# ESG and Transparency Act Report 2022

Caiano AS

CAÍANO

# ESG AND TRANSPARENCY REPORT 2022

## Caiano AS

#### 1. Board Statement

Caiano AS (hereafter referred to as «Caiano») has always focused on long-term commitment, hard work, sincerity and trust.

The vision of Caiano is to create lasting values in a respectable, responsible and good manner. Creating values is more than creating financial proceeds. It is about creating and developing businesses and contribute to changes that develop our community and individuals.

A sustainable development is a development that meets the needs of the present without compromising the ability of future generations to meet their own needs. Sustainability has three dimensions:

- Economic
- Social
- Environmental

Caiano is a family-owned business with active ownership. Caiano operates and manages most of the investments internally. Our role as an active owner gives us the opportunity to focus on sustainability and to make sustainable changes. Good corporate governance is important for us. Short-term profit can contradict sustainability and long-term value creation. We have both the will and ability to think long-term. Caiano's influence contributes positively to long-term value creation.

Through our business as active owner and investor, Caiano has since the start in 1965 worked for a sustainable development. In our opinion sustainability and profitability are interconnected. We can not be profitable without also taking care of the people and the environment. We have worked to create long lasting values, create positive footprints and develop businesses that contribute to changes that develop our society and individuals. This is the core of creating a sustainable development for us.

We also focus on maintaining and extending the lifetime of our assets as long as possible. We take care of them. This is also reflected in the maintenance of and the lifetime of our ships in Wilson ASA and Green Shipping AS. We believe that focus on reduced consumption due to good maintenance is one of the most important contributions to a sustainable society. We will continue to create lasting values in a responsible and good manner also for the future. We have the courage to think new thoughts and find commercial opportunities in light of the sustainability challenges the world is facing. We will continue to do what we do well, and at the same time a more visible and increased focus on sustainability will make us even better.

The ESG report for 2021 was our first. We wanted to make it visible and increase the focus on sustainability in our business, not only in the parent company, but also in the subsidiaries.

In the ESG report for 2022 we have also included information regarding the important work made in relation to the Norwegian Transparency Act. The Transparency Act entered into force 1 July 2022. The Transparency Act shall promote enterprises' respect for fundamental human rights and decent working conditions.

#### 2. Sustainability goals

UNs sustainability goals are the plan to achieve a better and more sustainable future for all by addressing challenges related to poverty, inequality and climate change by 2030.

UNs sustainability goals consist of 17 goals and 169 intermediate goals. The goals are to work as a direction for countries, businesses and the society.

We work towards positive influence on these goals, whereby we consider the following to be the most relevant for our business:



We are supportive of the UN Global Compact 10 principles of conducting business in a responsible manner.

#### 3. ESG reporting for subsidiaries

The Caiano Group consists of different companies with different level of influence on the relevant goals. Caiano complies with its duties in relation to the Transparency Act through reporting in its different subgroups/-companies. Through board representation Caiano actively participates in the company's work related to environment-, social- and governance (ESG). Caiano AS as the parent has sent its representative to different companies of the group, in order to present information on the Transparency Act, create a dialogue and contribute to due dilligence being performed and giving the necessary focus on the work related to transparency. Through their work and mapping the respective companies have considered which goals are most relevant for their company. More information on ESG reports, also in relation to the part related to transparency, can be found at the websites of our subgroups/-companies.

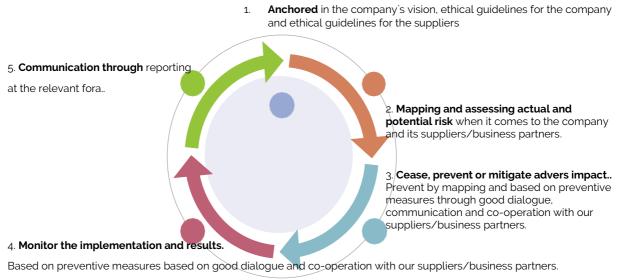
#### 4. Work related to due dilligence and the Transparency Act

At the Caiano Group there has been a focus on promoting the purpose of the Transparency Act and awareness related to this throughout the Group. This is connected to the values of Caiano related to creating values in a proper, responsible and good manner – a vision that also involves focusing on promoting respect for human rights and decent working conditions.

Work related to due dilligence is embedded in the company's vision and board. Caiano and its daughters also have a vision of zero accidents, and focus on preventing incidents with potential negative effect on working conditions and human rights. See also below under point 5 Corporate governance.

Caiano performs due dilligence / reporting through its subgroups/subsidiaries. The due dilligence is made with the Transparency Act § 4 and OECS's guidelines as a starting point, including embedding this at board level and guidelines, identification/mapping and assessment of potential and possible adverse impact for working conditions and human rights in our own company, and in relation to suppliers/business partners, and look at measures in this relation. This does not mean that the work is done once and for all. This is a continous process. The focus is on continous improvement.

Caiano's long-term focus also applies in relation to our choices of suppliers/business partners. In our opinion, this will make it easier to know if the supplier is operating in a responsible manner and to be able to influence for change.



Track implementation and results, use the experience and seek to improve in the future.

6. **Provide for or co-operate in remediation where this is required in situations** where the company is responsible or use influence for follow up of the responsible party.

At Caiano there has and will continue to be a focus on this topic, for example through giving information and building the culture. Through the information given, the employees become familiar with the company guidelines and also information is being given in order to increase the awareness of these topics throughout the group. In 2022 there has been a special focus on information regarding the Transparency Act, due dilligence, ethical guidelines of the company, ethical guidelines for suppliers, new routines related to inquiries regarding the Transparency Act, This in addition to again giving information related to the guidelines on protection of personal data and whistleblowing procedure. This is important in order to achieve good working conditions and ethical behaviour.

We have established written ethical guidelines in Caiano. When it comes to ethical guidelines for suppliers, our work with the Transparency Act made us aware that we did not have such written ethical guidelines for suppliers. Such written ethical guidelines were therefore established and are now available on our webpage. This is expected to make our expectations in relation to respect for human rights and decent working conditions even more visible and will be an important tool for the future in order to be able to have the possibility to influence suppliers. We have also developed a form for Q&A, that can be used for suppliers self assessment or possibly for our or third party audit of suppliers or when chosing a supplier.

Also, stakeholders have been identified in relation to the DD being performed in the group, like customers, suppliers, business partners, co-workers, representatives of the employees/unions, local community, public authorities, banks, competitors and owners. We communicate through our reporting and in relevant forums.

Further information on the company structure and area of business can be found on the company's webpage caiano.no.

Further information on work related to the Transparency Act in our subgroups/-subsidiaries can be found in the ESG reports on these companies webpages. Links to these webpages can be found at caiano.no.

From 1. juli 2022 any person has the right to information regarding how the company addresses actual and potential adverse impacts pursuant to Section 4,

Request for such information can be sent to post@caiano.no.

#### 5. Corporate governance

Caiano AS has written ethical guidelines, describing expectations and requirements regarding anti-corruption, privacy protection (GDPR), anti-money laundering and diversity. Caiano has procedures for whistleblowing and IT security. In 2022 written ethical guidelines for suppliers were established as a result of the work performed in relation to the Transparency Act.

**Eivind Eidesvil** 

General Manager/Board Member

Haugesund, 23 June 2023

Kristian Eidesvik Chair of the Board

Fidescile

Bernt Eidesvik Board Member

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caiano.no





# **Board Statement**

Green Group has been operating more than 20 years within the reefer segment. ESG has always been an important part of our business, as we focus on sustainable long-term value creation.

This is our second ESG report, as our first report on ESG was made in 2021. It gives information on our environmental, social and governance (ESG) performance in 2022. We believe that our focus on ESG is crucial in order to enable us to offer attractive and competitive reefer vessel transportation services for our clients.

The maritime industry has a collective responsibility to reduce harmful emissions. The company therefore works on continous im-

provement within all ESG related topics, with increased focus on environment. The board has ESG continously on its agenda and believes an important part of this is a commitment to being a good employer and to extend the lifetime of the vessels through planned and high quality maintenance.

# ntroduction. Second year of reporting on ESG

LIFE Below water

The reporting is part of Green's strategy to increase the focus on sustainability of its business. The company, through its reporting, will seek to present relevant information to its stakeholders, enabling to a certain extent an analysis of the company's current situation and development.

In the process of developing the company's first ESG report there has at the same time been made an analysis of The UN Sustainable Development Goals (SDGs) in order to identify which of the 17 goals are most relevant for the company. Green has concluded that presently the following UN Sustainable Development goals are most relevant:





In the following more detailed information is provided on the current status and what Green does in order to improve on ESG related matters and how Green supports the UN Sustainable Development Goals.

# The starting point of company - about the company



G reen Group (hereafter "Green") is fully owned by Caiano Group and consists of Green Shipping AS (and its fully owned subsidiaries Caiano Shipping AS, Green Management AS, Green Management Sp z.o.o and ooo Green Management) and Green Shipowning AS.

Caiano Group has always focused on long-term commitment, hard work, sincerity, and trust. This is reflected in the Group's investments, which are made with frankness and longterm perspective with focus on responsibility and dedication. Therefore, Caiano operates and manages most of the investments internally. Caiano is a family owned business with active involvement in day to day business.

Green's vision is always to be the preferred reefer operator within its segment. Green is dedicated, responsible and trustworthy. Part of this is ESG commitment throughout the chain to customers, suppliers, business partners, employees, owners and the global community. ESG is at the core of everything that we do in order to always be safe, long-term, low carbon and add high value.

The top management has ESG continously on its agenda and believes that maintenance, in order to extend the life-time of the vessels and other assets, is very important in order to achieve emission reduction.

Green is a shipping company. Shipping - which transports about 90% of global trade - is statistically, the least environmentally damaging mode of transport, 11% of CO2 emission of the Global Transport or about 3% of global GHG Emissions, when its productive value is taken into consideration. For example, the vast quantity of grain required to make the world's daily bread could

not be transported any other way than by ship.

Moreover, set against land-based industry, shipping is, overall, a comparatively minor contributor to global pollution from human activities.

Green delivers tonnage in the form of specialised reefer vessels worldwide. The services of Green benefits society in the form of transportation of fruit, vegetables and fish (mainly to Africa), purchase of goods and services, employment and corporation tax. Sea transportation is per today the most sustainable way of transporting the food for the company's clients.

Our customers at present have limited alternatives for transportation of their cargo, and the company experiences that the number of customers that want to chose environmental friendly solutions are increasing. For example



bananas need transportation, as they are only cultivated in certain countries.

Also the transshipment of fish by Green is necessary and sustainable as it is transported directly and in compliance with all regulations, preventing illegal fishing and

#### IMO vision and strategy

nternational Maritime Organization (IMO) in its vision remains committed to reduce GHG emissions from international shipping, and as a matter of urgency, aims to phase them out as soon as possible in this century.

IMO initial GHG strategy envisages, in particular, a reduction in carbon intensity of the international shipping (to reduce CO2 emissions per transport work, as an average across international shipping, by at least 40% by 2030, compared to 2008); and that annual GHG emissions from international shipping should be reduced by at least 70% by 2050 compared to 2008. The IMO strategy includes a specific referance to «a pathway of CO2 emissions reduction consistent with the Paris Agreement temperature goals». The IMO strategy envisages that a revised strategy will be adopted in 2023. As part of the United

preventing decreasing of fish population.

No other form of transportation is more environmentally friendly than sea transportation. Both EU and the Norwegian government has an overall goal to shift transportation of goods from road to sea. However, Green recognizes that our business also has negative impact on the environment and that all contributions to reduce this impact matters. We continuously work actively on reducing this negative impact on the environment.

Nations familiy, IMO is actively working towards the 2030 Agenda for Sustainable Development and the associated SDGs.

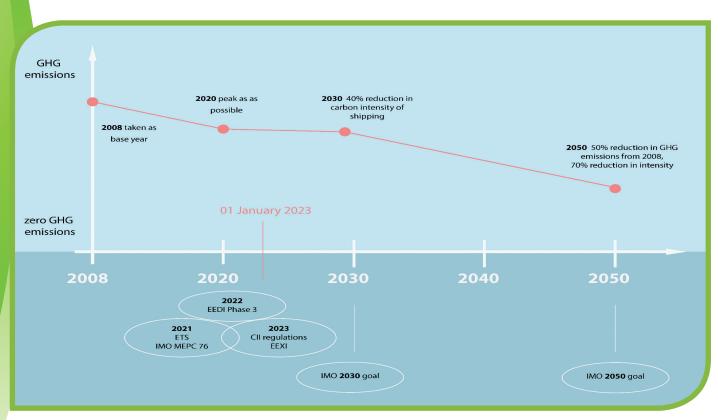
The IMO initial Strategy identifies levels of ambition for the international shipping sector noting that technological innovation and the global introduction of alternative fuels and/or energy sources for international shipping will be integral to achieve updated emission estimates, emissions reduction options for international shipping, and the reports of the Intergovernmental Panel on Climate Change (IPCC).

Levels of ambition directing the Initial Strategy as follows:

1. Carbon intensity of the ship to decline through implementation of further phases of the EEDI for new ships to review with the aim to strengthen the energy efficiency design requirements for ships, with the percentage improvement for each phase to be determined for each ship type, as appropriate;

2. Carbon intensity of international shipping to reduce CO2 emissions per transport work as an average across international shipping, by at least 40% by 2030, pursuing efforts towards 70% by 2050, compared to 2008; and

3. Declining of peak of GHG emissions from international shipping as soon as possible and to reduce the annual global tonnage of GHG emissions by at least 50% by 2050 compared to 2008, whilst pursuing efforts towards phasing them out, as called for in the Vision, as a point on a pathway for CO2 emissions reduction, consistent with the Paris Agreement temperature goals.



# Green focuses on compliance and thus supporting the IMO vision and strategy

The company complies with all applicable acts and regulations.

As described in 3.2, IMO has set ambitionus requirements and goals for reduction of emissions, which Green aim to comply with. Green is in compliance with existing IMO regulations, but is also continously working towards fulfilling all new reqirements and goals for reduction of emissions. Green is of the opinion that new technology needs to be developed and implemented before

2030 in order to reach the goals set and Green will continue to look for not only existing, but also new technologies in this respect.

At the same time Green is also looking at possibilities of implementing already existing measures to reduce emissions. In relation to this, a new position as Emission Reduction Manager was established in December 2021 in the subsidiary dealing with technical management of the vessels. We will refer to it further in this report, but will already now just mention that we are presently for example preparing to comply with the changes in MARPOL Annex VI for Energy Efficiency Existing Ship Index (EEXI) and Carbon Intensity Indicator (CII) and are also installing Ballast Water Treatment Systems on our vessels.



# Materiality analysis

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The company has performed a materiality analysis in order to identify stakeholders, their primary areas of interest and identify areas of relevance. The analysis is performed based on discussions with the corporate management.

Stakeholder group	Primary areas of interest	Arena of dialogue	Company measures
Shareholders	<ul> <li>Good corporate governance</li> <li>Optimum operation</li> <li>Adding value</li> <li>Sustainable value creation</li> <li>Compliance with all applicable laws and regulations</li> <li>Compliance with applicable requirements for reporting</li> <li>IT security</li> </ul>	<ul> <li>AGM Reports</li> <li>Annual report</li> <li>Board Meetings and other meetings</li> </ul>	• ESG reporting
Financial institutions	<ul> <li>Compliance with all applicable laws and regulations</li> <li>Regulatory requirements</li> <li>Adherence to financial obligations</li> <li>Sustainable value creation</li> </ul>	• Meetings between the bank and the company	<ul> <li>Annual reporting</li> <li>ESG reporting</li> <li>Compliance with financial agreements</li> </ul>
Public authorities	<ul> <li>Compliance with all applicable laws and regulations</li> <li>Compliance with reporting requirements</li> <li>Sustainable and responsible operation</li> <li>Good working conditions</li> <li>Adherence to fundamental human rights, also in the chain of suppliers</li> </ul>	<ul> <li>Mandatory or non- mandatory reporting</li> <li>PSC</li> <li>ISM audit</li> <li>Processes related to certification Surveys</li> <li>Reporting and contact with the flag state and the class</li> </ul>	<ul> <li>Compliance with all applicable laws and regulations</li> <li>Compliance with applicable requirements for reporting</li> <li>Continously positioning the company for compliance with all applicable future laws and regulations</li> </ul>
Community, including local community	<ul> <li>Compliance with all applicable laws and regulations</li> <li>Transparency and openness</li> <li>Sustainable responsible operation</li> <li>Add value to the community</li> </ul>	<ul> <li>Mandatory and non- mandatory reporting</li> <li>Webpage</li> </ul>	<ul> <li>Compliance with all applicable laws and regulations</li> <li>Compliance with applicable requirements for reporting</li> <li>ESG/sustainability report</li> <li>Focus on ESG in operations</li> <li>Continously positioning the company for complian- ce with all applicable futu- re laws and regulations</li> </ul>
Suppliers	<ul> <li>Fulfilment of agreement</li> <li>Good co-operation</li> <li>On time</li> <li>Predictability</li> </ul>	• Continous dialogue via phone, e-mail and meetings	<ul> <li>If sensible use the same yards long term and with good relations</li> <li>Aim to position the ships in order to minimize deviation to the shipyard from the original trading pattern</li> <li>Using local suppliers and vendors</li> <li>Follow-up on supplier agreements</li> </ul>

Stakeholder group	Primary areas of interest	Arena of dialogue	Company meansoures
Customers, for example charterers, fishing companies, traders	<ul> <li>Fulfilment of agreement</li> <li>On time delivery</li> <li>Predictability</li> <li>Competitive quality and price</li> <li>Compliance with all applicable laws and regulations, including IMO regulations related to emission</li> <li>Transparent and reliable</li> <li>Sustaibability and responsible management</li> </ul>	• Contract negotiations • Contact between commercial management company and customers during the contract period/ transportation	<ul> <li>Compliance with all applicable laws and regulations</li> <li>Using a long term commercial management company</li> <li>Using a long term and proven technical management company</li> <li>Cooperation with charterer/receiver to minimize vessel's leizure time and thus minimize emission not related to transportation of goods</li> </ul>
Landbased employees	<ul> <li>Safe working environment</li> <li>Possibilities for development</li> <li>Equal opportunities</li> <li>Good working environment</li> <li>Competitive salary and conditions</li> <li>Job satisfaction</li> <li>Good colleagues</li> </ul>	<ul> <li>Morning meetings</li> <li>HR conversations</li> <li>Department meetings</li> <li>Availability</li> </ul>	<ul> <li>Compliance with all applicable laws and regulation</li> <li>Competetive salary and other conditions like medical and sports program</li> </ul>
Seafarers	<ul> <li>Safe working environment</li> <li>Focus on health and safety</li> <li>Possibilities for development</li> <li>Good working environment</li> <li>Competitive salary and contidions</li> <li>Job satisfaction</li> <li>Good colleagues</li> </ul>	<ul> <li>Briefing/debriefing in relation to employment contract</li> <li>Videomeetings with company management</li> <li>Trainings</li> <li>Meetings if material deviations from company standards</li> </ul>	<ul> <li>ITF membership</li> <li>Competitive salary and for many positions also beyond minimum requirements in ITF agreements</li> <li>Green pays money to Welfare Fund (for Russian, Ukrainian and Polish sea- farers) via Norwegian Maritime Unions (Norwegian Union of Marine Engineers, NSOF and NSF) as well as directly to Ukrainian Black Sea Union for Social Benefit Program and Medical Protection Program</li> <li>Safety management system</li> <li>Safety campains</li> <li>Requirements for crew according to STCW</li> <li>Manning in addition to required safety maning in order to meet the requirements related to rest time and safety</li> <li>Focus on human element and room for making mistakes and improvement. It is human to make mistakes, but not to report is unacceptable.</li> <li>Promotions of crew members</li> </ul>



# Climatic foot print, climate risk and air pollution

In 2021 there were 18 vessels in the fleet. In the course of 2022 two vessels have been sold, so by the end of 2022 Company had 16 vessels.

It is the opinion of the company that in today's market, the flexible sailing patterns of the vessels and optimization of these, whereby the company combines the different customers need for transportation in one system for optimal combination, is the most environmentally friendly way of transporting the fruit, vegetables and fish in the market area of the company. For example Green offers direct sailings from port of loading to port of discharge, transshipment, avoiding unnecessary reloading hubs and securing minimum transit time.

Given today's technology and fuel infrastructure there is no realistic alternative to today's fuel in order to eliminate the climatic footprint of the company in the nearby future. All Green ships use fossil fuel, which leads to a climatic footprint and climate risk. However, Green is actively working on reducing the fuel consumption and at the same time looking at alternative options for fuel now and for the future in order to minimize or eliminate the climate foot print related to this.

Consumption of fuel leads to emissions of CO2, NOx, SOx to air. The starting point for the company is to move the cargo efficiently from A to B with low consumption and minimizing ballast percentage. We seek to lower emissions of CO2 as far as possible in order to also run the operations efficiently. Measures like antifouling, cleaning of hull and propellars are used in order to reduce fuel consumption.

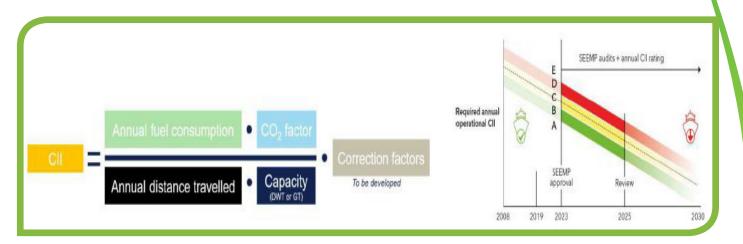
The company is already preparing for the EEXI certification and will

comply with CII requirements set by IMO, which enter into force in 2023. The CII measures show how efficiently a ship transports goods and is given in grams of CO2 emitted per deadweight and nautical mile. The ship is then given an annual rating ranging from A to E, whereby the rating thresholds will become increasingly stringent towards 2030.

There has been 0 numbers of incidents in 2022, so there is neither any volume of spill and emissions to the environment less than 100 liter nor any total volume of spill and emissions to the environment more than 100 liter.

The company is mainly involved in transportation of fruit, vegetables, fish and meat, so cargo emissions damaging the environment is not an issue as only food is being transported.

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#### GreenSea pool

GreenSea N.V. («GreenSea») is a pool of the combined fleet of vessels owned by Green and Seatrade. The combined fleet consists of about 35 vessels with approximate total DWT of more than 228 000.

GreenSea is the commercial manager of the fleet of both Green and Seatrade. This and operating in a pool is positive for several reasons, including these: More contracts

Shorter ballast

Less idle time

regulations,

• Optimalization of sailing patterns

• Increased ability to adapt and optimalize intake of cargo in order to reduce the number of voyages not fully loaded resulting in higher load-factors • Agility to adapt quickly to changes in the market

• Bigger fleet, more efficiency and therefore lower emissions per mile.

In other words: Less tonnage is needed to carry the same amount of cargo across the world, meaning more cargo-tons, but less miles travelled, hence less emissions.

#### Sustainable fishing

There is a worldwide increased focus on sustainable fishing and combatting illegal fishing (IUU fishing). Resulting in more strict rules and regulations for loading fish directly from fishing vessels to reefer ships.

GreenSea will always comply with

#### «Friend of the Sea» certification

GreenSea was the first specialized reefer company to obtain the certification «Friend of the Sea». The international sustainable shipping standard «Friend of the Sea» was launched in 2016. «Friend of the Sea» is an international certification program for products from sustainable fisheries and aquaculture.

Over 500 companies in more that 50 countries have relied on «Friend of the Sea» to assess the sustainability of their seafood origins. Audits, based on the best and most updated available scientific data, are run by accredited independent certification bodies.

«Friend of the Sea» certification

strict EU regulations with regards to fishing, hygiene and sanitary issues. To ensure sustainable fishing, GreenSea complies fully with Regional Fishery Management Orga-

mental regulations, and work

according to the most recent and

including environ-

nizations (RFMO) policy. Moreover, the ships in the pool are flagged with countries which are contracting or cooperating parties to RFMOs, ensuring strict agreements on sustainable fishing are made and kept.

#### regulations. The control by RFMOs and coastal states is important. The «Friend of the Sea» certification is an acknowledgement of the commitment to ensure longterm use of sustainable fisheries and efforts made by GreenSea to eliminate IUU fishing. Although we do transshipment and are not fishing ourselves, we take the reporting when it comes to transshipment

very seriously. The certification shows that transshipment of fishing can be done in a responsible and controlled way.

To find more information and watch GreenSea video on sustainability certification please visit the webpage:

www.greensea.be/sustainability



includes strict requirements, related to pollution prevention, water and waste control, sustainable seafood requirements and social accountability.

Of course GreenSea complies with all applicable rules and

#### 360 Quality Label

GreenSea is part of the 360 Quality association. The 360 Quality association is a quality label for the worldwide specialized reefer sector assessing ships, companies, terminals, and other service providers according to the 360Q Code.

The association's goal is to ship products from port to port, without the quality of the product being compromised. To do this, it uses big refrigerated ships, also called

#### 360 Quality Supply Chain

Quality in the supply chain is holistic and covers the complete process. 360 Quality has a specific approach to quality: fast, dedicated and direct.

Fast: keeping short transit and terminal times in order to get perishables in the stores faster.

reefer ships. The ships of GreenSea pool - our ships.

360 Quality is a quality label/certification. Every ship and every terminal with a 360 Quality Label is checked according to 360 Quality's checklists. We are convinced that these checkpoints are of utmost importance to maintain qualitative vessels and terminals.

Through the 360 Quality Association, we are proud member of the United Nations «Save Food»

Dedicated: building and sharing know-how about the perishables, the ships, the ports, the legislation and much more.

Direct: keeping direct contact with the cargo and checking product quality regularly to assure quality.

As GreenSea is associated with

initiative.

The 360Q Code formalises the cooperation between shipping lines and their service providers. It creates a standard that is fully endorsed by all the participating companies, i.e. the shipping lines and their service providers, such as stevedores and terminals.

The handling of the Code brings transparency and accountability into all elements covered by the scope.

360 Quality, we are committed to meeting the 360 Quality standards. In this way, GreenSea is fast by transmitting the cargo by use of own cranes. We are dedicated by showing transparency and our human touch. Direct by maintaining clear-cut contact with our clients while delivering our personal service.

#### **Emissions of CO2**

The company's starting point is low consumption and as little as possible time at port. The company seeks to reduce emissions of CO2 to a minimum of what can be achieved when also running an efficient operation always in compliance with all regulations.

#### Reduction of SOx and NOx emissons

The company uses fuel compliant with regulations regarding SOX. From the beginning of 2020 new regulations regarding emission of SOx entered into force.

The maximum limit of SOx in the consumed fuels dropped from 3,5% to 0,5% outside the ECA zone and 0,1% of SOx within ECA zone has been maintained. Green complies

with new requirements and only consumes VLSFO (Very Low Sulfur Fuel Oil were SOx<0,5%) outside ECA zone and <0,1% SOx MGO when sailing inside ECA zones. Change over procedure, just to be sure that proper fuel is in use upon entering the ECA zone, is established on board of all our vessels and approved by class. The company has implemented and will in the future implement additional measures that are expected to have a positive effect on the company's climatic footprint and minimize climate risk, whilst at the same time contributing to fulfil other interests of the company's stakeholders.

#### Weather routing systems

In order to achieve an optimized travel route on every journey all owned ships and operators are equipped with Swedish Meterological Institute weather routing system. Quality weather report services contribute to increased safety for crew, ship and cargo. Each vessel, who encounters bad weather in the planned voyage, can ask provider to advice the best route, bearing in mind not only safety of the vessel, but also duration at sea and thus emission value. At the same time it contributes to optimizing every single journey and as a result reducing the total fuel consumption.

This results in a lower climatic foot print. The report is also being used in order to check if the company has used the budgeted fuel for the journey and this information is shared with the customer. This enables good fuel planning of journeys, which contributes to lower emissions.

When the ports will be available for

landbased electricity, the company will easily be able to use this, as this only requires minor changes onboard the vessel.



### Life expectancy of vessels

The company has a long-term dedication. The company has a principle of maintaining and extending the lifetime of the vessels and assets as long as possible. Proper maintainance is crucial to secure efficient and good management throughout each vessels lifetime and gives important environmental gain. When the lifetime of a ship comes to an end, the company will recycle the ships in accordance with all applicable laws and regulations.

#### Fleet renewal or purchase of existing vessels

The company on a regular basis considers the possibilities of purchase of existing or new ships. In this relation one of the elements that the company is taking into account is how this will influence the company's environmental profile.

#### **BWTS**



The Ballast Water Management Convention (BWM Convention) is a treaty adopted by IMO in order to help prevent the spread of potentially harmful aquatic organisms and pathogens in ships` ballast water.

According to this, ships must manage their ballast water, so that aquatic organisms and pathogens are removed or rendered harmless before the ballast water is released into a new location.

As a main rule the company avoids

ballasting within the 12 nm zone, but exemptions are made when it can not be avoided.

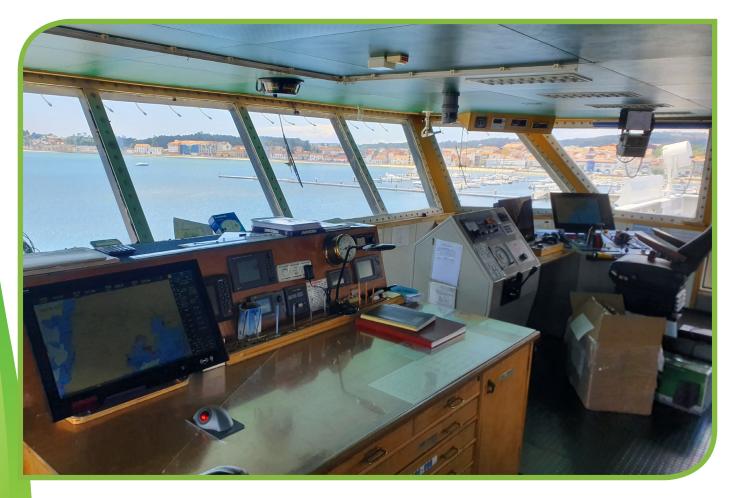
The ships have BWMP (Ballast Water Management Plan) in place and complies with all regulations and is also prepared to install BWTS (Ballast Water Treatment System) before due date for each vessel in the Fleet.

The company has entered into a frame contract for the fleet with Norwegian Greentech for instalment of BWTS on all ships owned or managed by Gre<mark>en,</mark> within May 2024.

This contract ensures that the company will be compliant for all vessels owned or managed by it with the coming requirements for BWTS in 2024. BWTS was installed and class approved for 1 vessel in 2021 (*Green Freezer*) and 13 vessels in 2022 (plus 1 vessel being in third party management).

## Digital auditing and surveys

With constantly increasing digital aids the company has, both alone, and in co-operation with the class and the flag, in an increasing extent performed digital auditing and surveys. The period of COVID-19 has increased the use of this type of work. Physical attendance is also necessary in the future, but for certain work it will now and for the future be possible to perform the work through digital solutions. Using digital tools to solve tasks that used to require physical attendance, when possible, saves both the environment and time and money for the company.



# Social conditions

Table presents data for the company's current situation and development the last 3 years in relation to accidents and safety.

Торіс	Measurement parametres	Data for 2020	Data for 2021	Data for 2022	Ref
Company starting point	Number of seafarers	275	260	266	
point	Retention Rate Officer	89,5%	<b>89,8</b> %	Top four 89,2%	
	Retention Rate Crew	<b>89,</b> 3%	86,8%	Total retention 83,9%	
Accidents, safety and employee rights	Lost time Injury Frequency (LTIF) Approximate LTIFR	4,1511	2,7645	1,3956	SDG 8
	Number of marine casualties classified as serious Definition of Marine casualties as per the IMO definition	8	10	7	SDG 8
	Number of Marine casualties classified as very serious Definition of Marine casualties as per IMO definition	1	0	0	SDG 8
	Number of Port State Control Detentions	2	1	0	SDG 8 & 14
	Number of deficiencies per Port State Control Company aim:<1,25	0,92	1,36	0,88	SDG 8 & 14

A serious injury means an injury which is sustained by a person, resulting in incapacitation where the person is unable to function normally for more than 72 hours, commencing within seven days from the date when the injury was suffered.

A very serious marine casualty means a marine casualty involving the total loss of the ship or a death or severe damage to the environment

#### Safety and health

With about 266 seafarers and about 30 administrative employees, it is important that the company seeks to be a safe and good working place for the employees. Focus on safety is key. Green Group has a strong focus on safety and health for all employees. The company has a vision of no injuries or deaths. Employees have a working place which involves high risk. The company therefore considers it to be important to focus on safety in all aspects of our operations. Systematic safety work over time is important. In 2022 the company had an LTIF of 1.3956 (when industry average is 5,56) and 0 incidents defined as very serious.

The company has worked actively in order to safeguard the employees during the COVID-19 pandemic. Amongst other things

the company has spent resourses aiming to change crew in a safe and predictable manner.

The most important measures in order to achieve and maintain a safe working environment for the seafarers is considered to be adhering to all applicable laws and regulations, qualified crew, safety management systems, safety campains, training and sufficient manning of the vessels.

Focus on these measures is high, and after each case, corrective measures are implemented to prevent reoccurance. In 2022 the company had 7 marine casualties, where neither of them have been defined as very serious. There were 6205 operational days and more than 360 port calls. Green works continously and systematic to ensure that the company at all times complies with all applicable laws and regulations. Through Port State Control the company gets a third party assessment on how well the company complies with these on board the ships. The answer is

be a member of a union and part

seafarers are ensured good labour

rights through the Maritime Labour Convention (MLC) and International

company is of the opinion that as a main rule the seafarers have

better conditions than what the ITF

The Owners are obliged to pay for

funeral, sickness, treatments etc.

according to applicable ITF Model

The company fleet consists of vessels

fully owned by the Green Group plus

one in third party management.

Transport Federation (ITF).

agreement requires.

Agreements.

The

The

collective negotiations.

found in Port State Control (PSC) Deficiency and Port State Control Detention. For 2021 the result was 1.36 Deficiencies per PSC and 1 Detentions. For 2022 the result was 0.88 Deficiencies per PSC and 0 detentions.

### Labour and human rights

of

Green aims to ensure labour and human rights for all its employees, landbased and seafarers.

The seafarers are key when it comes to delivering good quality of the sea transportation services that the company offers. Amongst the seafarers the company has a retention rate of 89.2% for top four officers and 83.9 % for crew in total (data from 2022). Figures Which is an indication that the seafarers has a good working place with competetive conditions. Taking into account Covid and geopolitical situation which makes travelling very difficult, figures are on a very good level.

All employees have the right to

#### Working environment

A good working environment is important to attract and keep competent employees. The human capital is considered to be essential for good management of the company. A good working environment is considered to be important to fulfil the interests of the company stakeholders.

Due to COVID-19 the company has spent more resourses aiming to change crew in a safe and predictable manner. This is considered to be important to ensure the seafarers predictability and well-being in the everyday work life.

Briefing and debriefing of crew in relation to crew change is important. At debriefing it is possible to recommend promotion of colleagues standing out in their performance. The company thereby ensures increased competence that strenghtens the individual wellbeing and also secures valuable competence for the company.

Training of seafarers is performed on a regular basis. The training we pay for is being performed by Green, for example training in safety management. The company pays reimbursment for the costs connected with mustering and visas for the seafarers as per CBA. The company also covers half of the licence for the course for 2nd Engineer and Chief Officer to attain Chief Engineer/Masters licence if they are promoted to Master or CE on board. Additionally, company strongly encourage seafarers to further develop English skills, by reimbursing 50% of the costs of their language courses.

Every year a survey is performed among the captains in order to map if they are happy with and find the training sufficient. The Company also arranges «Master Council» every year to discuss performance and possible improvement/corrective measures to apply.

COVID-19 and war in Ukraine forced the company to be more flexible, especially in the area of crewing. New challenges occurred, due to significant drop of crew who were not able to leave their country because of war or obstacles in receiving visas. Green has four main manning agencies; one in Poland, Gdynia, one in Russia, one in Ukraine an one in Phillipines. Together, for crew recruitment purposes, company is cooperating with 8 agencies.

The vessels are manned with more seafarers than required by minimum safe manning. This is to ensure safety and rest. Also, the company is of the opinion that this contributes to increased quality of the company transportation services.

Through the Green Code of Conduct any form of discrimination or racism is unacceptable. The company also has a routine for notification of censurable conditions.

However company managed to finish 2022 with officers' rotation of 83,9%. It was necessary to rebuild the system of permanent work force and we succeeded. The Owners supported our crew members from Ukraine with additional funds, helping them to survive these tragic times.

Also for the landbased employees it is important to have a good working environment. Well-being and motivated employees is important to create a good working environment.

The company normally has seminars where all employees attend, although due to COVID - 19 this has not been to the same extent in 2020 and 2021 as earlier. In 2022 we did it in a hybrid way as a combination of physical and remote attendance. The company offers competitive salary and conditions.

# A short introduction to the work related to due dilligence and transparency

At Green group there has been a focus on promoting the purpose of the Norwegian transparency act throughout the group. The group has a vision of zero accidents and focus on the safety of our employees, including focus on preventing accidents with potentially negative effect on working conditions and human rights. See also other information provided earlier in this report.

The companies in Green are performing due dilligence, with OECDs guidelines (and the Norwegian Transparency Act) as a starting point, including embedding this at board level and guidelines, identication/ mapping and assessment of potential and possible adverse impact for working conditions and human rights in our group, and in relation to suppliers/business partner, and look at different measures in this relation. This does not mean that the work is done once and for all as soon as we finish it this year. This is a continous procesess moving forward, where the focus is on improving.

Green has a long term focus, also when it comes to many of the suppliers and business partners, which can be an advantage when it comes to making sure the partners are responsible and also in relation to being able to achieve improvement if a need for that is identified.

1. Anchored in the company vision/ values, ethcal guidelines for the company and the ethical guidelines for the suppliers. 2. Mapping and assessing actual and potential risk when it comes to the company and its suppliers/business partners.

3. Cease, prevent or mitigate adverse impact. Prevent by mapping and based on preventive measures through good dialogue, communication and co-operation with our suppliers/ business.

4. Monitor the implementation and results. Based on preventive measures based on good dialogue and cooperation with our suppliers/business partners. Track implementation and results, use the experience and seek to improve in the future.

5. Communication through reporting at the relevant fora.

6. Provide for or co-operate in remediation where this is required in situations where the company is responsible or use influence for follow up of the responsible party.

In the group there has been and will continue to be a focus on this topic, for example through giving information. Through the information given the employees becomes familiar with the company guidelines and also information is being given in order to increase the awareness of these topics throughout our company. In 2022 there has been a special focus on information regarding the transparency Act, due dilligence, ethical guidelines of the company, ethical guidelines for suppliers, new routines related to inquiries regarding the transparency act, in addition to again giving information related to the guidelines on protection of personal data and whistleblowing procedure.

We have established written etical guidelines at group level. When it comes to ethical guidelines for suppliers, our work with the transparency act made us aware that we did not have such written ethical guidelines for suppliers. Such written ethical guidelines were therefore established and are now available on our webpage. This is expected to make our expectations in relation to respect for human rights and decent working contitions even more visible and will be an important tool for the future in order to be able to have the possibility to influence suppliers if change is needed. We have also developed a Q&A form, that has been and can be used for suppliers self assessment (or an audit of the suppliers by us or others) if requested by us.

Also, stakeholders have been identified, like customers, suppliers, business partners, coworkers, representatives of the employees/ unions, local community, public authorities, banks, competitors and owners. We communicate through our reporting and in relevant forums.

Futher information on the company structure and area of business is reflected in the annual report of the companies and also earlier in this report.



# Corporate governance

The company works actively in order to maintain good corporate governance. The company has clear guidelines in order to avoid corruption and money laundering, secure transparency and trust, and in order to ensure internal warning.

#### **Anti-corruption**

Green has zero tolerance for corruption and bribe. Green Code of Conduct states that no form of corruption is acceptable, including gifts or other contributions which could be considered as, or intended to influence the employee's business decisions.

# Cyber threat

The company uses resources on securing the computer systems from outside attacks. High standard on the company IT-security and IT-systems is essential in order to avoid fraud, loss of personal data and minimize downtime on critical computer systems.

## Anti money laundering

The company uses «Know your customer» (KYC) principles in order to secure knowledge of company customers. This is important to prevent and reveal money laundering and give information to customers or suppliers requiring this. Most of our clients, suppliers and business relations are long-term relations.

### Transparency and trustworthy

One of the company core values is to always be trustworthy. The company is of the opinion that trust is a more important value than short-term profit. Open, transparent and honest communication to stakeholders will give a better foundation for good decisions and good cooperation over time.

The company has clear guidelines for notification of censurable conditions. In this guidelines it is clearly explained what censurable conditions are, how notification can be done, when and to whom, content, form, rights regarding anonymous notification etc.

# Gender equality and discrimination

G reen is a firm believer in and works for gender equality and against discrimination. All humans connected to the company shall have equal worth, same opportunities and same rights. Through Green «Code of Conduct» it is stated that any form of discrimination is unacceptable.

The company continuosly work through its employee and recruiting policies to promote gender equality and work against discrimination.

