantly contribute to the overall performance and growth of our company. Therefore, we strive to implement exemplary employment practices and create optimal working conditions that align with our high standards. Our goal is to attract, develop, and retain talented employees, both ashore and at sea.

This section outlines our performance and initiatives aimed at enhancing the well-being and empowerment of our employees and local communities.

Related SDGs



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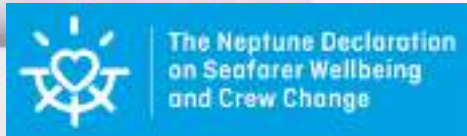


# Our founding principle is “People First”



## Occupational Health, Safety & Wellbeing

- ISO 45001 certification
- Safety Committees
- Medical and Health Care (24-Support Line)
- Specialized training programs
- Wellness programs
- Onboard recreational facilities



## Employment

- Collective bargaining agreements for all
- Internships, Cadetship Programs
- Employee engagement surveys
- Transparent recruitment process
- Endorsing initiatives
- Performance appraisal



## Human Rights, Diversity & Equal Opportunities

- Public commitments
- Specialized training programs
- Internal reporting process & complaint procedures
- Endorsing initiatives



## Community Investment

- Fighting poverty
- Education & Culture
- Athletic events
- Infrastructure Projects



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### 3.1 Occupational Health, Safety and Security

#### Health and safety of our people is paramount

At Neptune Lines, our health and safety policy is designed to ensure that all employees work in a safe and healthy environment in compliance with relevant legislation. By continuously monitoring health and safety performance both onshore and onboard, we evaluate results and take corrective action as needed to safeguard our employees.

Our occupational health and safety management system addresses risks through preventive and protective measures, considering the unique physical, ergonomic, chemical, biological, psychological, and social challenges of the maritime working environment. Seafarers encounter demanding conditions, including long hours, isolation, and high levels of stress and fatigue, necessitating effective communication and collaboration among multinational crews to foster a common safety culture.

Additionally, issues such as substance abuse, violence, harassment, and infectious diseases present significant challenges. Recognizing that both physical and mental well-being are crucial for safe and productive work, our effective occupational health and safety management system emphasizes prevention, striving to enhance worker protection both onboard and at our shore-based facilities.

Shore-based personnel also face workplace stressors that can impact their physical and mental health due to high workloads and demanding deadlines.

As part of our commitment to employee safety, we regularly identify work-related hazards that could lead to high-consequence injuries. The hazards are determined through continuous risk assessments, which include input from crew members, safety audits, incident reports, and expert consultations. We focus on both onboard and shore-based operations to ensure a comprehensive safety approach.

The work related hazards posing the highest risk of severe injuries include: fall hazards, struck-by and crushing hazards, electricity/ electrical equipment power tools, life boats, launching appliances and on-load, hazards related with mooring and unmooring operations as well as enclosed or confined spaces hazards.

During the reporting period, there were no high-consequence injuries reported. However, the above-mentioned hazards remain a focus of our

risk management efforts, and we continue to take proactive steps to prevent any incidents that could result in severe injuries.

We take a proactive approach to eliminate hazards and minimize risks through the hierarchy of controls, prioritizing the following actions:

- 1. Engineering Controls:**
  - ➔ Enclosed spaces safeguards: Gas detection systems, ventilation, and lighting.
  - ➔ Anti-slip surfaces: Coatings on decks and walkways.
  - ➔ Fall prevention: Guardrails, safety nets, and harness points.
  - ➔ Fire protection: Fixed detection/suppression systems and explosion-proof equipment.
  - ➔ Mechanical aids: Cranes, hoists, and shock-absorbing flooring.
- 2. Administrative Controls**
  - ➔ Permits to Work (PTW): Procedures for high-risk tasks like hot work and confined spaces.
  - ➔ Safety Management System (SMS): ISM Code compliance, audits, and risk assessments.
  - ➔ Training and drills: Fire safety, first aid, and emergency scenarios.
  - ➔ Fatigue management: Adhering to work/rest hour requirements.
  - ➔ Lockout/tagout (LOTO): Energy isolation during maintenance.
- 3. Personal Protective Equipment (PPE)**
  - ➔ Mandatory PPE: Helmets, gloves, boots, and high-visibility clothing.
  - ➔ Fall arrest systems: Harnesses and lanyards.
  - ➔ Hearing and eye protection: Earplugs, goggles, and face shields.
- 4. Emergency Response**
  - ➔ Escape equipment: Lifeboats, life jackets, and breathing apparatus.
  - ➔ Alarms: Fire, gas leak, and flooding alarms.
  - ➔ Medical readiness: First aid kits and training.

- 5. Safety Culture**
  - ➔ Toolbox talks: Daily risk discussions.
  - ➔ Near-miss reporting: Encourage reporting unsafe conditions.
  - ➔ Safety committees: Regular crew involvement in safety improvements
- We continuously monitor the effectiveness of these controls and are committed to further refining our practices to eliminate or minimize the risk of high-consequence injuries.

#### Work-Related Hazards and Injuries

- Fall Hazards**
- Struck-by and Crushing Hazards**
- Electricity / Electrical Equipment Powet Tools**
- Lifeboats, Launching Appliances and On-load**
- Hazards Related with Mooring & Unmooring Operations**
- Enclosed or Confined Spaces Hazards**



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Communication channels on health and safety

Communicating health, safety, and welfare issues is outmost at Neptune Lines. Effective communication helps prevent unsafe practices, promotes critical emergency responses, and addresses the concerns and hazards faced by our employees.

Communication occurs through various Occupational Health and Safety (OH&S) reporting mechanisms, including:

- ➔ Complaint forms
- ➔ Familiarization forms during office induction/pre-journey
- ➔ Near-miss and incident forms
- ➔ Reporting deficiencies through the Planned Maintenance System (PMS)
- ➔ Master’s reviews
- ➔ Handover reports and checklists
- ➔ Direct communication via email
- ➔ Post-service interviews followed by written comments from seafarers after disembarkation
- ➔ An internal reporting process

We encourage our employees to report all work-related hazards and incidents so that we can respond promptly.

To ensure that all employees feel comfortable and supported in reporting hazards or concerns, we have implemented comprehensive policies that protect workers from retaliation or adverse treatment. Employees are guaranteed confidentiality when submitting reports, and any concerns raised in good faith are addressed promptly and without any form of retaliation, discrimination, or negative consequences.

In addition, we have a clear procedure in place that allows workers to remove themselves from any work situation that they believe poses a risk of injury or ill health. Employees are encouraged to immediately report such concerns to their supervisor and they are assured that they will not face negative repercussions for prioritizing their health and safety. To further encourage transparency, we have placed complaint boxes in messrooms, offering a secure option for anonymous submissions of concerns or complaints.

Our commitment to maintaining a safe and supportive reporting environment is reinforced through regular training sessions for all employees, where the importance of these protections and the right

to remove oneself from hazardous conditions is emphasized. By fostering a culture of openness and accountability, we are able to address health and safety issues quickly and effectively, ensuring a safe working environment for everyone.

Safety and Security Management System

A robust safety and security management system is essential to ensure compliance with mandatory safety regulations and adherence to codes, guidelines, and standards recommended by the IMO and recognized organizations. Our management system implements the provisions of all mandatory shipping conventions, regulations, and codes, including SOLAS, MARPOL, STCW, ISM Code, and the Maritime Labor Convention 2006. It is certified under ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018, and is subject to periodic verification by accredited bodies.

The results of the verification process, along with internal findings, are discussed at management review meetings and compiled into detailed reports shared with fleet vessels, company departments, and management for further review and improvement. Neptune Lines’ Management System includes, but is not limited to, the following:

- ➔ Ship reporting of near misses and incidents, followed by root cause analysis
- ➔ Periodic execution of safety and security drills, along with ship-to-shore exercises and performance evaluations
- ➔ Emergency preparedness processes and procedures as outlined in corporate manuals and plans
- ➔ Risk assessments conducted prior to high-risk activities
- ➔ Dedicated Safety & Security Committees onboard our fleet
- ➔ Safety and security meetings with specific agendas, held onboard each vessel twice a month
- ➔ Periodical reviews and assessments of the Management System by the Master
- ➔ Clear lines of communication between office and shipboard personnel, along with post-service debriefing to report any unsafe conditions or operations
- ➔ Regular internal audits and onboard marine and technical inspections by office personnel, focusing on management system

- requirements, with findings recorded and monitored
- ➔ Training and familiarization through forms, focused training courses, computer-based modules, and DVDs
- ➔ Circulation of safety and security bulletins, informative materials, regulatory updates, and specific instructions
- ➔ Monitoring vessel maintenance through our electronic Planned Maintenance System and day-to-day communication with vessels
- ➔ Office internal audits
- ➔ Annual review of objectives and targets using established Key Performance Indicators (KPIs)
- ➔ Ongoing monitoring of existing processes and procedures to ensure effectiveness and currency



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Incident investigation

Incident investigation aims to identify the root causes of accidents, near misses, and other safety-related incidents. When an incident occurs, a thorough investigation is conducted to collect and analyze evidence, examining technical issues, human error, and corporate practices that may have contributed to the incident.

Vessel incident investigations are led by the Designated Person Ashore (DPA), who reports directly to Senior Management on the progress and results of the investigation. Once the root cause analysis is complete, a follow-up action plan is issued to the responsible department to ensure timely implementation of corrective actions. Progress on these actions is presented and discussed at ad hoc internal meetings, and electronic ERP modules are used to monitor progress until the case is resolved.

At Neptune Lines, we prioritize the rigorous implementation of safety and quality standards, adhering to industry guidelines such as the CSS Code (Code of Safe Practice for Cargo Stowage and Securing), along with company-specific requirements and customer instructions. Cargo quality, safety, and security are managed through several processes and measures, including:

- ➔ Scrutinizing cargo-related information
- ➔ Careful planning and continuous monitoring of proper stowage and securing operations by competent personnel
- ➔ Continuous cargo training through tailored courses
- ➔ Crew evaluations based on cargo handling skills and performance
- ➔ Onboard internal audits
- ➔ Attendance of qualified personnel during special cargo loading operations
- ➔ Proper maintenance of lashing equipment
- ➔ Collaboration with independent certified surveyors at ports of operation
- ➔ Evaluation and improvement of existing cargo handling and securing procedures with assistance from field experts

Near Misses

One of the most valuable tools for improving safety onboard is our near-miss management system. At Neptune Lines, we encourage

employees to report near misses so they can be addressed promptly. Near miss reporting enables us to allocate resources for investigation, processing, and analysis of the causes. Once identified, actions are taken to eliminate the associated risks.

In 2023, a total of 191 near misses were reported, compared to 92 in 2022. This increase resulted from a campaign launched across all ships to enhance near-miss reporting on a monthly basis. As a result, several potential incidents were prevented by identifying appropriate corrective actions and sharing them across the fleet.

|                           | 2022 | 2023 |
|---------------------------|------|------|
| No of near miss incidents | 92   | 191  |

LTIF & TRI

The safety of our team is non-negotiable and always a priority. This is a fundamental aspect of our business culture. All incidents occurring in the workplace must be reported, as proper reporting is essential for monitoring performance and achieving targets.

The Lost Time Injury Frequency (LTIF) rate reflects the frequency of crew injuries onboard vessels, measuring the number of lost-time injuries per million hours worked during the year. In 2023, the LTIF increased from 1.23 in 2022 to 1.31. While all injuries were minor for 2023, the increase is attributed to a higher number of “off-duty” days prescribed by doctors.

|   | 2022      | 2023      |
|---|-----------|-----------|
| Lost Time Injury Frequency (LTIF)*            | 1.23      | 1.31      |
| Total number of recordable injuries per annum | 5         | 8         |
| Number of hours worked                        | 3,260,520 | 3,828,120 |
| Rate of recordable work related injuries      | 1.53      | 2.09      |

\* Rates have been calculated based on 1,000,000 hours  
\* Fatalities as a result of work-related injuries are zero (0) for the reporting period.  
One (1) High consequence work- related injury for 2022.


Drug and Alcohol Policy

The use of drugs and alcohol can impair a seafarer’s judgment and ability to perform duties effectively and safely. In some cases, it can lead to incidents, injuries, and even fatalities. Neptune Lines has implemented a Drug & Alcohol Policy that enforces a strict zero-tolerance approach to the possession and use of alcohol and drugs, aiming to minimize the risk of substance abuse incidents.

We continuously monitor adherence to this policy and have contracted an external provider to conduct unannounced drug and alcohol tests for crew members at selected ports, serving as an effective preventive measure. Results are communicated to our office promptly. Upon the granting of shore leave, crew members’ belongings are thoroughly checked upon their return to the ship to eliminate the possibility of alcohol or illegal substances being brought on board.


**Drug & Alcohol policy**

Our Drug and Alcohol Policy is mandatory for all our employees and prohibits the use, possession or distribution of drugs and alcohol to ensure their safety and welfare.



**On board drills, audits, and inspections**

Our fleet undergoes audits, drills, and inspections to ensure safety onboard and pollution prevention, so that all our employees are working in a safe and healthy environment in accordance with applicable regulations.





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PSC Inspections

Regular inspections by authorized third parties enhance maritime safety and security while preventing marine pollution. Port State Control (PSC) inspections are a key tool for verifying that ships and their equipment comply with international regulations.

In 2023, a total of 65 PSC inspections were conducted, including 11 MARPOL and 6 ISPS inspections, with an average of 0.62 deficiencies per inspection. Notably, there were no detentions recorded in 2023, compared to one detention in 2022.

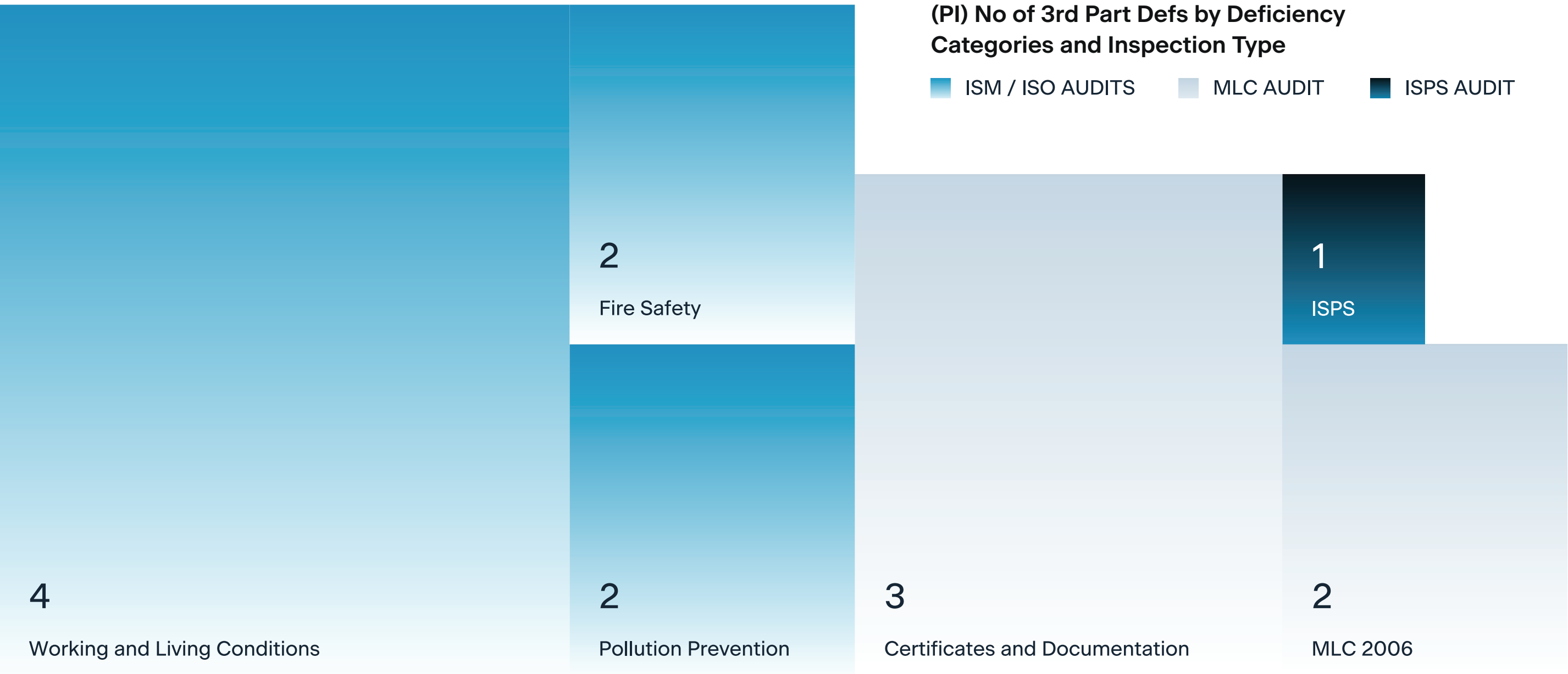
After the 2022 detention, all necessary corrective measures were implemented, and further analysis led to preventive actions that addressed identified issues. Comprehensive training sessions were conducted to raise crew awareness of required standards and practices. Additionally, revisions to the Management System were made to prevent recurrence across the fleet.

|   | 2022 | 2023 |
|---|------|------|
| Number of PSC inspections                 | 51   | 65   |
| Number of PSC deficiencies per inspection | 1.41 | 0.62 |

External audits

External audits are conducted periodically across our fleet. In the reporting period, a total of 32 external audits were performed, resulting in 3 non-conformities and 5 observations. Corrective actions have been implemented for all identified non-conformities and observations, and the corresponding corrective action plan has been approved by the designated recognized organization.

|                                      | 2022 | 2023 |
|--------------------------------------|------|------|
| Number of non-conformities per audit | 0.62 | 0.25 |



Flag inspections

Flag State inspections involve verifying statutory documentation, ensuring compliance with applicable regulations, and conducting a thorough examination of the vessel’s structure, machinery, and equipment. In 2023, 24 Flag State inspections were conducted, resulting in a total of 39 recorded deficiencies, which equates to an average of 1.63 deficiencies per inspection.

|                                       | 2022 | 2023 |
|---------------------------------------|------|------|
| Number of flag state inspections      | 14   | 24   |
| Number of deficiencies per inspection | 1.21 | 1.63 |

Internal audits

In 2023, we successfully conducted riding audits on all vessels, performing internal ISM, ISPS, ISO, and MLC audits to verify the implementation of processes outlined in our management system. Internal audits were carried out by either the vessel’s HSQE coordinator or an internal auditor assigned by a third party. Additionally, an audit plan for the annual internal audit scope was prepared for all vessels and company departments at the beginning of the year.



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Drills and Exercises

A well-structured drill plan was implemented throughout 2023, with crew performance during the drills reported as satisfactory by the Masters and Safety Officers. The drill plan covered essential topics, including abandoning ship, lowering lifeboats, and fire safety.

Crew Rest Hours

Fatigue is a significant factor in many maritime incidents and injuries, making it essential to ensure adequate rest for our seafarers to maintain safety, operational efficiency, and overall employee well-being. However, achieving this balance can be challenging. To assist our crew in recording and monitoring their work and rest hours, we provide specialized software onboard with a user-friendly interface.

Health & Safety Training

Health and safety training is fundamental to Neptune Lines, fostering a proactive safety culture and preparing all personnel for the unique challenges of the maritime environment. We ensure that both shore-based and shipboard staff are familiar with our health and safety management system by offering a range of relevant training courses covering topics such as:

- ➔ Medical Care
- ➔ Persons Recovery from Water Rescue Techniques
- ➔ Occupational Health and Safety Management System and ISO 45001
- ➔ Fatigue Management
- ➔ Personal Safety and Survival (e.g., familiarization, survival craft, rescue, and abandoning ship)
- ➔ Risk Assessment and Management
- ➔ Mooring Operations (including risk assessment and safe handling practices)
- ➔ Permit to Work
- ➔ First Aid (including principles of first aid, unconsciousness causes, CPR, burns, shock management, and casualty transport)
- ➔ Inspection and Maintenance of Safety Equipment (personal responsibilities)

Additionally, to effectively manage the safety and security risks inherent in shipping operations and protect our people, fleet, cargo, and the environment, we implement the following training sessions:

- ➔ Ship Handling in Rough Seas to avoid heavy weather
- ➔ PSC Inspections: Addressing new and ongoing challenges to comply with safety and pollution prevention regulations
- ➔ Emergency Preparedness and Response to enhance knowledge of emergency procedures
- ➔ Ship Stability, Cargo Lashing, and Handling of H&H Vehicles tailored to our requirements
- ➔ Vessel-Specific Training for the use of ECDIS in navigation
- ➔ IMDG Training through advanced e-learning courses on the International Maritime Dangerous Goods Code
- ➔ Crisis Communication and Media Response training

Advanced Fire Fighting Training

During the reporting period, we placed significant emphasis on firefighting training, equipping our crew members with the skills and knowledge to respond effectively to fire emergencies. Our successful firefighting training program, conducted at the Hellenic Navy training center “Palaska,” includes both theoretical instruction and practical skills, along with opportunities to simulate real-life firefighting and evacuation scenarios in the center’s dedicated simulator facilities.

Particular attention is given to training our crews to manage potential fires arising from electric vehicles. The number of alternative fuel vehicles (AFVs) carried onboard our vessels has been steadily increasing in recent years, necessitating adjustments to our emergency response plans to address these specific fire risks.

Our crews are trained in the use of specialized firefighting equipment designed for handling fires involving alternative fuel vehicles, including fire blankets, condensed dry aerosol units, and water lances. Additionally, enhanced communication equipment is provided for fire patrol personnel to facilitate timely information sharing and effective coordination of the emergency response.

Fire detection artificial intelligence (AI) solutions are being evaluated for their effectiveness in reducing the time required to identify fire sources, thereby providing onboard emergency teams with more time to respond. A pilot project is scheduled for 2024.

In our electronic training platform, an average score exceeding 80 out of 100 was achieved by our seafarers. Specifically, the average

score across all ranks for the year 2023 is 88.9, reflecting a strong level of professional knowledge in areas such as technical skills, safety, security, operations, navigation, and other relevant subjects.



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Health & Safety and Wellbeing initiatives

At Neptune Lines, we aim to meet and where possible, exceed the applicable requirements for the welfare of our seafarers and shore-based personnel.

Our Seafarers

Medical & Healthcare Services to Seafarers

Our crew and their 1st degree relatives are insured under a group policy for:

- ➔ 24/7 health support communication to health care facilities
- ➔ emergency care and urgent hospital assistance coverage
- ➔ doctor home visit
- ➔ medication support

First aid kits, defibrillators and oxygen concentrators are available on board.

Our Onshore employees

Medical & Healthcare Services for shore-based personnel

We have insured all our shore-based employees under a group policy, which was extended in 2022 and 2023 to include their spouses in addition to their children. The insurance program provides them with various benefits, such as:

- ➔ life insurance
- ➔ permanent total disability insurance due to sickness (prior to age 60 years old)
- ➔ accidental death - permanent disability insurance due to accident
- ➔ major medical insurance (In and Out-of-Hospital) due to accident or sickness
- ➔ maternity benefit insurance
- ➔ in hospital indemnity insurance due to accident or disease
- ➔ surgical benefit insurance due to accident or sickness
- ➔ preventive insurance (check-up).

The company doctor visits the offices twice a month.



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High Quality food

Particular attention is given to the quantity and quality of provisions and food preparation on board. Providing nutritious, diverse, and appetizing meals significantly contributes to the overall well-being and productivity of our workforce. Our onboard inspections frequently assess the following:

- ➔ Hygienic standards and cleanliness of the galley, provision rooms, and other areas onboard
- ➔ The cook’s skills and knowledge of various cuisines to accommodate the diverse backgrounds of our crew members
- ➔ Additional areas of concern related to food preparation and service



First Aid Training

By providing comprehensive first aid training, we aim not only to comply with safety regulations but also to equip our employees with the confidence and knowledge to act quickly and effectively in emergencies. As part of the company’s Occupational Health & Safety program, we have continued to conduct first aid seminars and defibrillator training in 2022 and 2023, training nearly one-third of our staff to date. The training covers the following topics:

- ➔ Basic Principles of First Aid
- ➔ Cardiopulmonary Resuscitation (CPR)
- ➔ Treatment of Bleeding and Burns
- ➔ Evaluation of Emergency Cases
- ➔ Basic CPR Techniques (“KAA”) and the use of an Automated External Defibrillator (AED)



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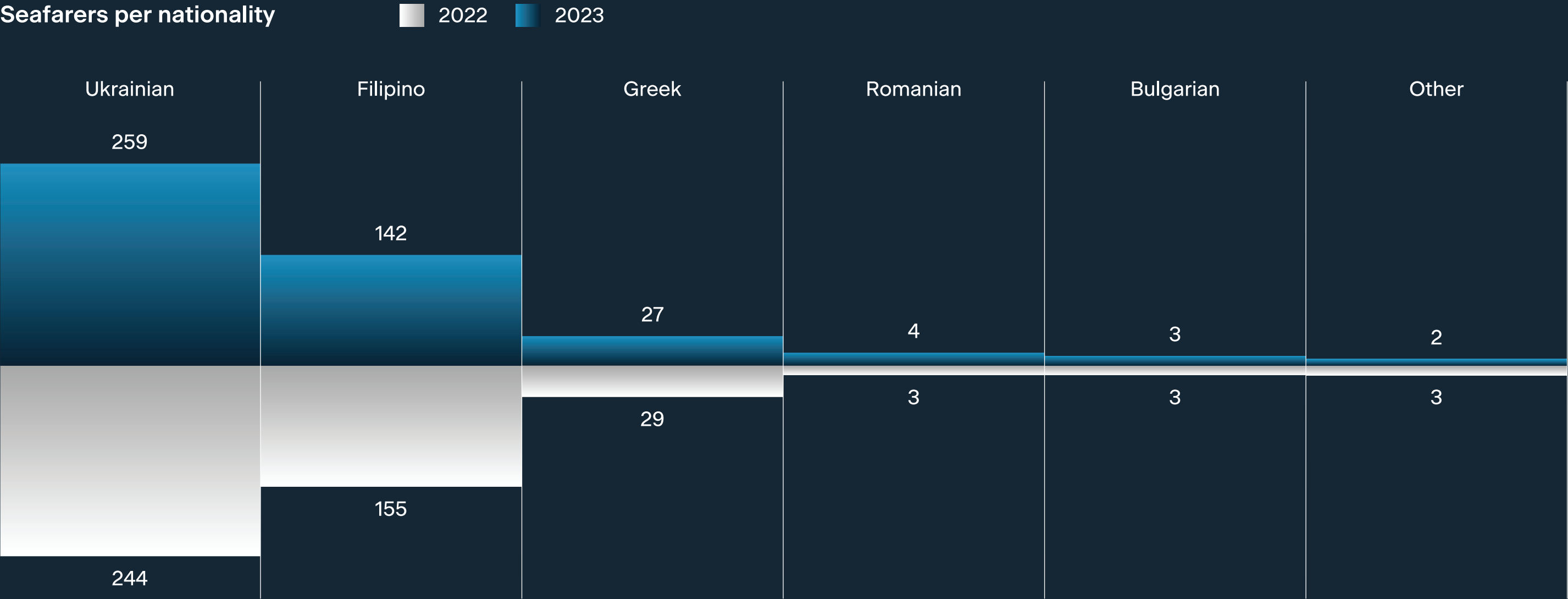
3.2 Employment

Shipboard personnel

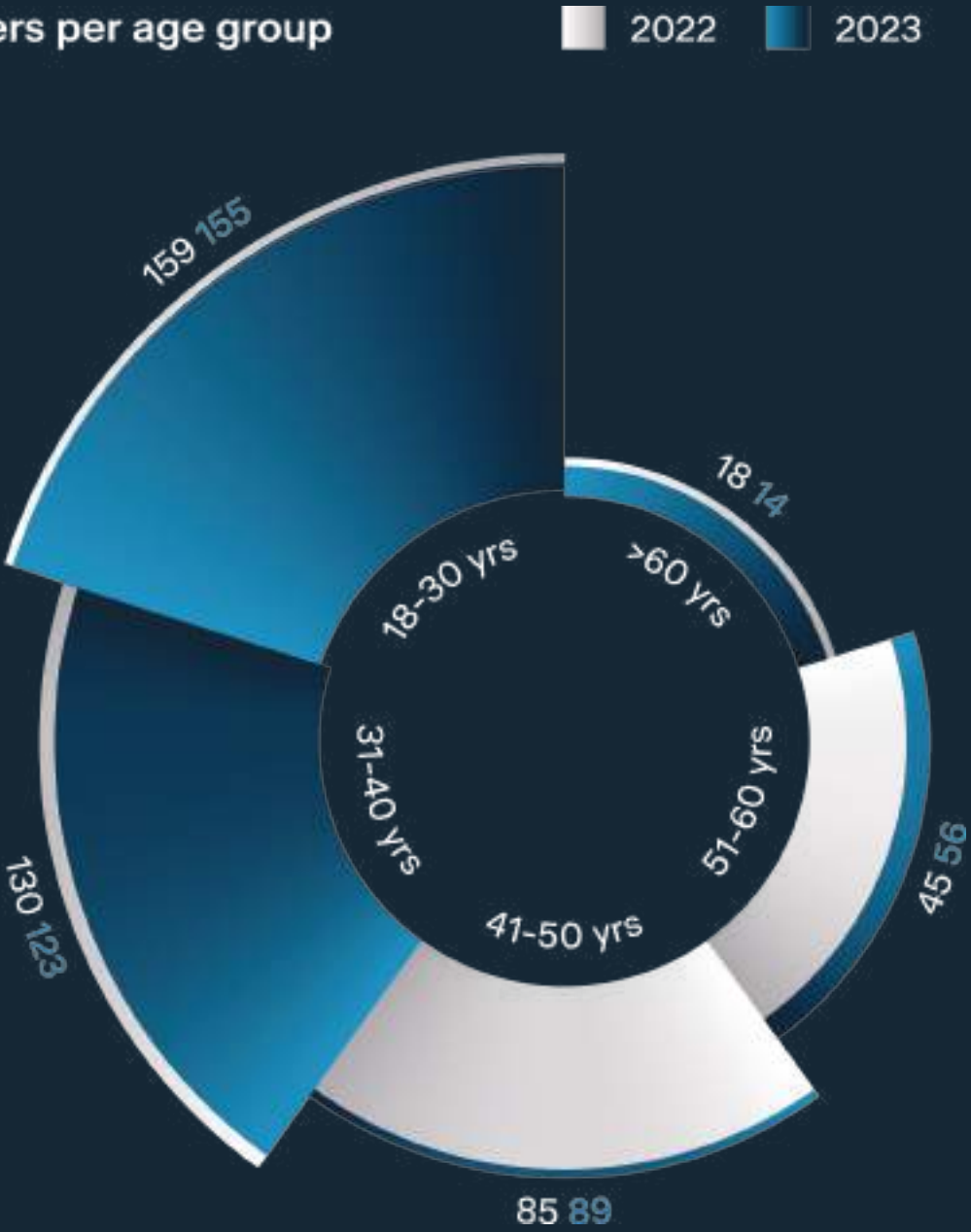
The shipboard personnel are the backbone of our company, playing a vital role in ensuring the safe and efficient operation of our fleet. Their expertise and teamwork are essential for navigating the complex challenges of maritime transport.

Our onboard team comprises 437 seafarers, all of whom are covered by Collective Bargaining agreements.

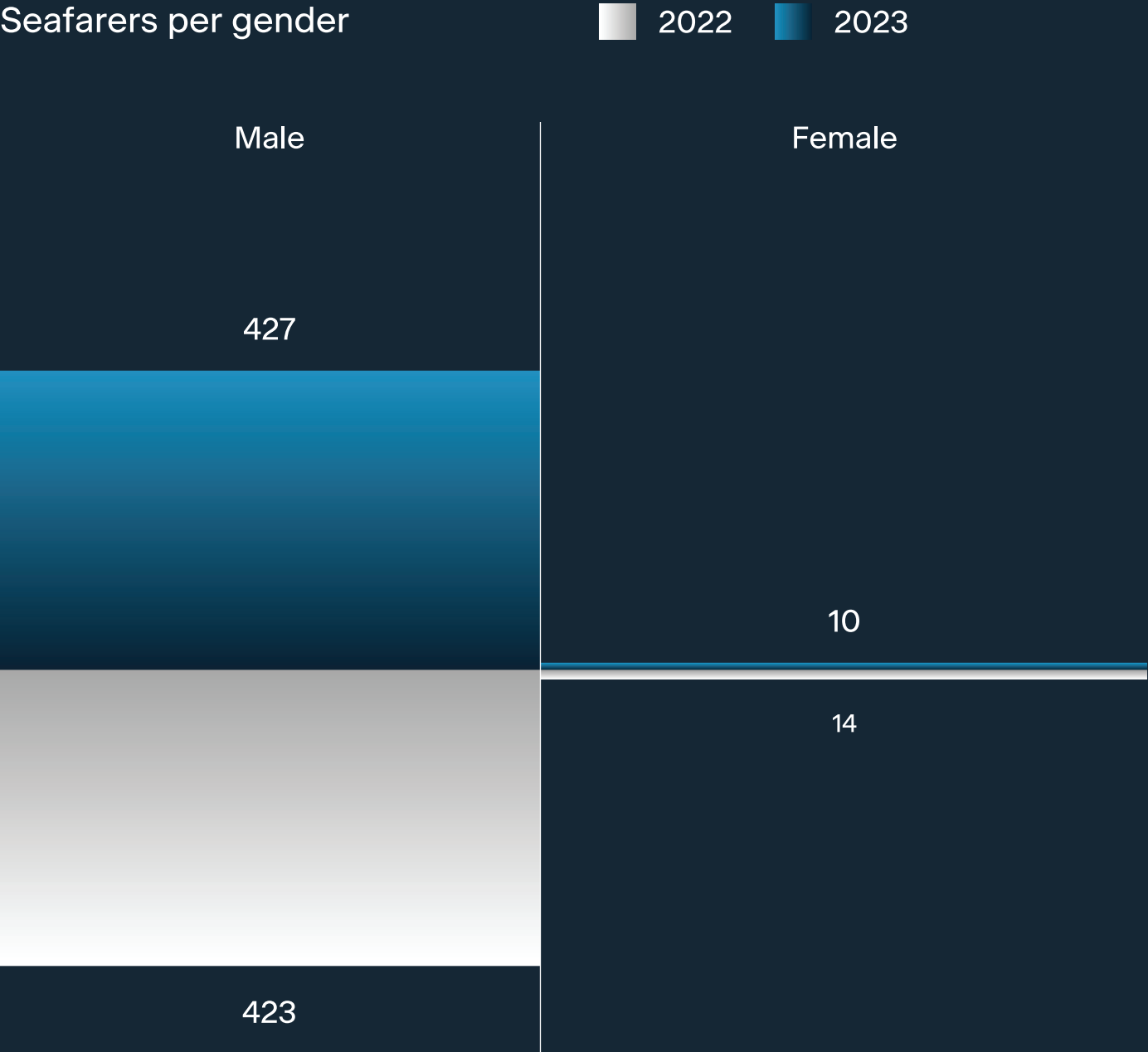
Seafarers per nationality



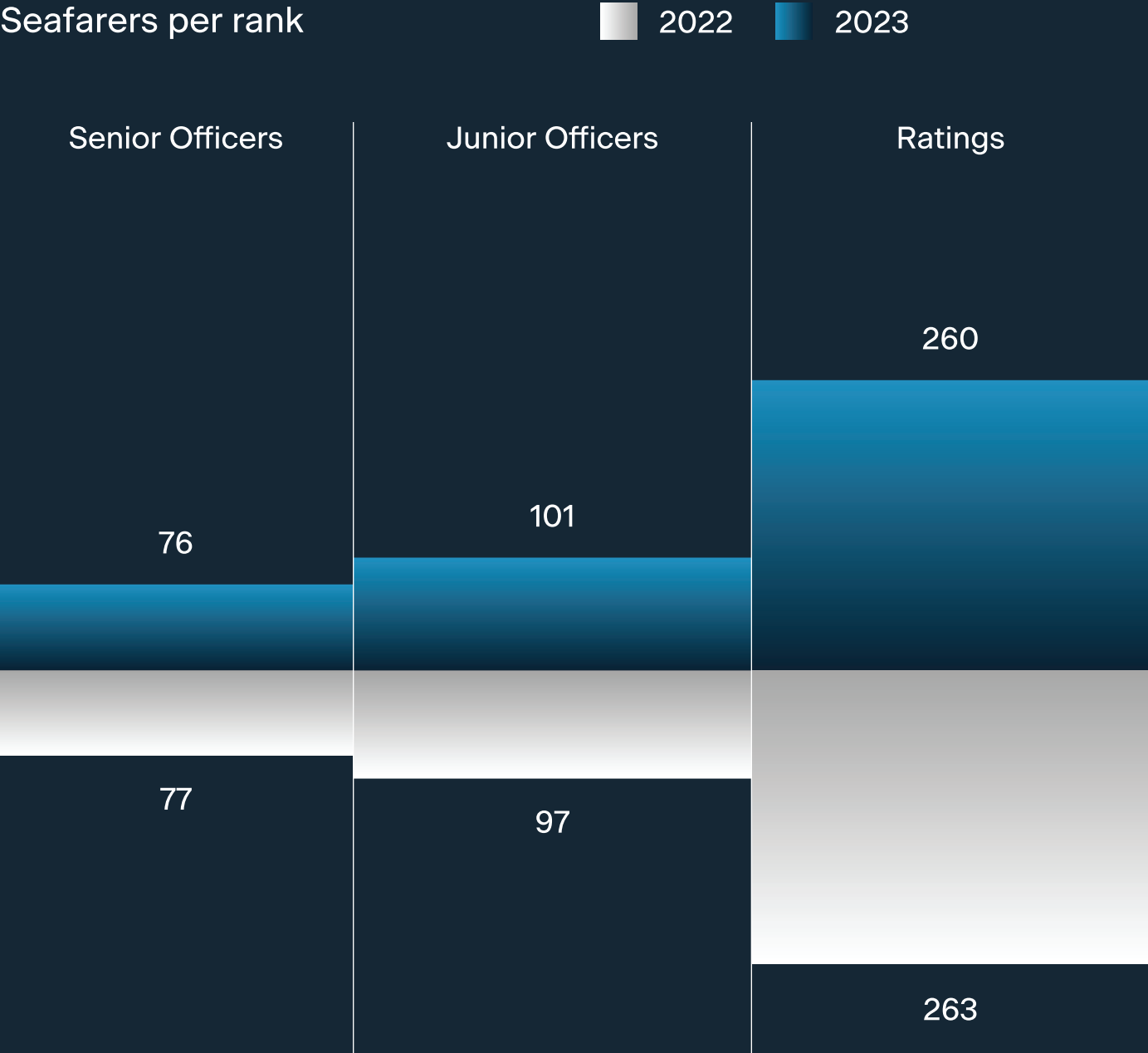
Seafarers per age group



Seafarers per gender



Seafarers per rank



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On board recruitment and retention

Attracting new hires involves a rigorous selection process to ensure that only the most skilled and dedicated seafarers join our team. Neptune Lines’ recruitment efforts focus on identifying individuals with exceptional abilities and a commitment to excellence. We prioritize crew retention by offering competitive compensation packages, benefits, and opportunities for career advancement.

In 2023, our overall retention rate remained above 90%, reflecting our strong commitment to enhancing crew retention.

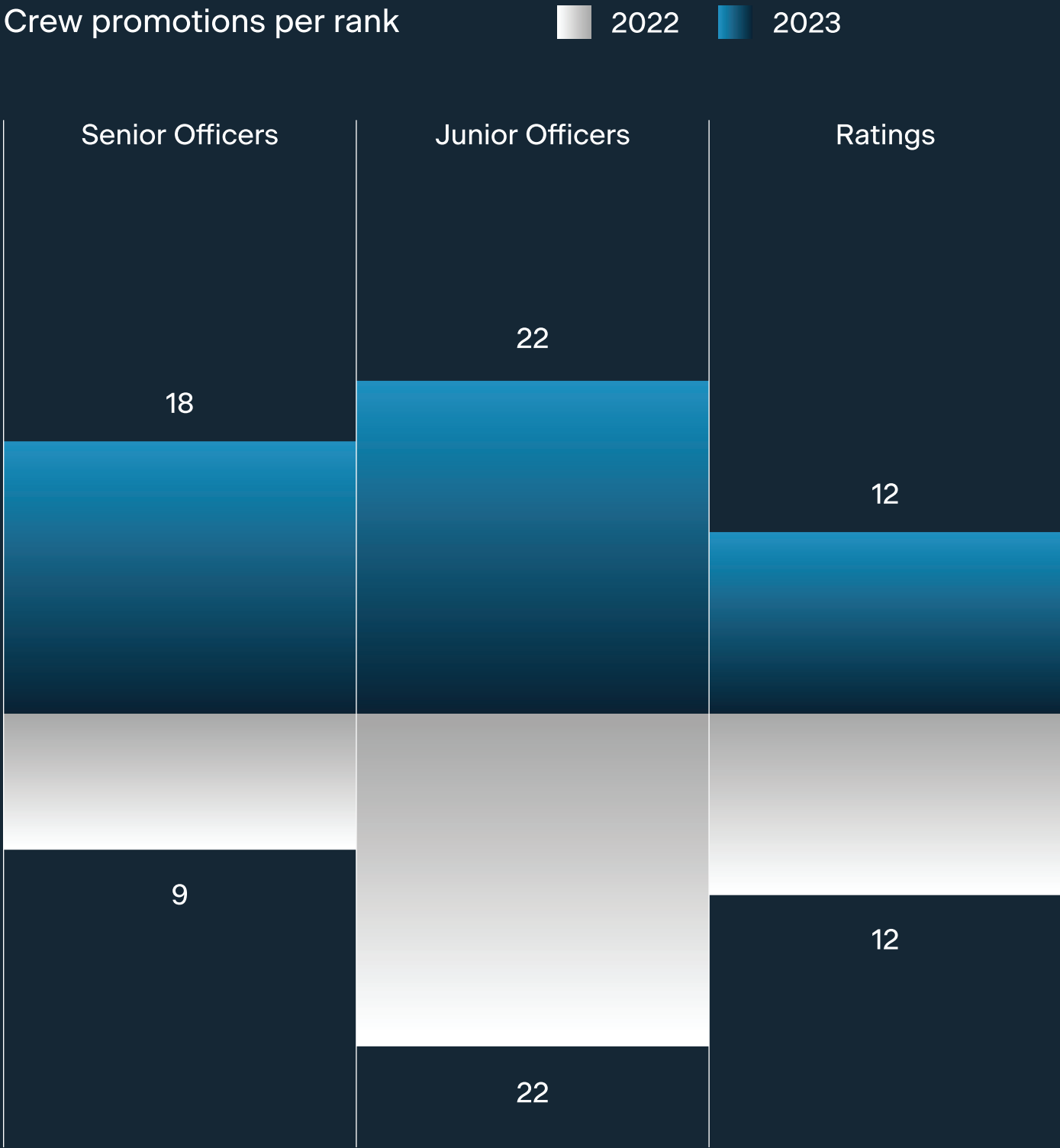
Regular feedback is provided through a robust appraisal process that supports professional development. This process recognizes outstanding performance and highlights the achievements of exemplary crew members.

In 2023, all our seafarers participated in the appraisal review process. Suggestions for the promotion of officers and ratings are submitted to the Crewing Manager by the Master or Chief Engineer and subsequently evaluated by the relevant departments within Neptune Lines.

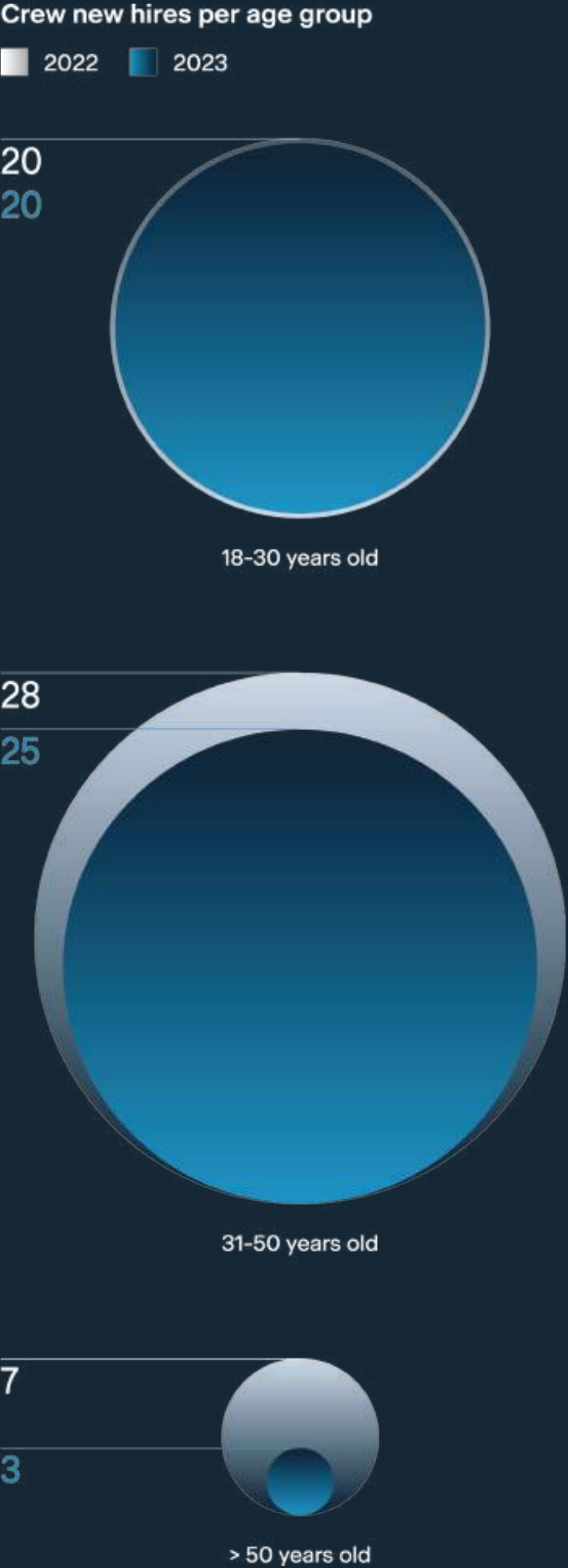
Crew new hires



Crew promotions per rank



Crew new hires per age group



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Crew new hires in 2023

In crew promotions compared to 2022

Crew retention in 2023

48 +20.1% 90%



Internships

Neptune Lines is dedicated to empowering young people and cultivating the next generation of maritime professionals through comprehensive internships that offer aspiring seafarers invaluable insights into the shipping industry’s daily operations.

Our Cadet Training Program actively recruits talented young individuals—men and women—from Merchant Marine Academies, providing them with the opportunity to complete their required sea service and gain essential experience for graduation and professional certification. During their time onboard, cadets receive a balanced mix of theoretical knowledge and practical training. This hands-on experience not only fosters their personal growth but also lays a strong foundation for a lasting professional relationship with our company.

|                  | 2022 | 2023 |
|------------------|------|------|
| Number of cadets | 46   | 45   |

Crew training program

Crew training and development is an integral part of Neptune Lines’ commitment to operational excellence and safety. By investing in a well-structured training program, continuous education, and skill enhancement, we ensure that our crew members remain proficient in the latest maritime technologies and best practices. Our program is designed not only to comply with international regulations, but also to go beyond the requirements and foster a culture of continuous improvement and professional growth.

| Average Training Sessions by Seafarer Category | 2022 | 2023 |
|--|------|------|
| Average training sessions per Master           | 14.9 | 12.8 |
| Average training sessions per Officer          | 15.1 | 11.5 |
| Average training sessions per Rating           | 15.3 | 10.7 |

Recruitment, Pre-Joining Training and Assessment

For every senior officer applying for a position at Neptune Lines, we utilize an electronic online assessment tool known as the Crew Evaluation System. This system assesses candidates’ knowledge relevant to the position they seek, featuring a database of over 5,000 multiple-choice questions aligned with maritime codes, rules, and regulations (e.g., navigation, emergency preparedness, marine engineering). The difficulty level is tailored to the rank of the position.

Upon completing each assessment section, candidates receive their results along with the correct answers for reference and further study. After the initial assessment, candidates undergo a background check and personal interviews with the relevant departments. Before joining our fleet vessels, approved candidates also complete a pre-joining assessment, which provides detailed explanations of their specific tasks.



Average training sessions per seafarer in 2023

11.1



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Soft Skills Training

At Neptune Lines, we recognize the importance of fostering a productive working environment onboard our vessels and enhancing interpersonal relationships to enable effective teamwork among our seafarers. To this end, we provide comprehensive soft skills training in areas such as communication, teamwork, leadership, business ethics, conflict resolution, stress management, project management, and data protection. Our commitment to soft skills training reflects our dedication to building a capable and cohesive team.

Specialized Training

In collaboration with external training centers and experienced trainers, we offer a range of specialized training courses for our crew, focusing on safety and critical operations onboard. Topics include the correct operation and maintenance of conventional lifeboats, advanced firefighting techniques, use of ECDIS, and proper cargo lashing.

Use of ECDIS in navigation

Ship specific training on the use of ECDIS has taken place on some of our vessels. A dedicated trainer was contracted by our company to train our crew in the correct use of the specific type of ECDIS installed on their vessel.

Ship stability, cargo lashing and handling of H&H vehicles

We continued our ship stability training program, which was supplemented by an online course on cargo lashing and the handling of high and heavy vehicles and special cargoes, customized for our company. Both shore staff and crew received distance training, which included lectures, discussions and group exercises.

Skills development Training

In addition to the training mentioned above, we offer a series of video training courses covering essential skills, such as onboard equipment operation and engine basics. These training programs are updated every two years. By providing these video courses, we ensure that our crew members remain competent and equipped to meet the evolving demands of the maritime industry, thereby contributing to the overall safety and efficiency of our operations.

On board entertainment

We also strive to provide our crew with various options for leisure activities during their free time, alongside opportunities for exercise and well-being. In this regard, our vessels are equipped with:

- ➔ Free internet access utilizing the latest technologies to achieve speeds comparable to terrestrial networks
- ➔ Gym equipment (e.g., weights, weightlifting bench, treadmills, exercise bike, boxing kit)
- ➔ Table tennis
- ➔ PlayStation
- ➔ Board games
- ➔ Karaoke equipment
- ➔ DVD and video player
- ➔ Stereo/CD player
- ➔ Digital satellite TV platform, providing access to over 500 channels, many in the native languages of our seafarers
- ➔ A library featuring vocational and general reading materials, including books and magazines



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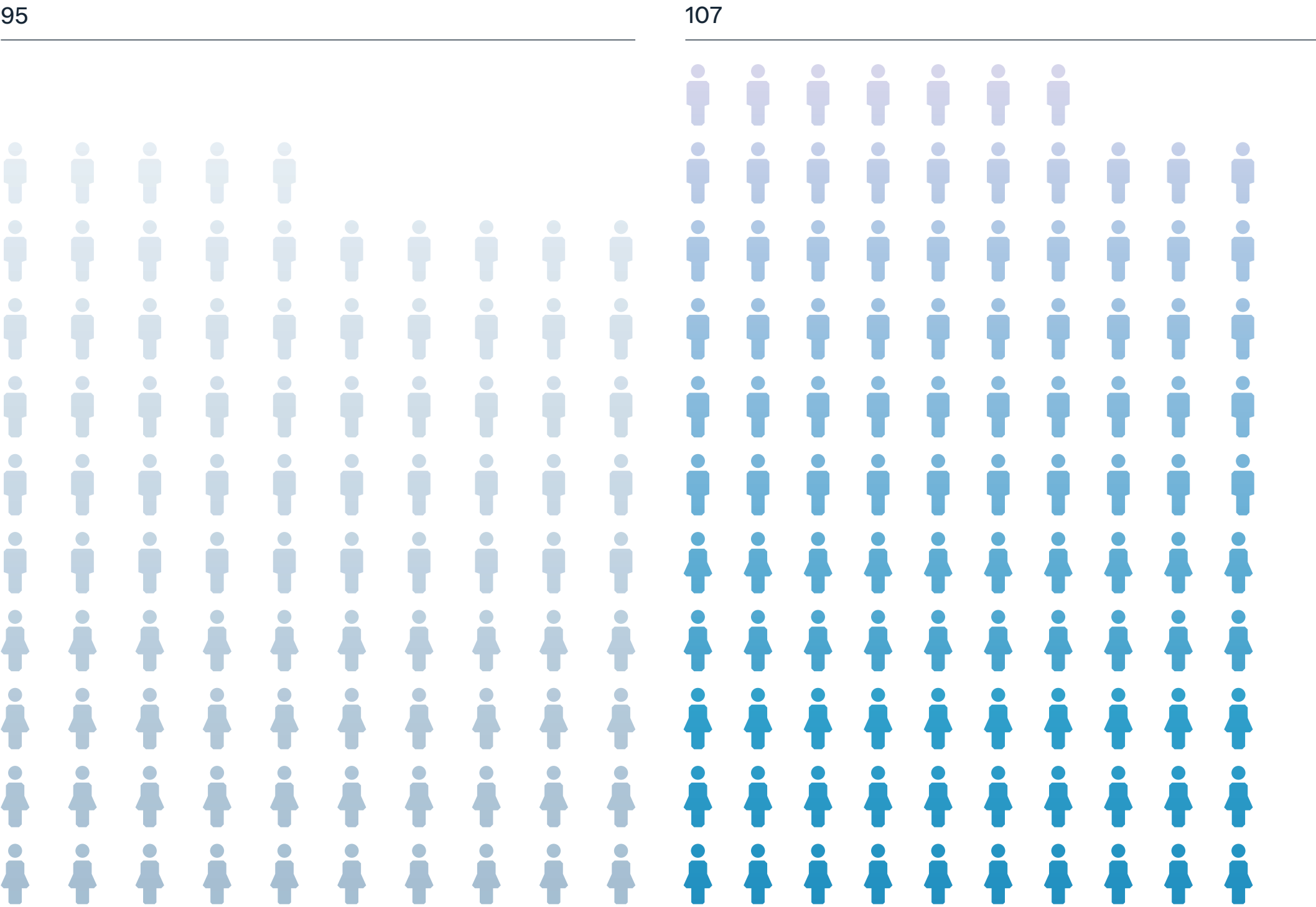


Shore-based personnel

Our onshore staff are responsible for supporting and enhancing the operations of our fleet through a wide range of activities including logistics, compliance, finance, human resources, and customer service. The number of shore-based employees increased by 12.6% compared to the previous year. The team consisted of 48 women and 59 men in 2023, while in 2022 51 men and 44 women are reported. All employees of Neptune Lines have full time, permanent contracts.

We abide by collective bargaining agreements and fully comply with national labor laws to ensure that our employment practices are fair and transparent.

Onshore Employees



Onshore Headcount per Gender

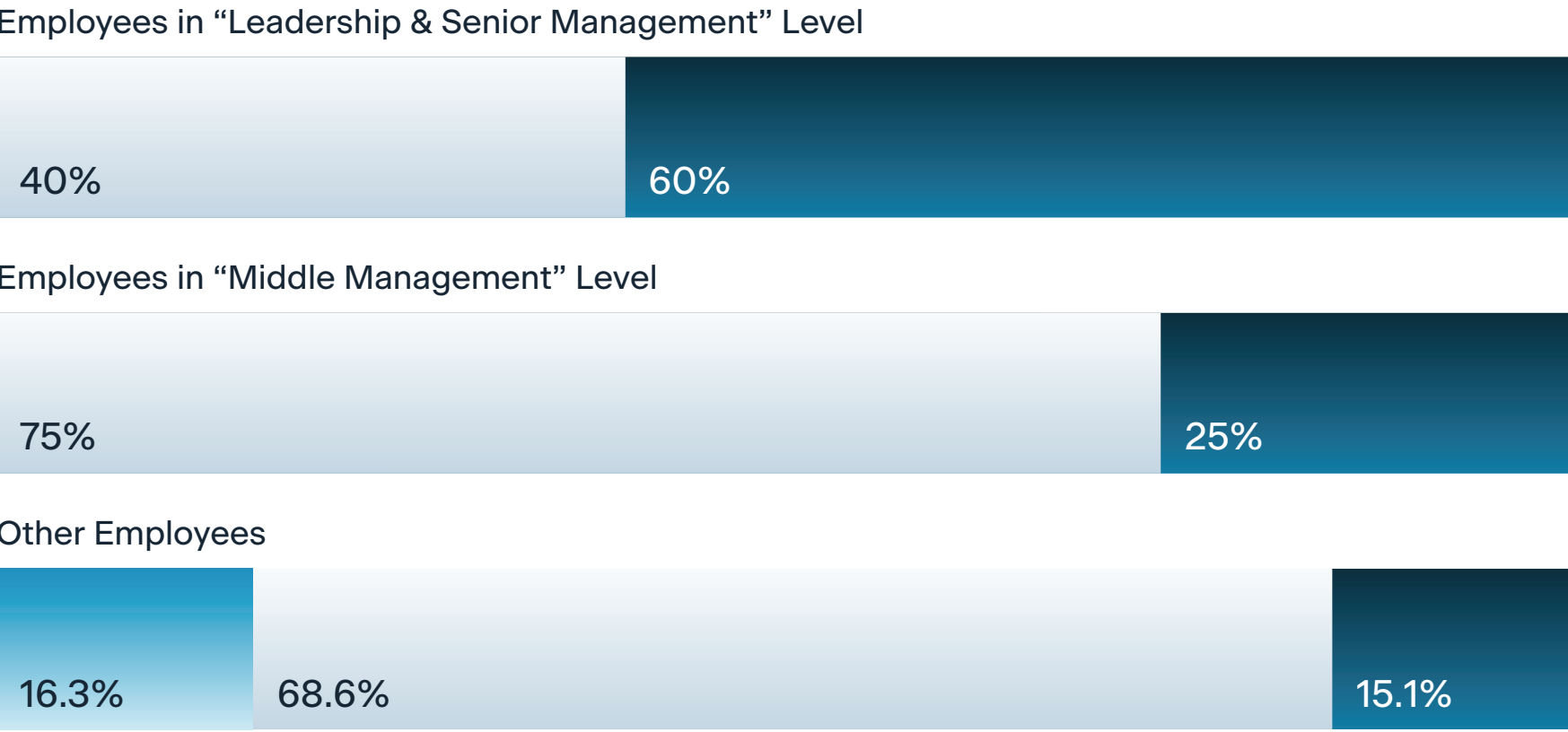


Onshore Employees per Nationality (2023)

| Greek | Philipino | French | Australian | Albanian |
|-------|-----------|--------|------------|----------|
| 102   | 2         | 1      | 1          | 1        |

Onshore Employees per Employee Category and Age Group (2023)

<30 years old    30-50 years old    >50 years old



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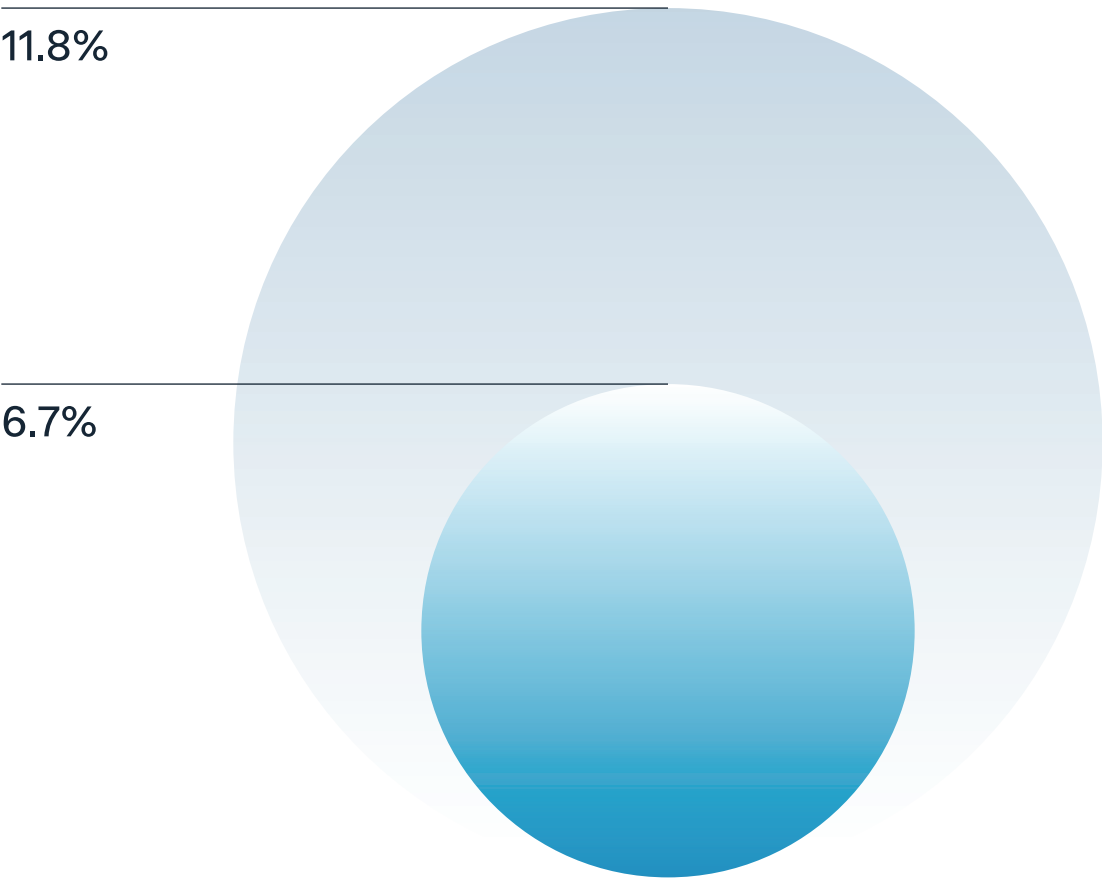


Recruitment and retention

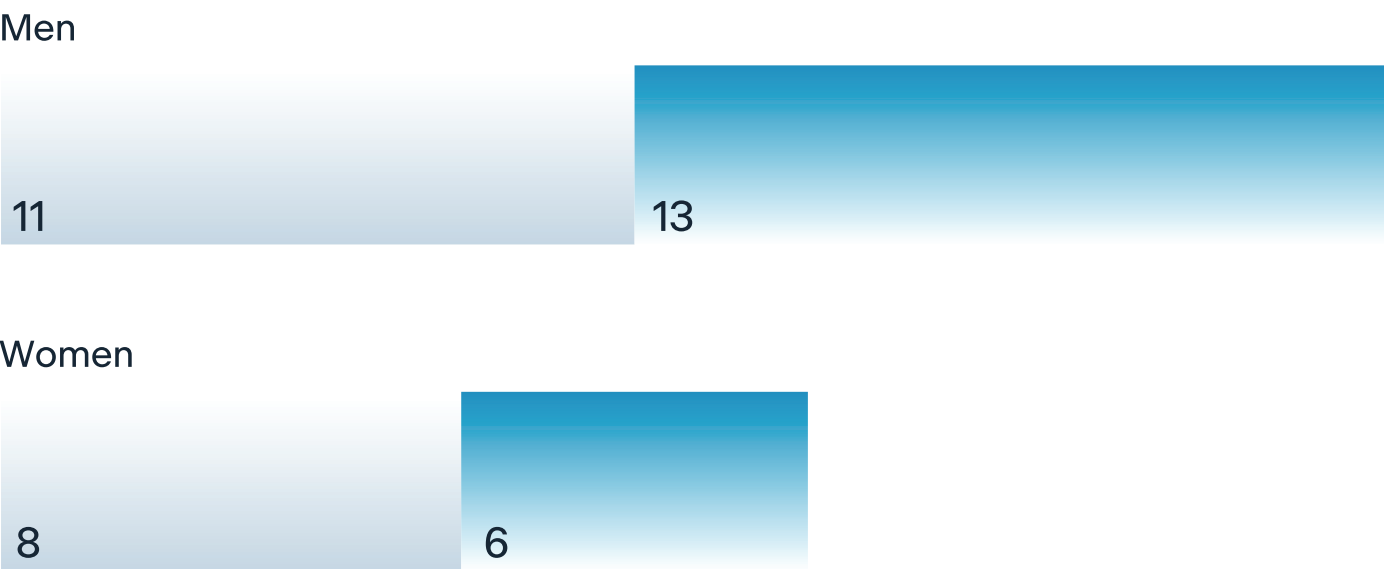
In 2023, we welcomed 19 new employees to our onshore team, bringing a diverse range of skills and experience. By integrating new talent, we aim to enhance our efficiency and streamline processes.

Employee turnover is a critical aspect of human resource management. High turnover rates can be costly and disruptive, leading to increased recruitment and training expenses, as well as a loss of institutional knowledge. Therefore, we strive to keep turnover rates as low as possible to ensure employee retention. In 2023, we achieved a 43.2% improvement in our turnover performance. We address the root causes of turnover through regular feedback, recognition programs, and by fostering a supportive workplace that encourages a committed and productive workforce.

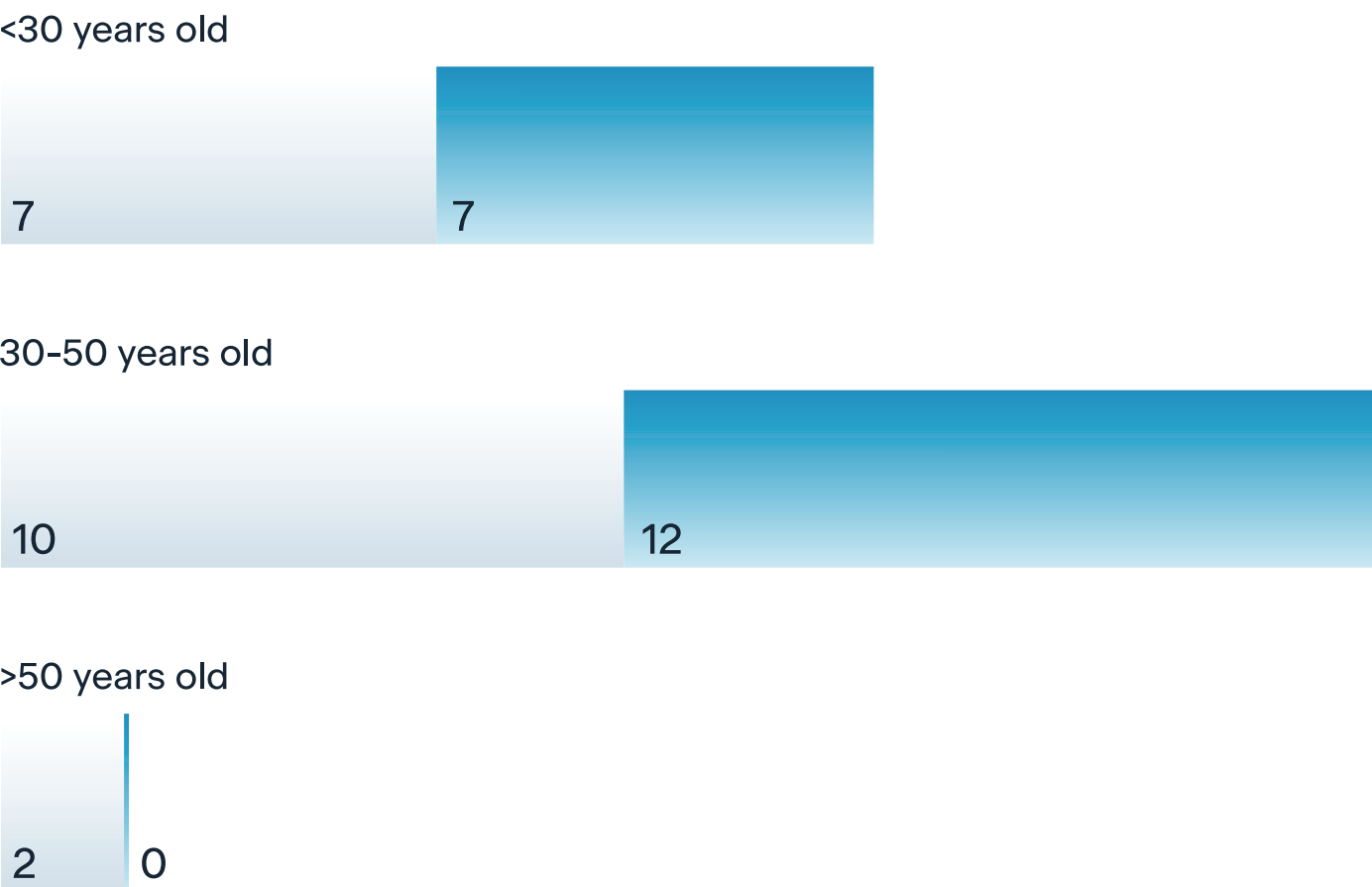
Employees' turnover rate



New hires per gender



New hires per age group



Decrease in onshore employees' turnover compared to 2022

43.2%



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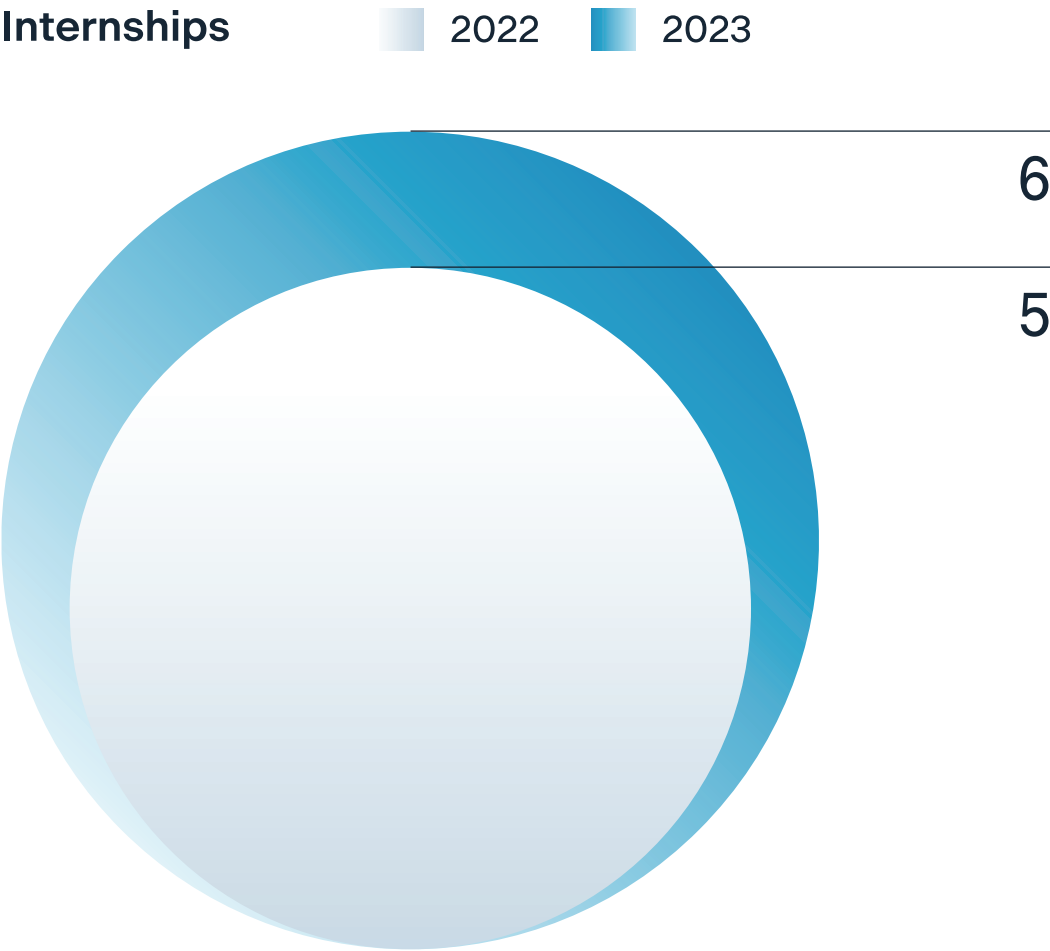
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Internships

We believe it is essential to engage and inspire young people to become familiar with and involved in the shipping industry. With this in mind, we conducted a comprehensive internship program in 2022 and 2023, targeting both graduate and undergraduate students to provide them with practical experience in shipping.

In collaboration with reputable universities, we supported young graduates in their initial career steps by offering internships, which in some cases led to permanent or temporary employment.



Sponsorship of postgraduate studies and professional qualifications

Neptune Lines encourages its employees to reach their full potential by sponsoring postgraduate studies and professional certifications. Training and development opportunities are essential elements of our human resource management and integral to our operations. Supporting postgraduate education and professional qualifications fosters greater job satisfaction, higher retention rates, and a stronger talent pool for the company. In 2023, we sponsored the studies of six employees, an increase from four in 2022.



Internships in 2023      Interns hired as permanent employees in 2023

6      3



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Empowerment of youth employability

Participation in ReGeneration program

Founded by Global Shapers Athens Hub, an initiative of the World Economic Forum, ReGeneration, was created to boost youth employability, bridge the skills gap and combat youth unemployment and brain drain. The ReGeneration training programs aims to democratize post-academic training and professional development opportunities for young graduates in Greece.



We have established a close collaboration with Regeneration, recruiting two employees—one in 2022 and another in 2023—who remain with Neptune Lines. Additionally, our existing employees have been granted free access to valuable e-learning courses from an online provider that partners with universities and other organizations to offer courses, certifications, and degrees in various subjects.

Participation in YES forum

Under the direction of the Ministries of Shipping, Education, and Tourism, the Hellenic Chamber of Shipping, and the majority of Greek Universities, the YES Forum serves as a forum for open discussion among principals, executives, and school and university students, recent graduates, and young executives in the Greek shipping and sea tourism industries.



As part of our cooperation with the YES Forum, we hired a young graduate who is still with us.

We also participated in the YES Forum’s Career Days, which aim to help young people understand the scope of the maritime cluster and the opportunities it offers, as well as to bring them into direct contact with the market and its leaders. To get a taste of the rhythm and energy of our company, we invited young students and graduates to visit our premises, where they had the opportunity to meet and talk to the President of the Company.



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Training and Development

Employee training and development initiatives are an essential component of enhancing skills, improving performance, and fostering career growth. Through our structured and ongoing programs, continuous learning opportunities and workshops, we equip our employees with the knowledge and skills they need, not only to elevate their performance, but also to drive the overall success of the company.

In 2023, all employees underwent performance and career development reviews to align individual goals with strategic objectives and promote growth through feedback, recognition, and reward.

Launch of Talent LMS E-Learning Platform

As part of our digital transformation of key HR activities, we announced the launch of Neptune Lines’ Talent LMS e-learning platform to all employees at the beginning of 2022. This innovative tool enhances our operational effectiveness by facilitating corporate training, ensuring consistency, and allowing us to frequently implement training programs tailored to the company’s needs. The e-learning platform is a modern and efficient learning management system that streamlines the design, evaluation, and implementation of training initiatives.

Following the platform’s launch, we developed and released customized e-learning courses, including:

➔ Code of Conduct Training

This course familiarizes employees with our Code of Conduct, as well as our Mission, Vision, and Values, while highlighting the management’s role in reinforcing these principles.

➔ Cybersecurity Training

This training educates employees on both the practical and theoretical aspects of cybersecurity, focusing on how to detect and prevent breaches or attacks. Additionally, it addresses human errors that can jeopardize data security.

Leadership Development Program for the Management Team

In 2022, as part of a corporate initiative to enhance the development of Neptune Lines’ management team, a comprehensive leadership development program was implemented for managers and directors. Spanning over six months, the program incorporated

Hogan psychometric tools and Hogan 360 feedback assessments, which played a crucial role in fostering self-awareness among the management team. Extensive feedback sessions followed, where participants received personalized insights into their psychometric results, identifying both strengths and areas for improvement. These sessions formed the foundation for individual development plans, which were further supported by detailed coaching sessions.

The coaching process enabled the management team to maximize their potential by focusing on specific areas related to their direct reports, teams, and the company as a whole. The primary objective of this initiative was to empower team members to grow as leaders, strengthen relationships with their teams, and enhance their strategic thinking.



Behavioral Risk Management training

In 2023, in collaboration with external partners, we launched a Behavioral Risk Management (BRM) training program led by an experienced occupational psychologist. This specialized training equipped participants with skills to identify, detect, and effectively manage workplace behaviors. The program blended theoretical knowledge with practical, interactive tools, including exercises, scenarios, and case studies.

Key learning objectives included recognizing functional and non-functional personality traits in the workplace, understanding the core elements of a corporate BRM policy and procedure, identifying early signs of behavioral risks, managing ‘undesirable’ behaviors in the workplace, and applying best practices to minimize the negative impact of behavioral risks on employees, teams, and the organization as a whole.



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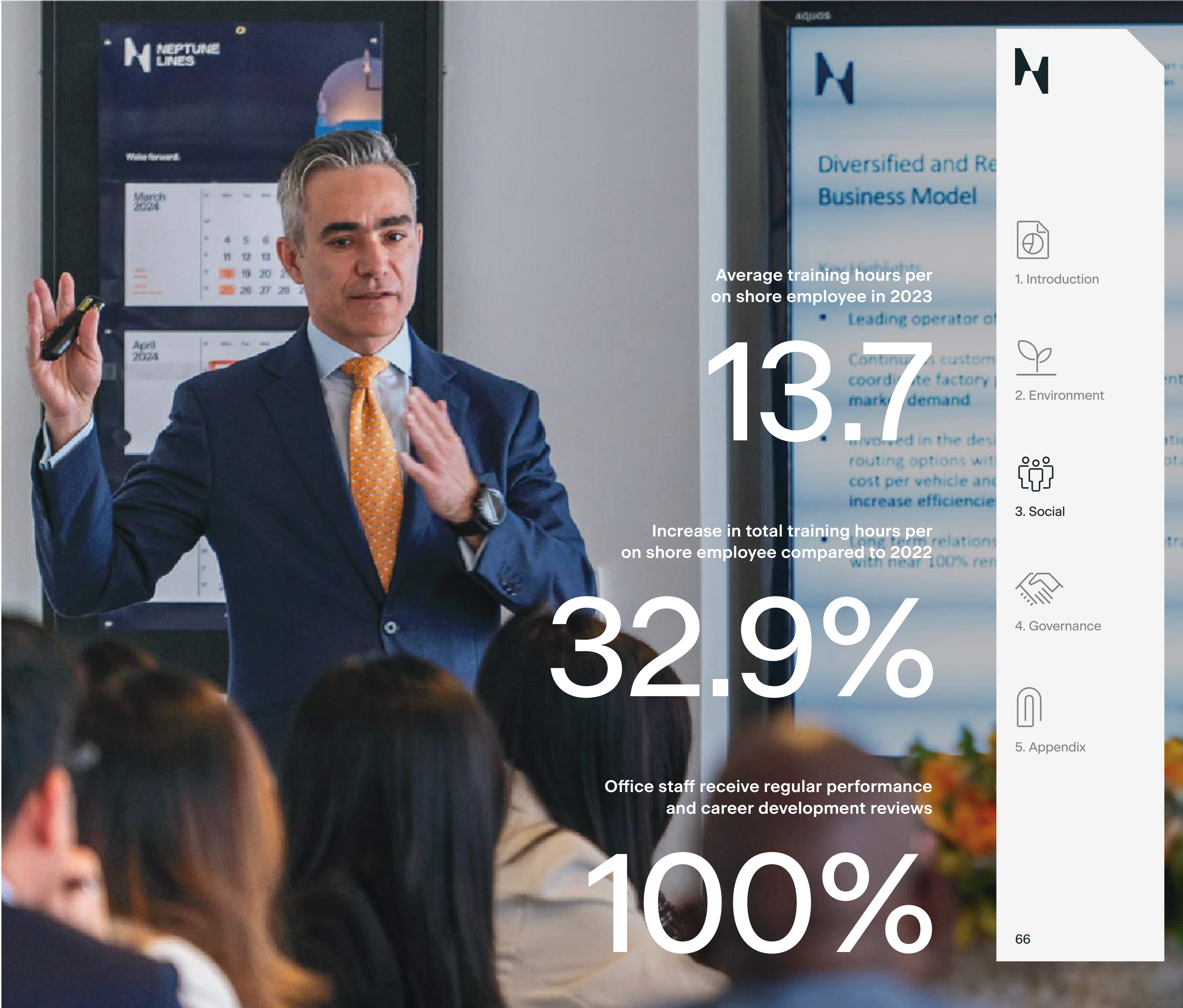
Presentation skills, crisis communication and media awareness training

Implementing comprehensive training programs in media awareness, communication skills, and crisis communication is essential for maintaining a strong and responsive corporate image in today’s fast-paced media landscape. Since 2023, we’ve introduced an annual, interactive seminar on presentation skills to help our employees become effective, engaging presenters. Additionally, we provide spokesperson training to ensure consistent and precise messaging during interviews.

Our crisis communication courses prepare employees to handle unexpected challenges, manage maritime accidents in the media, and responsibly use social media while protecting sensitive information. We also conduct media strategy and incident management training to emphasize effective crisis response.

Thanks to these new training initiatives, total employee training hours increased by 32.9% in 2023 compared to the previous year, with a 145.5% rise in training hours for executives and senior managers, reflecting our investment in leadership development.

| Average training hours of onshore employees by gender            | 2022 | 2023 |
|--|------|------|
| Per female employee  | 9.9  | 12.6 |
| Per male employee  | 11.6 | 15.3 |
| Per employee   | 10.8 | 13.7 |
| Average training hours of onshore employees by employee category | 2022 | 2023 |
| For Leadership & Senior Management                               | 16.5 | 40.5 |
| For Middle Management  | 19.9 | 11.0 |
| For remaining employees  | 7.8  | 12.8 |



Average training hours per on shore employee in 2023

13.7

Increase in total training hours per on shore employee compared to 2022

32.9%

Office staff receive regular performance and career development reviews

100%



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Wellness & Team-building Initiatives



Running events

Neptune Lines sponsors employee participation in the Athens Authentic Marathon and Half Marathon as part of our wellness program. To support this, we offer outdoor training sessions and encourage employees to join, seeing these events as excellent opportunities to foster team spirit. On average, 35 employees participate in each event.

In addition, in 2023, the company formed a basketball team to further promote physical activity and camaraderie among staff.



Reforestation initiative

In 2022, Greece faced devastating wildfires that severely impacted natural habitats, disrupted ecosystems, and caused significant loss of life and property. Moved by the environmental damage, Neptune Lines launched its first reforestation initiative, inviting our volunteer team and their families to participate. Partnering with We4All, we joined a reforestation program in Poikilo Oros, Athens. Over 50 employees and their families planted the first 200 trees, part of the 1,000 trees Neptune Lines committed to planting in the following period. This initiative not only supported environmental restoration but also strengthened the bonds among our team, united by a shared commitment to environmental stewardship.



Healthy food initiatives

At Neptune Lines, we prioritize the physical well-being and nutrition of our employees. To support this, we have partnered with a catering company to provide healthy, balanced meals daily, complete with nutritional information to guide meal choices. In 2022, we introduced free seasonal fruits for all employees. Additionally, in 2023, we launched a new canteen, managed by a specialized catering company with extensive experience in corporate catering, further enhancing our commitment to employee wellness.



Christmas Volunteering Event

In 2022 and 2023, representatives from our company visited the “Friends of the Child” Nursery School, an organization that has been close to our hearts for over a decade. Our ongoing support for their daily needs reflects a deep and lasting relationship built on mutual care and giving. During these visits, we were delighted to bring joy to the children by distributing Christmas gifts and sweets, marking another meaningful chapter in our shared journey.



Communication Summer Event

In 2023, following the introduction of our newly established corporate identity elements—our Soul, our Work, and our Direction—we held a company-wide meeting to personally explain their significance to all employees. This gathering also provided a great opportunity to discuss our refreshed Mission, Vision, and Values. We concluded the event with canapés and drinks, celebrating our shared journey and wishing everyone a happy and relaxing summer.



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### 3.3 Human Rights at Work and Within our Supply Chain

At Neptune Lines, we regard human rights as not only a moral obligation but as a core value that underpins our operations. We fully adhere to international human rights standards, laws, and regulations, with an unwavering commitment to fostering inclusiveness, equality, and dignity for all individuals—both within our company and in the communities we serve. To uphold these principles, we have implemented comprehensive policies, including our Non-Discrimination, Harassment, and Bullying Policy, which are designed to eliminate any form of discrimination, harassment, or unfair treatment in our workplace. These policies are embedded at all levels of the organization, with responsibility for their implementation allocated across key roles within the company. Senior leadership is responsible for setting the tone and ensuring that human rights considerations are integrated into strategic decision-making. Managers are tasked with overseeing day-to-day compliance and providing guidance to employees, while Human Resources is responsible for implementing and monitoring relevant training programs and policies. We ensure that all employees are equipped with the knowledge and tools to implement these commitments through regular training sessions. These sessions cover human rights topics, such as recognizing and addressing discrimination, harassment, and fostering a respectful workplace culture. In addition, we are committed to motivating that our suppliers and partners meet the high standards outlined in our Code of Conduct. We carefully evaluate potential suppliers and employees to ensure they share our commitment to human rights and ethical practices. By continuously reviewing and enhancing our human rights practices, we strive to create a working environment that promotes respect, fairness, and equal opportunities for all.

#### Standing against forced or child labor

Neptune Lines is fully committed to the fair and dignified treatment of workers and strongly opposes all forms of forced or compulsory labor. In line with international standards, such as Maritime Labor Convention and the ILO Forced Labor Convention, 1930 (No. 29), we believe that work should be voluntary and free from coercion or threats. Our employees have the right to express concerns or terminate their employment in accordance with established rules and procedures. These commitments are outlined in our Forced Labor and Child Labor Policy of our Code of Conduct.

We also strongly condemn child labor and uphold the rights of children, supporting the ILO’s Conventions Nos. 138 and 182. We ensure that our operations and business relationships comply with these international standards, prohibiting the employment of anyone under 18. To further uphold these principles, we implement rigorous recruitment and employment processes, including age verification checks, to prevent the inadvertent hiring of minors. In addition to our internal policies, we extend these labor standards to all contractors, suppliers, and partners, requiring adherence to the highest ethical standards. We remain vigilant in our efforts to eliminate any potential human rights abuses across our operations and supply chain, striving for continuous improvement. To support this commitment, we provide training for employees to ensure awareness of labor rights, ethical standards, and the importance of upholding human dignity in the workplace. Our commitment to eliminating forced and child labor

is an ongoing priority, and we continuously seek to enhance our practices to promote fairness, equality, and respect for all workers. These policies were approved at the Senior Executive Management level, ensuring they align with the highest standards of governance and oversight within our organization.

**Non-Discrimination, Harassment and Bullying Policy**  
Our Non-Discrimination Harassment and Bullying Policy affirms our commitment to maintaining a fair and inclusive workplace, where individuals are treated with respect and dignity.



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### 3.4 Diversity, Equity, and Inclusion

At Neptune Lines, we recognize that the diverse perspectives, experiences, and backgrounds of our employees drive innovation, creativity, and the overall success of our company.

We are committed to fostering a diverse and inclusive workplace, as outlined in our Code of Conduct, which prohibits discrimination based on gender, race, ethnicity, age, religion, marital status, medical condition, disability, or sexual orientation. Our focus is on promoting fair treatment tailored to each individual’s unique needs and circumstances. We continuously enhance our efforts to ensure that our people, programs, and practices cultivate a culture of inclusion and belonging.

#### Women empowerment

##### International Women’s Day Initiatives (2022 and 2023)

To celebrate International Women’s Day on 8 March, Neptune Lines hosted workshops for the women of our company. In 2022, we partnered with Women on Top to focus on work-life balance, while the 2023 workshop addressed self-confidence and its link to the “inner judge.”

##### Signing of the United Nations Women’s Empowerment Principles

In 2022, Neptune Lines signed the United Nations Women’s Empowerment Principles (WEPs), reaffirming our commitment to gender equality and women’s empowerment. We strive to foster an inclusive work environment free from discrimination, promoting equal opportunities for all.

##### Participation in the UN Gender Equality Program

Committed to advancing gender equality, Neptune Lines participated in the UN’s Target Gender Equality Program for the 2022-2023 and 2023-2024 cycles. This initiative helps companies set ambitious goals for gender balance, women’s leadership, and equal pay. Two team members received in-depth training on these issues. Using the WEPs Gender Gap Analysis Tool, we improved

our gender equality performance, increasing our score from 44% in 2022 to 49% in 2023.

##### Diversity & Inclusion Training

In collaboration with the Greek Diversity Charter, we conducted Diversity & Inclusion training for 15 team leaders, focusing on the benefits of diversity, addressing stereotypes, and sharing best practices. Additionally, we introduced an e-learning program on Diversity & Inclusion and Unconscious Bias for all employees. In 2022, we were awarded first place for our contribution to diversity and inclusion, demonstrating our commitment to creating a sustainable work environment that supports women’s empowerment and equality in the shipping industry.

##### Parental Leave

Neptune Lines is dedicated to supporting employees in balancing work and family life. We offer comprehensive parental leave, including maternity, paternity, and childcare leave, to ensure our employees can focus on their growing families without added stress.

| Type of Leave Used | 2022          | 2023          |
|--------------------|---------------|---------------|
| Childcare Leave    | 136h (17d)    | 192h (24d)    |
| Maternity Leave    | 2,848h (365d) | 3,384h (423d) |
| Paternity Leave    | 320h (40d)    | 216h (27d)    |
| Total Hours        | 3,304h (422d) | 3,792h (474d) |



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### 3.5 Community Investments

#### Our response to social crises

At Neptune Lines, we are dedicated to proactive engagement and meaningful support for both affected communities and our employees. In times of crisis, we swiftly mobilize resources and coordinate efforts to deliver immediate relief and assistance.

#### Russia-Ukraine Conflict

The Russia-Ukraine conflict has significantly disrupted global shipping, affecting maritime routes and supply chains, while also impacting the well-being of our seafarers. Ukrainian crew members play a vital role in our operations, and in a show of solidarity, we provided accommodation in Athens for the families of our Ukrainian seafarers, ensuring their safe relocation. Over a five-month period, we offered housing, essential amenities, medical care, and psychological support. Additionally, we assisted them in applying for political asylum in Greece.

#### Syrian Civil War

In 2023, Neptune Lines partnered with the Greek Ministry of Foreign Affairs to support humanitarian relief in Syria. Our vessel, Neptune Odyssey, transported 17 tonnes of aid collected by the Municipality of Athens, delivering food and essentials from the port of Piraeus to Beirut, with further assistance provided by the Syrian Red Crescent for distribution in Syria.

#### Earthquakes in Turkey and Syria

Following the devastating earthquakes in Turkey and Syria in 2023, Neptune Lines worked with the Greek Ministry of Foreign Affairs and the Central Union of Municipalities to transport 250 cubic meters of essential supplies—blankets, heaters, bedding, and medicines—donated by Greek citizens. Four trucks carried the aid to Turkey in response to urgent requests from Turkish authorities.

#### Community engagement and sustainable livelihood development

Community investments and donations are key pillars of our corporate social responsibility, reflecting our commitment to making a positive and lasting impact on the communities where we operate. Our efforts are guided by a structured corporate program centered on five core pillars: poverty alleviation, education and culture, sports, infrastructure projects, and wildlife and ocean conservation.



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Contributing to Child Welfare

Neptune Lines is deeply committed to the welfare of children and proudly supports the non-profit organization “Friends of the Child.” Established in 1987, this association provides vital social and healthcare services to low-income families, single mothers, and children living in institutions. Its mission is to meet the essential needs of children - whether from single-parent or nuclear families - who face financial and social challenges, offering support in the form of medical care, social services, and recreational activities.

In addition, the association’s staff, composed of highly trained professionals from various fields, offer their expertise to both children and parents, contributing valuable knowledge and experience.

Neptune Lines continues to sponsor the monthly food needs of these children, as well as cover the cost of a special needs teacher, ensuring ongoing support for their growth and development.



Protecting Against Wildfires

In response to the devastating wildfires that ravaged Greece in August 2022, exacerbated by extreme heatwaves, Neptune Lines took swift action by providing essential personal protective equipment to support the Hellenic Volunteer Fire Brigade Association in their critical work. Their remarkable dedication and sacrifice in safeguarding local communities and forests serve as a shining example of heroism, and we remain committed to backing their increasingly challenging efforts.



Supporting students: Adopt a Ship

Neptune Lines proudly supports the “Adopt a Ship” initiative, which fosters a unique connection between primary school children and seafarers, helping to educate young students about the maritime industry and seafaring as a profession. Throughout the school year, a class adopts a ship and engages with its crew on a weekly basis, gaining insight into life at sea. This interactive learning experience includes following the ship’s journey on a global map and participating in educational activities, giving students the opportunity to experience the world of maritime in a hands-on way.



YES Forum - Reverse Open Day

As part of our ongoing collaboration with the YES Forum, and to promote marine innovation, education, and technology, Neptune Lines participated in the YES Forum Reverse Open Day in 2023. Represented by our HR department, we conducted mock interviews and interacted with students



aspiring to enter the shipping industry. On March 1, 2023, the event took place at the Piraeus Chamber of Commerce and Industry, where 150 students connected with shipping executives from 25 companies. In addition to mock interviews, business-to-business discussions and workshops were held, offering participants a deeper understanding of the industry’s career opportunities and interview processes.

Collaboration with World Maritime University - Malmö

In 2023, Neptune Lines had the privilege of hosting students from the World Maritime University in Malmö, Sweden, as part of an annual initiative supported by the Union of Greek Shipowners. These visits provide invaluable learning opportunities, combining academic knowledge with practical experience, while also exposing students to Greece’s rich maritime culture. Our executives engaged with these future shipping leaders in discussions on logistics, operations, cybersecurity, crewing, and technical matters. Neptune Lines values opportunities to support and empower the next generation of maritime professionals and looks forward to continuing such initiatives.

Additionally, we actively participate in career events to help students and alumni familiarize themselves with the labor market. In partnership with the BCA, Neptune Lines’ HR department has taken part in the BCA Career Days in both 2022 and 2023, conducting mock interviews and offering guidance to those pursuing careers in the shipping industry.



Supporting youth athletes

Sponsoring athletes reflects our strong sense of corporate responsibility and underscores our commitment to nurturing talent and promoting youth development in sports. By offering support, Neptune Lines enables young, talented individuals to pursue their dreams with greater focus and dedication. We remain dedicated to fostering the potential of these promising athletes, helping them achieve their goals both on and off the field.



Participating in blood donation

We understand the vital importance of voluntary blood donation and the profound impact each contribution can make. That’s why the Neptune Lines team participates in annual blood drives in collaboration with the Amalia Fleming General Hospital. Held twice a year at our premises, these events allow us to donate approximately 30 units of blood annually while also raising awareness about the critical need for blood donations.



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# 4. Governance

At Neptune Lines, we uphold policies, procedures, and leadership oversight that ensure strong governance, ethical business practices, and effective risk management, while maintaining full compliance with regulatory requirements. Our goal is to cultivate a culture of transparency, integrity, and active stakeholder engagement within our governance framework. By doing so, we promote continuous improvement and strive to make a positive impact on the shipping industry and society as a whole.

Related SDGs

8

DECENT WORK AND ECONOMIC GROWTH

9

INDUSTRY, INNOVATION AND INFRASTRUCTURE

10

REDUCED INEQUALITIES

17

PARTNERSHIPS FOR THE GOALS



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## 4.1 Corporate Governance Structure

“Excellence is not a gift, but a skill that takes practice. We do not act rightly because we are excellent, but we achieve excellence by acting rightly.”

Plato

Our trusted and efficient administrative bodies are the foundation and driving force behind our business and strategic development. Setting the right tone from the top is essential in establishing and maintaining the ethical integrity of our operations. Understanding this principle, our corporate leadership is committed to leading by example, with a strong focus on compliance and ethical conduct throughout the company.

### Governance Structure of Neptune Lines

- ➔ Board of Directors (BoD)
- ➔ Chief Executive Officer (CEO)
- ➔ Executive Committee
- ➔ ESG Committee

The Board of Directors approves the company’s business plan and strategic objectives along with the required policies and frameworks for due diligence processes addressing economic, environmental and social impacts. The Board approves the necessary actions related to sustainability and governance goals while at same time ensures that mechanisms are in place to identify, assess and mitigate risks associated with the organization’s operations and value chain.

The Board stays informed of the overall business risk environment and its impact on the company.

The Board governs and oversees the company’s management and operations, ensuring Neptune Lines’ financial, operational, ESG (Environmental, Social, Governance), and commercial performance aligns with the corporate purpose and contributes to value creation.

The Board actively engages with stakeholders through participation in forums, conferences or meetings with key stakeholders including employees, customers, regulators and communities.

Outcomes of due diligence and impact management processes are used to form strategic planning, sustainability goals and operational decisions.

The Board comprises six members, including two women. The Chair and Chief Executive Officer are executive members, while the remaining are non-executive members. The nomination and selection of board members are vital to our organization’s success, as they represent our values and guide the company’s future.

The organization does not impose term limits on governance body members, ensuring continuity and retention of institutional knowledge.

The nomination and selection of the highest governance body members are guided by the following key criteria:

- 1. Independence:** Members are evaluated for independence to avoid conflicts of interest
- 2. Relevant Competencies:** Candidates are selected for expertise in areas like sustainability, governance, industry knowledge, and emerging challenges.
- 3. Diversity:** The Board prioritize diversity in gender, age, ethnicity, geography, and experience to reflect varied perspectives and improve decision-making.

**4. Stakeholder Views:** Feedback from stakeholders is considered through consultations and transparent processes

The Board delegates authority to the CEO, who is responsible for managing the company and driving its strategic objectives. Our BoD has an indefinite tenure. The indefinite tenure of a Board of Directors can provide continuity and stability in leadership, allowing experienced members to offer consistent guidance and institutional knowledge over time, especially during periods of organizational change or strategic decision-making.

The Executive Committee, which includes the CEO, Chief Operating Officer (COO), Chief Financial Officer (CFO), and Logistics Director, supports the CEO in these responsibilities. This committee oversees the daily management of the company, and its members also participate in the ESG Committee. They maintain close communication with their line department managers, monitoring processes, addressing challenges, and proposing solutions related to ESG pillars, strategic matters, and overall company operations.

In 2022, in alignment with our digital acceleration efforts, Neptune Lines digitized its Board meeting process to enhance confidentiality, time management, and efficiency. Meetings are now conducted via a secure platform, accessible only to Board members, the Board Secretary, and designated observers and presenters. This platform also serves as a repository for all past meeting documentation.

Neptune Lines’ ESG initiatives reflect our unwavering commitment to ethical decision-making and supporting the communities in which we operate. Ethical integrity is built upon the tone set at the top, and our leadership is dedicated to prioritizing compliance and ethical conduct as cornerstones of our corporate culture.

At Neptune Lines, we recognize the importance of ensuring that our highest governance body is equipped with the knowledge, skills, and experience necessary to oversee and guide our sustainability efforts effectively. To advance their collective understanding of sustainable development, we have implemented the following measures:

**Engagement with Sustainability Experts:** We engage with sustainability experts, including advisors and third-party consultants, who provide insights on emerging environmental, social, and governance (ESG) issues. These experts contribute to Board discussions and strategic decision-making, enhancing the Board’s ability to assess risks and opportunities related to sustainability.

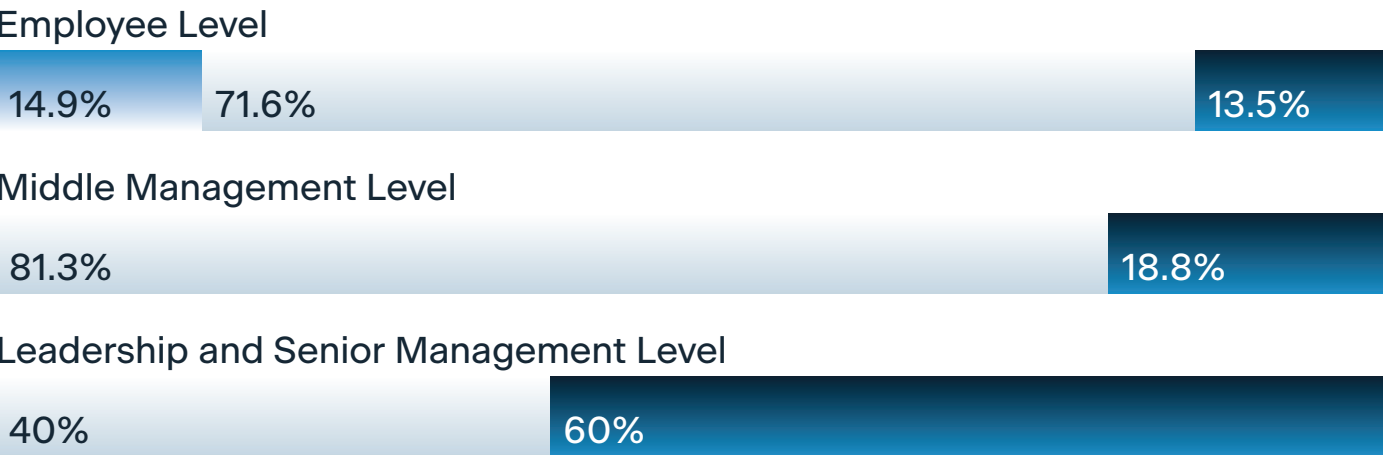
**Participation in Industry Conferences and Forums:** Board members are encouraged to attend relevant sustainability conferences, seminars, and forums to stay informed on global developments in sustainable business practices. This involvement fosters networking opportunities with other industry leaders and provides valuable insights into sustainability trends and innovations.

**Regular Sustainability Reports and Briefings:** The Board receives regular sustainability reports and briefings on Neptune Lines’ ESG performance and goals, ensuring that sustainability remains a priority at every level of decision-making. This allows the Board to assess the impact of our initiatives, identify areas for improvement, and steer the company towards more sustainable outcomes.

These ongoing efforts contribute to the continuous improvement of the collective knowledge and expertise of our governance body on sustainability, ensuring that Neptune Lines remains committed to long-term, responsible growth in alignment with global sustainable development goals.

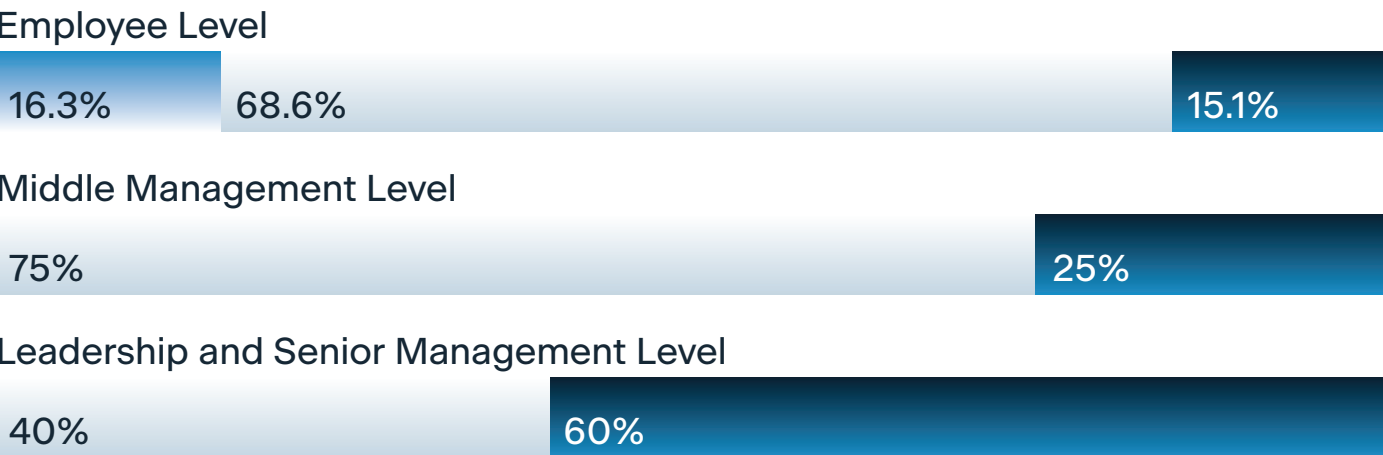
### Diversity of governance bodies and employees by age 2022

<30 years old    30-50 years old    >50 years old



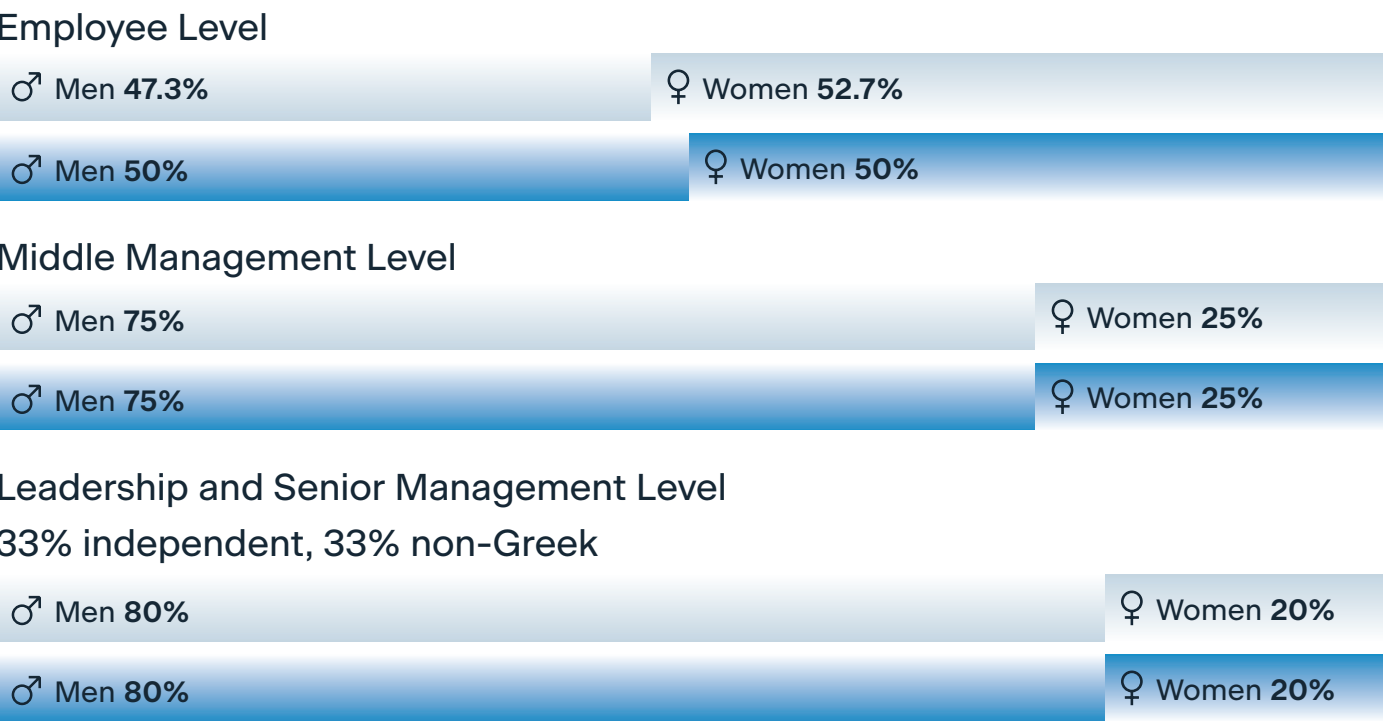
### Diversity of governance bodies and employees by age 2023

<30 years old    30-50 years old    >50 years old



### Diversity of governance bodies and employees by gender

2022    2023



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## 4.2 Code of Conduct and Business Ethics

Our Corporate Policies and Code of Conduct define the core principles that guide every aspect of our business, reflecting our unwavering commitment to fair and ethical business practices, good governance, human and labor rights, and environmental protection.

Our commitment to ethical behavior is clearly outlined in our Code of Conduct, which applies to all levels of the organization. This Code serves as our moral compass, requiring all employees whether onboard or onshore management, and third parties conducting business with or on behalf of Neptune Lines to act lawfully, with fairness, integrity, and high standards of personal and professional ethics. The Corporate Policies and Code of Conduct are developed by the Compliance Officer, supported by the ESG Committee, and approved by the highest governing body.

New employees are thoroughly familiarized with these policies upon joining and are required to sign the Code of Conduct. This essential corporate material is always available via the company’s document management system. Seafarers on fixed-term contracts receive briefings before joining the vessels, either at Neptune Lines’ offices or through the manning agent, to stay informed of updates such as new regulations, company policies, and instructions.

### Whistleblowing and Reporting

At Neptune Lines, we are committed to fostering a workplace where all employees feel empowered to raise concerns and report potential misconduct without fear of retaliation. Office staff can voice concerns to their line manager or Human Resources, while seafarers may contact Crewing—the department responsible for seafarer conduct—or the company’s Designated Person Ashore (DPA).

All concerns are handled with the utmost confidentiality. If an issue warrants further attention, the Compliance Officer is notified to investigate and determine the nature of the report. The Compliance Officer, who has legal expertise and serves on the ESG Committee, reports directly to the Board of Directors. In cases where an ethical breach is identified, the matter is escalated to the Executive Committee, which consults to decide the appropriate course of action based on the severity of the incident. It is to be noted that no critical concerns were communicated ti the highest governance body during the reporting period.



### Speak Up

Trust is a core value at Neptune Lines, fostering an environment of integrity where everyone feels comfortable speaking up. To support this, we are implementing a web-based whistleblowing system and a telephone hotline, the “Speak Up Line,” in line with Greek Law 4990/22 and EU Directive 2019/1937. This confidential tool allows for anonymous reporting of any misconduct or behavior that violates our Code of Conduct. The Speak Up Line is accessible to everyone, and we are committed to addressing all reports with the utmost seriousness.



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**Anti-bribery, anti-corruption and anti-money laundering policy**

At Neptune Lines, managing risks related to bribery and corruption is essential. Our anti-bribery, anti-fraud, anti-corruption, and anti-money laundering policies reflect our zero-tolerance stance on bribery and extortion. We strictly comply with all relevant anti-corruption laws, including the UK Bribery Act, and take firm action against any unlawful activities, whether they involve facilitation payments, institutionalized bribery, fraud, or money laundering.

Our Anti-Bribery and Anti-Money Laundering Policy includes measures and guidance on mitigating risk, understanding relevant legislation, and reporting concerns. As part of our Code of Conduct, employees, agents, and business cooperators of Neptune Lines may not offer, provide, accept, or promise (directly or indirectly) any undue financial or other advantage to any public and/or private official, person or entity for the purpose of obtaining any favorable treatment, business advantage or personal gain. We assert our influence over our business partners and encourage them to act in a manner consistent with our values and Code of Conduct.

We have developed a system of internal controls to address money laundering concerns. The key elements of these controls are:

- ➔ collection of KYC information for each new customer/ provider
- ➔ regular updating of information and periodic screening tests for existing customers/providers and the maintenance of documentary evidence of each due diligence measure taken
- ➔ identification of “red flags” and reporting in accordance with established procedures
- ➔ receipt of payments only from designated bank accounts - compliance with applicable data protection laws



Neptune Lines is an active member of the Maritime Anti-Corruption Network (MACN) since 2015, a network of more than 200 shipping related members worldwide. The network aims to combat corruption

in ports and throughout the maritime supply chain, and we are proud to be part of it. Through our MACN membership, we gain knowledge from other companies’ experiences and industry best practices. We also have access to a wide range of useful materials (e.g., toolkits, risk assessment tools, methodologies, etc.) which we use to support our anti-corruption measures on board.

We also participate in the MACN’s anonymous reporting system, developed to collect data on corruption practices. This system allows maritime companies to submit reports on corrupt demands they have encountered during port operations. The data collected is analyzed by the MACN in order to determine the scope of the problem and develop further action plans to eliminate its extent and frequency.

As part of our obligations as an active member of MACN, we also complete and submit an annual self-assessment. The results of the assessment are shared at regular members’ meetings and are used as a tool to identify issues on which we can put emphasis (with guidance from MACN) to further support our compliance on board. In addition, we provide relevant training to employees on bribery, fraud, corruption, and money laundering as part of our Code of Conduct risk-based learning.

**Fair Business, Anti-Competitive, and Anti-Trust Practices**

Neptune Lines is committed to fair business practices and compliance with EU competition laws, which aim to prevent monopolistic behavior and protect society’s interests. Our Fair Business Practices Policy ensures transparency in all transactions and adherence to anti-competitive and anti-trust regulations. Violations of these laws can result in significant penalties for both the company and its employees.

**Antitrust / Competition Law Training**

The training provided a thorough overview of the fundamental principles of EU and Greek antitrust and competition law, supported by case law examples, including topics such as cartels, vertical agreements, and abuse of dominance. It also addressed potential risk areas, such as contact with competitors, information sharing, and cooperation agreements with competitors, as well as the sanctions for non-compliance and issues arising from miscommunication. Participants were given a list of best practices for professional communication. In 2023, 17 employees successfully completed this course.



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Training on dawn raids and investigative powers of competition authorities

The training covered the procedures for dawn raids conducted by competition authorities under EU and Greek competition law. It provided a clear explanation of the general principles of dawn raids, outlining employees’ rights and obligations during such inspections. The session was supplemented with real-life examples, including relevant documents, procedures, and past incidents. Sanctions for obstructing investigations were also addressed, along with case law examples from recent and past dawn raids. So far, 9 participants have completed this training.

We are currently developing an internal training course specifically focused on dawn raid procedures for our staff, aligned with the materials covered in the initial sessions.

Conflicts of Interest

Undeclared or poorly managed conflicts of interest can cause reputational harm, diminish trust in our internal controls, increase the risk of bribery or corruption, and erode confidence in our decision-making process. These situations may also result in fines and penalties for both the company and individuals involved. At Neptune Lines, we are committed to acting in the company’s best interests, avoiding actual, potential, or perceived conflicts of interest, and ensuring these are properly disclosed and managed.

To mitigate conflicts of interest, our Board of Directors is overseeing the identification and management of conflicts at the highest level. The Board ensures that any conflicts are disclosed transparently, both within the organization and to external stakeholders, where necessary. Board members are required to declare any potential or actual conflicts of interest upon joining and on an ongoing basis. These declarations are reviewed annually, and any new conflicts are assessed and addressed promptly. In cases where conflicts of interest arise, the Board of Directors takes immediate action to ensure that decisions are not influenced by these conflicts, either by refusing affected individuals from decision-making processes or by implementing alternative procedures to ensure impartiality.

We disclose any material conflicts of interest to our stakeholders through our sustainability reports, ensuring full transparency. We also encourage employees to report any concerns they may have about conflicts of interest, with assurances that these reports will be

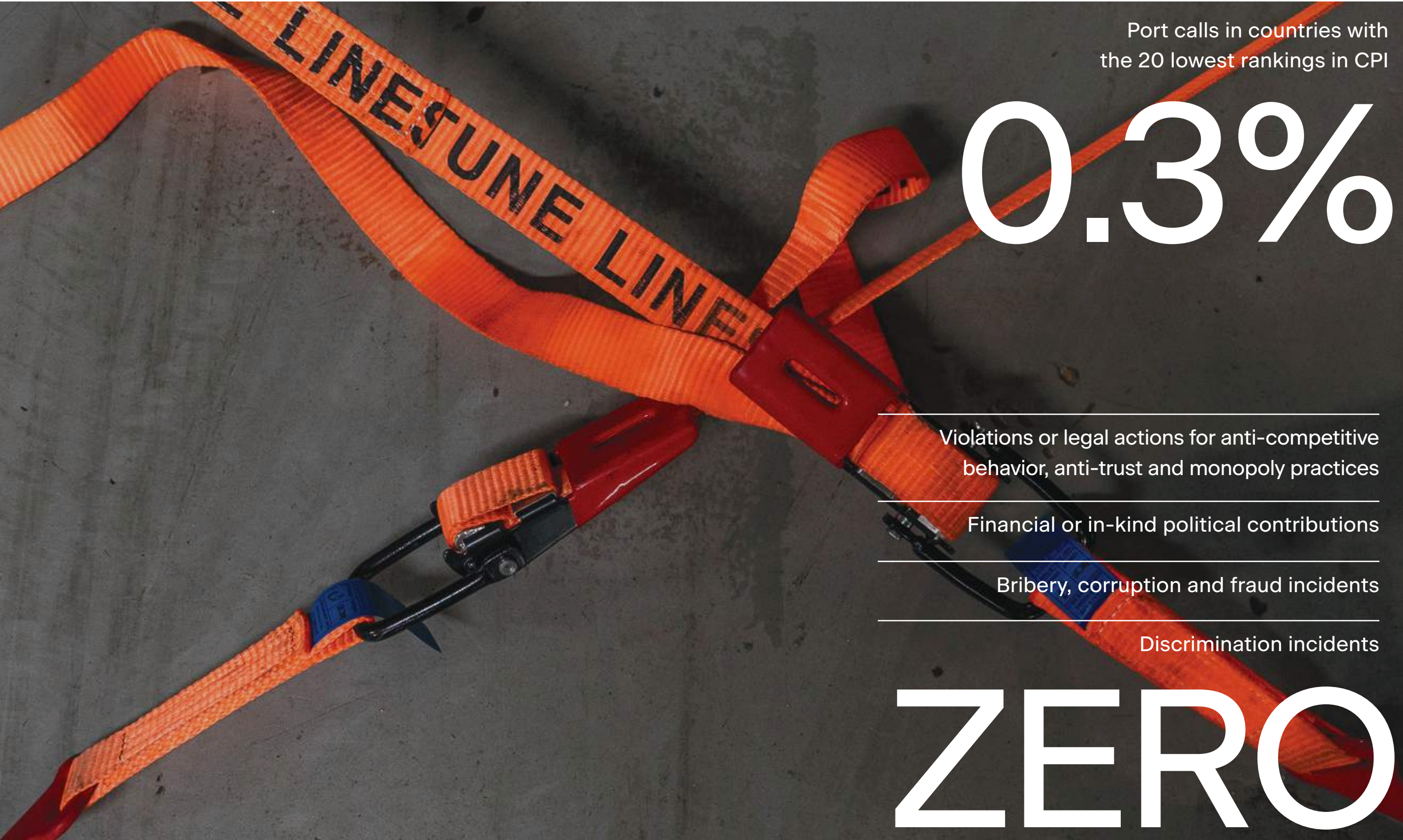
treated with confidentiality and without retaliation. We maintain a zero-tolerance policy for retaliation against anyone who raises concerns about behavior they believe breaches our Code of Conduct and policies. By adhering to these practices, we are committed to maintaining the integrity of our decision-making and ensuring stakeholder trust.

Corruption Perception Index

Corruption poses a significant threat to global security, and shipping companies often operate in regions where corruption risks are high.

It is crucial to minimize as much as possible any risks that may arise from our activities. The Corruption Perception Index (CPI), the most widely used global measure of corruption, ranks 180 countries and territories by their perceived levels of public sector corruption.

In 2023, we significantly reduced our port calls to countries ranked lowest on Transparency International’s CPI. Specifically, only 0.3% of our vessels’ port calls were in countries within the bottom 20 of the CPI, a substantial improvement from 2022, when the figure was 3.0%.



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### 4.3 Sustainable Procurement & Suppliers Code of Conduct

Beyond responsible business practices, we are committed to integrating social, ethical, and environmental considerations into our supplier relationships.

#### Selection and Evaluation

We prioritize a rigorous supplier selection process, ensuring all partners meet our high standards for quality, reliability, sustainability, and adherence to strict environmental and ethical guidelines. Most of our suppliers are certified by international maritime associations and hold certifications such as ISO (9001, 14001, 37001, 45001), OHSAS 18001, and HACCP, ensuring compliance with best practices in safety, sustainability, and quality. Many are also certified and referenced through assessments by reputable organizations like the International Marine Purchasing Association (IMPA) and the International Ship Suppliers & Services Association (ISSA).

We maintain and annually assess a list of key subcontractors, with supplier performance regularly evaluated by the ships as part of established procedures. Corrective actions are taken when necessary to ensure continuous improvement, and the average supplier score remains within acceptable levels.

#### Suppliers’ Code of Conduct

Collective action is essential to achieving our sustainability goals, deterring misconduct, and encouraging our suppliers to act responsibly. We expect our business partners to align with our values and share our commitment to ethical, legal, and socially responsible business practices.

To foster a mutual understanding of our core values, we have developed a dedicated Supplier Code of Conduct. This Code outlines the principles suppliers must follow to initiate and maintain a relationship with us. It provides clear guidance on expected behavior and what constitutes good practice according to Neptune Lines. Adhering to this Code is a key step in building long-term, sustainable relationships with our suppliers and the communities in which we operate.

Beyond enforcing these standards, we assess each procurement-related contract to ensure compliance with human and labor rights and ethical business conduct. We are also committed to open communication, addressing any concerns or dissatisfaction that may arise with our suppliers.



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## 4.4 Cyber Security and Data Protection

In an era of rapid technological advancement, safeguarding the data of our company, employees, and customers is crucial as cyber security threats grow in complexity.

Neptune Lines is fully committed to adhering to regulations and has adopted the IMO Classification on Maritime Cyber Risk Management (IMO, MSC.428(98) & MSC-FAL.1/Circ.3), which came into effect on January 1, 2021. Our IT department continuously updates security systems both ashore and on board vessels to prevent potential security breaches.

### Systems and resources to support safe and secure operations

As vessels increasingly rely on digital technologies, our IT department plays a critical role in maintaining secure and efficient operations. Key activities include:

- ➔ Annual fleet vessel audits for cybersecurity checks, system upgrades, and maintenance
- ➔ Real-time incident visibility for any events occurring on vessels
  - To protect ship communications and ensure fast recovery from potential cyber-attacks, we have implemented the following measures:
- ➔ Security live monitoring for vessels
- ➔ Satellite access management and failover
- ➔ Intrusion detection and prevention
- ➔ Content filtering and application control
- ➔ Central anti-virus scanning
- ➔ Web filtering and firewalling
- ➔ Email anti-spam and front-end anti-malware scanning
- ➔ Remote monitoring and control
- ➔ Endpoint control and monitoring
- ➔ Data loss prevention
- ➔ Live incident monitoring and reporting
- ➔ Physical security at office premises
- ➔ IT infrastructure upgrades at headquarters

To enhance operational automation and efficiency, we have implemented 24/7 live cybersecurity monitoring. Additionally, we are planning to deploy onboard AI and computer vision technology to analyze real-time video footage and generate actionable insights, which will be presented via dashboards both on board and ashore.

This technology will help:

- ➔ Improve navigational safety
- ➔ Enhance operational safety (cargo operations, mooring, etc.)
- ➔ Ensure compliance with procedures and regulations
- ➔ Better manage vessel security
- ➔ Implement a more effective training strategy

We have also deployed:

- ➔ Network monitoring systems with alert notifications for critical incidents
- ➔ Data loss prevention and mobile device monitoring tools.
- ➔ RAS servers for remote work and training
- ➔ Integrated backup cloud solutions to recover from malware and ransomware attacks



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Cyber Security testing

Neptune Lines acknowledges that completely eliminating information risk is impossible, but we take proactive steps to mitigate it. We conduct regular Cyber Risk Assessments to identify threats and vulnerabilities in our information assets, in line with our Information Security Policy, approved by the CEO based on recommendations from the Information Security Executive Committee (ISEC).

ISEC oversees:

- ➔ Approving and revising the Information Security Policy.
- ➔ Implementing security procedures
- ➔ Budgeting and managing financial requirements for the Information Security Management System

We regularly conduct penetration tests to detect weaknesses in our systems, including:

- ➔ External black-box penetration tests
- ➔ Internal penetration tests
- ➔ Vulnerability assessments
- ➔ Social engineering tests

Cyber Security attack

In 2023, we experienced a sophisticated cyber-attack involving a breach of policy. Thanks to our Managed Detection and Response (MDR) support team, the anomaly was quickly detected, and the threat was contained. Following the attack, we took precautionary and corrective measures and deployed cutting-edge technology to secure our operations and bolster our cyber defenses.

Cyber security  
incident in 2023

Substantiated complaints concerning  
breachers of customer privacy and losses  
of customer data

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Upgrading skills and knowledge

Cyber Security Training

Cybersecurity knowledge is fundamental to preventing breaches and attacks. Training employees on cyber security is crucial for safeguarding company data and infrastructure, while also teaching threat detection, response strategies, and adherence to security protocols. In 2022, we launched a custom-designed e-learning course on Cyber Security for all personnel to enhance their knowledge and preparedness.

Power BI tool Training

In 2023, we conducted Power BI training through four sessions, covering both basic and advanced concepts. The training began with data import and transformation, visualization techniques, and understanding the purpose of each type of visualization. As the sessions progressed, employees explored advanced topics like DAX functions and practical applications through real-life case scenarios.

The key features of the Power BI platform include data visualization, connectivity, modelling, and collaboration.

We also tested an external Power BI course from a reputable online provider, starting with one staff member. This training covered essential skills, such as transforming data into insights, creating reports and dashboards, preparing data in Excel for Power BI, and building data models using the star schema and DAX calculations.

Microsoft Teams Training

As part of our transition to Microsoft Teams, we initiated dedicated training sessions for all employees. These sessions cover the use of Teams and channels, workplace chat, file storage, online meetings, and app integrations (including third-party apps), to help employees optimize their day-to-day work. Training will continue progressively throughout the year to ensure everyone is proficient with the platform.

Digital Transformation Department

As technology advances at lightning speed and our operational needs evolve, in 2023 we refocused our IT department to manage and optimize the company’s technology systems, maintain infrastructure, and ensure system integrity—all safeguarded by the latest cybersecurity technologies.

Additionally, rapidly emerging technologies such as Datafication, Artificial Intelligence, and Machine Learning are transforming business processes, enabling more efficient decision-making and offering a comprehensive view of how to achieve strategic goals.

In response to this, we have introduced a significant corporate change by establishing a Digital Transformation Department. This new department will accelerate our digital efforts, lead technological change, and ensure Neptune Lines stays at the forefront of innovation and digital transformation.



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5.1 GRI Content Index

|                                   |  |
|-----------------------------------|--|
| Statement of use                  | Neptune Lines has reported in accordance with the GRI Standards from 1 January 2022 to 31 December 2023. |
| GRI 1 used                        | GRI 1: Foundation 2021   |
| Applicable GRI Sector Standard(s) | Not applicable   |

| GRI Standard                      | Disclosure   | Location  |                  | Omissions              |  |             | External assurance |
|-----------------------------------|--|---|------------------|------------------------|--|-------------|--------------------|
|                                   |  | Section   | Page(s)          | Requirement(s) omitted | Reason   | Explanation |                    |
| General Disclosures               |  |   |                  |                        |  |             |                    |
| GRI 2: General Disclosures 2021   | 1. The organization and its reporting practices                      |   |                  |                        |  |             |                    |
|                                   | 2-1 Organizational details   | Introduction  | 4, 7, 11         |                        |  |             | ✓                  |
|                                   | 2-2 Entities included in the organization’s sustainability reporting | Introduction  | 4                |                        |  |             | ✓                  |
|                                   | 2-3 Reporting period, frequency and contact point                    | Introduction  | 4                |                        |  |             | ✓                  |
|                                   | 2-4 Restatements of information                                      | Neptune Lines has not made any restatement in the reporting period.   |                  |                        |  |             | ✓                  |
|                                   | 2-5 External assurance   | Neptune Lines provides all the requested documentation to the assurers, conducts frequent meetings, and is highly involved in the external assurance process. Additionally, the ESG Committee frequently informs the BoD about the process and requirements and provides feedback from the external auditors. | 94               |                        |  |             | ✓                  |
|                                   | 2. Activities and workers  |   |                  |                        |  |             |                    |
|                                   | 2-6 Activities, value chain and other business relationships         | Introduction  | 11               |                        |  |             | ✓                  |
|                                   | 2-7 Employees  | Social  | 56-58, 61-62     |                        |  |             | ✓                  |
| 2-8 Workers who are not employees | -  | -   | Whole disclosure | Not applicable         | All the workers performing work for Neptune Lines are employees and the company does not have any workers who are not employees. |             |                    |



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| GRI Standard                    | Disclosure   | Location                          | Omissions                                 |                        |                             | External assurance   |             |
|---------------------------------|--|-----------------------------------|---|------------------------|-----------------------------|--|-------------|
|                                 |  | Section                           | Page(s)                                   | Requirement(s) omitted | Reason                      |  | Explanation |
| General Disclosures             |  |                                   |   |                        |                             |  |             |
| GRI 2: General Disclosures 2021 | 3. Governance  |                                   |   |                        |                             |  |             |
|                                 | 2-9 Governance structure and composition                             | Introduction / Governance         | 16, 73                                    |                        |                             | ✓  |             |
|                                 | 2-10 Nomination and selection of the highest governance body         | Governance                        | 73  |                        |                             | ✓  |             |
|                                 | 2-11 Chair of the highest governance body                            | Introduction                      | 5-6                                       |                        |                             | ✓  |             |
|                                 | 2-12 Role of the highest governance body in overseeing the           | Governance                        | 73  |                        |                             | ✓  |             |
|                                 | 2-13 Delegation of responsibility for managing impacts               | Introduction / Governance         | 16, 73                                    |                        |                             | ✓  |             |
|                                 | 2-14 Role of the highest governance body in sustainability reporting | Introduction / Governance         | 16, 73                                    |                        |                             | ✓  |             |
|                                 | 2-15 Conflicts of interest   | Governance                        | 76  |                        |                             | ✓  |             |
|                                 | 2-16 Communication of critical concerns                              |                                   | 74  |                        |                             | ✓  |             |
|                                 | 2-17 Collective knowledge of the highest governance body             |                                   | 73  |                        |                             | ✓  |             |
|                                 | 2-18 Evaluation of the performance of the highest governance body    | -                                 | -   | Yes                    | Confidentiality constraints | As a private company and for reasons of confidentiality, Neptune Lines does not disclose these KPIs. |             |
|                                 | 2-19 Remuneration policies   | -                                 | -   | Yes                    | Confidentiality constraints | As a private company and for reasons of confidentiality, Neptune Lines does not disclose these KPIs. |             |
|                                 | 2-20 Process to determine remuneration                               |                                   |   |                        |                             |  |             |
|                                 | 2-21 Annual total compensation ratio                                 | -                                 | -   | Yes                    | Confidentiality constraints | As a private company and for reasons of confidentiality, Neptune Lines does not disclose these KPIs. |             |
|                                 | 4. Strategy, policies, and practices                                 |                                   |   |                        |                             |  |             |
|                                 | 2-22 Statement on sustainable development strategy                   | Message from CEO / Introduction   | 5-6, 14                                   |                        |                             |  | ✓           |
|                                 | 2-23 Policy commitments  | Environment / Social / Governance | 24-28, 42, 46, 49-50, 68, 74-76, 78       |                        |                             |  | ✓           |
|                                 | 2-24 Embedding policy commitments                                    |                                   | 24-28, 42, 46, 49-50, 68, 74-76, 78       |                        |                             |  | ✓           |
|                                 | 2-25 Processes to remediate negative impacts                         | Environment / Social / Governance | 22, 28-29, 32-40, 43-45, 51-52, 68, 74-76 |                        |                             |  | ✓           |
|                                 | 2-26 Mechanisms for seeking advice and raising concerns              | Governance                        | 74  |                        |                             |  | ✓           |
|                                 | 2-27 Compliance with laws and regulations                            | Introduction / Governance         | 15, 74                                    |                        |                             |  | ✓           |
|                                 | 2-28 Membership associations   | Introduction                      | 9   |                        |                             |  | ✓           |



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| GRI Standard                                   | Disclosure  | Location                   | Omissions            |                        |                                      | External assurance   |
|--|---|----------------------------|----------------------|------------------------|--------------------------------------|--|
|  |   | Section                    | Page(s)              | Requirement(s) omitted | Reason                               |  |
| General Disclosures                            |   |                            |                      |                        |                                      |  |
| GRI 2: General Disclosures 2021                | 5. Stakeholder engagement   |                            |                      |                        |                                      |  |
|  | 2-29 Approach to stakeholder engagement   | Introduction               | 17                   |                        |                                      | ✓  |
|  | 2-30 Collective bargaining agreements   | Social                     | 56, 61               |                        |                                      | ✓  |
| Material Topics                                |   |                            |                      |                        |                                      |  |
| GRI 3: Material Topics 2021                    | 3-1 Process to determine material topics  | Introduction               | 21                   |                        |                                      | ✓  |
|  | 3-2 List of material topics   |                            | 22                   |                        |                                      | ✓  |
| Topic Disclosures                              |   |                            |                      |                        |                                      |  |
| Emissions - Energy Efficiency & Climate Change |   |                            |                      |                        |                                      |  |
| GRI 3: Material Topics 2021                    | 3-3 Management of material topics   | Introduction / Environment | 22, 29-31, 32-36, 41 |                        |                                      | ✓  |
| GRI 305: Emissions 2016                        | 305-1 Direct (Scope 1) GHG emissions  | Environment                | 30                   |                        |                                      | ✓  |
|  | 305-2 Energy indirect (Scope 2) GHG emissions   |                            | 31                   |                        |                                      |  |
|  | 305-3 Other indirect (Scope 3) GHG emissions  | -                          | -                    | Yes                    | Information unavailable / incomplete | Neptune Lines does not currently monitor its Scope 3 emissions. Plans for potential future disclosure are under consideration. |
|  | 305-4 GHG emissions intensity   | Environment                | 30                   |                        |                                      | ✓  |
|  | 305-5 Reduction of GHG emissions  |                            | 29-30                |                        |                                      | ✓  |
|  | 305-6 Emissions of ozone-depleting substances (ODS)                                   | -                          | -                    | Yes                    | Information unavailable / incomplete | Neptune Lines does not currently monitor this KPI. Plans for potential future disclosure are under consideration.              |
|  | 305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions | Environment                | 31                   |                        |                                      |  |
| GRI 302: Energy 2016                           | 302-1 Energy consumption within the organization                                      |                            | 41                   |                        |                                      | ✓  |
|  | 302-2 Energy consumption outside of the organization                                  | -                          | -                    | Yes                    | Information unavailable / incomplete | Neptune Lines does not currently monitor this KPI. Plans for potential future disclosure are under consideration.              |
|  | 302-3 Energy intensity  | Environment                | -                    | Yes                    | Information unavailable / incomplete | Neptune Lines does not currently monitor this KPI. Plans for potential future disclosure are under consideration.              |
|  | 302-4 Reduction of energy consumption   |                            | 32-36, 41            |                        |                                      |  |
|  | 302-5 Reductions in energy requirements of products and services                      | -                          | -                    | Yes                    | Not applicable                       | Neptune Lines does not monitor this KPI as it is not related to its operations.  |



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| GRI Standard                                 | Disclosure  | Location                  | Omissions    |                        |                                      | External assurance  |
|--|---|---------------------------|--------------|------------------------|--------------------------------------|---|
|  |   | Section                   | Page(s)      | Requirement(s) omitted | Reason                               |   |
| Topic Disclosures                            |   |                           |              |                        |                                      |   |
| Environmental pollution                      |   |                           |              |                        |                                      |   |
| GRI 3: Material Topics 2021                  | 3-3 Management of material topics   | Introduction/ Environment | 22, 42       |                        |                                      | ✓   |
| GRI 303: Water and, Effluents 2018           | 303-1 Interactions with water as a shared resource  | Environment               | 42           |                        |                                      |   |
|  | 303-2 Management of water discharge-related impacts   |                           | 42           |                        |                                      |   |
|  | 303-3 Water withdrawal  |                           | 42           |                        |                                      | ✓   |
|  | 303-4 Water discharge   |                           | 42           |                        |                                      |   |
|  | 303-5 Water consumption   |                           | 42           |                        |                                      |   |
| Occupational health, safety & wellbeing      |   |                           |              |                        |                                      |   |
| GRI 3: Material Topics 2021                  | 3-3 Management of material topics   | Introduction/ Social      | 22, 49-55    |                        |                                      | ✓   |
| GRI 403: Occupational Health and Safety 2018 | 403-1 Occupational health and safety management system  | Social                    | 49-50        |                        |                                      |   |
|  | 403-2 Hazard identification, risk assessment, and incident investigation  |                           | 49, 51-52    |                        |                                      |   |
|  | 403-3 Occupational health services  |                           | 49-50, 54-55 |                        |                                      |   |
|  | 403-4 Worker participation, consultation, and communication on occupational health and safety                       |                           | 50           |                        |                                      |   |
|  | 403-5 Worker training on occupational health and safety   |                           | 53           |                        |                                      |   |
|  | 403-6 Promotion of worker health  |                           | 54-55        |                        |                                      |   |
|  | 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships |                           | 50-53        |                        |                                      |   |
|  | 403-8 Workers covered by an occupational health and safety management system  |                           | 49           |                        |                                      |   |
|  | 403-9 Work-related injuries   |                           | 51           |                        |                                      | ✓   |
|  | 403-10 Work-related ill health  |                           |              | Yes                    | Information unavailable / incomplete | Neptune Lines does not currently monitor this KPI. Plans for potential future disclosure are under consideration. |



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| GRI Standard  | Disclosure   | Location                           | Omissions      |                        |        | External assurance |
|---|--|------------------------------------|----------------|------------------------|--------|--------------------|
|   |  | Section                            | Page(s)        | Requirement(s) omitted | Reason |                    |
| Topic Disclosures                                   |  |                                    |                |                        |        |                    |
| Equal treatment and opportunities for all           |  |                                    |                |                        |        |                    |
| GRI 3: Material Topics 2021                         | 3-3 Management of material topics  | Introduction / Social / Governance | 22, 61, 69, 73 |                        |        | ✓                  |
| GRI 401: Employment 2016                            | 401-3 Parental leave   | Social                             | 69             |                        |        | ✓                  |
| GRI 405: Diversity and Equal Opportunity 2016       | 405-1 Diversity of governance bodies and employees   | Social / Governance                | 61, 73         |                        |        |                    |
|   | 405-2 Ratio of basic salary and remuneration of women to men   | Social                             | 69             |                        |        | ✓                  |
| Customer Focus & Service Quality                    |  |                                    |                |                        |        |                    |
| GRI 3: Material Topics 2021                         | 3-3 Management of material topics  | Introduction                       | 22, 12         |                        |        | ✓                  |
|   | Internal KPI: Measures to ensure service quality and customer satisfaction   | Introduction                       | 12             |                        |        |                    |
| Corporate Governance - Compliance & Business Ethics |  |                                    |                |                        |        |                    |
| GRI 3: Material Topics 2021                         | 3-3 Management of material topics  | Introduction / Governance          | 22, 76-77      |                        |        | ✓                  |
| GRI 205: Anti-corruption 2016                       | 205-1 Operations assessed for risks related to corruption  | Governance                         | 75-76          |                        |        |                    |
|   | 205-2 Communication and training about anti-corruption policies and procedures   |                                    | 75-76          |                        |        |                    |
|   | 205-3 Confirmed incidents of corruption and actions taken  |                                    | 76-77          |                        |        | ✓                  |
| GRI 415: Public Policy 2016                         | 415-1 Political contributions  |                                    | 76             |                        |        |                    |
| Business Continuity - Safe & Secure Operations      |  |                                    |                |                        |        |                    |
| GRI 3: Material Topics 2021                         | 3-3 Management of material topics  | Introduction / Governance          | 22, 80         |                        |        | ✓                  |
| GRI 418: Customer Privacy 2016                      | 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data generated and distributed | Governance                         | 79             |                        |        | ✓                  |



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| GRI Standard  | Disclosure   | Location    | Omissions |                        |        | External assurance |
|---|--|-------------|-----------|------------------------|--------|--------------------|
|   |  | Section     | Page(s)   | Requirement(s) omitted | Reason |                    |
| Other significant topics                                    |  |             |           |                        |        |                    |
| Environmental Pollution, Effluents - Waste & Materials used |  |             |           |                        |        |                    |
| GRI 301: Materials 2016                                     | 301-1 Materials used by weight or volume   | Environment | 46        |                        |        |                    |
| GRI 306: Waste 2020   | 306-1 Waste generation and significant waste-related impacts                                   |             | 46        |                        |        |                    |
|   | 306-2 Management of significant waste-related impacts  |             | 46        |                        |        |                    |
|   | 306-3 Waste generated  |             | 46        |                        |        |                    |
| Employment  |  |             |           |                        |        |                    |
| GRI 401: Employment 2016                                    | 401-1 New employee hires and employee turnover   | Social      | 57, 62    |                        |        |                    |
| GRI 404: Training and Education 2016                        | 404-1 Average hours of training per year per employee  | Social      | 59, 66    |                        |        |                    |
|   | 404-3 Percentage of employees receiving regular performance and career development reviews     | Social      | 57, 65    |                        |        |                    |
| Human Rights at Work and Within our Supply Chain            |  |             |           |                        |        |                    |
| GRI 406: Non-discrimination 2016                            | 406-1 Incidents of discrimination and corrective actions taken                                 | Governance  | 76        |                        |        |                    |
| GRI 408: Child Labor 2016                                   | 408-1 Operations and suppliers at significant risk for incidents of child labor                | Governance  | 68        |                        |        |                    |
| GRI 409: Forced or Compulsory Labor 2016                    | 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor | Governance  | 68        |                        |        |                    |
| GRI 411: Rights of Indigenous Peoples 2016                  | 411-1 Incidents of violations involving rights of indigenous peoples                           | Social      | 68        |                        |        |                    |
| Community Investment  |  |             |           |                        |        |                    |
| GRI 413: Local Communities 2016                             | 413-1 Operations with local community engagement, impact assessments, and development programs | Social      | 70-71     |                        |        |                    |



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| GRI Standard                                    | Disclosure   | Location     |         | Omissions              |        |             | External assurance |
|---|--|--------------|---------|------------------------|--------|-------------|--------------------|
|   |  | Section      | Page(s) | Requirement(s) omitted | Reason | Explanation |                    |
| Other significant topics                        |  |              |         |                        |        |             |                    |
| Suppliers' management and assessment            |  |              |         |                        |        |             |                    |
| GRI 308: Supplier Environmental Assessment 2016 | 308-1 New suppliers that were screened using environmental criteria                  | Governance   | 77      |                        |        |             |                    |
| GRI 414: Supplier Social Assessment 2016        | 414-1 New suppliers that were screened using social criteria                         |              | 77      |                        |        |             |                    |
| Economic value generated and distributed        |  |              |         |                        |        |             |                    |
| GRI 201: Economic Performance 2016              | 201-2 Financial implications and other risks and opportunities due to climate change | Environment  | 43-45   |                        |        |             |                    |
|   | 201-4 Financial assistance received from government                                  | Introduction | 15      |                        |        |             |                    |



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5.2 SASB Content Index

Table 1. Sustainability Disclosure Topics & Accounting Metrics

| Topic                        | Accounting Metric  | Code         | Location     |              |
|------------------------------|--|--------------|--------------|--------------|
|                              |  |              | Section      | Page(s)      |
| Greenhouse Gas Emissions     | Gross global Scope 1 emissions   | TR-MT-110a.1 | Environment  | 30-31        |
|                              | Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets | TR-MT-110a.2 | Environment  | 25-26, 29-30 |
|                              | Total energy consumed, percentage from heavy fuel oil, percentage from renewables  | TR-MT-110a.3 | Introduction | 41           |
| Air Quality                  | Air emissions for the following pollutants: NOx, SOx, and particulate matter (PM)  | TR-MT-120a.1 | Environment  | 31           |
| Ecological Impacts           | Percentage of fleet implementing (1) ballast water exchange and (2) ballast water treatment  | TR-MT-160a.2 | Environment  | 42           |
|                              | Number and aggregate volume of spills and releases to the environment  | TR-MT-160a.3 | Introduction | 15           |
| Employee Health & Safety     | Lost time injury rate (LTIR)   | TR-MT-320a.1 | Social       | 51           |
| Business Ethics              | Number of calls at ports in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index                                     | TR-MT-510a.1 | Governance   | 76           |
|                              | Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption   | TR-MT-510a.2 | Governance   | 15, 76       |
| Accident & Safety management | Number of marine casualties, percentage classified as very serious   | TR-MT-540a.1 | Environment  | 28           |
|                              | Number of Conditions of Class or Recommendations   | TR-MT-540a.2 | Introduction | 15           |
|                              | Number of port state control (1) deficiencies and (2) detentions   | TR-MT-540a.3 | Social       | 52           |

Table 2. Activity Metrics

| Activity Metric                           | Code        | Location     |         |
|---|-------------|--------------|---------|
|   |             | Section      | Page(s) |
| Number of shipboard employees             | TR-MT-000.A | Social       | 9, 56   |
| Total distance traveled by vessels        | TR-MT-000.B | Introduction | 9       |
| Operating days                            | TR-MT-000.C | Introduction | 12      |
| Deadweight tonnage*                       | TR-MT-000.D | Introduction | 9       |
| Number of vessels in total shipping fleet | TR-MT-000.E | Introduction | 9       |
| Number of vessel port calls               | TR-MT-000.F | Introduction | 12      |

\*Due to the profile of the Neptune Lines’ fleet, the total carrying capacity (in units) has been disclosed as it is more accurate and representative.



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5.3 Sustainable Development Goals (SDGs)

| Sustainable Development Goals (SDGs) related with our business activities and impacts   | Report section(s) where relevant information can be found/page numbers   |
|---|--|
| <b>Goal 1</b><br>End poverty in all its forms everywhere  |  <ul style="list-style-type: none"><li>Social (pg. 70-71)</li></ul>   |
| <b>Goal 3</b><br>Ensure healthy lives and promote wellbeing for all at all ages   |  <ul style="list-style-type: none"><li>Social (pg. 54-55, 67, 70-71)</li></ul>                                      |
| <b>Goal 4</b><br>Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all                 |  <ul style="list-style-type: none"><li>Social (pg. 59-60, 63-66, 70-71)</li></ul>                                   |
| <b>Goal 5</b><br>Achieve gender equality and empower all women and girls  |  <ul style="list-style-type: none"><li>Social (pg. 56, 61, 69)</li></ul>  |
| <b>Goal 6</b><br>Ensure availability and sustainable management of water and sanitation for all                                       |  <ul style="list-style-type: none"><li>Environment (pg. 42)</li></ul>   |
| <b>Goal 7</b><br>Ensure access to affordable, reliable, sustainable and modern energy for all   |  <ul style="list-style-type: none"><li>Environment (pg. 41)</li></ul>   |
| <b>Goal 8</b><br>Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all |  <ul style="list-style-type: none"><li>Social (pg. 57-60, 62-66, 68, 69)</li><li>Governance (pg. 74-76)</li></ul> |
| <b>Goal 9</b><br>Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation            |  <ul style="list-style-type: none"><li>Environment (pg. 32-40)</li><li>Governance (pg.78)</li></ul>               |
| <b>Goal 10</b><br>Reduce inequalities within and among countries  |  <ul style="list-style-type: none"><li>Social (pg. 56, 61, 68)</li></ul>  |
| <b>Goal 11</b><br>Make cities and human settlements inclusive, safe, resilient and sustainable  |  <ul style="list-style-type: none"><li>Social (pg. 70-71)</li></ul>   |

| Sustainable Development Goals (SDGs) related with our business activities and impacts   | Report section(s) where relevant information can be found/page numbers   |
|---|--|
| <b>Goal 12</b><br>Ensure sustainable consumption and production patterns  |  <ul style="list-style-type: none"><li>Environment (pg. 46)</li></ul>   |
| <b>Goal 13</b><br>Take urgent action to combat climate change and its impacts   |  <ul style="list-style-type: none"><li>Environment (pg. 24-31, 37-39, 41, 43-45)</li></ul>  |
| <b>Goal 14</b><br>Conserve and sustainably use the oceans, seas and marine resources for sustainable development  |  <ul style="list-style-type: none"><li>Environment (pg. 42, 46)</li></ul>   |
| <b>Goal 16</b><br>Promote peaceful and inclusive societies for sustainable development; provide access to justice for all and build effective, accountable and inclusive institutions at all levels |  <ul style="list-style-type: none"><li>Introduction (pg. 12-14)</li><li>Social (pg. 59-60, 63-66, 68, 70-71)</li><li>Governance (pg. 73-76)</li></ul>             |
| <b>Goal 17</b><br>Strengthen the means of implementation and revitalize the global partnership for sustainable development  |  <ul style="list-style-type: none"><li>Introduction (pg. 9, 17-20)</li><li>Environment (pg. 40)</li><li>Social (pg. 70-71)</li><li>Governance (pg. 75)</li></ul> |

The 17 Sustainable Development Goals (SDGs) are an initiative promoted by the UN to end poverty, protect the planet, and improve the lives and prospects of people around the world.



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## 5.4 The United Nations Global Compact (UNGC) 10 Principles

The United Nations Global Compact (UNGC) is an initiative that global corporations can sign on to committing to responsible business practices in the areas of human rights, labor, the environment, and corruption. The UN Global Compact has 10 operating principles outlining these values. By integrating the 10 principles of the UN Global Compact into our strategy, policies and procedures and creating a culture of integrity, we are not only upholding our fundamental responsibilities to people and the planet, but also setting the stage for long-term success.



| Description     |  | Reference on report section(s) & Page numbers          |
|-----------------|--|--|
| Human Rights    |  |  |
| Principle 1     | Businesses should support and respect the protection of internationally proclaimed human rights.                         | • Social (pg. 49-51, 56, 61, 68, 69, 70-71)            |
| Principle 2     | Businesses should make sure that they are not complicit in human rights abuses.  | • Social (pg. 68)                                      |
| Labor           |  |  |
| Principle 3     | Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining. | • Social (pg. 56, 61)                                  |
| Principle 4     | Businesses should uphold the elimination of all forms of forced and compulsory labor.                                    | • Social (pg. 68)                                      |
| Principle 5     | Businesses should uphold the effective abolition of child labor.   | • Social (pg. 68)                                      |
| Principle 6     | Businesses should uphold the elimination of discrimination in respect of employment and occupation.                      | • Social (pg. 56, 61, 68, 69)<br>• Governance (74, 76) |
| Environment     |  |  |
| Principle 7     | Businesses should support a precautionary approach to environmental challenges.  | • Environment (pg. 24-29, 32-41)                       |
| Principle 8     | Businesses should undertake initiatives to promote greater environmental responsibility.                                 | • Environment (pg. 32-42, 46)                          |
| Principle 9     | Businesses should encourage the development and diffusion of environmentally friendly technologies.                      | • Introduction (pg. 9)<br>• Environment (pg. 32-41)    |
| Anti-Corruption |  |  |
| Principle 10    | Businesses should work against corruption in all its forms, including extortion and bribery.                             | • Governance (pg. 74-76)                               |



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5.5 Glossary and Abbreviations

| Abbreviation    | Term   |
|-----------------|--|
| ISPS            | International Ship and Port Facility Security        |
| MRV             | Monitoring Reporting & Verification                  |
| AMP             | Alternative Maritime Power                           |
| AED             | Automated External Defibrillator                     |
| AER             | Annual Efficiency Ratio                              |
| AFS             | Antifouling Systems                                  |
| AFVs            | Alternative Fuel Vehicles                            |
| AI              | Artificial Intelligence                              |
| BI              | Business Intelligence                                |
| BoD             | Board of Directors                                   |
| BWM             | Ballast Water Management                             |
| BWMP            | Ballast Water Management Convention                  |
| BRM             | Behavioral Risk Management                           |
| CBT             | Computer-Based Training                              |
| CCS             | Carbon Capture and Storage                           |
| CFD             | Computational Fluid Dynamics                         |
| COOP            | Commercial Operations                                |
| CO <sub>2</sub> | Carbon dioxide                                       |
| CDP             | Carbon Disclosure Project                            |
| CII             | Carbon Intensity Indicator                           |
| CPP             | Controllable Pitch Propeller                         |
| CPI             | Corruption Perception Index                          |
| CSC             | Customer Service Coordinator                         |
| CSRD            | Corporate Sustainability Reporting Directive         |
| CSS Code        | Code of Safe Practice for Cargo Stowage and Securing |
| XTD             | Cross Track Distance                                 |
| DAX             | Data Analysis Expressions                            |

| Abbreviation | Term  |
|--------------|---|
| DPA          | Designated Person Ashore  |
| DG           | Diesel Generators   |
| DCS          | Data Collection System  |
| ECAs         | Emission Control Areas  |
| ECDIS        | Electronic Chart Display and Information System                     |
| EEDI         | Energy Efficiency Design Index                                      |
| EEXI         | Energy Efficiency eXisting ship Index                               |
| EEOI         | Energy Efficiency Operational Indicator                             |
| EPLO         | Engine Part-Load Optimization                                       |
| EPLO         | Engine Power Limitation Optimization                                |
| EPL          | Engine Power Limitation   |
| ERP          | Enterprise Resource Planning  |
| EU ETS       | EU Emissions Trading System   |
| EU SRR       | EU Ship Recycling Regulation  |
| EPDWA        | European Point-of-use Drinking Water Association                    |
| ESRS         | European Sustainability Reporting Standards                         |
| EGCS         | Exhaust Gas Cleaning System   |
| GJ           | Gigajoules  |
| GRI          | Global Reporting Initiative   |
| GHG          | Greenhouse Gas  |
| HACCP        | Hazard Analysis and Critical Control Points                         |
| H&H          | Hydrologic and Hydraulic  |
| IMO DCS      | IMO Data Collection System  |
| IoT          | Internet of Things  |
| ISEC         | Information Security Executive Committee                            |
| MARPOL       | International Convention for the Prevention of Pollution from Ships |

| Abbreviation     | Term  |
|------------------|---|
| STCW             | International Convention on Standards of Training, Certification and Watchkeeping for Seafarers |
| ILO              | International Labor Organization  |
| IMPA             | International Marine Purchasing Association   |
| IMDG             | International Maritime Dangerous Goods  |
| IMO              | International Maritime Organization   |
| ISM Code         | International Safety Management Code  |
| ISSA             | International Shipsuppliers & Services Association  |
| IHM              | Inventory of Hazardous Materials  |
| IT               | Information Technology  |
| KPIs             | Key Performance Indicators  |
| KYC              | Know Your Client  |
| LED              | Light Emitting Diode  |
| LMS              | Learning Management System  |
| LNG              | Liquefied Natural Gas   |
| LTIF             | Lost Time Injury Frequency  |
| MDR              | Managed Detection and Response  |
| MACN             | Maritime Anti-Corruption Network  |
| MLC              | Maritime Labor Convention   |
| CH <sub>4</sub>  | Methane   |
| NSF              | National Sanitization Foundation  |
| NLP              | Natural Language Processing   |
| NOx              | Nitrogen Oxides   |
| N <sub>2</sub> O | Nitrous Oxide   |
| OH&S             | Occupational Health and Safety  |
| OWS              | Oily Water Separator  |
| ORC              | Organic Rankine Cycle   |



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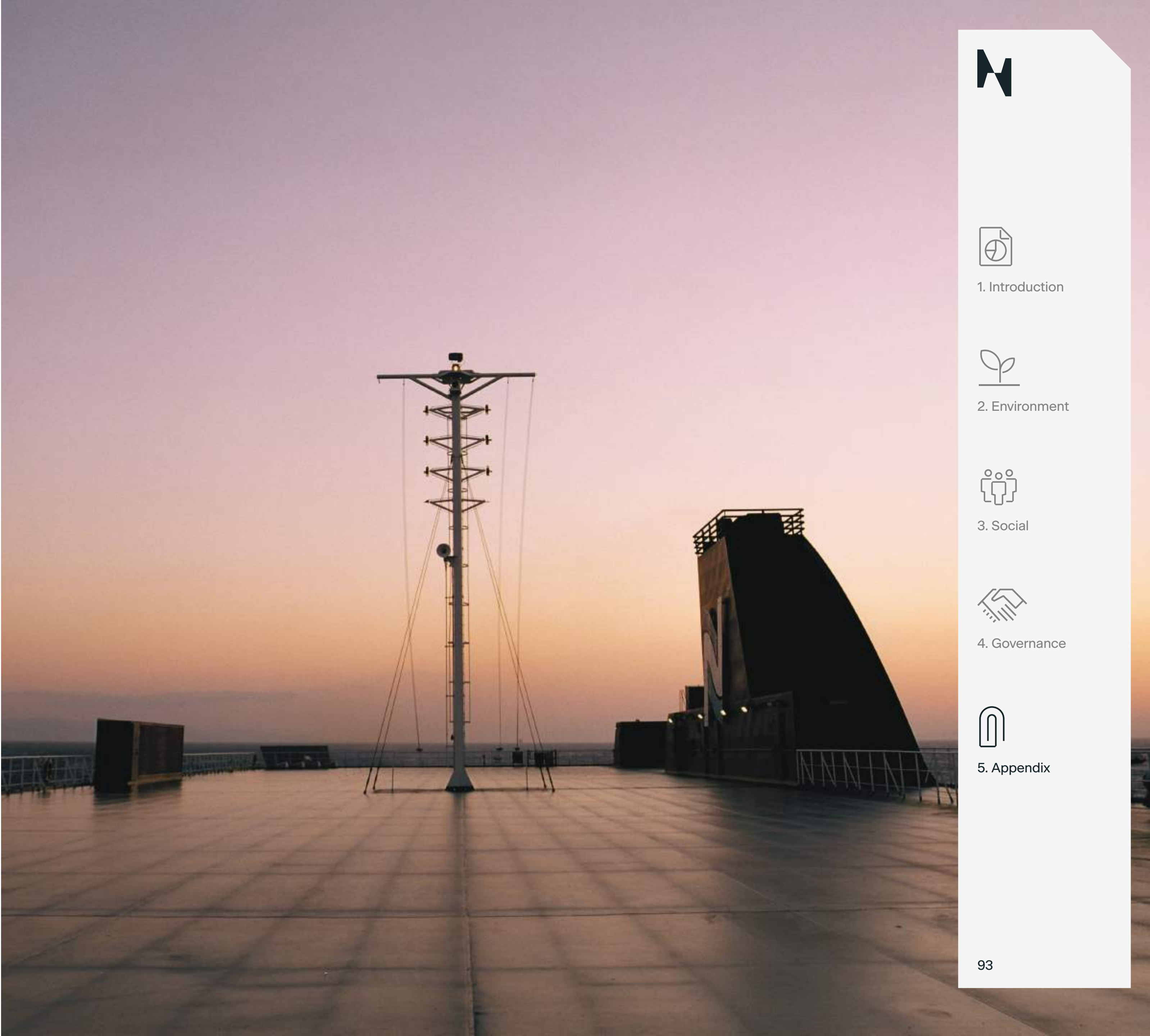
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| Abbreviation | Term                                      |
|--------------|---|
| POD          | Port of Discharge                         |
| POL          | Port of Loading                           |
| PMS          | Performance Monitoring Systems            |
| PROMAS       | Propulsion & Maneuvering System           |
| PSC          | Port State Control                        |
| PSV          | Pre Shrouded Vane                         |
| PV           | Photovoltaic                              |
| PBCF         | Propeller Boss Cap Fins                   |
| RAS          | Remote Access Server                      |
| R&D          | Research and Development                  |
| SAQ          | Self-Assessment Questionnaire             |
| SOLAS        | Safety of Life at Sea                     |
| SEEMP        | Ship Energy Efficiency Management Plan    |
| SSP          | Shore-to-Ship Power                       |
| SSS          | Short Sea Shipping                        |
| SOx          | Sulfur Oxides                             |
| SASB         | Sustainability Accounting Standards Board |
| SDGs         | Sustainable Development Goals             |
| TRI          | Total Recordable Injuries                 |
| UNGC         | United Nations Global Compact             |
| VFD          | Variable Frequency Drive                  |
| VLSFO        | Very Low Sulphur Fuel Oil                 |
| WEPS         | Women's Empowerment Principles            |
| WtW          | Well to Wheel                             |
| XTD          | Cross Track Distance                      |



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5.6 Limited External Assurance



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Certified Auditors-Accountants S.A.  
88 Chimarras str., Maroussi  
151 25 Athens, Greece

Tel: +30 210 2886 000  
Fax:+30 210 2886 905  
ey.com

Independent practitioner’s assurance report

To the management of Neptune Lines Shipping and Managing Enterprises S.A.

Scope

We have been engaged by Neptune Lines Shipping and Managing Enterprises S.A. (hereinafter “Neptune Lines”) to perform a “limited assurance engagement”, as defined by International Standards on Assurance Engagements, hereafter referred to as the “Engagement”, in order to express a conclusion relative to the Engagement Subject Matter listed below and is included in the 2022 - 2023 ESG Report, (hereinafter the “Report”) for the year ended 31 December 2023:

- 1. Adherence of the Report against the requirements set in the GRI 1: Foundation 2021 Universal Standard for 'in-accordance' option of the Global Reporting Initiative (GRI) Standards 2021.
- 2. All the disclosures of the GRI 2: General Disclosures 2021 Universal Standard (indicated in the “External Assurance” column of the GRI Content Index, Appendix 5.1).
- 3. GRI Disclosure 3-1 Process to determine material topics of the GRI 3: Material Topics 2021 Universal Standard, including the new approach of materiality analysis (indicated in the “External Assurance” column of the GRI Content Index, Appendix 5.1).
- 4. GRI Disclosure 3-2 List of material topics, of the GRI 3: Material Topics 2021 Universal Standard (indicated in the “External Assurance” column of the GRI Content Index, Appendix 5.1).
- 5. GRI Disclosure 3-3 Management of material topics, of the GRI 3: Material Topics 2021 Universal Standard, for 7 material topics (indicated in the “External Assurance” column of the GRI Content Index, Appendix 5.1).
- 6. 9 GRI topic specific disclosures and 1 entity specific disclosure, related to the aforementioned 7 material topics, (indicated in the “External Assurance” column of GRI Content Index, Appendix 5.1)

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

Criteria applied by Neptune Lines

In preparing the Subject Matter, Neptune Lines applied the GRI Standards 2021 (Foundation & General Disclosures) and 2016, 2018, 2020 for the Topic Specific disclosures, including the reporting principles listed in the GRI: 1 2021 Foundation Standard for accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness, and verifiability, the criteria set in the GRI 1 2021 Foundation Standard for “in-accordance.

Neptune Line’s responsibilities

Neptune Lines management is responsible for selecting the Criteria, and for presenting the Subject Matter in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

EY’s responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the *International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ('ISAE 3000' (revised)), and the terms of reference for this engagement as agreed with Neptune Lines on 18 November 2024. Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and

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151 25 Athens, Greece

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extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

Our independence and quality management

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

Our firm applies International Standard on Quality Management (ISQM) 1 “*Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements*”, and consequently maintains a comprehensive quality management system, which includes documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management’s internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Subject Matter and related information and applying analytical and other appropriate procedures.

Our procedures included:

1.

Reading information to substantiate data and statements regarding the Neptune Line’s sustainable development performance, under the scope of our assurance engagement, as these are presented in the Report.
2.

Performing interviews with specialists responsible for managing, collating, reviewing and processing sustainability data reported for internal and public reporting purposes, linked to the GRI 2021 General Disclosures Standard (GRI 2), GRI 2021 Material Topics Standard (GRI 3), GRI 2016 Topic Specific Disclosures, under the scope of our assurance engagement (as indicated in the column “External Assurance” of the GRI Content Index found on Appendices 5.1 of the Report).
3.

Reading the Report for the appropriate transposition and presentation of the sustainability data linked to the GRI 2021 General Disclosures Standard (GRI 2), GRI 2021 Material Topics Standard (GRI 3), GRI 2016 Topic Specific Disclosures, under the scope of our assurance engagement (as indicated in the column “External Assurance” of the GRI Content Index found on Appendices 5.1 of the Report), including limitations and assumptions relating to how these data are presented within the Report.



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ERNST & YOUNG (HELLAS)  
Certified Auditors-Accountants S.A.  
8B Chimarras str., Maroussi  
151 25 Athens, Greece

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Fax:+30 210 2886 905  
ey.com

4. Reading information or explanations to substantiate key data, statements and assertions regarding the sustainability disclosures under the scope of our assurance engagement.

We also performed such other procedures as we considered necessary in the circumstances.

Limitation of our Review

- Our review was limited to the English version of the Report for the years 2022 - 2023. In the event on any inconsistency in translation between the English and other (if any) versions, as far as our conclusions are concerned, the English version of the Report prevails.
- Our work did not cover activities performed by third parties or the performance of any third parties, not our involvement in stakeholder engagement activities. In addition, it did not include any review of the accuracy of survey results assigned to third parties, nor Information Technology systems used by third parties, but was instead limited to the proper transposition of the final results -within the scope of our engagement- to the Report.
- Our review did not include financial data and the corresponding narrative text in the Report, nor the Information Technology systems used or upon which the collection and aggregation of data was based by the Company.
- We do not provide any assurance relating to future information such as estimates, expectations or targets, or their achievability.

Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to the Subject Matter as of 17.03.2025 for the year ended 31.12.2023, for the period ended from 01.01.2022 to 31.12.2023 in order for it to be in accordance with the Criteria.

Restricted use

This report is intended solely for the information and use of Neptune Lines in accordance with the terms of reference agreed between us and is not intended to be and should not be used by anyone other than Neptune Lines.

Athens, 17 March 2025

Ioannis Pierros  
Certified Auditor Accountant  
SOEL R.N. 3505

ERNST & YOUNG (HELLAS)  
Certified Auditors Accountants S.A.  
8B Chimarras St., Maroussi  
151 25 Athens, Greece  
Company SOEL R.N. 107

Legal Name: ERNST & YOUNG (HELLAS) Certified Auditors-Accountants S.A.  
Distinctive title: ERNST & YOUNG  
Legal form: Societe Anonyme  
Registered seat: Chimarras 8B, Maroussi, 15125  
General Commercial Registry No: 000710901000  
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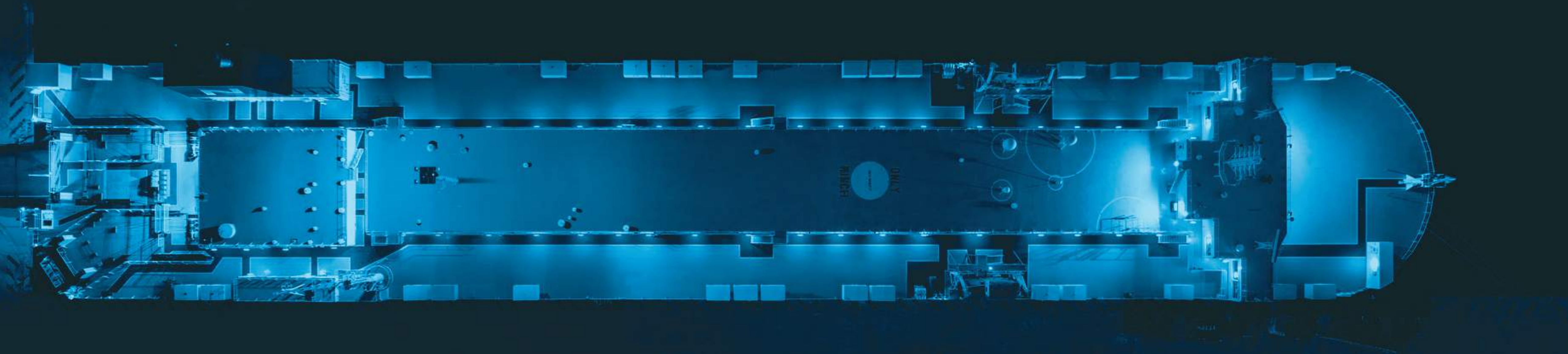


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**Neptune Lines**  
Shipping & Managing Enterprises S.A.  
5-9 Iassonos Street, 185 37 Piraeus, Hellas  
hsqe@neptunelines.com  
+30 210 45 57 700  
neptunelines.com

**Wake forward.**