

# 5 Governance



## CORPORATE GOVERNANCE STRUCTURE

The demanding and constantly evolving regulatory environment in which we operate, demands an effective corporate governance structure, which will quickly respond to the challenges and adapt to the economic and social conditions, by recognizing the risks and opportunities.

We have established an Executive Committee, responsible for the management of the company, which reports to the Board of Directors and to our Chairman. The table below presents the members of our executive committee:

### Executive officers

### Role

Melisanidis George	Chairman
Hondos Nikolaos	CEO
Kechris Christos	CFO
Koraki-Fragkia Olga	Head of Legal Department
Stamoudis Dimitrios	Compliance Manager DPA
Panousi Georgia	HQSE Manager Deputy DPA/CSO
Aidonidis Lazaros	Operations Manager
Stavropoulos Konstantinos	Technical Manager
Mendrinou Stamatis	Marine Manager
Panagopoulou Eirini	Purchasing & Supply Manager
Dimakakos Ioannis	Chief Accountant

Our Executive committee is responsible for the effective management of risks. As part of establishing a strong corporate governance framework, we identify, evaluate, monitor, and apply measures to mitigate the strategic, compliance, financial and operating risks, that may affect our vision and business objectives.

### SANCTIONS

We take actions in order to eliminate the risk of sanctions. During 2020, we developed our Sanctions Corporate Compliance policy that includes the restrictions applied by countries or international organizations in connection with certain countries, territories, entities or individuals. The policy will be in effect at February 2021. All employees shall be committed to the rules established in our Sanctions Compliance Policy.



# Strong ethical values

## ZERO-TOLERANCE TOWARDS BRIBERY AND CORRUPTION, FRAUD AND DECEPTION

We are committed to promote an honest and trustworthy working environment, both on-board our vessel and ashore, protecting our corporate properties and information assets. Senior Management and all employees are required at all times to implement strictly and without deviations the Company's Business Conduct and Ethics Policy and report any actual or suspected violation incidents. We have established monitoring mechanisms to ensure that our employees act honestly, ethically, and fairly towards our customers, suppliers, competitors and colleagues. During 2020, we recorded zero violations from our people on shore and at sea.

Our strong corporate governance structure and practices ensure the mitigation of any ethical and corruption risks that might result from our activities. In 2020, we had no legal and regulatory fines and settlements associated with bribery or corruption and 9% of our vessel's port calls were in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index (CPI). The number of port calls in countries with lowest ranking during 2020, was increased by 3% compared to 2019, due to the addition of new vessels to our fleet.

**0 violations**

of our Conduct & Ethics Policy



**9% port calls**

in countries with the 20 lowest rankings in CPI



## Our Whistleblowing Policy

Our staff is required to comply with all applicable laws and regulations, as well as our internal policies and procedures. We have established a whistleblowing mechanism, that allows our employees to report anonymously any violation, concealment, crime committed or likely to be committed, non-compliance incidents, actions damaging the environment, illegitimacy practices, malpractice or unethical conduct incidents, misrepresentation of material facts, breaches of legal obligation or regulatory requirements, and finally, miscarriages of justice.

## PREVENTING HARASSMENT AND BULLYING

Our Harassment and bullying policy applies to all employees, as well as our sub-contractors and is related to incidents that might occur both at work (on-board and ashore) and outside the workplace (including work trips, work-related events or social functions). Any incident of harassment, discrimination, hostile or vindictive behavior that violates the dignity of a person and creates an intimidating, hostile, degrading, humiliating or offensive environment, shall be immediately reported.

**0 whistleblowing**

incidents

**0 cases**

of harassment or bullying



# Business Continuity Management System

**W**e were the first shipping company in Greece and the second worldwide to be awarded with the ISO 22301:2012 standard for Business Continuity. Following standard's requirements and best practices we have implemented a Business Continuity Management System (BCMS) which aims to address significant disruptions that might affect our day-to-day activities, protect the safety of our staff and our reputation, and ensure the reliable delivery of our services.

**We have formulated a business continuity plan for all our activities with high risk rating results, to address the following threats:**

Loss, damage, or inaccessibility of business premises;

Loss or unavailability of critical information systems;

Loss or unavailability of key skills and or knowledge.

Our business continuity plan is implemented with the express intention of maintaining the continuation of our services to customers, while complying with relevant laws and regulations. Therefore, all business continuity arrangements ensure that all vessels, customers, regulatory bodies, agents, suppliers and other interested parties will continue to have access, through normal channels (telephone, fax and e-mail), to their key contacts within our organization. The arrangements also ensure that the Company's personnel will continue to perform all necessary activities and deliver services to our customers, regardless of any significant business disruptions.

Our Business Continuity Management System (BCMS) was successfully applied during COVID-19 outbreak without any disruption on our operations and services offered to our customers.

**0.52**

**RTO (Recovery Time Objective) achieved during annual tests for 2020**

## Cyber security awareness & actions

We have developed a Cyber Security Plan and vessel-specific Cyber Security Handbooks, that follow and exceed the requirements set by the Resolution MSC.428(98), adopted by the IMO, in order to mitigate the cyber risks associated with our operations, and strengthen the cyber security on-board our vessels.

By 2021, all of our vessels will be certified, following the industry's requirements and cyber security's best practices.

We aim to enhance more the cyber security on-board our vessels the following years.



# Appendix A

## COMPANY'S KEY PERFORMANCE INDICATORS

<b>Environment</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
Average fleet EEOI (gr CO <sub>2</sub> / Tonne – mile)*	20.33	10.09	<b>9.76</b>
Average Efficiency Ratio (AER) (gr CO <sub>2</sub> / dwt– mile)**	4.06	5.09	<b>5.26</b>
Average fleet EEDI (gr CO <sub>2</sub> / Tonne – mile)		3.79	
CO <sub>2</sub> emissions ('000 tonnes)*	94.78	114.32	<b>191.70</b>
Fuel consumption ('000 tonnes)*	30.27	36.53	<b>61.00</b>
SO <sub>x</sub> (Tonnes)	–	701.29	<b>234.17</b>
NO <sub>x</sub> (Tonnes)	–	3,234.50	<b>5,103.54</b>
Total waste (m <sup>3</sup> )	3,112	3,006	<b>3,499</b>
% of fleet implementing BWT	20	100	<b>100</b>
Class recommendations	0	2	<b>0</b>
Spills to the marine environment	0	0	<b>0</b>

\* Average fleet EEOI is calculated for the vessels owned and managed during all years.

\*\* AER, CO<sub>2</sub> emissions and fuel consumption were increased in 2020, due to the increase of the number of vessels in our fleet.

<b>Social</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
Number of seafarers	258	298	<b>378</b>
Crew promotions	13	22	<b>14</b>
Crew retention rate (%)	99.2	99.2	<b>100</b>
Lost Time Injury Frequency ratio (LTIF)	1.23	0.95	<b>0</b>
Marine casualties	0	0	<b>0</b>
On-board drills	406	473	<b>860</b>
Crew training days	444	615	<b>454</b>
On-board drug and alcohol tests	56	110	<b>131</b>
On-shore employees	27	28	<b>27</b>

<b>Governance</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>
Corruption / bribery incidents	0	0	<b>0</b>
Violations of Code of Conduct	0	0	<b>0</b>
Number of port calls in bottom CPI countries	12	14	<b>25</b>
Code of Business Conduct and Ethics		✓	
Whistleblowing Policy		✓	



# Appendix B

## MANAGEMENT AND IMPACT OF MATERIAL ISSUES

The following table presents each material issue and the main stakeholder groups concerned with / affected by the issue.



### ENVIRONMENT

Material issue	Boundaries / Stakeholders affected
<b>Compliance with environmental regulation &amp; standards</b>	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners, Financial institutions, Flag States, International / Industry organisations, Port Authorities, Insurers / P&I Clubs, Classification Societies, Community and society
<b>Water pollution prevention, control &amp; compliance with respective regulations</b>	Seafarers and office employees, Charterers / Brokers, Financial institutions, Flag States, International / Industry organisations, Port Authorities, Insurers / P&I Clubs, Classification Societies, Community and society
<b>Air pollution reduction &amp; compliance with respective regulations</b>	Seafarers and office employees, Charterers / Brokers, Financial institutions, Flag States, International / Industry organisations, Port Authorities, Classification Societies
<b>Fuel and energy efficiency</b>	Seafarers and office employees, Charterers / Brokers, Financial institutions, Flag States, International / Industry organisations, Port Authorities, Classification Societies
<b>Waste management and recycling</b>	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners, Flag States, International / Industry organisations, Port Authorities, Classification Societies, Community and society
<b>Investments Research &amp; Innovation in green technologies and alternative fuels</b>	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners, Financial institutions, International / Industry organisations



### SOCIAL

Material issue	Boundaries / Stakeholders affected
<b>Health and safety during COVID-19 outbreak</b>	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners, Financial institutions, Flag States, International / Industry organisations, Port Authorities, Insurers / P&I Clubs, Classification Societies, Community and society
<b>Occupational health and safety</b>	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners, Financial institutions, Flag States, International / Industry organisations, Port Authorities, Insurers / P&I Clubs, Classification Societies, Community and society
<b>Relationship with business partners</b>	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners



Material issue	Boundaries / Stakeholders affected
Labor practices depicting the relationship between Management and employees	Seafarers and office employees, Charterers / Brokers, International / Industry organisations, Community and society
Employee training / competency development	Seafarers and office employees, Charterers / Brokers, Community and society
Community investments	Seafarers and office employees, Community and society
Remuneration & benefits	Seafarers and office employees, Community and society
Talent attraction and retention	Seafarers and office employees, Community and society
Diversity and inclusion	Seafarers and office employees, Community and society
Career opportunities and advancement	Seafarers and office employees, Charterers /Brokers, Community and society



## GOVERNANCE

Material issue	Boundaries / Stakeholders affected
Corporate governance, ethics and transparency	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners, Financial institutions, International / Industry organisations, Community and society
Regulatory Compliance and application	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners, Financial institutions, Flag States, International / Industry organisations, Port Authorities, Classification Societies
Financial performance	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners, Financial institutions, Insurers / P&I Clubs
Security of transportation both physical and cyber security	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners, Financial institutions, Flag States, International / Industry organisations, Port Authorities, Insurers / P&I Clubs, Classification Societies, Community and society
Risk mitigation and control	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners, Financial institutions, Port Authorities, Insurers / P&I Clubs, Classification Societies
Commercial strategy & Commercial performance	Seafarers and office employees, Charterers / Brokers, Suppliers / Business Partners, Financial institutions

