



PARADISE NAVIGATION S.A.

# ESG REPORT 2022

RELEASED: 18<sup>TH</sup> DECEMBER 2023



# CONTENTS

<b>1</b>	<b>Report Parameters</b>	<b>6</b>
<b>2</b>	<b>President's Message</b>	<b>8</b>
<b>3</b>	<b>PARADISE NAVIGATION Profile</b>	<b>10</b>
<b>4</b>	<b>Stakeholder Engagement</b>	<b>22</b>
<b>5</b>	<b>Materiality Process</b>	<b>26</b>
<b>6</b>	<b>Environment</b>	<b>38</b>
<b>7</b>	<b>Society</b>	<b>68</b>
<b>8</b>	<b>Governance</b>	<b>88</b>
<b>9</b>	<b>Sustainability Standards</b>	<b>116</b>
	GRI Standards Index	
	SASB Standards Index	

# 1 Report Parameters

This is the first Sustainability Report -ESG Disclosure for PARADISE NAVIGATION S.A. The Report was prepared in accordance with the standards of the Global Reporting Initiative (GRI STANDARDS) and key indicators of the Sustainability Accounting Standards Board (SASB) for marine transportation. It emphasizes on our Company's Sustainability Strategy and Non-Financial performance for the period 1/1/2022 to 31/12/2022.

The report communicates our commitment to create and provide sustainable growth and value to all our stakeholders. It presents our efforts on the process to achieve and exceed International Maritime Organization's (IMO) objectives for the marine community's sustainable future and focuses on actions we undertake in order to meet the United Nations Sustainable Development Goals (UN SDGs). It includes information for activities that the Company has defined having

key impacts on Sustainable Development assessing Environmental, Social and Governance criteria.

Sustainability material topics, of significant importance for the success of our efforts in achieving strategic objectives, are presented as these have been identified through Materiality Assessment and prioritized by our ESG and management team.

Margetis Maritime ESG Department assisted our team for the development of this report.

We welcome all comments or suggestions regarding the contents of the Report. You can submit your views by contacting:

**Mr Simos Camhis**  
CFO

**Mrs. Glykeria Radaiou**  
HSQE Officer



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

# 2

## President's Message

At Paradise Navigation S.A. we are proud to present our first Corporate Responsibility (ESG) Report for 2022, which demonstrates that we achieved much more than financial performance records in the recent year.

We are always firm in our commitment to provide world-class ship management services that meet or exceed the safety and environmental requirements as well as our customers' expectations and to conduct operations in a manner that protects people safety, health & wellbeing, respects the environment, and contributes to prosperity.

Everybody within PNSA recognize that the scope of their efforts is summarized in the company's mission to set the standards for safe and environmentally friendly sea transportation of goods with modern, technically advanced ships, crewed and operated by motivated, professional, and well-trained sea-borne and shore personnel.

We have the aspiration to be a ship management company that promotes safety culture utilizing new technologies consistent with

strategic goals, and achieving maximum efficiency through superior management. Our willing to create positive impact on our world drives us forward as we aim to be a leader of choice for global sea transportation of oil cargoes /gas cargoes.

The Company's Core Values of honesty, responsibility, reliability, excellence, ownership and commitment formulate a guiding compass that permeates every aspect of our business culture and be reflected on everyone's actions and day-to-day activities.

In 2022, besides our decarbonization efforts, we prioritized a wide range of ESG targets, being in strategic alignment with the UN Sustainability Development Goals, including, among others, protecting the ecosystem and bio diversity, preventing sea water pollution, managing waste, treating ballast water, embracing workforce diversity, providing knowledge and skills to our people and promoting sustainable procurement.

Adherence to high standards of corporate governance and responsible decision-making



are an integral part of our commitment as we strive not just to succeed, but to drive progress for all our stakeholders.

The Top Management provides evidence of commitment to the development and implementation of the IMS and continual improvement of its effectiveness by establishing Company's Policies, developing a strategic plan, evaluating progress against the plan and communicating to everyone the importance of meeting the customers' as well as the statutory and regulatory requirements.

The company maintains the infrastructure necessary for the achievement of the specified or implied requirements of its customers and other interested parties, determines and manages the work environment, both on-board the

ships and in the Office, to achieve conformity with the requirements of the provided services and makes sure that each ship has qualified, certified, and medically fit seafarers, following national and international requirements.

Management team is committed to ensure that all Company's employees receive relevant information on the IMS in a working language they understand and can communicate effectively during the performance of their duties. They actively demonstrate leadership and management practices that promote quality excellence and policies concept to people on land and at sea.

Paradise Navigation S.A. has an outstanding team that is deeply committed to development and sustainability. In the coming years, I am confident that we will succeed in becoming part of the leading group of sustainable shipping. We strive to innovate, lead and inspire positive change for all our stakeholders.

**President**  
*Konstantinos Tsakiris*



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards



PARADISE NAVIGATION S.A.



PARADISE  
GAS CARRIERS

# PROFILE



# 3

## About Paradise Navigation

Paradise Navigation SA (PNSA) is a Liberian registered ship management company offering technical management services to shipowners. We are established in Greece under law 89 to perform management and ship operation functions for its owning principals. Originally, founded back in 1968, as Navipower Compania Naviera SA, by the Tsakiris family, a traditional Greek ship-owning and operating family. Since 1996 we are based in Athens, Greece. Currently the company is employing 20 employees and managing 10 vessels, 4 Tankers and 6 LPGs, all under Ship Management Agreements (Bimco 2009) with the Owning companies. Paradise Navigation holds also an office in Constanta/Romania, offering Crewing & Technical Services.

The Company enjoys excellent reputation in market for integrity, ethics and quality with a 20 year record of a very successful technical management.

Since 2014, Paradise Navigation SA has been the exclusive Manager of all vessels of **Paradise Gas Carriers Group**.

We employ our vessels to some of the world's leading Oil and Gas Traders, which provide us with stable cash flows and high utilization rates. We operate according to the highest standards of safety and reliability, while promoting a Company-wide environmental and energy efficiency philosophy.

The company uses US GAAP (Generally Accepted Accounting Principles) accounting standards, encompassing the details, complexities, and legalities of business and corporate accounting. It has established ties with US investors.

Paradise Navigation is very experienced in New-Buildings supervision and conversion projects and most of its vessels have been under company's management from the construction stage until today.

### OUR MISSION, VISION and CORE VALUES

We want to offer quality ship-management services selectively to a number of shipowners. We currently manage 10 vessels (oil tankers and LPG carriers), we aim at gradually growing our fleet to 15 or more vessels by maintaining top quality standards.

#### COMPANY'S MISSION

To set the standards for safe and environmentally friendly sea transportation of oil and gas cargoes with modern, technically advanced ships, crewed and operated by motivated, professional and well-trained seaborne and shore personnel.

#### COMPANY'S VISION

Our vision is to be a leader in the ship management industry, by promoting safety culture and utilizing new technologies, consistent with strategic goals and by realizing maximum efficiency through superior management.

We aim to be a leading Ship Management Company for global sea transportation of Oil and Gas cargoes.

#### CORE VALUES

Our core values are:

- Quality
- Transparency
- Ethics
- People's safety and well-being
- Protection of the environment



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

# Paradise Navigation in brief



**50**  
years  
of operation



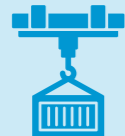
**2**  
locations  
(Athens-Greece,  
Constanta Romania)



**20**  
people  
ashore



**10**  
Vessels



**336K**  
DWT

**12,5**  
Average  
vessel's  
Years

Fleet  
modernization  
every  
**10-12** years



Report  
Parameters



President's  
Message



PARADISE  
NAVIGATION  
Profile



Stakeholder  
Engagement



Materiality  
Process



Environment



Society



Governance



Sustainability  
Standards

# Our Fleet



**PGC MARINA**  
LR1 Tanker  
SIZE: 72,000 MT  
Built in: 2005



**PGC STRIDENT FORCE**  
LPG Tanker  
SIZE: 6400 cbm  
Built in: 1999



**PGC ARATOS**  
LEG – Ethylene Carrier  
SIZE: 9,000 cbm  
Built in: 2003



**PGC ALEXANDRIA**  
LR1 Tanker  
SIZE: 72,900 MT  
Built in: 2006



**PGC IKAROS\***  
LR1 Tanker  
SIZE: 72,900 MT  
Built in: 2004



**PGC COMPANION**  
LR1 Tanker  
SIZE: 72,900 MT  
Built in: 2005



**PGC PATREAS**  
Fully-Pressurized Gas Carrier  
SIZE: 7,500 cbm  
Built in: 2017



**PGC PERIKLIS**  
Fully-Pressurized Gas Carrier  
SIZE: 7,500 cbm  
Built in: 2017



**PGC TAORMINA**  
Semi-Refrigerated Gas Carrier  
SIZE: 7,000 cbm  
Built in: 2017



**PGC EIRINI**  
Semi-Refrigerated Gas Carrier  
SIZE: 7,000 cbm  
Built in: 2018



# Our Journey

1947

**John Tsakiris**, the founder of Tsakiris family shipping interests, joined the exporters of Sudanese produce in London, Karapanagioti & Co Ltd.;

1951

John Tsakiris became a Director of Tsakiroglou & Co (Port Sudan) and Sudan Oil Mills Ltd. in charge of production, exports & chartering ground nut oil & derivatives; Through his family connection with the Frangistas family, he started investing into ship-owning by taking minority interests in the Frangistas vessels;

1962

After amicably separating with Frangistas, John Tsakiris and consolidations their interests in 2 Liberty ships, together with his brother Vakis & nephew George, set-up Shipping & Produce in London; Shipping & Produce culminated with a fleet of 12 vessels, all cash-financed.

1996

Following a policy of successful disposals, John Tsakiris separated business interests from his brother & nephew, passing Management duties to Constantinos Tsakiris. New start based in Athens, renaming of the Company to Paradise Navigation.

1997

First Vessel acquired "Achilleas F" (1980 built, 35000mt Bulker) on behalf of Clients Paradise Tankers.

2000

First Tanker under management, the 1988 built, 61,000mts Coated "Redina".

2002

Order Placed to Chinese Shipyard Hudong for 1 + 1 coated 72000 Panamax Tankers for delivery September 2004. Order was eventually upped to 4 firm vessels, all supervised by PNSA.

2003

John Tsakiris dies of Cancer, at age 79.

- ISO 14000 documentation completed and approved by DNV.
- Paradise Navigation becomes a member of the Heidmar run panama tanker STAR pool.
- M/T Redina's time charter with Stentex has been extended for another 2 years ending spring 2007.
- Delivery of M/T Aspropyrgos (72,000 dwt) from shipyard trading into the STAR pool.
- Delivery of M/T Ikaros (72,000 dwt) from shipyard trading into the STAR pool.

2007

M/T Polar taken under Paradise Navigation S.A management. Acquired the remaining 50% in MT Ikaros.

2008

PTC concluded strategic deal with Stena Bulk, who acquired 35% of the Holding company Paradise Tankers Corp.

2013

JV with Vasilopoulos Family started through **Paradise Gas Carriers (PGC)**. Acquisition of M/T Polar, a sister vessel of S. Callas, S. Chronos and S. Chiron. Delivery was effected on July 18, 2013 when the vessel was renamed M/T PGC Marina. Paradise Group enters to LPG sector and PNSA becomes a Member of the Gaschem-Gasmare Pool. Delivery of the Group's first LPG, ex. "Syn Alcor", renamed to M/V PGC Aratos effected on October 24th 2013.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

2014

**Paradise Gas Carriers** agreed the acquisition of two more LPG carriers.

The Newmarket 1, a 6,500 cbm Semi-Refrigerated Gas Carrier built 1999, re-named PGC Strident Force and the Aintree, a 6,500 Fully Pressurised Gas Carrier built 1997, renamed PGC Darko King. MoA signed on 13th January 2014 for both acquisitions and delivery effected on 12th and 17th of March 2014 accordingly.

Paradise also became a member on Penfield’s Pool, formed by Heidmar former top executives.

On 4th of November 2014, PGC placed an order for 2 units of 7,500 cbm Fully-Pressurized LPG carriers at Kyokuyo Shipyard in Japan.

At the end of the year (18th December 2014) PGC acquired 2 sister LR1 tankers, both built in 2004 at Hudong Zhonghua Shipyard in China, renamed PGC Ikaros and Aspropyrgos.

2015

PGC Ikaros was sold during May, to Norwegian buyers. The sale was accompanied by a 4-year Bareboat back to to PGC.

The company completed the planned, USD 6 million, capital increase, to be used for further investments.

On July the 30th, PGC placed an order for two 7,000 cbm, Semi-Refrigerated LPG vessels, at Kyokuyo shipyard in Japan.

2016

Took over the supervision of 4 New-building LPG vessels in Kyokuyo Japan, monitoring the successful construction and delivery. Project valued at \$104 million.

2017

PGC Patreas and PGC Periklis were taken under our management in May and July respectively while PGC Taormina in October 2017.

2018

PGC Eirini was taken under our management from March 2018. All four newbuilding LPG vessels have been under our management until today.

## MEMBERSHIPS CERTIFICATIONS & AWARDS

Quality oriented operation with many certifications including ISM, ISO, ISPS, and now implementing TMSA 3. Have approvals from all major oil companies, with very high success rate on Vetting inspections.

Members of:



## STRATEGIC PARTNERSHIPS



PNSA became a member Heidmar’s Star Pool (50% owned by Morgan Stanley) in 2004, one of the most competent and transparent pools in the tanker market. Since then, all our panamax vessels have been trading in this pool very successfully, scoring almost maximum pool points outperforming a vast majority of the pool members (approx. 30 vessels).



Formed a strategic partnership with Harry Sargeant III, a well known US shipowner, with whom we jointly built and owned 3 vessels, Ikaros, Daedalos and Polar.



In 2008, PTC’s shareholders sold 35% of their shares to STENA, hence our vessels were delivered to Stena Sonangol Panamax Pool, where they have been trading until 2012. Stena is one of the world’s leading players in shipping, very active in a number of sectors.



The company formed a strategic relationship with the Vasilopoulos family (well-known in the Pharmaceuticals industry) to coinvest in the gas sector, focusing mainly on LPG carriers. The two parties have formed the joint venture, **PARADISE GAS CARRIERS CORP (PGC)**.



Report Parameters



President’s Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards



**STAKEHOLDERS**  
ENGAGEMENT

# 4

# Stakeholders Engagement

Stakeholders groups	Engagement framework	Stakeholders expectations	Engagement channels and frequency
<b>Suppliers</b>	<ul style="list-style-type: none"> <li>Procurement Policies and Procedures</li> <li>Cooperation agreements</li> <li>Sustainable resources</li> <li>Economic value</li> </ul>	<ul style="list-style-type: none"> <li>Clear terms &amp; conditions</li> <li>Transparency</li> <li>Well-defined information</li> </ul>	<ul style="list-style-type: none"> <li>Meetings</li> <li>Calls and online</li> <li>Emails</li> </ul> <p><b>e.g. Regularly</b></p>
<b>Employees</b>	<ul style="list-style-type: none"> <li>Employment policies and corporate working environment</li> <li>Training</li> <li>Skills improvement</li> <li>Environmental and social awareness</li> </ul>	Meaningful work, fair treatment and wages, a sense of belonging, development opportunities, training schemes, safe working conditions, non-discrimination policies and equal opportunities	<ul style="list-style-type: none"> <li>Meetings</li> <li>Calls and online</li> <li>Emails</li> </ul> <p><b>Daily</b></p>
<b>Clients/ customers</b>	<ul style="list-style-type: none"> <li>Customer service</li> <li>Responsible information</li> <li>Company's services</li> <li>Projects progress</li> <li>Industry's news</li> <li>Innovations</li> <li>Environmental and social impact</li> <li>New regulations</li> <li>Training</li> </ul>	<ul style="list-style-type: none"> <li>Well-defined terms &amp; conditions</li> <li>Transparency</li> <li>Reliable information</li> <li>On-time delivery</li> <li>Confidentiality</li> <li>Quality service (customer journey - reports)</li> <li>Highly-trained personnel (professionalism)</li> </ul>	<ul style="list-style-type: none"> <li>Meetings (annual - pool / semester)</li> <li>Calls and online</li> <li>Emails</li> <li>Reports</li> </ul> <p><b>Daily   Monthly   Annually</b></p>
<b>Contractors</b>	<ul style="list-style-type: none"> <li>Climate change and environmental impact</li> <li>Cooperation</li> <li>Innovations and technology</li> <li>ESG and economic trends</li> </ul>	<ul style="list-style-type: none"> <li>Clear terms &amp; conditions</li> <li>Transparency</li> <li>Reliable information</li> <li>On-time delivery</li> </ul>	<ul style="list-style-type: none"> <li>Meetings</li> <li>Calls and online</li> <li>Emails</li> </ul> <p><b>Daily   Regularly</b></p>

Stakeholders groups	Engagement framework	Stakeholders expectations	Engagement channels and frequency
<b>Society</b>	<ul style="list-style-type: none"> <li>Communication and support for actions with social impact</li> <li>Volunteer, participation in actions</li> <li>Reply and processing requests</li> </ul>	<ul style="list-style-type: none"> <li>Support</li> <li>Transparency</li> <li>Zero incidents harming human rights</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Calls</li> </ul> <p><b>Occasionally</b></p>
<b>Government and/or regulatory authorities</b>	<ul style="list-style-type: none"> <li>Regulations</li> <li>Compliance</li> <li>Issuance</li> <li>Training</li> </ul>	<ul style="list-style-type: none"> <li>Compliance</li> <li>Transparency</li> <li>Reliable information</li> <li>Tax reliability</li> </ul>	<ul style="list-style-type: none"> <li>Meetings</li> <li>Calls and online</li> <li>Emails</li> <li>Events</li> </ul> <p><b>Regularly</b></p>
<b>Business Community</b>	<ul style="list-style-type: none"> <li>Environmental, social and industrial impact</li> <li>Economic environment</li> <li>Changes and new regulations/trends</li> <li>Industry, market local and worldwide trends</li> <li>Cooperation</li> <li>Industry best practices</li> </ul>	<ul style="list-style-type: none"> <li>Transparency</li> <li>Exchange of information</li> <li>Sharing the industry's best practices</li> </ul>	<ul style="list-style-type: none"> <li>Events</li> <li>Meetings</li> <li>Emails</li> <li>Newsletters/Circulars</li> </ul> <p><b>Regularly Weekly</b></p>
<b>Academic community</b>	<ul style="list-style-type: none"> <li>Training and skills development</li> <li>Internships</li> </ul>	<ul style="list-style-type: none"> <li>Support</li> <li>Hiring</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Meetings</li> </ul> <p><b>Occasionally</b></p>



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society

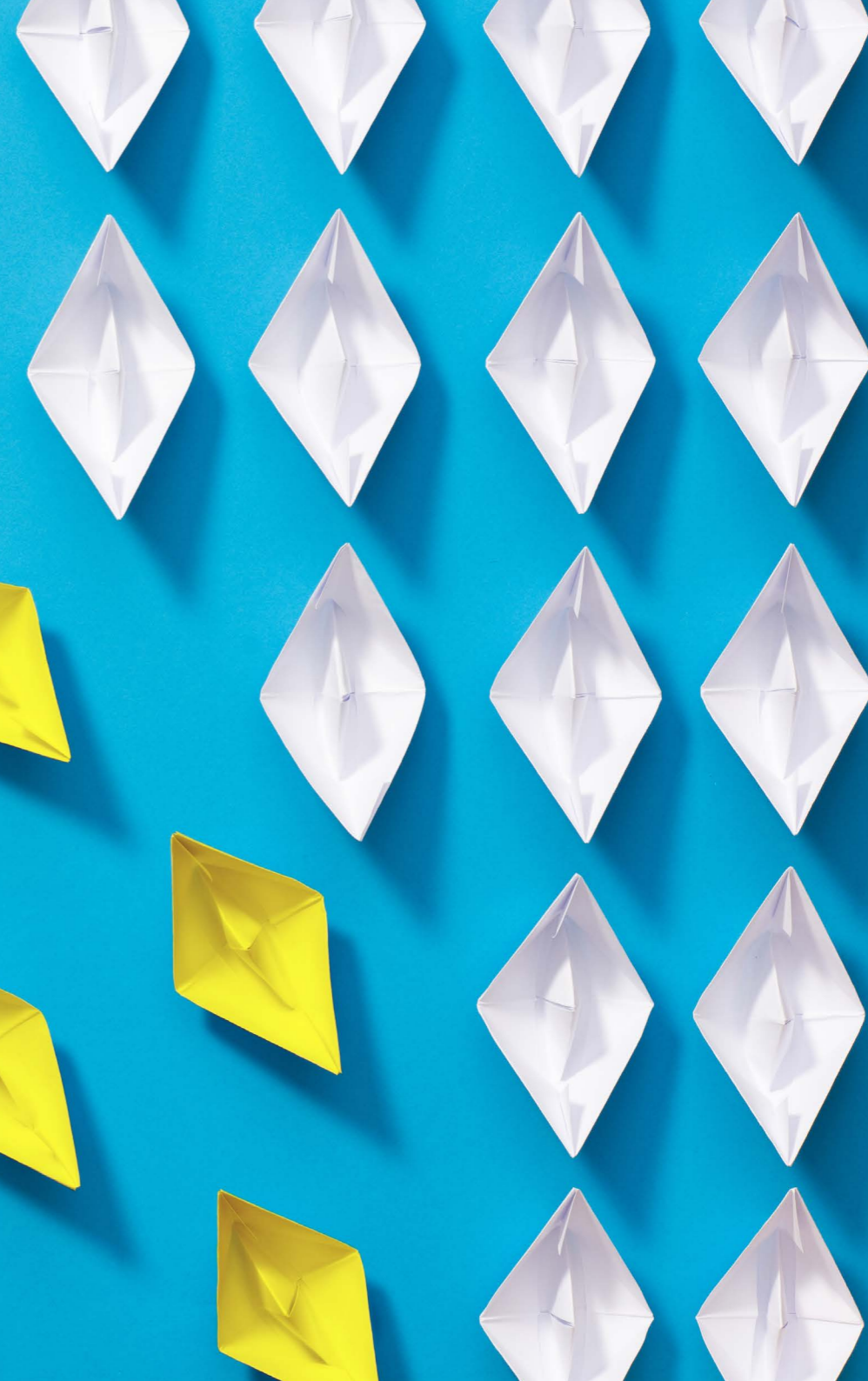


Governance



Sustainability Standards

# **MATERIALITY** PROCESS



# 5

## Our materiality assessment process

### Topics identification

By investigating both the Company's external and internal environment through external research, industry benchmarking, a review of leading global reporting standards, and a review of internal documents, we identified a broad list of significant issues that were assessed. Besides PARADISE's Sustainability strategy we evaluate the list of topics taking into consideration parameters like: ESG-related international context, EU and national regulatory context (including maritime environmental IMO regulations and guides), ESG-related shipping sector priorities, ESG cross sector megatrends and global accords, such as the UN SDGs and the Paris Agreement, SASB Materiality map, GRI standards.

### Engagement and Assessment

The broad list was first set for a qualitative internal and external assessment with stakeholders on thorough meetings. All topics deal with general and marine issues, and are all related to the three pil-

lars i.e. Environment, Society and Governance practices. We conducted interviews with internal and external stakeholders in order to review emerging trends and understand how these topics may evolve and how we could address the boundaries for these topics. We finally concluded on 20 material issues through which our performance has a significant impact to the Environment, to people and the economy and the related to them risks affect our results and sustainable future.

### Prioritization

We performed a risk and double impact analysis, weighing the issues identified by the stakeholder groups as they emerged from the preliminary review. We assessed each issue's associated impact on the environment, people and the economy and the associated potential risks facing the company and finally we prioritized the issues according to their significance. The company's management team checked and finalized the issues and prioritization list.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

Material topics	Our Commitment	Our impact	Impact to our company's performance and the related risks our business is facing
<b>S</b> Health and safety of crew on board	Develop Practices and policies that ensure our people Health & Safety at sea. Regulations that contribute to accident prevention and health conditions reassurance.	Ensuring the health and safety of our crew is our highest priority. We believe that every member of a crew should feel safe and secure. Our policies can have a positive – protective impact on them, preventing accidents and unsecured situations while a poor procedure might increase dangers.	The ship operation and performance and the completion of each trip depends on our people health and safety. The condition of their H&S has an impact on our performance and results along with the overall economy.
<b>S</b> Health and safety of office employees	Develop Standards and practices addressing safety, welfare, and ensuring health conditions for our office personnel.	Employees' health and safety is fundamental for a sustainable business. We believe that all people should always feel safe and secure. We are committed to maintain a safe working environment for all our employees and set high health and safety standards policies in order to prevent accidents, take precautions and avoid dangerous situations.	As long as our people health and safety increase or decrease accordingly the impact on our performance and results (and the overall the economy as well) is direct.
<b>S</b> Protection and respect of human rights	1. Develop Internal and external Policies and Practices that address human rights respect and zero tolerance for all forms of child labor, forced labor or other forms of exploitation. 2. Implement Equal treatment and non-discrimination practices related to nationality, age, education and more both at sea and ashore.	We strive to create a work environment that supports, inspires, and respects everyone Respecting the human rights of our people, our clients, our cooperators, our suppliers we contribute to the formation of relations and societies that operate under the spectrum of sustainable development.	Violation of Human Rights can have negative effect on the smooth, proper and safe operation of vessels, leading to financial losses and damaging the company's reputation.

Material topics	Our Commitment	Our impact	Impact to our company's performance and the related risks our business is facing
<b>S</b> Human Capital Management	1. Create Fair compensation policies, remuneration and benefits for office and crew employees. 2. Create excellent working conditions and standards.	Our human capital management philosophy is: <ul style="list-style-type: none"> <li>to provide competitive pay and valuable benefits to all,</li> <li>to provide a Decent working environment and economic growth,</li> <li>to achieve full and productive employment and decent work, while eradicate forced labour, modern slavery, human trafficking and child labour and promote safe and protected working environments.</li> </ul>	Decent and equal working environment is related to economic growth, higher levels of productivity and resource efficiency.
<b>S</b> Human Resources training	1. Continuous training of crew on board and personnel on land. 2. Improving, strengthening and expanding qualifications and technical skills. 3. Training and development on new fields of expertise, upskill and skills refine.	We provide learning and development opportunities to all our people (office personnel and crew). We wish to contribute to a highly trained marine community that deploy best practices.	Skilled and well trained personnel leads to enhanced performance, stronger dynamics and lower risk.
<b>S</b> Employees' physical, emotional & social well-being	1. Improve our people Work and personal/social Life Balance. 2. Take care for employees' emotional balanced and good feelings.	We drive our forces to help our people to build resilience through balanced well-being and personal health. We undertake policies and practices that contribute to people's emotional health.	We understand that a strong personnel wellbeing positively affects productivity and performance.

Material topics	Our Commitment	Our impact	Impact to our company's performance and the related risks our business is facing
<b>S</b> crew physical, emotional & social well-being	Tactics to improve and maintain in good level crew mental and physical well-being.	We undertake policies and practices that contribute to seafarers' emotional and mental health.	The effects of mental and emotional stress are critical elements of a vessel's workplace and operation.
<b>E</b> Climate change	<ol style="list-style-type: none"> <li>Develop Resilience against climate change risks. Dealing with weather changes and extreme sea conditions.</li> <li>Minimize impact of our activities regarding Air emissions. Putting measures in place to reduce energy use and greenhouse gas (GHG) emissions.</li> <li>Take measures regarding our operations. Environmental footprint improvement</li> </ol>	Improve our systems and performance to reduce our impact and contribute to a circular and low carbon economy.	<p>Increased climate change risks require extra resources both human and financial in order to mitigate related threats.</p> <p>Any catastrophic event resulting from weather phenomena may damage vessels or other assets, cause transportation delays and harm company's credibility by interrupting its operation.</p>
<b>E</b> Compliance with environmental regulations	<ol style="list-style-type: none"> <li>Compliance with emissions targets regulations.</li> <li>Compliance with fuels targets.</li> <li>Compliance with decarbonization targets.</li> <li>Compliance with waste management regulations.</li> </ol>	Environmental regulation compliance leads to faster implementation of environmental targets and decarbonization goals. On the other hand poor compliance increases environmental instability and future prosperity.	Any lack of adequate integration and adoption of existing and emerging regulations into internal processes, management systems and training plans may harm our reputation, revenues and clients' and community's trust.

Material topics	Our Commitment	Our impact	Impact to our company's performance and the related risks our business is facing
<b>E</b> Energy transition	1. Modernization of fleet.	We constantly explore opportunities for better and efficient operation that lower the risk for poor and inadequate energy goals achievement. We want to develop transportation marine services that minimize their environmental impact.	Vessels' modernization investment may increase transportation projects deliverables, elevate our corporate image and enhance results.
<b>E</b> Protection of the Ecosystem and Biodiversity	<ol style="list-style-type: none"> <li>Protecting the ecosystem in which we operate.</li> <li>Waste management system adoption and improvement.</li> <li>Food and supply management.</li> <li>Recycling in our premises and on shore and on board.</li> </ol>	We operate in sea and we are taking actions to manage and measure our impact to the ecosystem, contributing to waste generation reduction and marine ecosystem protection. We closely manage our ballast water to avoid conditions development that could potentially harm the marine environment.	The marine is the environment in which we operate and any potential damage to it, accelerates the risk of ineffective business activity, while at the same time requires ever-increasing resources.
<b>E</b> Prevention of water pollution	<ol style="list-style-type: none"> <li>Prevention of water pollution strategy, corporate culture, people awareness.</li> <li>Sea anti-pollution guidelines and waste management system.</li> <li>Minimizing our impact Ballast water management system.</li> </ol>	It is of highest importance for us to minimize water pollution risks. We design related procedures and management system, we raise people awareness, we undertake training programs. We apply strict operating and monitoring policies that ensure minimize of spills incidents.	Risk that the Company does not invest adequately in Sea protection, with consequent harm in both the short and long term results.



Material topics	Our Commitment	Our impact	Impact to our company's performance and the related risks our business is facing
<b>E</b> Environmental awareness of crew and office personnel	Policies and services that will improve and enhance employees' and crews' awareness regarding environmental issues.	Our people awareness is of highest responsibility that lead to environmental protection. Both at sea and on land improving our carbon footprint doesn't just depend on enforcing rules and procedures, it relies on raising everyone's awareness in this direction.	Environmental procedures, systems and regulations can effectively be implemented only whenever people are well informed and clearly understand the reason of performing accordingly.
<b>G</b> Trusted relationships with our clients	<ol style="list-style-type: none"> <li>1. Cooperation under clear and transparent Terms and conditions.</li> <li>2. Policies and practices for clear, confidential and comprehensive client information, care and respect.</li> <li>3. Responsible performance and design of policies that allow us to be credible regarding our service deliverables.</li> <li>4. Contract terms clarity and compliance with the agreed conditions.</li> </ol>	The trust we earn through the development of practices that ensure trusted relations, enables our firm to drive impact for our clients and our communities.	Trusted relationships build loyalty, increase results and is the ultimate element for ensuring prosperity and economic growth.

Material topics	Our Commitment	Our impact	Impact to our company's performance and the related risks our business is facing
<b>G</b> Business ethics	<ol style="list-style-type: none"> <li>1. Anti-corruption and anti-bribery policies and culture.</li> <li>2. Transparency and equality in stakeholder's engagement.</li> <li>3. Integrity, respect and ethical business practices.</li> </ol>	We aim to operate with the ultimate Ethics and Compliance codes that builds and maintains the trust of our clients, overall stakeholders and the broad society.	We build a corporate culture of ethics, integrity, and compliance across our company ashore and onshore, ensuring high standards of our daily performance.
<b>G</b> Compliance and implementation of laws and regulations	<ol style="list-style-type: none"> <li>1. Compliance with regulations and laws.</li> <li>2. Responsible tax practices.</li> </ol>	We constantly assess and update our policies and systems to meet compliance requirements, contributing to the establishment of a well-structured and clearly defined global system.	We are regularly monitoring compliance with policies and controls and continuously improving our program, in order to ensure their effectiveness and sustainability for an excellent and performance.
<b>G</b> Privacy & Security	<ol style="list-style-type: none"> <li>1. Resources, appropriate procedures and responsibilities that are set to mitigate any risk throughout all operational activities ashore and onboard.</li> <li>2. Cyber security regulations.</li> <li>3. Cyber security New technologies.</li> <li>4. Cyber Security awareness as AI improves.</li> </ol>	<p>We are committed to meeting high standards of data privacy and information security, for our people, our clients, and economy.</p> <p>As the technology improves daily, our strategy focuses to assess constantly our CS systems in order to implement strong defenses against violations.</p>	Strong CS systems prevent incidents, ensure proper functioning and maintain safe and well-structured trips. Any violation is of highest risk importance and may reduce corporate results even in a severe way.

Material topics	Our Commitment	Our impact	Impact to our company's performance and the related risks our business is facing
<b>G</b> Development of risk management assessment process	Policies, plans and procedures that provide the possibility to identify in an organized and data-driven manner the possible risks and probabilities and specify the ways to manage and deal with them both in operational areas and in environmental and human factors.	We assess risks to our firm across many areas and we seek opportunities to better identify, analyze, and mitigate risk. We want to contribute to the building of resilience for a future and sustainable growth.	Risk assessments help us to understand the nature of the risks we face and identify what policies and controls we develop and what we should design to mitigate those risks in order to enhance our growth.
<b>G</b> Digital transformation	<ol style="list-style-type: none"> <li>1. New technologies usage on board, for better and safer navigation.</li> <li>2. On shore for better control, for emergency responses, for problems solving and efficient operation.</li> <li>3. Remote navigation.</li> </ol>	We closely monitor developments in the adoption of new technologies and gradually implement digitization tactics that contribute to the improvement of the environment, the economy and the working conditions of our people.	Poor Investments in digitalization and artificial intelligence, have a consequent adverse impact on competitiveness and on the development of more efficient and sustainable decisions and solutions for low emissions of greenhouse gases and energy efficiency targets. Digital transformation requires a well in advance structured plan and a monitored execution to lower the risk of high costs and operational inefficiencies.

# Prioritization per pilar

## SOCIAL TOPICS

1. Health and safety of crew on board
2. Human Capital management
3. Protection and respect of human rights
4. Crew physical, emotional & social well-being
5. Employees' physical, emotional & social well-being
6. Health and safety of office employees
7. Human Resources training
8. DEI

## ENVIRONMENTAL TOPICS

1. Climate change
2. Prevention of water pollution
3. Protection of the Ecosystem and Biodiversity
4. Compliance with environmental regulations
5. Environmental awareness of crew and office personnel
6. Energy transition

## GOVERNANCE TOPICS

1. Trusted relationships with our clients
2. Business ethics
3. Compliance and implementation of laws and regulations
4. Privacy & Security
5. Development of risk management assessment process
6. Digital transformation



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

# ENVIRONMENT



1. Climate change
2. Prevention of water pollution
3. Protection of the Ecosystem and Biodiversity
4. Compliance with environmental regulations
5. Environmental awareness of crew and office personnel
6. Energy transition



# 6 Our Approach

We include a commitment to environmental sustainability and responsible resource management.

In Paradise Navigation S.A. we believe shipping is about creating real and long lasting opportunities and we advocate a balanced, sustainable approach to our business. Moving goods by sea is the most energy efficient and environmental mode of transportation. While we acknowledge that our energy consumption and emissions as a Shipping Company is **significant**, we aim to make energy transportation even more sustainable by complying to all applicable rules and regulations and also adopting innovative measures.

Our Environmental Policy recognizes environmental protection and management as

one of its highest priorities. We are committed to environmentally responsible operations and to a cleaner and safer environment, regularly reviewing our performance and seeking opportunities for improvement and for minimizing the risk of potential incidents.

Our vessels incorporate features that comply with the strictest global environmental standards. Comprehensive environmental initiatives are also being implemented on-board ships.

The Company's aim is to operate its ships under a zero spill policy and to eliminate the possibility of pollution by ensuring that high standards of safety and awareness are maintained and that all applicable and forthcoming legislation is complied with.



**Paradise Navigation** considers the following key focus area that environmental conditions being affected by or capable of affecting the Company:

- Water pollution
- Air pollution
- Waste reduction
- Energy conservation
- Training of employees on EMS
- Identifying new aspects
- Regulatory and other compliance

We have identified that our potential impact on the marine environment is related to:

- Air emissions (CO<sub>2</sub>/ SO<sub>x</sub>/ NO<sub>x</sub> / PM, etc.);
- Release of oil and chemicals: through accidental spills and operational discharges;
- Transfer of invasive alien species: through ballast water and on ship hulls;
- Release of biocides: from toxic chemicals used in antifouling paints;
- Physical and other damage: through dropping of anchors, noise and wave disturbances and striking of whales and other marine mammals;
- Use of antifouling paints;
- Disposal of marine debris, disposal of waste materials and sewage;
- Oil spills from routine activities or accidental incidents;

- Spills of hazardous materials including chemicals;
- Noise including underwater disturbance

In order to minimize our negative impact we are committed to ensure:

- Pollution prevention that emphasizes source reduction, including necessary funding and human resources to effectively maintain the onboard systems, equipment and components.
- Continuous reduction of environmental risks.
- Minimisation of environmental impact of its operations.
- Sharing information on environmental performance with external stakeholders.
- That the environmental policy is available to the public.
- Minimizing the environmental impact of its operations.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

We are committed to the implementation and on-going improvement of sound environmental practices and measures that include:



We have developed a **Company Environmental Management System (EMS)**, which is a systematic, dynamic program integrating environmental management with the Company operations in accordance with the international Standard ISO14001. It applies to all environmental aspects that the Company identifies, ei-

ther as those that it can control or those that it can influence.

The purpose of the EMS is to ensure that Company's vessels comply with all applicable marine environmental protection requirements established under applicable International, Flag State, Port State and

Coastal State law including, and to the additional requirements and voluntary undertakings. Voluntary undertakings may include the adaptations of industry best practices or industry norms that the Company may choose to adopt. In the case of a conflict between the EMS and any of the aforementioned requirements such that the EMS is less restrictive, then the more restrictive authority shall govern.

The EMS helps the Company to achieve the intended results, and provides value for the environment, the Company itself and the interested parties. It assists the company to enhance its environmental performance in a systematic manner and contributes to the environmental pillar of sustainability. The intended outcomes include:

- Protection of the environment by preventing or eliminating the adverse environmental impacts;
- Enhancement of environmental performance;
- Fulfilment of compliance obligations;
- Achievement of environmental objectives.
- Communication of environmental information to relevant interested parties.

The implementation of a robust EMS and the achievement of sound environmental performance require all activities, operations and personnel to be in the frame of

environmental awareness, care and set of objectives. Consequently, all employees are aware of this system and understand, implement and continually support any requirements of our EMS.

In order to minimize its environmental footprint Paradise Navigation has applied technical and operational initiatives that focus on:

- Waste generation reduction and marine ecosystem protection
- Ship recycling
- Environmental training to seafarers
- Energy mix
- Use of antifouling paints
- Perform underwater operations dedicated to hull cleaning and propeller polishing to improve energy efficiency.
- Supply of chemicals which enhance fuel properties with the aim to improve combustion properties and subsequently increase engine performance and save fuel
- Improve air quality
- Manage Energy use, water consumption and waste recycling at the Company's premises

Our management team in assessing and managing climate-related risks and opportunities Conducts Environmental Management Review to discuss with all personnel newly identified environmental hazards and the additional measures to be applied, always consulting Industry's guidelines.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

# Climate Change

Our Environmental Policy recognizes environmental protection and management as one of our highest priorities.

We are committed to environmentally responsible operations and to a cleaner and safer environment, regularly reviewing our performance and seeking opportunities for improvement. We seek to drive incidents with environmental impact to zero, to operate in a manner that is not harmful to the environment and to achieve excellent environmental performance. Our approach to environmental management includes the systematic identification and assessment of all sources of pollution and measures for the reduction of potential impacts onboard and ashore.

Company's processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management. By managing and succeeding in the process, the company:

- Complies with all applicable environmental laws, regulations and requirements and applies responsible standards where laws, regulations and requirements do not exist.
- Responds quickly and effectively to environmental incidents resulting from its operations, in cooperation with industry

organizations and authorized government agencies.

- Assesses all identified risks to the environment and establishes appropriate safeguards.
- Shows concern and respect for the environment, emphasizes every employee's responsibility in environmental performance and promotes appropriate operating practices and training.
- Undertakes appropriate reviews and evaluations of its operations to measure progress and to enforce compliance with this Policy.
- Conducts and supports research to improve understanding of the impact of its business on the environment, to improve methods of environmental protection and to enhance its capability to make operations compatible with the environment.
- Manages its business with the goal of preventing environmental incidents and of controlling emissions and wastes to below harmful levels.
- Designs, operates and maintains facilities to this end.
- Shares its experience with others to facilitate improvements in industry performance



## GHG Emissions Performance & Reduction Schedule

UN International Maritime Organization (IMO) rules already require that all ships constructed from 2025 must be 30% more efficient compared to the 2000s with further improvements going forward. In Paradise Navigation S.A. we believe shipping is about creating real and long lasting opportunities and we advocate a balanced, sustainable approach to our business.

Carbon emissions which contribute to global warming are in the spotlight in particular,

and the public, the media and regulators are demanding action. There is little doubt that rules and regulations covering environmental issues will become stricter in the years ahead.

We are putting all efforts to reduce CO<sub>2</sub> emissions per transport work by at least 40% by 2030 compared to 2008 and our long terms actions are in line with the IMO GHG strategy.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society

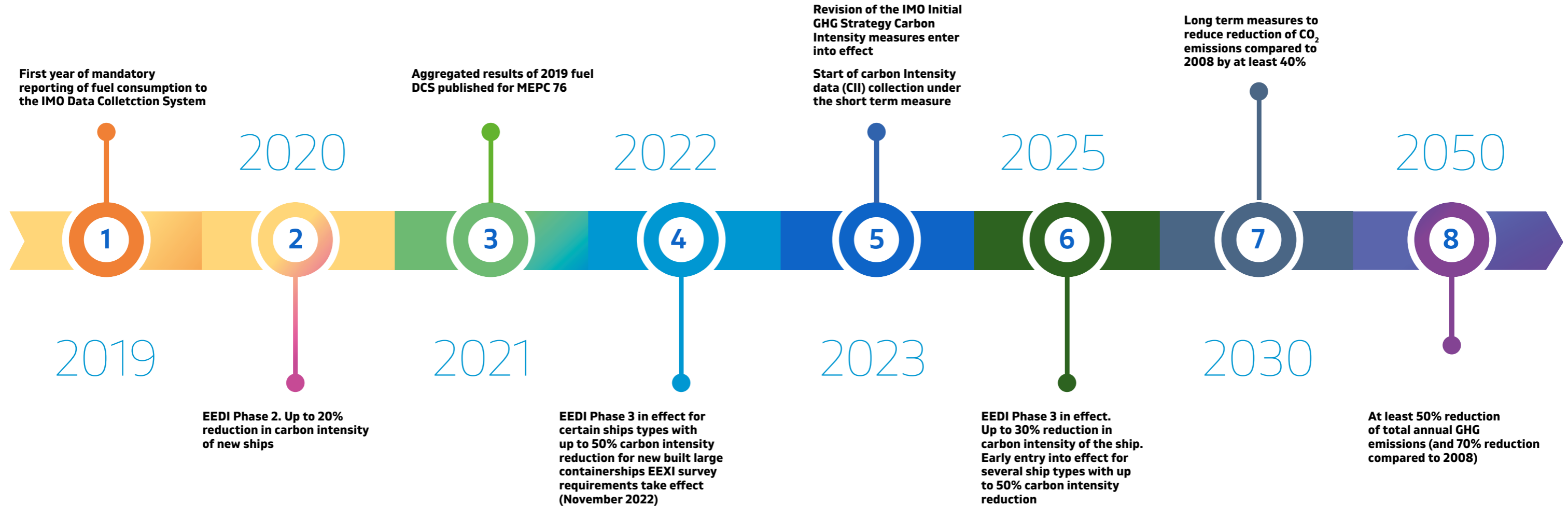


Governance



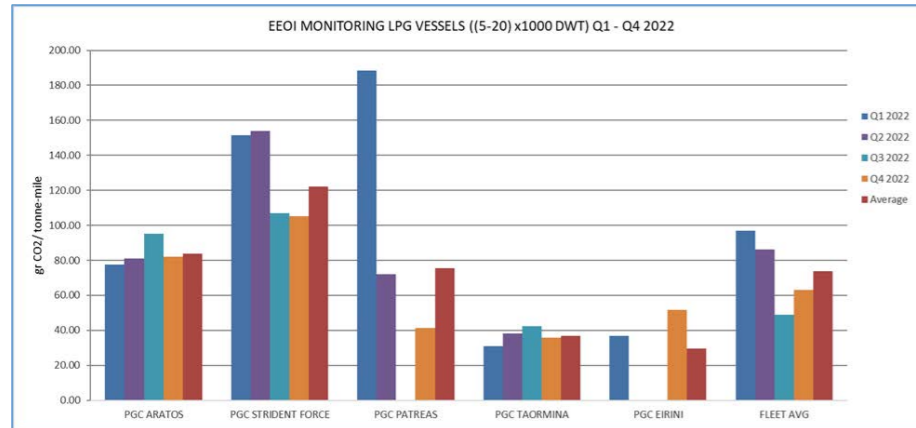
Sustainability Standards

# Timetable of actions to reduce GHG emissions from ships

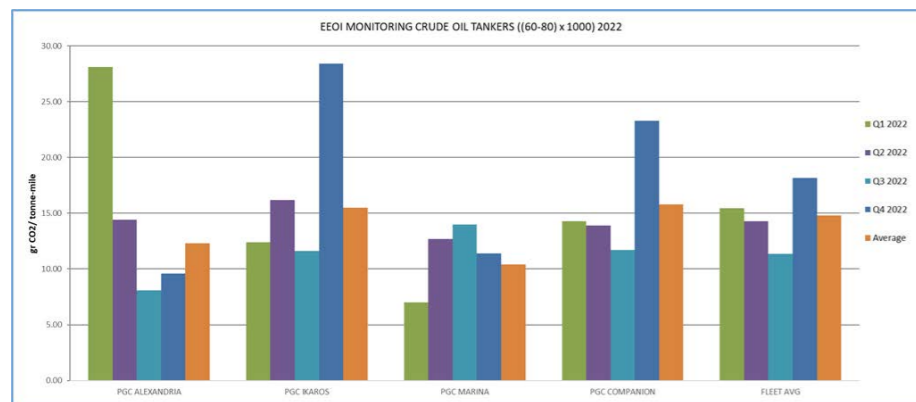


## FLEET ENERGY PERFORMANCE MONITORING/BENCHMARKING ANALYSIS, CO<sub>2</sub> Emissions (EEOI – gr CO<sub>2</sub> / tonne-mile)

### LPG CARRIERS EEOI 2022

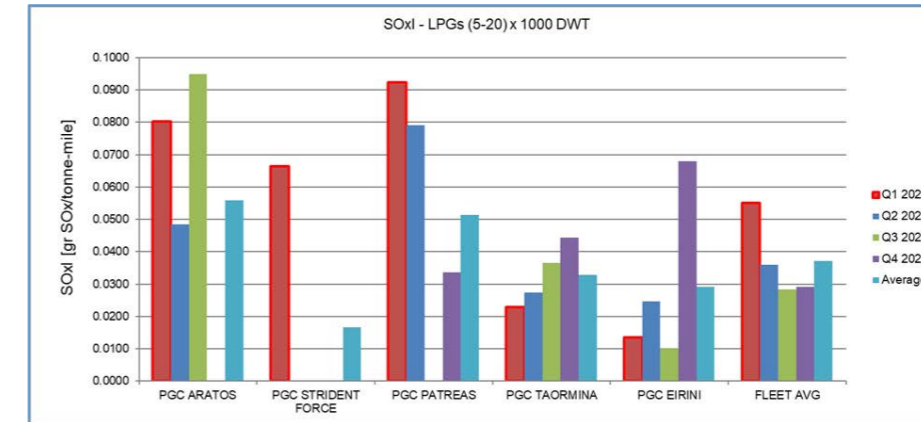


### CRUDE OIL TANKERS EEOI 2022

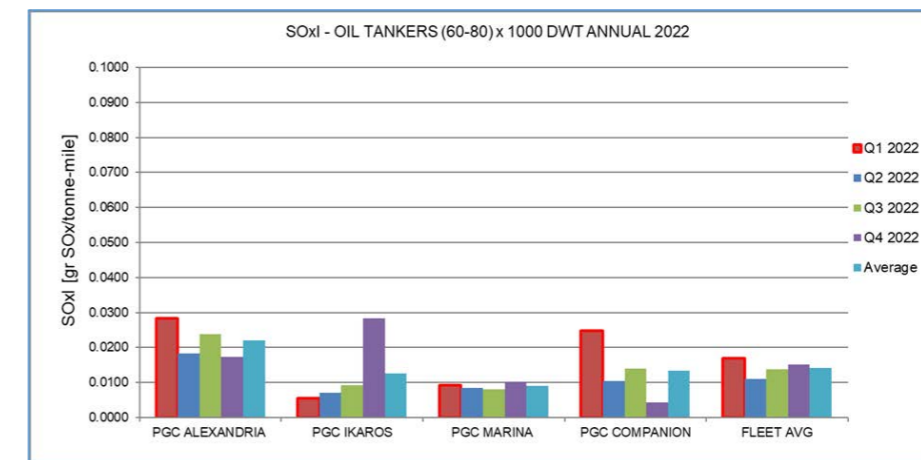


## FLEET ENERGY PERFORMANCE MONITORING/BENCHMARKING ANALYSIS, SO<sub>x</sub> Emissions (SO<sub>x</sub>l – gr SO<sub>x</sub> / tonne-mile)

### LPG CARRIERS



### CRUDE OIL TANKERS



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance

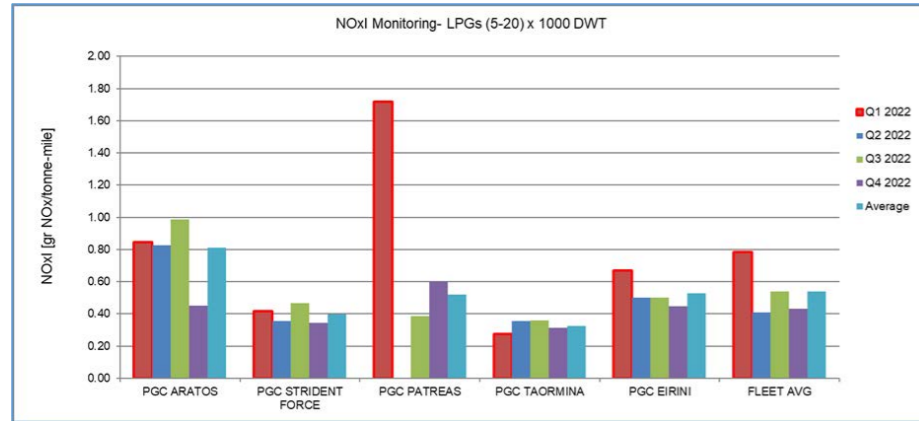


Sustainability Standards

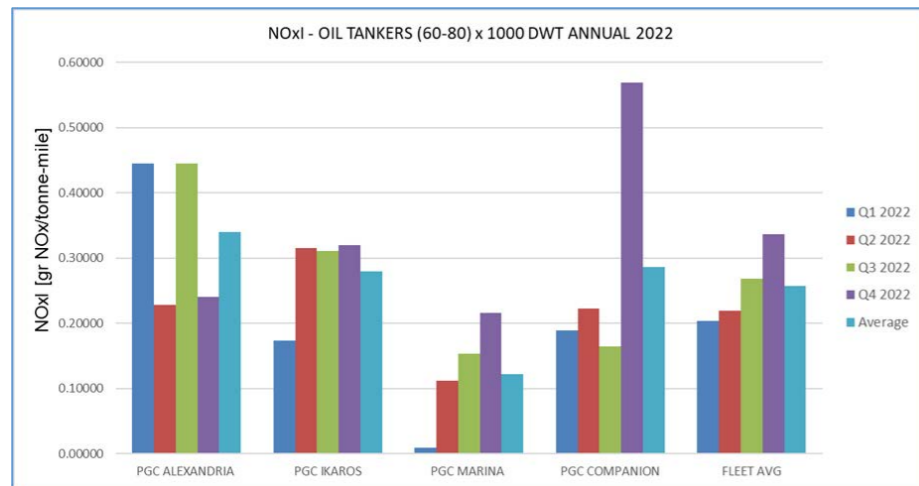


## FLEET ENERGY PERFORMANCE MONITORING/BENCHMARKING ANALYSIS, NOx Emissions (NOxI – gr NOx / tonne-mile)

### LPG CARRIERS

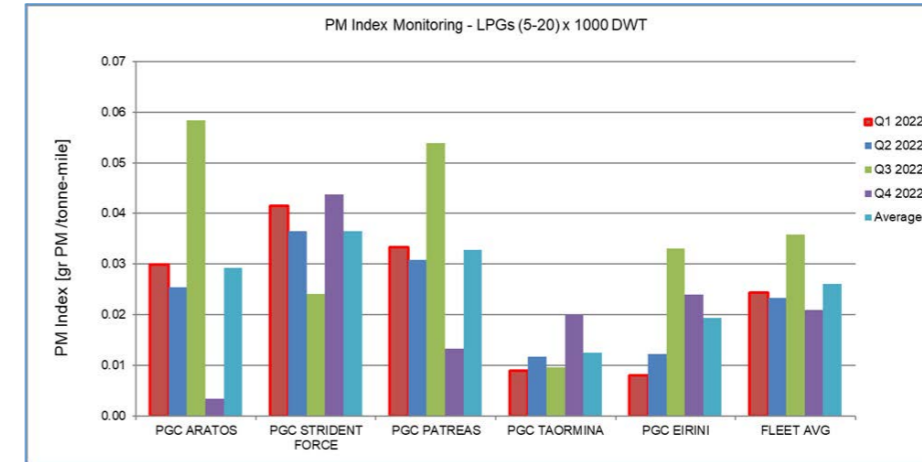


### CRUDE OIL TANKERS

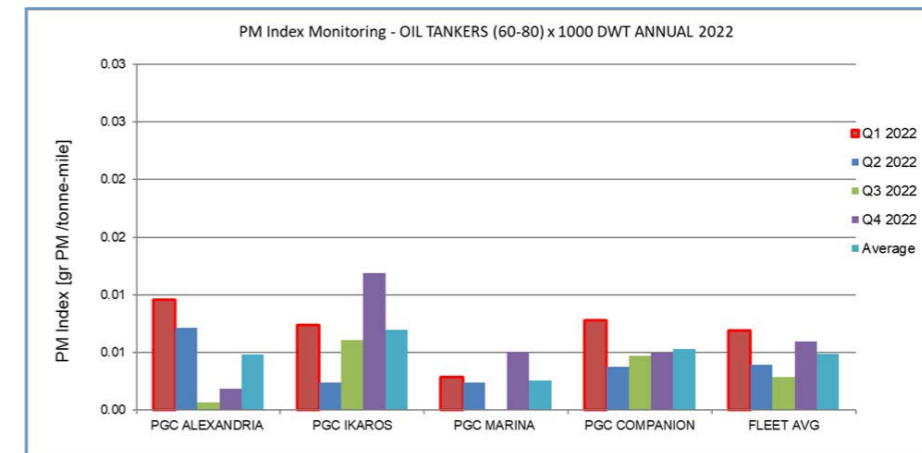


## FLEET ENERGY PERFORMANCE MONITORING PM Emissions (PMI – gr PM / tonne-mile)

### LPG CARRIERS



### CRUDE OIL TANKERS



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

# GHG emissions Reduction Objectives & Actions

**Main Objective:** Enhance the onboard energy conservation and efficiency and reduce GHG emissions COMPLETION

Paradise Navigation acknowledging the reduction of GHG emissions as one of the most significant element to reach sustainable development, to meet the targets of the international community and to be complied with relative regulatory framework, has designed and set a list of actions for the period ending 2/2030.

## ACTIVITIES

### PHASE I – SHORT TERM ACTIONS (DUE DATE: 20/03/2025)

- Calculate and monitor the IMO Energy Efficiency Operation Index (EEOI) per vessel and for the fleet (average) in line with IMO MEPC.1/Circ. 684
- Calculate and monitor the SOx Index (SOxI) per vessel and for the fleet (average)
- Calculate and monitor the NOx Index (NOxI) per vessel and for the fleet (average)
- Calculate and monitor the PM Index (PMI) per vessel and for the fleet (average)
- Incorporate in the Company's Training Plan a training course for the responsible shore and sea staff on "Ship Energy Conservation / Efficiency" to share knowledge gained and depicted in the SEEMP and to enhance awareness on energy conservation

### PHASE II – MID TERM ACTIONS (DUE DATE: 14/02/2027)

- Consider installation of hydrodynamic improvement devices (HIDs) that improve the hull / propeller efficiency in new-buildings - review and assess available technologies
- Consider installation of engine performance monitoring software and hardware (KYMA, etc.) in new-buildings - review available technologies
- Conduct market research on "weather routing" programs and assess their effectiveness. Develop a procedure for the implementation of a "weather routing" program on selected fleet vessel(s). Monitor implementation with the aim of deciding follow-up targets
- Carry out hull and/or propeller cleaning, if practicable and cost-effective
- Consider implementation of the "slow steam-

ing" concept. Make use of the most economical speed when practical. Reduce speed in heavy weather to avoid excess pounding and FO consumption. Optimize the water ballast amount taken

### PHASE III – LONG TERM ACTIONS (DUE DATE: 14/02/2030)

- Set a target for fuel quality with a sulphur percentage less than the maximum allowable as per MARPOL Annex VI. Use of high quality fuels, when possible (high thermodynamic power, low sulphur, low water).
- Consider application of new generation hull coatings to improve smoothness and hydrodynamic performance and reduce friction and fuel consumption
- As an alternative to propeller polishing, consider the application of new generation propeller coating to improve smoothness and hydrodynamic performance of propeller and reduce friction and fuel consumption
- EEXI Technical File & determination of required EPL (new MCR) to be prepared for all fleet vessels. For all vessels >400 GT, the EEXI Technical File should be approved by each vessel's Class by the first annual /intermediate / renewal survey after 1/1/2023.
- Incorporate in the Company's Training Plan a training course for the responsible sea staff on "EEXI, CII & New SEEMP / Latest MARPOL Annex VI requirements" to share knowledge gained and to enhance awareness on energy conservation (to be reviewed after (MEPC 78)).

- Incorporate in the Company's Training Plan a training course for the responsible shore staff on "EEXI, CII & New SEEMP / Latest MARPOL Annex VI requirements" to share knowledge gained and to enhance awareness on energy conservation
- Calculate and monitor the annual CII after 1/1/2022
- EPL (Engine Power Limitation) or ShaPoLi (Shaft Power Limitation) application to vessels for achieving emissions reduction by the first annual /intermediate / renewal survey after 1/1/2023.
- Install low energy consumption bulbs/ lamps
- Following EPL or ShaPoLi installation, the Company will proceed in the preparation of relevant Management Plan which will be approved by each vessel's Class by the first annual /intermediate / renewal survey after 1/1/2023
- The option of alternate fuels (LNG, Ammonia, Hydrogen, Biofuels) will be considered for the reduction of CII, as penalties may be enforced and difficulties may rise from the side of charterers, for low-rated vessels
- For all ships >5000 GT, SEEMP manuals will be updated and re-approved by 1/1/2023. The upgraded SEEMP will include:
  - Required annual operational CII for the next 3 years;
  - Implementation Plan (methodology) to calculate the CII, how to achieve annual operational CII targets during the next 3 years and report this to the RO;
  - A procedure for self-evaluation and improvement



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

# Prevention of water pollution

## Protection of the ecosystem & biodiversity

### GARBAGE MANAGEMENT

**Objective:** Monitor type/quantities of garbage onboard - continually reduce environmental impact. **COMPLETION DEADLINE:** 14/02/2030

### ACTIVITIES

Garbage generation and handling onboard the vessels. Garbage includes all kinds of food, domestic and operational waste, excluding fresh fish, generated during normal operation of vessel and liable to be disposed off continuously or periodically.

To facilitate the landing of recyclable residues/waste, we shall consider establishing contracts with the facilities on ports that are visited on a regular basis. This will fulfill both the need to use a reputable supplier and facilitate the discharge of segregated waste ashore on each port visit. Where reception facilities for segregated and/or recyclable wastes are not provided in a port, Masters are encouraged to request that such facilities are developed in conjunction with the recycling capability of the locality or region.

### PHASE I – SHORT TERM ACTIONS

(DUE DATE: 20/03/2025)

- Monitor the quantity of garbage generated, disposed and incinerated onboard. Statistical analysis of the abovementioned quantities is produced
- Encourage recycling, purchasing in bulk and using non-disposable equipment
- Promote the re-use or disposal of empty paint, lubricating, hydraulic oil & empty chemical drums in Port Reception Facilities (PRF)
- With the aim of minimizing the garbage generation onboard, the following actions can be taken:
  1. When purchasing products, ask suppliers as far as practicable (and in addition to the ordinary products) to quote for environmentally friendly ones.
  2. A standardized message to be included in purchase orders that states the promotion of environmental friendly pack-



aging, based on which the vendors will be asked to confirm their compliance with said standard. Ask suppliers for packing material to be recyclable, to reduce cardboard and plastic packaging and to ensure that packaging is kept to a safe minimum.

### PHASE II – MID TERM ACTIONS

(DUE DATE: 14/02/2027)

- Promote the use of the IMO format for reporting alleged inadequacies of port reception facilities
- Minimize packaging from ship stores e.g. by establishing an agreement with the supplier to accept the return of the packaging upon delivery, or to reduce the amount of packaging
- Food waste is a huge problem leading to environmental damage and pollution. It is a waste of environmental resources, wasted food packing, wasted energy, and waste of money

- When inviting quotations for a new product, request offers from several suppliers and choose, as far as practicable and without endangering the vessel's safety performance, that with the lowest environmental impact

### PHASE III – LONG TERM ACTIONS

(DUE DATE: 14/02/2030)

- The Company will consider to supply all vessels with Garbage Compactors or Waste Compressors
- Vessels to inform the office whenever an increased quantity of plastic packaging materials is observed at a specific supplier delivery
- Establish an "Approved Suppliers of Packaged Goods List" to be used on future supplies
- No plastics should be burned in the Incinerator i.e. Polyvinyl Chlorides (PVC) - even if the Incinerator is IMO Type approved



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



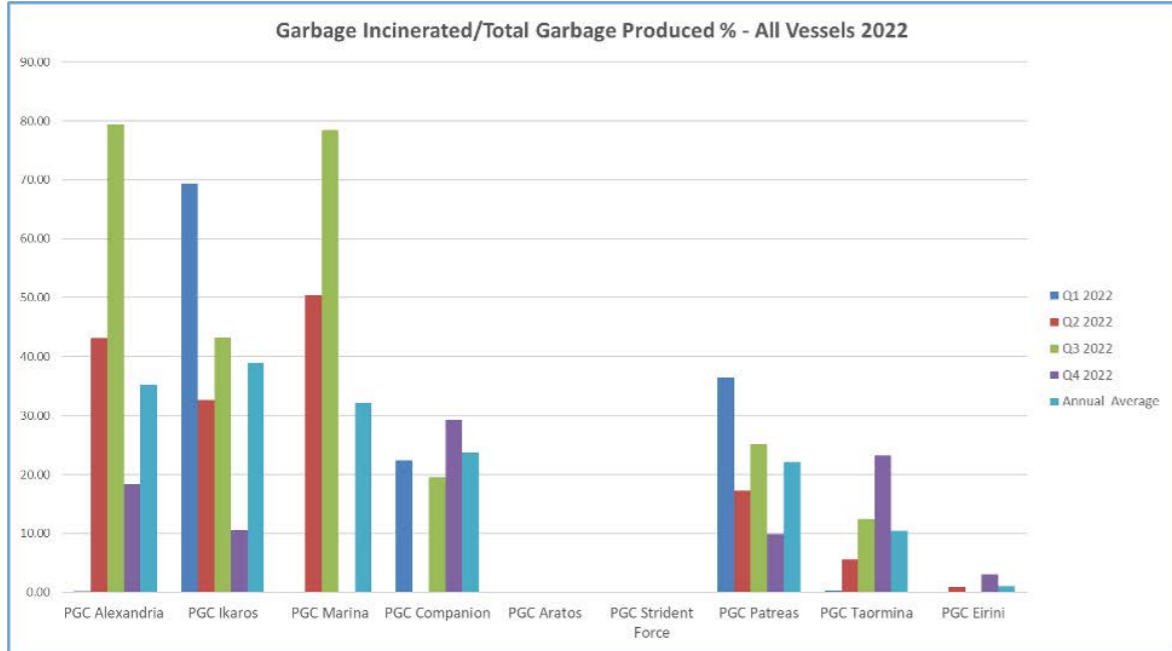
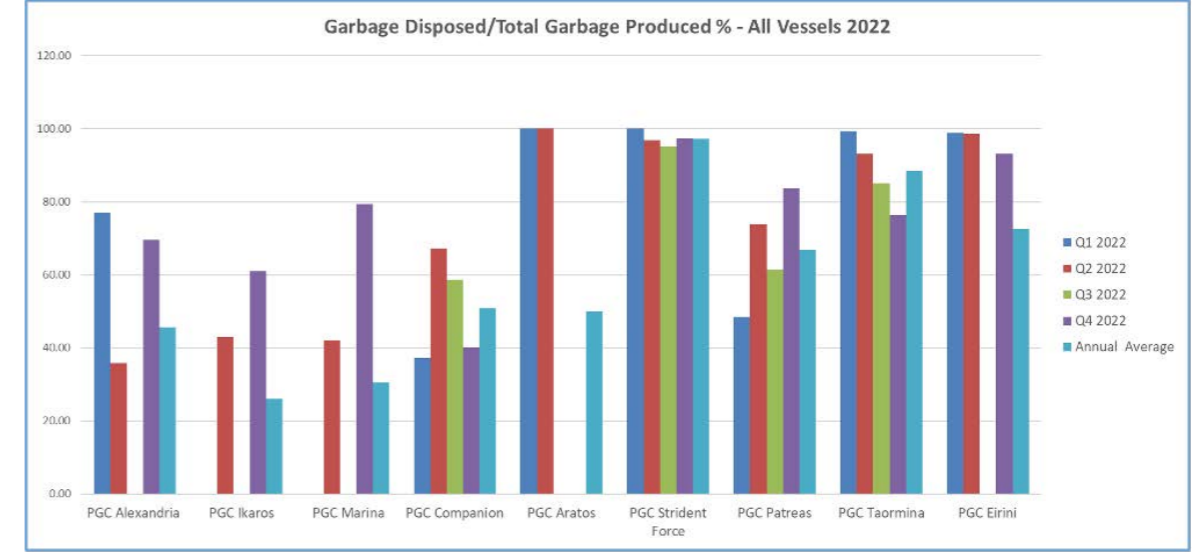
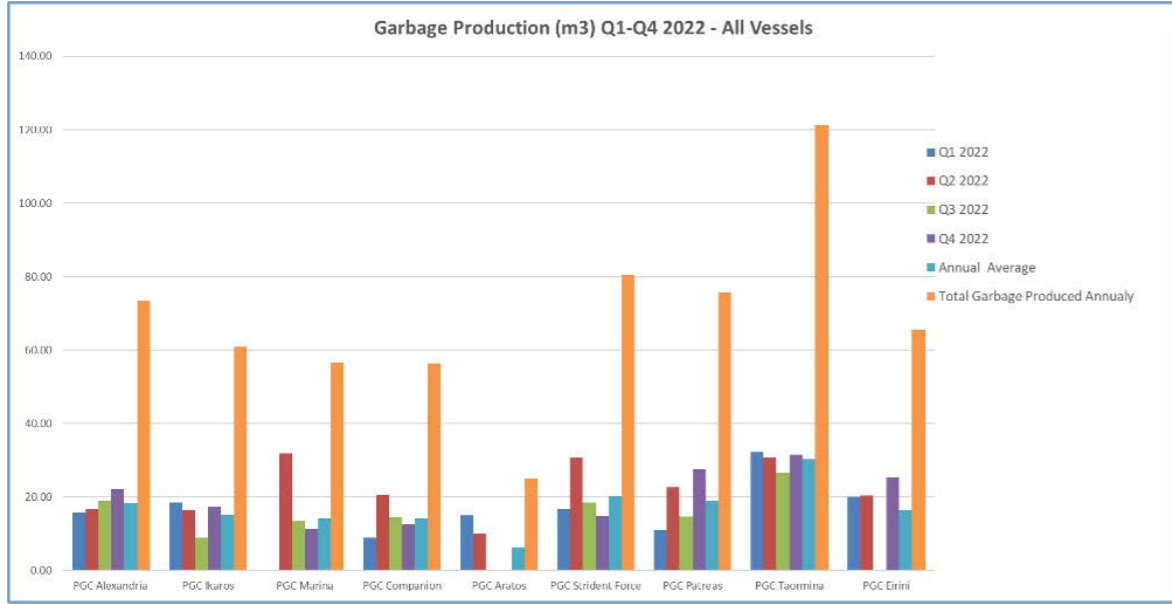
Society



Governance



Sustainability Standards



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

**Handling of oily bilge water /sludges**  
generated in machinery spaces- stern tube oil- inert gas effluent discharge

We are always looking for continual improvement of the efficiency and effectiveness of the onboard systems and practices for handling of oily bilge water / oily residues (sludge) / Stern Tube Lube Oil / Inert Gas Effluent Discharge.

Therefore to reach the goal we strive activities towards increased familiarity with the ship's engine room treatment systems coupled with the crew's training in oily waste management will assist in reducing the amount of waste produced and improve the overall onboard management of oily waste. The future use of the Integrated Bilge Water Treatment System (IBTS) will facilitate segregation of oily waste, allowing for the storage of oily sludge, oil-water mixtures and clean water separately.

We will work harder in increasing Ship's crew understanding of the correct use of, and entries to, the Oil Record Book. This will help to easy monitoring and auditing.

We have defined the following action plan to ensure the achievement of the objectives and have set the corresponding level and team of accountability and responsibility:

**PHASE I – SHORT TERM ACTIONS**  
(DUE DATE: 20/03/2025)

- Monitor the sludge production onboard vessels in relation to the fuel consumption with the aim of promptly identifying any case where a corrective action is needed
- Continuous control of the balance between the quantity of oily wastes generated in vessels' engine room and that disposed ashore or in another way legitimately handled

**PHASE II – MID TERM ACTIONS**  
(DUE DATE: 14/02/2027)

- Keep in good condition and operation all pollution prevention equipment such as OWS, OCM, ODME prior any voyage. Use only suitable chemicals for cleaning the equipment
- Crew's training in oily waste management and Oil Record Book recording
- Monitor Inert Gas Effluent discharge production onboard vessels



**PHASE III – LONG TERM ACTIONS**  
(DUE DATE: 14/02/2030)

- Proper maintenance of OWS and ODME
- Consider installation of a high capacity incinerator to new-buildings
- An estimated 4.6 to 28.6 million litres of stern tube lubricants enter the sea each year and biodegradable oils are already part of the regulatory framework. These oils minimise environmental impact, present no particular toxic hazards, minimise mechanical failures and extend equipment life. Gradual replacement of conventional Lub oils to biodegradable lubricants is under process to our fleet
- Additives to Fuel Oil produced by vegeta-

ble components deliver reduced friction, increased viscosity, improved viscosity index, resistance to corrosion and oxidation, aging or contamination. They also provide additional lubricity and reduce emissions

- Report any kind of violation related to OWS, OCM. By-passing the OWS is prohibited and is a serious violation of MARPOL
- Monitor the quarterly oily bilge water generation onboard with the aim of promptly identifying any case where a corrective action is needed
- Reduce always the oily mixture quantities entering the OWS by landing to reception facilities, if possible



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

## Sewage and grey- water discharges

Environmental impacts from the discharge of sewage and grey water into shallow or confined waters can lead to excessive algae growth due to the high concentration of nitrogen in the effluent. Consequently there can be oxygen limitation in the aquatic ecosystem stressing the fish and in some cases causing them to die. It can also destroy coral reefs and lead to loss of biodiversity. Sewage may contain high concentrations of pathogens, which could lead to seawater contamination, increase the likelihood of disease and contaminate shellfish beds. Grey water can also contain bacteria, pathogens, oils and greases, detergent/soap residues, nutrients and therefore their discharge into near shore marine environments could cause negative environmental impacts. Grey water and sewage should never be transferred to the Bilge Holding Tank.

Our aim is to continuously improve the efficiency and effectiveness of on-board systems and practices for handling sewage and grey water discharges. The relative plan is assigned to a team and a person in charge and is divided into the following chronological phases:

### PHASE I – SHORT TERM ACTIONS

(DUE DATE: 20/03/2025)

- Grey water discharge is prohibited in some ports and local rules and regulations must be taken into account. Grey water production must be minimized when the vessel is in port
- Consider installation of a vacuum toilet system to new buildings

### PHASE II – MID TERM ACTIONS

(DUE DATE: 14/02/2027)

- Consider use of environmentally friendly vacuum toilet cleaners with the aim of enhancing the efficacy of the sewage treatment systems
- Consider installation of a grease trap to the galley grey water discharge piping to new-buildings
- Greywater discharge is prohibited in some ports and local rules and regulations must be taken into account. Grey water production must be minimized when the vessel is in port



### PHASE III – LONG TERM ACTIONS

(DUE DATE: 14/02/2030)

- Consider the installation of sewage treatment plants equipped with means to treat grey water in addition to sewage for new-buildings
- Consider the installation of a sewage / grey water holding tank with sufficient capacity for the storage of both sewage and grey water for newbuildings
- Consider the installation of a piping connection for permanently storing the grey water to a dedicated grey water tank for newbuildings
- Consider the correct operation of the Sewage Treatment Plant

- Crew members must always report any malfunction of the Sewage Treatment Plant to the vessel's Flag and/or Class and all proper actions must be taken to avoid any untreated sewage discharge overboard

### OTHER OBJECTIVES

- Minimization of the use of antifouling paints containing biocides
- Minimization of the refrigerant gas emissions
- Promotion of environmental friendly ship recycling practices



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

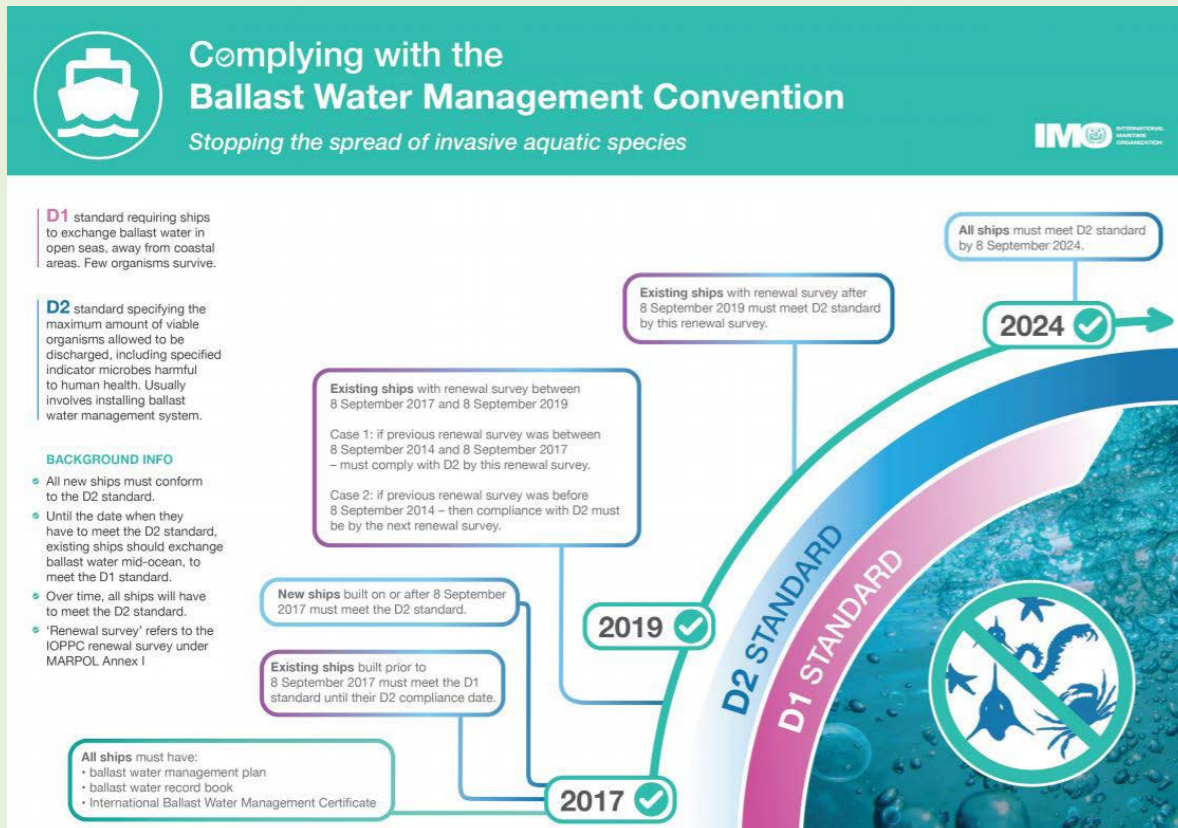
## Ballast water management

Water ballast may pose a serious ecological, economic and public health impact on the receiving environment due to the multitude of marine species carried in it. Aiming to maintain a zero ballast contamination incident record / Zero legislative violation, we have established a Ballast Water management system.

To cope with the problem of invasive species from ballast water, IMO has developed guidelines for the development and implemen-

tation of the ballast water management on board ships aiming in preventing, minimising and ultimately eliminating the risk of introducing harmful aquatic organisms and pathogens from ships' ballast water and associated sediments while protecting ships' safety.

IMO also adopted the Int. Convention for the Control and Management of Ships' Ballast Water and Sediments entered into force on September 2017.



In order to meet all the requirements and being complied with the relative regulations we have divided our actions in 3 phases:

### PHASE I – SHORT TERM ACTIONS (DUE DATE: 20/03/2025)

The following are being considered by the Company for the existing vessels:

- Comply with BWMP (IMO Ballast Convention D-1)
- Determine the IMO Ballast Convention D-2 compliance date
- Decide whether the vessel is fit to be equipped with a BWTS – a ship specific feasibility study to be conducted
- 3D scanning to be conducted on all managed vessels
- Market research in order to identify the most proper BWTS
- Ships/Office to be furnished with latest international and local requirements

The following are being considered for all new-buildings:

- To be equipped with a BWTS
- Crew to be well trained for the use of such systems
- Ensure availability of required materials for the use of the systems

Ballast operations should be monitored with respect to the following:

- Water Volume Ballasted at Cargo Discharging Ports
- Ballast Water Volume Exchanged during Sea Passages
- Water volume Discharged at loading Ports
- Monitor the proper implementation of the BWMP

The Company shall implement the following measures:

- Personnel familiarization with BWMP and local/international regulations
- Crew to be well trained for the use of BWTS
- Familiarization of Crew for record/sample keeping

### PHASE II – MID TERM ACTIONS (DUE DATE: 14/02/2027)

- Start phase-out of vessels that are not fit for BWTS installation.
- Prepare other vessels to be fitted with BWTS as per IMO Ballast Convention D-2, according to their implementation date
- Crew training on hazards associated with chemicals used in the BWTS. Training on the use, handling and storage.
- Training on the correct Ballast Water Management record keeping. Lack of knowledge of the applicable regulations, and lack of supervision by cross signing official records without checking them may lead to observations during PSC inspections.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

# Compliance with environmental regulations

Company's goal and top priority is to ensure that its vessels comply with all applicable marine environmental protection requirements established under applicable International, Flag State, Port State and Coastal State law including.

To accomplish this task and apart from the development of EMS as this discussed, the Company has established, implements and maintains a procedure for continuous evaluating its compliance with the legal requirements that are applicable to its environmental aspects, as part of its commitment to continuous improvement and constantly monitors the changing circumstances in the International Regulatory framework.

The SEMS includes methods to perform periodic, documented and objective evaluation of reports showing performance for the significant aspects (e.g. emissions or effluents reporting) and auditing of the Company's performance in achieving its objectives, and on how well the SEMS assists in achieving those objectives.

Company Management continuously monitors and accesses vessel systems and equipment, and the ability and proficiency at

which vessel crewmembers and personnel ashore comply with the policies and procedures established by the SEMS. A variety of methods are used to assess compliance, including processes such as:

- Company's and Vessels' audits;
- Document and/or records review;
- Vessel inspections;
- Interviews and/or direct observation;
- Routine sample analysis or test results, and/or verification sampling/testing.

The Company has established a frequency and methodology for evaluation of compliance that suits its size, type and complexity. Frequency is affected by factors such as past compliance performance or specific legal requirements. The Company keeps records of the results of the periodic evaluations, which include:

- Periodic Inspections by ship's Flag Administration and third parties;
- Annual and periodic audits and inspections by ship's Classification Society;
- Annual and periodic SEMS internal and external audits, etc.

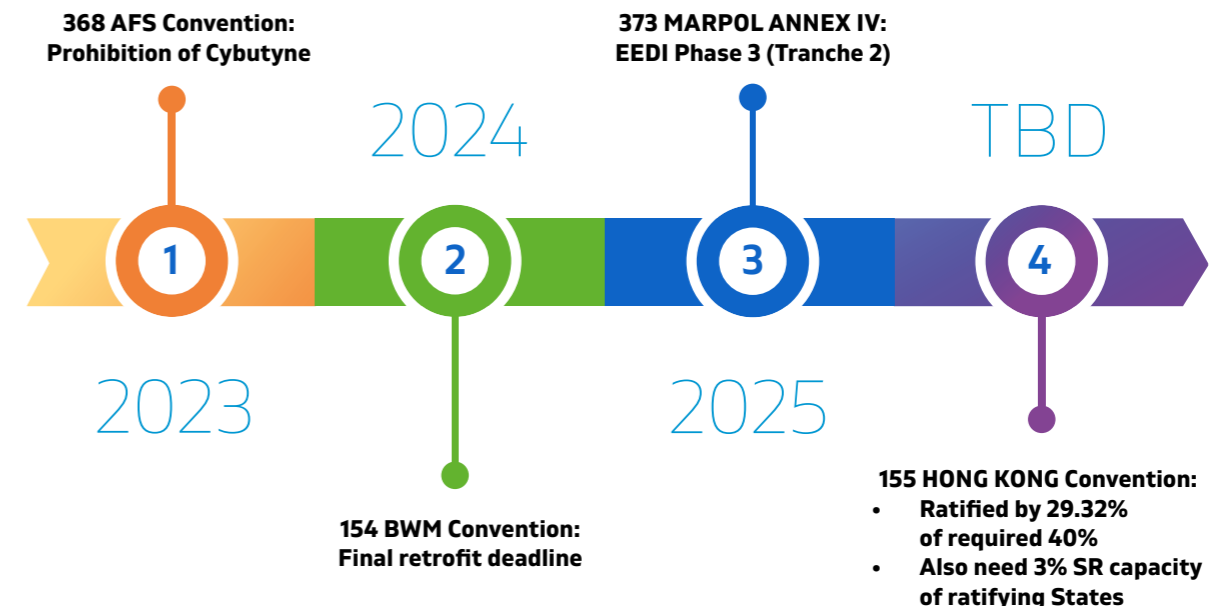
Additionally, the Company's and vessel's Inter-

nal Audit Checklists are oriented to monitoring of compliance with applicable legal requirements.

Evaluation is also achieved through the use of Environmental Performance Indicators (EPIS) which, when possible, are benchmarked quar-

terly within the fleet and annually across the industry. By the end of each calendar year the annual fleet environmental results and the progress of the Company's Planning actions related to ships activities are circulated to the managed fleet.

## Significant Environmental Requirements Timeline



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards



# Environmental awareness of crew & office personnel

At Paradise we understand that limiting the negative impact on the environment that results from our office and vessels activities and operation, requires efforts from all employees. Consequently, everyone's awareness and alertness to the change in daily life and work habits is imperative. We have established a relevant environmental awareness Program that aims to minimize the impact on the environment related to our activities and to promote best environmental practices.

Office activities are divided in 2 main categories i.e. resources consumption (including energy) and garbage management. The target is to make the most efficient use of resources, material, electricity, heat and water, as well as to reduce the quantity of garbage and minimize the impact from contamination.

Resource Management Methodology: The key words for efficient use of resources are: Reduce, Re-use, Recycle and Recover (4R).

- **Reduce:** Wherever possible, it would be best to reduce material, energy and water consumption, so as to produce as little waste as possible.
- **Re-use:** Once a product or material, solid, liquid, energy, etc. has been used, every effort

should be made to re-use it, if feasible.

- **Recycle:** Recycling should be considered only for materials and products that cannot be re-used. Although, recycling does help to conserve resources and reduce waste, there are economic and environmental costs associated with waste collection and recycling process. Company's involvement is restricted to the collection and forwarding of material for recycling.
- **Recover:** It may be possible to recover materials or energy from solid waste that cannot be reduced, re-used or recycled at source. This is a specialized activity, not within Company's capabilities.

Through implementing the waste management procedures, the current practices shall be examined and changes shall be considered. Opportunities to Reduce, Re-use and Recycle, to save energy and to improve the management of chemicals shall be investigated as well.

A lot of initiatives can be taken by changing our attitudes and habits. Some cases will require substantive involvement from Managers, employees and 3rd parties. Some will be simple, with low or no-cost; others will require the development of the existing infrastructure or

supply of new equipment. To address all of the above cases the following 2-fold approach has been selected:

- Cases that data is not available or cannot be measured or determined. Mostly, they are simple cases of no or low-cost implementation that mainly require changes in habits.
- Cases that data should be collected and measured prior to define targets

Training courses, regarding the Company's Environmental System, for both of shore and ships' personnel are designed, while we are planning to initiate 2 Campaigns:

## a. For the shore personnel focusing on the following:

1. Use public transportation when possible.
2. Organize a car pool and encourage others to do the same

## b. For all personnel focusing on the following:

1. Re-usable parts are preferred, such as rechargeable batteries.
2. Energy saving material is also preferred such as printers/copiers with double-side capability.
3. Non-polluting products and chemicals are preferred.
4. Devices/equipment having long service life and good after sales services are preferred.
5. Environmentally friendly suppliers' preference.

6. Preference of products marked with the Environmental "Eco" Logo.
7. Company's printers toner refilling.

Till 2027 we are scheduling to establish an Environmental notice board (Green Board) ashore and onboard to communicate new "green" ideas, post environmental information, announcements, posters, results of implemented programs, promote relevant ideas and best practices etc.

## REDUCTION OF PAPER AND BATTERIES CONSUMPTION

We have realized that the average employee generates approximately 1 kilogram of paper and paperboard products every day. From mistakes printed, bad photocopies and reports 90 % of all office waste is paper. With so much paper discarded on a consistent basis, offices are ideal for recycling programs because large quantities of paper can be gathered efficiently. Therefore we are about to design a program to eliminate depletion of resources related to our activities and to promote environmental best practices, directing our efforts to "Reduce" by changing habits and implementing specific measures like:

- Recycling paper
- Minimizing photocopy
- Minimizing paper use for filing, circulation and communication by using electronic media
- Initiating batteries recycling



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

**SOCIETY**



1. Health and safety of crew on board
2. Human Capital management
3. Protection and respect of human rights
4. Rew physical, emotional & social well-being
5. Employees' physical, emotional & social well-being
6. Health and safety of office employees
7. Human Resources training
8. DEI



# 7 Human Resources

The Company perceives its employees as valuable assets and believes that they constitute the cornerstone for the safe operation of the vessels. Through encouraging job satisfaction, motivation and provision of incentives to the staff, Company ensures the implementation of set policies, procedures and SEMS.

Financial awards have been established in order to recognize and reward employees when good performance has been observed. Management policy is that individuals and groups are recognized for their contributions toward achieving goals.

It was agreed that Company's "Benefits and Awards" should be communicated to the fleet. A relevant revision was made on the SEMS Procedures CP01 "Shore Based Personnel" and CP03 "Seafarers Familiarization, Training & Appraisal Procedure" which were enhanced in order to include motivations and incentives offered to shore based and onboard personnel respectively. All seagoing and shore-based personnel should be aware of the Company's benefits and awards in order to be further motivated to work in accordance with Company's requirements and contribute to its effort for QSE excellence.

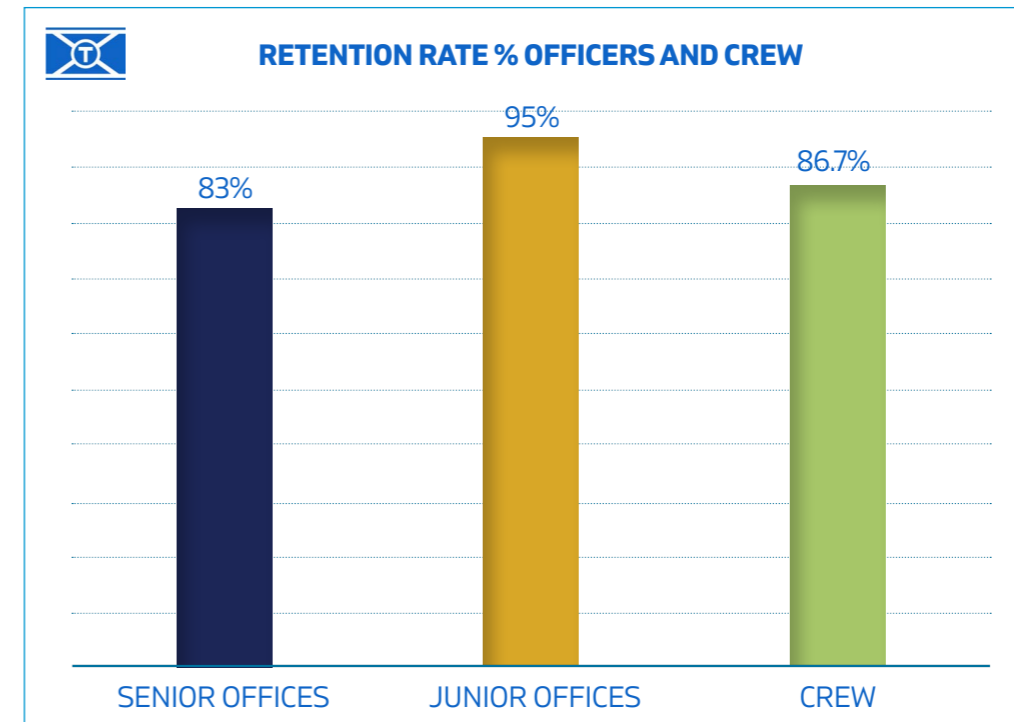


Within 2022, we had no termination of employment or new hires. When terminations occur, they are discussed and analyzed along with lessons learnt from the exit interviews. Likewise, in cases of new employments the Company's procedures for sufficient training and familiarization prior to taking over fully duties, are properly followed. Only essential new hires will be conducted within 2023. We emphasize the importance of ongoing learning, training, and professional devel-

opment to enhance ethical awareness and competence among employees. We encourage employees to ask questions, seek guidance, and engage in ethical discussions.

## RETENTION RATES

Paradise Navigation enjoys very strong loyalty by Management and employees who have been with company since the re-birth in 1996-1998 and also own shares in **Paradise Gas Carriers**.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



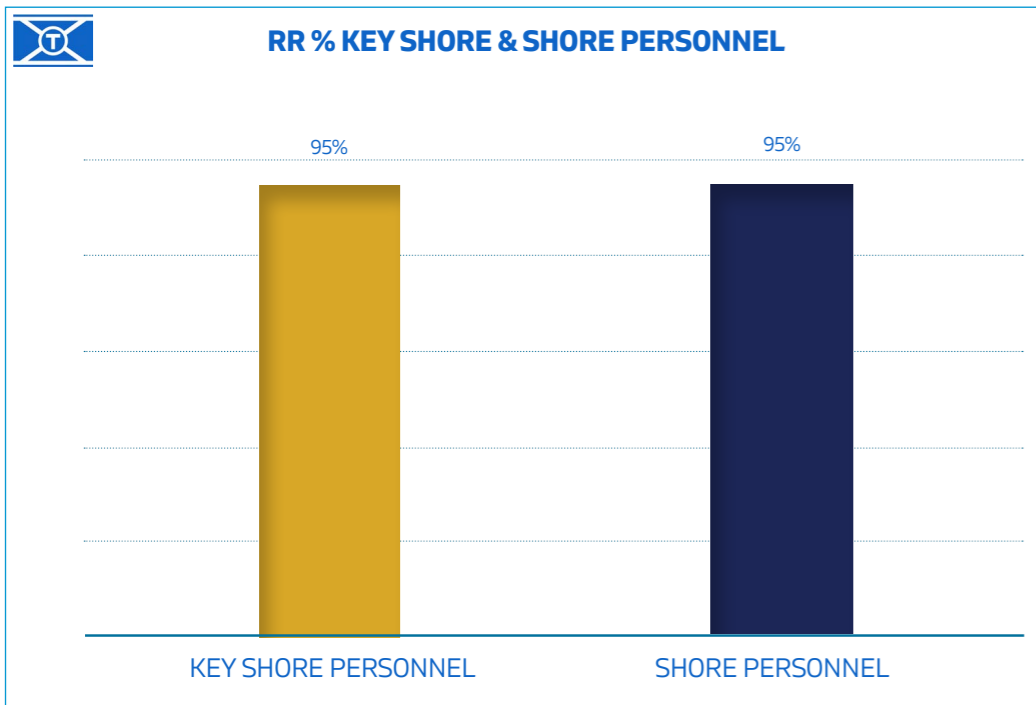
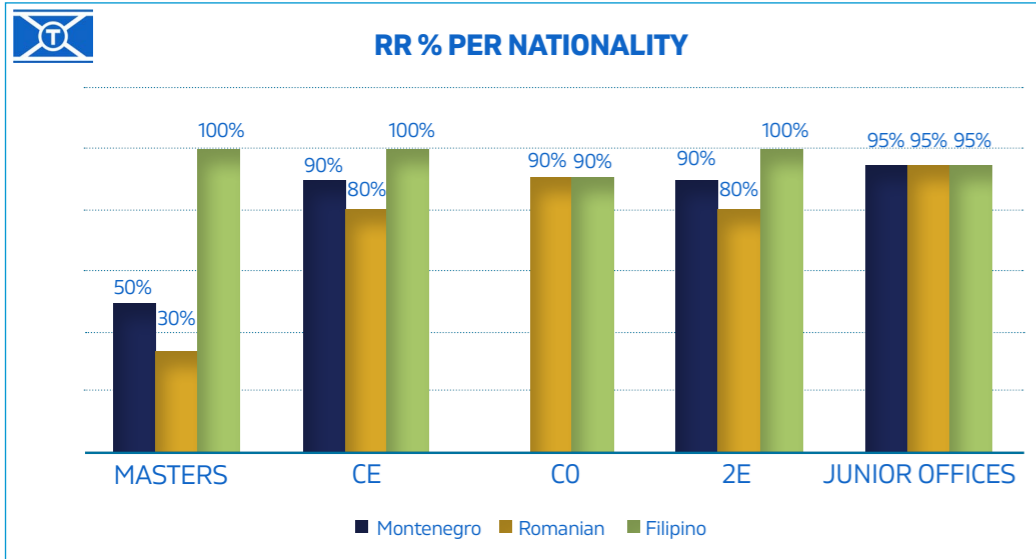
Society



Governance



Sustainability Standards



## Training issues in 2022

Our Company is committed towards improving the SQE skills of its ship / shore personnel. All training requests and training needs are covered independently of the budget, since this is considered a priority by our Company's Top Management. The training requirements in the individual job descriptions are reviewed periodically to ensure that all individuals maintain their training levels to meet changing needs of the ship-

ping industry. Job descriptions were also reviewed in order to ensure that they remain valid and ensure that accountability and responsibility per role is well defined.

The training of seagoing and shore personnel was reviewed as of its effectiveness and adherence to Company's training plan with satisfactory results. The Company implements onboard, in-house and external



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

training (initial, on-the-job and refresher) for the seafarers to ensure their awareness and conformity with SEMS and international requirements and standards.

The training conducted during 2022 to the shore staff and seagoing personnel was also reviewed by the Committee and verified to be in accordance with the plan.

All training needs identified in the shore staff appraisal reports have been given priority and resolved. In order to ensure that individuals maintain their training levels at optimal level and identify any additional training requirements, the Training Matrix with the minimum training requirements for the Shore and Seagoing staff, as well as the onboard CBT Plan, was reviewed for its effectiveness and adequacy considering changing industry requirements, as well as, by

- Monitoring new legislation.
- Reviewing appraisal records including feedback from onboard drills and exercises.
- Reviewing vessel performance trends.
- Assessing competence in rank or in preparation for promotion.
- Reviewing audit and inspection trends.
- Correlating non-conformances, incidents and near misses.

The Shore personnel training matrix was discussed in order to validate and amend it, as required. The training budget is unlimited in order all training needs (scheduled and un-

scheduled) to be satisfied. The disciplinary TMSA requirements were reminded and it was highlighted that all those who have been involved in operational incidents should be re-educated. The Company monitors and records training results and training effectiveness which is measured by:

- Feedback from trainees.
- Company representation at training courses.
- Review of appraisal records.
- Review of audit and inspection trends.
- Correlation of non-conformances, incidents and near misses.

### Seafarers Company's Seminars

The Target for 2022 was 100% of all Senior Officers to attend Company's seminars, Open Forums

Officers' Company's Seminars are tools to communicate safety and environmental related information, highlight / refresh the essential points of the SEMS, promote a safety culture, communicate any new / forthcoming regulations and most of all promote an open discussion with the participants and obtain essential feedback for improving Company's operations and procedures.

The scope of the Company's Seminars is to strengthen bonds between the office staff and the seafarers and discuss issues of mutual concern. The goals set for the Open Forum are the following:

- Reassure Seafarers' Job Security;
- Promote a strong Safety Culture;
- Discuss Best Practices for the Management of Crew;
- Discuss QSE, Company's Policies and KPIs;
- Provide training regarding SEMS amendments;
- Provide recommendations for SEMS improvement;
- Promote the concept of continuous improvement & safety and environmental excellence;

- Discuss lessons learnt for Company's incidents;
- Discuss current Company's Campaigns, etc.

Officers' Company's Seminars carried out within the year along with the planned ones for 2023 were discussed. Our target is that all Senior Officers will attend a Company's Seminars during a 2-year period. A process for the monitoring of the Officers' attendance of Company's Seminars was established. The Crew Manager pointed out that the 2022 target has been achieved.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

# Health & Safety

The Management of Paradise Navigation SA is committed to take all reasonable precautions and measures, during the operation of managed vessels, in order to ensure safety at sea, prevention of human injury or loss of life and avoidance of damage to property and the environment.

The Company's goal is to achieve ZERO incidents (including injuries) through continuous improvement. To fulfil these objectives, the management is committed to the following approach:

- Compliance with mandatory rules and regulations and taking into consideration the Codes, guidelines and standards recommended by the IMO, Flag Administrations, Class Societies and Industry organizations, applicable to operations of managed vessels.
- Adherence to an Integrated Management System (SEMS) by all Company's employees, including managed vessels, which promotes the concept of HSSQEE excellence, continuous improvement and enhancement of personnel skills.
- Assigning employees possessing sound skills and capabilities in required areas of responsibility, including adequate verification resources.

- Defining the organization, responsibility, authority and interfacing of the various management functions within the frame of the SEMS.
- Providing for safe and environmentally sound practices in the operation of managed vessels.
- Providing and maintaining a safe working environment onboard to assist in preventing human injury and loss of life.
- Providing the necessary training to ensure that Company's employees are capable of achieving safety and pollution prevention objectives in the work they perform.
- Providing facilities, systems/equipment and a maintenance system that is suited for the purpose of achieving objectives.
- Conducting management review meetings and management system audits.

This Policy has the full support of Top Management and applies to all Company's employees.

## Health and Hygiene Policy

Paradise Navigation SA holds health and hygiene as first priority in its operations, while its outmost concern is to always ensure that all employees execute their work under safe and hygienic conditions.

In order to strive toward its goal, the Company:

- Complies with all applicable legislation and regulations, observes relevant guidelines, and applies responsible standards where laws and regulations do not exist.
- Seeks to identify and evaluate health and hygiene risks related to its operations that potentially affect employees, contractors or the public and establishes appropriate safeguards.
- Communicates knowledge about health and hygiene risks to individuals in potential risk or organizations and the scientific community.
- Determines at the time of employment and thereafter, as appropriate, the medical fitness of employees to perform their work without undue risk to themselves or others.
- Implements programs and appropriate protective measures to control such risks, including appropriate monitoring of employees in potential risk.
- Provides or arranges, as appropriate, for medical services necessary for the treatment of employee occupational illnesses or injuries and for the handling of medical emergencies.
- Provides voluntary health and hygiene promotion programs designed to enhance employees' well being and personal safe-

ty. These programs should supplement, but not interfere with, the responsibility of employees over their own health care.

- Undertakes appropriate reviews and evaluations of its operations to measure progress and to enforce compliance with this Policy.

Information about employees are confidential and should not be revealed to non-medical personnel except at the request of the employee concerned, or when required by law, when dictated by overriding public health considerations, or when necessitated by the Company's Drug and Alcohol Policy. This policy is continuously reviewed for its suitability and is available to the public and the Company's customers, vendors and suppliers and has the full support of Top Management and applies to all Company's employees.

## Drug and Alcohol Policy

It is the Company's Policy that no seafarer, whatever rank, will navigate the vessel or will operate its equipment while impaired by drugs or alcohol or where there is any risk of such impairment.

In following this Policy, Paradise Navigation SA:

- The company recognizes and adopts the limit set by the United States Coast Guard (USCG) for the maximum permitted blood/alcohol contents which is 40mg alcohol / 100ml blood..



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



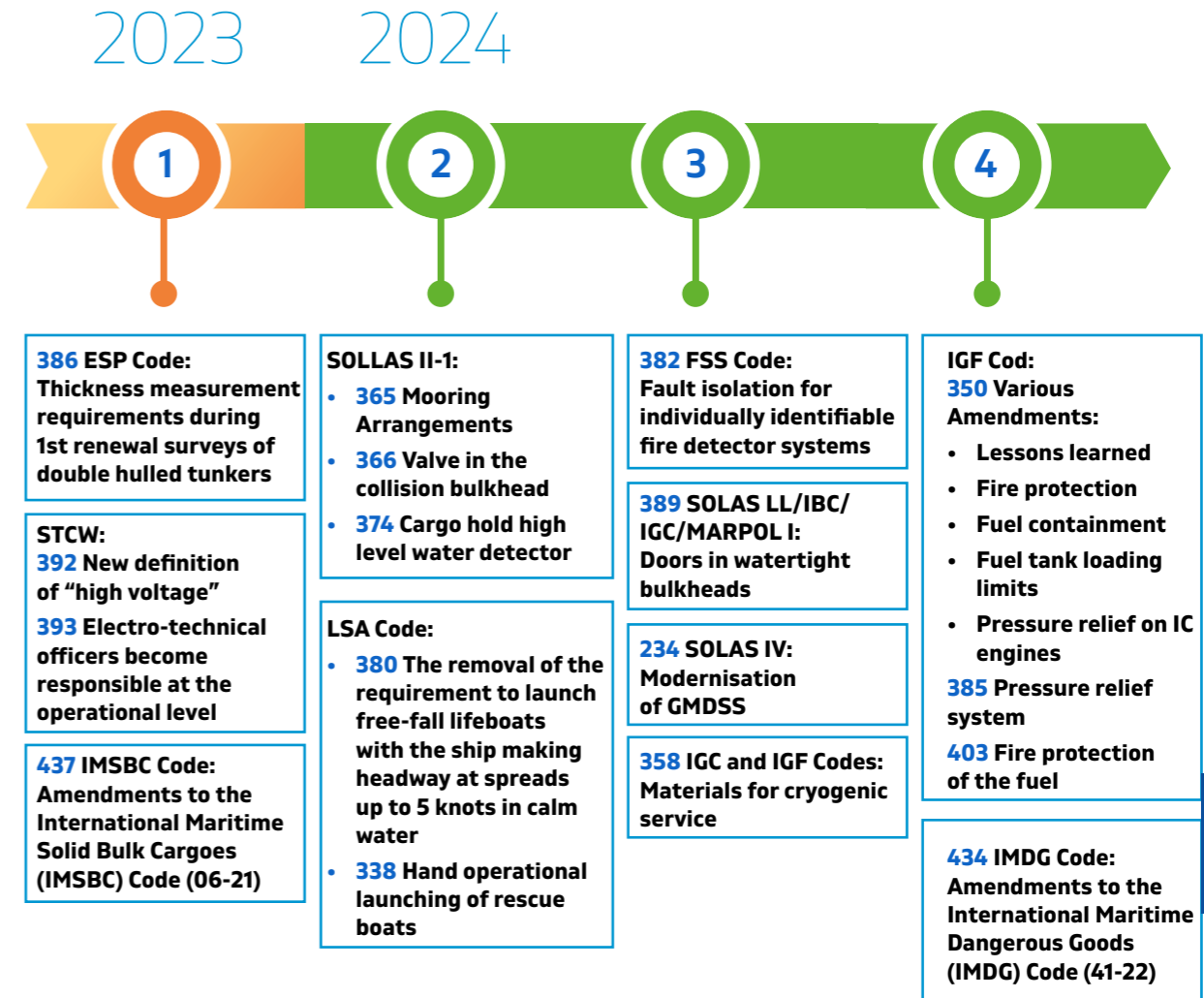
Governance



Sustainability Standards

- Has banned any form of drug, with the exception of prescribed drugs, as well as the misuse of legitimate drugs. If a crewmember is found in possession of drugs then the Local Authorities will be contacted immediately.
  - Has implemented random testing of all crew for banned substances and alcohol.
  - Controls the use of all medical supplies on board the managed vessels.
  - Will dismiss and impose penalty, as per National and International regulations, to anybody:
    - Found under the influence of alcohol or banned substances on board the vessel;
    - caught in possession of unregulated alcohol or banned substances;
    - found to have been instrumental in bringing alcohol or banned substances on board;
    - found to have a positive trace in any random testing sample, unless prior notice with authorisation for use, had been given to the Master.
  - On no account shall a person under the influence of drugs or alcohol, be allowed to stand watch or perform any other duty, involving the safety of the vessel, her crew or cargo, and the public.
  - Will take all disciplinary action, including dismissal, against anybody consuming alcohol, for at least 4 hrs prior scheduled watch-keeping duties or work period.
  - Any crewmember suspected for being under the influence of drugs or alcohol, while on duty, shall be immediately relieved from his duty and placed under observation until the influence of drugs or alcohol subsides.
  - All crewmembers understand that it is their duty and benefit, to report immediately to the appropriate Officer or the Master, if they suspect or have evidence that one of their fellow crewmembers is intoxicated.
  - The use of alcohol on the part of the pilot while performing his duties is strictly prohibited; if a pilot is noticed to be under the influence of substances resulting to the incapability of performing his duties, he will not be allowed to be part of the bridge team.
  - Requires all new recruits, prior their embarkation, to undergo a Drug and Alcohol test.
  - Requires monthly tests onboard, administered by the Master on all crew members and random tests, initiated by the company on a selected small number of crew members (different every time the test is carried out). During these tests, the results are required to be submitted to the company by email, within two hours from the time they were requested.
- All employees must be adequately informed on the provisions of this Policy and must comply with their intent. This Policy has the full support of Top Management and applies to all employees.

## Significant Safety Requirements Timeline



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards



## Company's Personnel Welfare & Wellbeing

Our Company aims to be caring, emotionally intelligent, reduce stigma and also assure the mental wellness of our seafarers especially during the current challenging times. Our policies were reviewed and strategies for supporting and improving the mental wellbeing of our seafarers were discussed considering the INTER-

TANKO Crew Welfare Management and Mental Wellness guide. Our peoples' voices are being heard, we strive to be close to them and constantly promote to all shore and seagoing personnel that the management is available 24/7 to discuss their concerns and provide any necessary assistance.

### PHYSICAL & MENTAL HEALTH target 2023

S/N	OBJECTIVES	PARAMETERS	REMARKS	TARGET FOR 2023	RESPONSIBLE	RESULT FOR PERIOD
01	Promote and ensure staff's Physical & Mental Health. Continuous improvement of staff's Wellbeing.	1. Complains about bullying or harassment per quarter		Zero	QSE Manager	
		2. Complains regarding supervisors' abusive behaviour (badmouthing, favouritism, discrimination) per quarter.		Zero		
		3. Mental health issues reported per year.		Zero		
		4. Compliance with Seafarer's Employment Agreement (SEA) regarding the agreed period on board.		100%		
		5. Crew Mental Health/Wellbeing Surveys per annum.		One (1)		

### ACTIONS

- Action 1:** Investigate all bullying & harassment complains if applicable – proceed in disciplinary action if required. Communicate lessons learnt to the fleet.
- Action 2:** Investigate unsuccessful handling of crewmembers Medical/Health issues cases. Proceed in any necessary process improvements, 3rd party service evaluation and follow up on relevant cases.
- Action 3:** Shore & Sea staff briefing/debriefing process to include Mental Health issues.
- Action 4:** 24/7 helpline information and usage to be promoted.
- Action 5:** Physical & Mental Health Campaigns to be initiated.
- Action 6:** All Senior Officers to be trained on Mental Health Awareness.
- Action 7:** Mental Health & Wellbeing to be added as MRM agenda item



## Review of Company's Objectives, Targets and KPIs

The progress towards the achievement of our set targets / KPIs of 2022 was presented to the MRC by the DPA along with our KPIs for 2023. It was highlighted that all Managers are responsible for achieving their targets and objectives.

HUMAN RESOURCES DEPARTMENT - 2022						
S/N	OBJECTIVES	PARAMETERS	REMARKS	TARGET FOR 2022	RESPONSIBLE	RESULT FOR PERIOD
H1	Promote staff continuity, with an emphasis on retaining and developing people in key roles. Improvement of retention rate of our shore employees	1. Retention rate over a 2-year period of key shore staff and superintendents.	Basis the key personnel of Operations, Technical, Purchasing, Marine, Quality, Crew and Management Personnel. Note: Calculations as per INTERTANKO formula	Over 88%	QSE Manager	Achieved
		2. Retention rate over a 2-year period of shore staff.		Over 86%		Achieved
ACTIONS						
<p><b>Action 1:</b> Identify and evaluate reasons for personnel not retained. Prepare proposals to the management.</p> <p><b>Action 2:</b> During end of year annual review investigate necessity of revision of company salary scheme, rewards etc. base on the evaluation.</p> <p><b>Action 3:</b> Lessons learnt from Exit Interviews to be analysed during MRC.</p> <p><b>Action 4:</b> Conduct a Shore Personnel Job Satisfaction Survey focusing on Motivation, Work-Life Balance, Personal Growth, Work Environment and Management Efficiency.</p>						

HUMAN RESOURCES DEPARTMENT - 2022						
S/N	OBJECTIVES	PARAMETERS	REMARKS	TARGET FOR 2022	RESPONSIBLE	RESULT FOR PERIOD
H2	Promote health awareness of seagoing personnel, improvement of health safety quality and health standards onboard and reduce occupational hazards	Complaints related to MLC on an annual basis.	Basis complaints received by crew onboard.	0	QSE Manager	Achieved
ACTIONS						
<p><b>Action 1:</b> Monitoring health hazards / incidents and continual reduction through proper corrective and preventive measures and early detection</p> <p><b>Action 2:</b> Health campaigns to be implemented</p> <p><b>Action 3:</b> Health risk assessment onboard to be enhanced</p> <p><b>Action 4:</b> Include MLC in Pre-boarding training and CBT training onboard</p>						

## CREWING DEPARTMENT - 2022

S/N	OBJECTIVES	PARAMETERS	REMARKS	TARGET FOR 2022	RESPONSIBLE	RESULT FOR PERIOD
C1	Promote staff continuity with an emphasis on retaining and developing people in key roles. Improvement of retention rate of our Senior Officers.	1. To maintain the retention rate over a 2-year period of Senior Officers.	Crew Manager shall keep a record of the total number of Masters, Chief Engineers, Chief Officers and 2nd Engineers / Officers employed. Retention rate will be calculated using the INTERTANKO Formula.	More than 88%	Crew Manager	<b>Not Achieved (83%)</b>
		2. To maintain the retention rate over a 2-year period of Officers.		More than 86%		<b>Achieved</b>
		3. To maintain the retention rate over a 2-year period of ratings.		More than 86%		<b>Achieved</b>

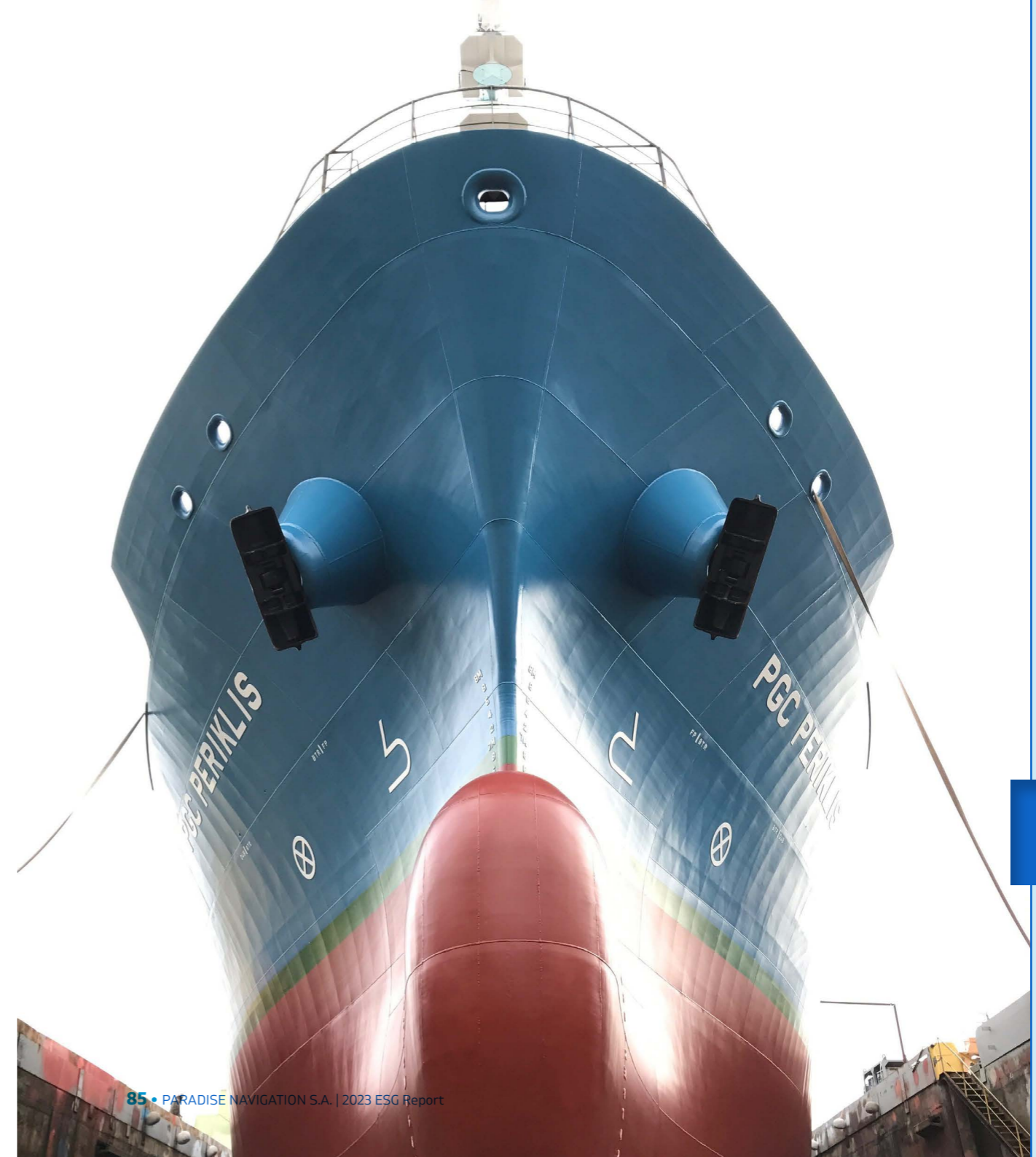
### ACTIONS

- Action 1:** Identify and evaluate reasons for those who are not retained. Proposals to Management.
- Action 2:** During the annual MRC, salary schemes, rewards, career development, etc. to be reconsidered based on the results of this evaluation.
- Action 3:** Lessons learnt from Exit Interviews to be analysed during MRC.
- Action 4:** Conduct a Crew Wellness Survey focusing on Mental Health, Fatigue, Social Interaction and Physical, Emotional & Spiritual Wellbeing.

C2	Promote, emphasize and enhance SMS through Company's Seminars. Officers' attendances to be promoted.	100% of Senior Officers to attend Company's Seminars, Open Forums etc.		65%	Crew Manager	<b>Achieved</b>
----	--	--	--	-----	--------------	-----------------

### ACTIONS

- Action 1:** Schedule of Company's seminars to be prepared annually and attendances to be planned.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

## HUMAN RESOURCES DEPARTMENT • Target 2023

S/N	OBJECTIVES	PARAMETERS	REMARKS	TARGET FOR 2023	RESPONSIBLE	RESULT FOR PERIOD
H1	Promote staff continuity, with an emphasis on retaining and developing people in key roles. Improvement of retention rate of our shore employees	1. Retention rate over a 2-year period of key shore staff and superintendents.	Basis the key personnel of Operations, Technical, Purchasing, Marine, Quality, Crew and Management Personnel. Note: Calculations as per INTERTANKO formula	Over 88%	QSE Manager	
		2. Retention rate over a 2-year period of shore staff.		Over 86%		

### ACTIONS

**Action 1:** Identify and evaluate reasons for personnel not retained. Prepare proposals to the management.

**Action 2:** During end of year annual review investigate necessity of revision of company salary scheme, rewards etc. base on the evaluation.

**Action 3:** Lessons learnt from Exit Interviews to be analysed during MRC.

**Action 4:** Conduct a Shore Personnel Job Satisfaction Survey focusing on Motivation, Work-Life Balance, Personal Growth, Work Environment and Management Efficiency.

H2	Promote health awareness of seagoing personnel, improvement of health safety quality and health standards onboard and reduce occupational hazards	Complaints related to MLC on an annual basis.	Basis complaints received by crew onboard.	0	QSE Manager	
----	---	---	--	---	-------------	--

### ACTIONS

**Action 1:** Monitoring health hazards / incidents and continual reduction through proper corrective and preventive measures and early detection

**Action 2:** Health campaigns to be implemented

**Action 3:** Health risk assessment onboard to be enhanced

**Action 4:** Include MLC in Pre-boarding training and CBT training onboard

## CREWING DEPARTMENT • Target 2023

S/N	OBJECTIVES	PARAMETERS	REMARKS	TARGET FOR 2023	RESPONSIBLE	RESULT FOR PERIOD
C1	Promote staff continuity with an emphasis on retaining and developing people in key roles. Improvement of retention rate of our Senior Officers.	1. To maintain the retention rate over a 2-year period of Senior Officers.	Crew Manager shall keep a record of the total number of Masters, Chief Engineers, Chief Officers and 2nd Engineers / Officers employed. Retention rate will be calculated using the INTERTANKO Formula.	More than 88%	Crew Manager	
		2. To maintain the retention rate over a 2-year period of Officers.		More than 86%		
		3. To maintain the retention rate over a 2-year period of ratings.		More than 86%		

### ACTIONS

**Action 1:** Identify and evaluate reasons for those who are not retained. Proposals to Management.

**Action 2:** During the annual MRC, salary schemes, rewards, career development, etc. to be reconsidered based on the results of this evaluation.

**Action 3:** Lessons learnt from Exit Interviews to be analysed during MRC.

**Action 4:** Conduct a Crew Wellness Survey focusing on Mental Health, Fatigue, Social Interaction and Physical, Emotional & Spiritual Wellbeing.

C2	Promote, emphasize and enhance SMS through Company's Seminars. Officers' attendances to be promoted.	100% of Senior Officers to attend Company's Seminars, Open Forums etc.		65%	Crew Manager	
----	--	--	--	-----	--------------	--

### ACTIONS

**Action 1:** Schedule of Company's seminars to be prepared annually and attendances to be planned.



**GOVERNANCE**

1. **Trusted relationships with our clients**
2. **Business ethics**
3. **Compliance and implementation of laws and regulations**
4. **Privacy & Security**
5. **Development of risk management assessment process**
6. **Digital transformation**



# 8 Management Functions

## TECHNICAL

In line with the company's policy of maintaining a thorough and up to date understanding of the vessels' structural, operational and cosmetic condition at all times, technical personnel are visiting each vessel at least twice each year and prepare an analytical technical report which is circulated to the top management. The company is using MESPAS, to monitor the PMS activities of the fleet which is always up-to-date by vessel to shore synchronization. Historical data and statistics are maintained for all vessels measuring performance on various aspects, including but not limited to, vetting inspections and PSC inspections.

## SAFETY

In-house training in ISM, ISPS, MLC, ISO, STCW, Structural Assessment, Drug & Alcohol abuse and Hazardous Material is conducted for all Senior Officers prior joining vessels. On board training in the above and additional subjects is conducted for other officers and crew, via CBT (Seagull). Regular scheduled and unannounced drills and exercises are being held ashore and on board. Table-top drills in VRP and California plan are carried out on an annual basis, through our QI in the US, mssrs O'Briens (for oil tankers) and Gallaghel Marine (for LPG vessels). Evaluation reports are used for identification of training needs. Near misses and incidents are analysed and circulat-

ed to all vessels as lessons learned. Since January 2018, Paradise Navigation SA is an active participant of the "Partners in Safety" initiative by Shell. Through participation in the relevant forums, we are working together with the leading shipping companies towards the ultimate aim of achieving "zero incidents" within our industry.

## CREWING

Through our crewing department, we cover recruitment for all ranks, using Greek, Montenegro, Romanian and Philippine officers and ratings. We are also supervising the recruitment process made by our Montenegro and Philippines agencies which provides us with candidate to join our fleet. For all nationality crew handled by our office we provide operational assistance such as: meeting visas formalities, flight arrangements and procedures, certification, Flag State applications and all other points related to safe embarkation/disembarkation of seafarers, issuing contracts and presenting terms and conditions, collaboration with ship agents, travelling agencies, external vendors, keeping updated files of sea staff in local shared drives are among some of the services we offer.

## INSURANCE

Since the new operation started, the company has focused its efforts on building and

steadily developing best possible relations with leading underwriters, particularly in the Norwegian and London risk markets. At present, the company has all of its vessels comprehensively covered for Hull and Machinery and allied risks with Gard as leaders. All vessels are entered with Gard P&I club. Fleet experience has been very rewarding and the fleet has excellent results in both Hull and Machinery and P&I. Paradise maintains regular face to face contact with all underwriters and Club principals who regularly visit and discuss openly with all departments.

## ACCOUNTING, FINANCE & REPORTING

- **Accounting:** Prepares individual and consolidated financial statements by USGAAP released on a quarterly basis and audited annually. Coordinates payments, monthly payroll and crew allotments and issues weekly cashflow reports.
- **Corporate Finance:** Arranges bank loans or other sources of financing, private equity or debt. Manages all matters related to banks and shareholders or investors.
- **Reporting:** Prepares Monthly Management Reports, including proforma P&L statements, OPEX breakdown and full cost analysis compared to the budget.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance

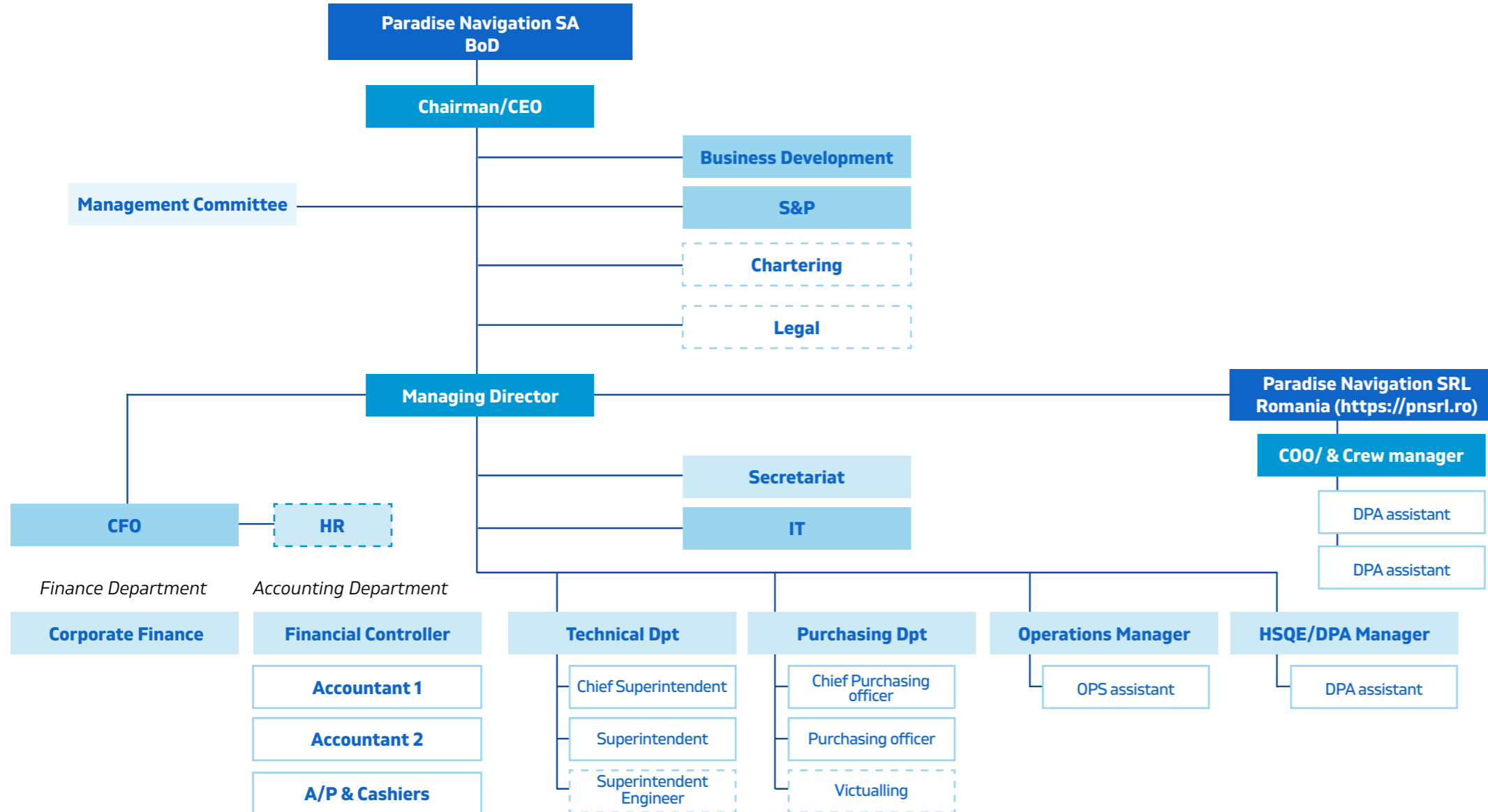


Sustainability Standards

# Organizational Structure



PARADISE NAVIGATION S.A.



# Ship-Owning Structure



# Organizational roles responsibilities and authorities

The Company's Management has appointed an Environmental Management Representative (EMR), who, irrespective of other responsibilities, has a defined role, responsibility and authority for:

- Ensuring that the EMS is established, implemented and maintained in accordance with the requirements of the International Standard ISO 14001;
- Reporting to Top Management, on all aspects of the company activities having significant environmental impact, ensuring they are identified, addressed and monitored;
- Reporting to Company's Management on EMS performance, including recommendations for improvement.

Furthermore, there is established onboard a Shipboard Safety & Environmental Committee (SEC) the objectives of its meetings include:

- Environmental protection by avoiding damage and preventing accidents;
- Promoting safe and environmental friendly working practices on board vessel;



- Advising the office of any experience or measure taken which may be of value to other vessels;
- monitoring and increasing the effectiveness of the EMS and Company's Policies;
- Motivating the crew in the observation of the Environmental and other Company's Policies

# Business Ethics

## CODE OF ETHICS

The Code of Ethics is based on Company's beliefs and values establishing its commitment to honesty and integrity. The main function of the Code of Ethics is to make the fundamental values and principles, which guide the activities of the Company, known within the Organization and its managed vessels and to all agents, contractors, suppliers and other third parties, the Company cooperates with. The Code of Ethics applies to the whole Company and managed vessels. The aim of the Codes is to ensure that the Company is united by strong and clear values and the highest standards of behaviour and to orient individual conduct with the purpose of confirming the image of correctness, prestige and the good reputation which have always been the assets of our Company. The Company expects from all personnel behaviour in line with the established principles, laws, rules and standards in order to protect its image, reputation and the quality of the services provided. All employees are responsible to comply with the Codes and actively support their principles. The Managers are responsible to ensure implementation and management of the Codes in their area of interest. The development, implementation, applicability and relevance of the Codes are reviewed during internal audits and management reviews. Any employee who fails to comply with the Codes

is subject to disciplinary action up to and including dismissal

Our most important ethical principles are:

- **Integrity:** Act with honesty, transparency, and fairness in all business dealings. Uphold high moral and ethical standards, and avoid conflicts of interest.
- **Respect:** Treat all individuals with dignity, respect their rights, and promote inclusivity and diversity. Create a safe and inclusive work environment that values different perspectives and fosters mutual respect.
- **Responsibility:** Take responsibility for the impact of the company's actions on various stakeholders, including employees, customers, communities, and the environment.
- **Accountability:** Be accountable for the company's actions and their consequences. Take ownership of mistakes, learn from them, and take appropriate corrective actions.
- **Compliance:** Comply with applicable laws, regulations, and industry standards. Strive to go beyond mere compliance and uphold ethical standards even when laws or regulations may not explicitly require it.
- **Trustworthiness:** Build and maintain trust



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

with stakeholders by consistently demonstrating reliability, credibility, and ethical behavior. Honor commitments and promises made to customers, employees, and other stakeholders.

- **Fairness:** Promote fairness and equality in all aspects of the company's operations. Treat employees equitably, provide equal opportunities, and avoid discrimination or favoritism.
- **Sustainability:** Consider the long-term impact of the company's actions on the environment, society, and future generations.
- **Confidentiality:** Respect the confidentiality of sensitive information, both internal and external, and maintain appropriate measures to protect privacy and data security.

We communicate these principles of ethics to all our members and we want to raise employee awareness on areas concerning ethical risk, fostering among them a culture of honesty and accountability. Our objective is to constantly provide guidance to employees helping them to recognize and deal with ethical issues, especially in preventing bribery and corruption, and we provide them with the appropriate mechanisms to report any unethical conduct they may perceive. We encourage employees to act with transparency, maintain high ethical standards, and avoid conflicts of interest, establishing a corporate commitment to honesty, integrity, and ethical behavior in all aspects of the business.

- The Paradise Navigation S.A. shore staff and seagoing personnel shall not be involved in any kind of harassment, abuse, discrimination or child pornography.
- The Company's personnel shall not conceal any identified unsafe act or event which affects or could affect human health and safety, the environment and the property.
- The Company's personnel shall carry out their duties in a professional and impartial manner. All Company's employees shall act in honesty and good faith.
- All information regarding Paradise Navigation S.A. operations, projects, reports or any work carried out shall be treated as business confidential to the extent that such information does not conflict with Company's policy for HSSQEE excellence and is not already disseminated or made generally available to third parties.
- Any kind of offer, gift or bribe in any form direct or indirect, including kickbacks is strongly prohibited in all Company's operations. Furthermore, the Company prohibits the use of other routes or channels for provision of improper benefits to, or receipt of improper benefits from agents, contractors, suppliers or employees of any such party or government officials.
- Procurements are conducted in a fair and transparent manner

# Anti-Corruption

PNSA's anti-corruption policies are designed to promote ethical conduct, integrity, and compliance with anti-corruption laws and regulations. More specifically:

- **Prohibition of Bribery and Corruption:** The policy refers to the company's zero-tolerance stance on bribery, corruption, and any form of unethical behavior.
- **Compliance with Anti-Corruption Laws:** The policy emphasizes compliance with relevant anti-corruption laws.
- **Conflicts of Interest:** The policy addresses conflicts of interest and provides guidelines for employees to identify and manage situations where personal interests may conflict with their duties to the company.
- **Gifts, Hospitality, and Entertainment:** Clear guidelines are provided to employees regarding the giving and receiving of gifts, hospitality, and entertainment.
- **Due Diligence on Business Partners:** The policy require conducting due diligence on potential business partners, such as agents, consultants, suppliers, and contractors, to ensure they adhere to similar ethical standards and do not engage in corrupt practices.



- **Monitoring and Auditing:** The policy states the company's commitment to monitoring and auditing compliance with anti-corruption policies.
- **Disciplinary Measures and Consequences:** The policy outlines the consequences of non-compliance, including disciplinary measures, which may include warnings, suspension, termination, and legal action, depending on the severity of the violation.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards





## Compliance with laws and regulations

Compliance with applicable laws is important for our company. Both the BOD and our Managing Director help ensure compliance, they instill a culture of compliance throughout the organization by setting a strong ethical tone at the top. They regularly emphasize the importance of following laws and regulations and encourage employees to report any concerns or potential violations through proper channels. More specifically, they:

- **Stay Informed:** They keep abreast of relevant laws and regulations that apply to our industry and the operations of our company. They regularly review legal requirements, including employment laws, tax regulations, environmental regulations, data privacy laws, and any other industry-specific laws that are applicable.
- **Monitor policies:** They monitor policies and procedures necessary to comply with relevant laws and regulations, i.e. employee training, reporting mecha-

nisms, and ongoing monitoring and auditing processes.

- **Monitor Regulatory Changes:** They stay vigilant about changes in laws and regulations that may affect our industry.
- **Engage Legal Counsel:** They work with legal and tax counsels who provide guidance on legal and tax matters, help interpret complex regulations and ensure compliance.
- **Seek Professional Advice:** In complex legal

matters, they would seek advice from legal and compliance professionals who specialize in the relevant areas.

- **Conduct Regular Audits:** They annually review and assess the company's compliance with applicable laws and regulations by engaging independent auditors.
- **Engage with Industry Associations:** They participate in industry associations and forums to stay informed about best practices and regulatory developments.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

# Areas

## Future Legislation - Actions to Be Taken

Paradise Navigation monitors all the developments of the forthcoming Rules and Regulations and all actions necessary to comply with are reviewed and discussed. New requirements affecting all types of vessels were discussed and relevant responsibilities were assigned for elaboration, and proposal to Management regarding the necessary actions to be taken were addressed.

- The Governments of both New Zealand and Australia have adopted regulations regarding the control of biofouling on ships' hulls
- Israel authorities have enacted a new regulation that will put in place measures for ships at berth similar to those set forth by the EU Sulphur Directive.
- AMENDMENTS TO ESP CODE
- Amendments to AFS Convention containing the control mechanisms for the ships bearing anti-fouling system containing Cybutryne in their external coating layer of the hull
- MARPOL Annexes I, II, IV, V and VI – regional reception facilities within Arctic waters
- MARPOL Annex V – Garbage Record Book
- MARPOL Annex VI – Mediterranean sulphur ECA
- MARPOL Annex VI – information to be included in the BDN
- MARPOL Annex VI – information to be submitted to the IMO Ship Fuel Oil Consumption Database
- Ballast Water Record Book (BWRB)
- Grey water and treated sewage in ballast tanks
- Ports with challenging water quality
- Energy Efficiency Design Index (EEDI)
- Licensing scheme for bunker suppliers
- Unified Interpretations
- Revision of the IMO GHG Strategy
- Mid and long-term measures to reduce GHG emissions
- Correction factors for the Carbon Intensity Indicator (CII)
- Revision of the Data Collection System (DCS)
- On-board CO<sub>2</sub> capture
- Lifecycle GHG/carbon intensity for marine fuels
- Marine plastic litter
- Identification and protection of special areas, ECAs and PSSAs



## US GAAP Standards

Paradise Navigation uses US GAAP Standards. Compliance with GAAP makes the financial reporting process transparent, providing terminology, definitions and methods. External parties can easily, quickly and securely compare financial statements of GAAP-compliant companies and accurately assume consistency. GAAP standards enable investors and stakeholders to make sound decisions. The consistency of GAAP compliance also allows companies to evaluate strategic business choices

GAAP incorporates three components: 10 accounting principles, FASB rules and standards, and generally accepted industry practices.

## 10 GAAP Principles:

- Principle of Regularity
- Principle of Consistency
- Principle of Sincerity
- Principle of Permanence of Methods
- Principle of Non-Compensation
- Principle of Prudence
- Principle of Continuity
- Principle of Periodicity
- Principle of Materiality
- Principle of Utmost Good Faith



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

# Trusted Relationships with clients

Enjoys good reputation in market for integrity, ethics and quality with a 15 years record of almost zero Hull & Machinery claims to date.

Well established relations with our Partners including Banks.

Within 2022, there were no customer complaints, KPI -Number of customer complaints per vessel per year less than 3-target achieved. Furthermore, no cargo shortages or speed claims were received within the year, so KPIs - Cargo Shortages per quantity of cargo transferred less than 1 case per year- and - Number of Speed or underperformance claims less than 1 per vessel per year- were also achieved. The Committee reminded that terminal reports with negative comments are treated as Customer complaints and are analyzed / discussed during the Management Review meetings. The Company's personnel visiting the vessels will continue to communicate to the rest of the Committee members the various comments when received during their visits onboard / attendances.



## OPERATIONS DEPARTMENT target and performance 2022

S/N	OBJECTIVES	PARAMETERS	REMARKS	TARGET FOR 2022	RESPONSIBLE	RESULT FOR PERIOD
1	To minimize any customer complaints by discharging a service that continuously and consistently meets the customer needs.	Number of customer complaints per number of voyages completed	Basis off-hire customer complaints received for vessel voyages completed.	Less than 3	Operations Manager	<b>Achieved</b>

### ACTIONS

**Action 1:** Analysis of all claims and protests and all related NCRs.

2	To monitor, evaluate and improve the performance of Company vessels in terms of discharging, pumping and speed performance.	1. Cargo shortages per quantity of cargo transferred.	Basis cargo shortage claimed per discharge.	Less than 1	Operations Manager	<b>Achieved</b>
		2. Number of speed claims per number per vessel per year	Basis customer complaints received per number of voyages completed.	Less than 1 per year	Operations Manager	<b>Achieved</b>

### ACTIONS

**Action 1:** Identify causes and take corrective actions in case of low performance in connection with C/P requirements  
**Action 2:** Monitoring and root cause analysis of all letters of Protest.

## TARGET 2023

S/N	OBJECTIVES	PARAMETERS	REMARKS	TARGET FOR 2022	RESPONSIBLE	RESULT FOR PERIOD
1	To minimize any customer complaints by discharging a service that continuously and consistently meets the customer needs.	Number of customer complaints per number of voyages completed	Basis off-hire customer complaints received for vessel voyages completed.	Less than 3	Operations Manager	

### ACTIONS

**Action 1:** Analysis of all claims and protests and all related NCRs.

2	To monitor, evaluate and improve the performance of Company vessels in terms of discharging, pumping and speed performance.	1. Cargo shortages per quantity of cargo transferred.	Basis cargo shortage claimed per discharge.	Less than 1	Operations Manager	
		2. Number of speed claims per number per vessel per year	Basis customer complaints received per number of voyages completed.	Less than 1 per year	Operations Manager	

### ACTIONS

**Action 1:** Identify causes and take corrective actions in case of low performance in connection with C/P requirements  
**Action 2:** Monitoring and root cause analysis of all letters of Protest.



# Privacy & Security

## Cyber Security

Cyber-attacks cost the maritime industry hundreds of millions of dollars. The Company is actively working to reduce risk in that domain. Successful cyber security is a collaborative approach and the Company is committed to protect its vessels, its people and its business.

Cyber security can be defined as “the collection of tools, policies, security concepts, security safeguards, guidelines, risk management approaches, actions, training, best practices, assurance and technologies that can be used to protect the cyber

environment and organization and user’s assets”. All relevant information is included in our Cyber Security Plan, which has been revised and updated so as to include all new provisions of the lately published industry guidelines. Company also performs penetration tests to the office and to our managed vessels. A penetration test, is an authorized simulated cyber-attack on a computer system, performed to evaluate the security of the system. The test is performed to identify weaknesses and vulnerabilities), including the potential for unauthorized parties to gain access to



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

the system's features and data, as well as strengths, enabling a full risk assessment to be completed.

Adopting digital solutions and prioritizing cybersecurity is essential to protect sensitive information, maintain operational efficiency, and safeguard against cyber threats. We have started adopting such policies thanks to the guidance of our In-house IT officer and our IT service provider/ advisor.

Both are responsible for the following tasks when adopting digital solutions and implementing cybersecurity measures:

- **Conduct Risk Assessments:** They conduct a comprehensive risk assessment to identify potential vulnerabilities and threats associated with digital solutions and cybersecurity. This assessment covers areas such as data privacy, network security, software vulnerabilities, and employee practices.
- **Develop a Cybersecurity Strategy:** We have set out with their help a cybersecurity strategy aiming at protecting data, managing risks, and responding to cyber incidents.
- **Implement Strong Access Controls:** Have established strict access controls to ensure that only authorized individuals have access to sensitive systems and data.
- **Regularly Update and Patch Systems:** We endeavor to keep all software and systems up to date with the latest security patches and updates. Our IT officer regularly

reviews and apply patches to address any known vulnerabilities.

- **Data Encryption and Backup:** We regularly backup critical data and ensure backups are stored securely, preferably in off-site or cloud-based locations.
- **Employee Training and Awareness:** We provide cybersecurity training to all employees. Educate them about common cyber threats, best practices for secure online behavior, and the importance of data protection. We encourage employees to report any suspicious activities promptly.
- **Network Security Measures:** We deploy firewalls, intrusion detection and prevention systems, and secure network configurations to protect against unauthorized access and external threats. Our IT officer regularly monitors network traffic for unusual activity.
- **Incident Response Plan:** Following a recent ransomware attack we have developed an incident response plan that outlines the steps to be taken in the event of a cyber incident, such as a data breach or a malware attack.
- **Third-Party Security:** We have ensured that our external IT service providers meet our standards and have established clear security requirements in our contract.
- **Continuous Monitoring and Improvement:** We regularly review and update security measures to adapt to evolving threats and technological advancements



The company has developed Security Policy to protect its information assets from all threats, whether internal or external, deliberate or accidental, to ensure operations continuity, minimize damage and maximize return on investments and relevant industry opportunities.

To fulfil these objectives, the management is committed to the following approach:

- It is the Policy of the Company to ensure that:
  - Information and Systems identified as vulnerable to Cyber-attacks will be protected from a loss of
  - Confidentiality, integrity and availability.
  - Regulatory and legislative requirements are to be met.
  - Cyber Security Contingency Plans have been produced for support.
  - Cyber Security training will be available to all staff.
  - All breaches of information security, actual or suspected, will be reported and investigated.
- Guidance and procedures have been produced to support this policy. These include incident handling, information backup, system access, virus controls, passwords and encryption.
- The role and responsibility of the Information Security Officer is to manage information security and to provide advice and guidance on implementation of the Cyber Security Policy.
- All managers are directly responsible for implementing this Policy within their departments.
- It is the responsibility of each employee/ crew member to adhere to the Cyber Security Policy.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

IT DEPARTMENT						
S/N	OBJECTIVES	PARAMETERS	REMARKS	TARGET FOR 2022	RESPONSIBLE	RESULT FOR PERIOD
I1	Enhance the cyber security preparedness and protection of the company and the fleet vessels.	1. Average number of cyber security incidents reported from vessels		One (1)	CSO	Achieved
		2. Number of cyber security related incidents reported from shore / number of office employees (annual)		Three (3)		Achieved
		3. Zero unauthorized entries into facilities containing IT/OT systems		Zero		Achieved

#### ACTIONS

- Action 1:** Initiate a cyber security awareness campaign that will run within the whole year.
- Action 2:** Count number of security incidents caused by malicious software and number of records of blocked attacks.
- Action 3:** Review annually the Internet provider support contract and the Antivirus/Endpoint solutions provider support contract.
- Action 4:** Run a cyber security drill ashore and one onboard annually.

S/N	OBJECTIVES	PARAMETERS	REMARKS	TARGET FOR 2023	RESPONSIBLE	RESULT FOR PERIOD
I1	Enhance the cyber security preparedness and protection of the company and the fleet vessels.	1. Average number of cyber security incidents reported from vessels		One (1)	CSO	
		2. Number of cyber security related incidents reported from shore / number of office employees (annual)		Three (3)		
		3. Zero unauthorized entries into facilities containing IT/OT systems		Zero		

#### ACTIONS

- Action 1:** Initiate a cyber security awareness campaign that will run within the whole year.
- Action 2:** Count number of security incidents caused by malicious software and number of records of blocked attacks.
- Action 3:** Review annually the Internet provider support contract and the Antivirus/Endpoint solutions provider support contract.
- Action 4:** Run a cyber security drill ashore and one onboard annually.



## Development of risk management assessment process

Implementation of the Risk Assessment procedure ashore and onboard was reviewed. Risk assessments are conducted onboard prior to each high or medium risk operation, and relevant mitigating measures are identified in this respect.

All RAs are reviewed by competent shore staff in order to ensure their validity, consistency and effectiveness. In this respect, all RA are gathered in a "Risk Assessment database" which is forwarded to all vessels in order to ensure that at any common RA is applied across the fleet and that the standards are consistent. "Risk Assessment database" will be expanded, as necessary, and any actions

referred in the Risk Assessments should be observed / followed each time a relevant operation is carried out. The feedback received till now from the implementation of the RA library is more than satisfactory, since vessels' personnel consider it is as a valuable tool during the vessel's daily operation.

The DPA emphasized that the Company's representatives boarding the vessels should always highlight that the cases described in the existing libraries are not exhaustive. Vessel's personnel are obliged to identify new risks and conduct risk assessments / job hazard analysis. Any such new RA should be forwarded immediately to the Office for review.



Report Parameters



President's Message



PARADISE NAVIGATION Profile



Stakeholder Engagement



Materiality Process



Environment



Society



Governance



Sustainability Standards

## Overall quality, safety & environmental targets achievement in 2022 and 2023 goals

QUALITY, SAFETY & ENVIRONMENTAL DEPARTMENT						
S/N	OBJECTIVES	PARAMETERS (KPIs)	REMARKS	TARGET FOR 2022	RESPONSIBLE	RESULT FOR PERIOD
Q1	Zero Spills – Zero Incidents To minimize all accidents and hazardous occurrences that endanger the safety of personnel, property, assets under care (including the cargo) and the environment in general.	1. Number of Lost Time Injuries per unit exposure hour. $LTIF = LTIs \times \frac{1,000,000}{ExposureHours}$	Basis the number of Lost Time Injuries affecting employed seafarers and of the exposure hours applying to the period concerned. (In accordance with OCIMF, "Marine Injury Reporting Guidelines")	Less than 1	QSE Manager	Achieved
		2. Number of Total Recordable Cases Frequency per 1unit exposure hour. $TRCF = TRCs \times \frac{1,000,000}{ExposureHours}$	Basis the number of Total Recordable Cases affecting employed seafarers and of the exposure hours applying to the period concerned. (In accordance with OCIMF, "Marine Injury Reporting Guidelines".	Less than 2.8		Achieved
		3. Contractors LTIF		Less than 2		Achieved
		4. Contractors TRCF		Less than 2.8		Achieved
		5. Near misses reported per vessel per year.	Basis all reports received from internal external auditors, shipboard and shore-based personnel relating to near misses which however have not caused any actual injury or harm to personnel, environment, property or process.	2/month		Achieved
		6. Near Misses to be reported annually by Superintendents & Managers during visits on-board		10/year		Achieved
		7. Number of fatalities	Basis all Fleet Vessels.	0		Achieved
		8. Best practices to be identified per year across the fleet	Basis Reports including NCR, RA, NM, Audits, Reviews, Observations, Complaints, etc, received	6		Achieved

QUALITY, SAFETY & ENVIRONMENTAL DEPARTMENT						
S/N	OBJECTIVES	PARAMETERS (KPIs)	REMARKS	TARGET FOR 2022	RESPONSIBLE	RESULT FOR PERIOD
		9. Calculate Free Incident days.	Days without the occurrence of any incident are calculated, with aim to achieve the highest incident free days per vessel.		QSE Manager	Achieved
		10. BBS Observation report to be prepared per vessel per month	BBS safety behavioural tools	1		Achieved
Q2	To ensure that no time delays occur to any of the vessels due to any failure of the Management System.	1. Additional external audits initiated by flag state or other inspections.	Basis all external audits failures or delays causing a major non-conformity which could require an additional audit.	0	QSE Manager	Achieved
		2. At least four (4) onboard visits per year by the MD and at least (8) eight by the Company's Managers.	Company's Managers will arrange also regular on-board visits to monitor the safety standards and training across the fleet.	4/8		Achieved
Q3	To monitor, evaluate and improve on vessels' performance during, Internal and inspections.	1. Number of internal non-Conformities issued per vessel.	Basis all reports of non-Conformities generated by internal audits.	More than 3	QSE Manager	Not Achieved (2.5)
		2. Number of external non-Conformities issued per audit.	Basis all reports of non-Conformities generated external audits for each vessel.	Less than 3		Achieved
		3. Average Navigation deficiencies during external inspections/audits.	Basis all Non-Conformities generated from external audits (PSC/Vetting/3rd Party) for each vessel	3		Achieved

## QUALITY, SAFETY & ENVIRONMENTAL DEPARTMENT

S/N	OBJECTIVES	PARAMETERS (KPIs)	REMARKS	TARGET FOR 2022	RESPONSIBLE	RESULT FOR PERIOD
Q4	To monitor, evaluate and improve on vessels' performance during, Flag State inspections.	1. Average number of deficiencies per inspection.	To be calculated basis the deficiencies issued during Flag State control inspections.	Less than 2	QSE Manager	<b>Achieved</b>
Q4	To monitor, evaluate and improve on vessels' performance during, Flag State inspections.	2. Average number of deficiencies per inspection.	N/A	0%	QSE Manager	<b>Achieved</b>
Q5	To monitor, evaluate and improve on vessels' performance during PSC inspections.	1. Average number of deficiencies per inspection per vessel.	To be calculated basis data relating to Paris MOU, Tokyo MOU, USCG authorities including CoC/ TVE examinations and Security Boardings. Benchmarking: EQUASIS, Paris MOU, USCG public data.	Less than 2	Marine S/T	<b>Achieved</b>
		2. Percentage of inspections with nil deficiencies.		30%		
		3. Percentage of inspections with detention.		0		

### ACTIONS

- Action 1:** Continuously record and investigate all incidents and identify weak areas through root cause analysis Share corrective actions with fleet
- Action 2:** Training of all key shore personnel in Inc. Inv., R.A.
- Action 3:** Initiation of behavioural based tools (TAKE 5 etc.) to promote QSE behaviours across the fleet. Measure effectiveness by taking feedback from the vessels and Company personnel boarding.
- Action 4:** TAKE 5, BBS and other safety intervention techniques (Stop Work Authority, Unsafe Act Awareness and Intervention, etc.) to be discussed during the ships' Safety Committee meetings. Senior Officers to provide feedback on their effectiveness.
- Action 5:** NCRs and Near Misses to be distributed across the fleet. These to be discussed in the Safety Committee meeting onboard
- Action 6:** Establish a system to measure the safety culture per vessel and for the whole fleet based on NM reporting, Crew Wellness Survey Results, Trade, Type of Vessel, LTIF/TRCF, Drills, Safety Culture Survey Results, etc.
- Action 7:** At least two certified crew onboard on incident investigation
- Action 8:** Train shore personnel in Company EMS procedures and include same in pre-boarding training and environmental training in CBT onboard.
- Action 9:** Company's list of best practices to be forwarded onboard.
- Action 10:** At least two training seminars on the definition of best practices, their identification and purpose. Examples to be provided for understanding.

S/N	OBJECTIVES	PARAMETERS (KPIs)	REMARKS	TARGET FOR 2023	RESPONSIBLE	RESULT FOR PERIOD
<b>QUALITY, SAFETY &amp; ENVIRONMENTAL DEPARTMENT</b>						
Q1	Zero Spills – Zero Incidents To minimize all accidents and hazardous occurrences that endanger the safety of personnel, property, assets under care (including the cargo) and the environment in general.	1. Number of Lost Time Injuries per unit exposure hour. $LTIF = LTIs \times \frac{1,000,000}{ExposureHours}$	Basis the number of Lost Time Injuries affecting employed seafarers and of the exposure hours applying to the period concerned. (In accordance with OCIMF, "Marine Injury Reporting Guidelines")	Less than 1	QSE Manager	
		2. Number of Total Recordable Cases Frequency per 1unit exposure hour. $TRCF = TRCs \times \frac{1,000,000}{ExposureHours}$	Basis the number of Total Recordable Cases affecting employed seafarers and of the exposure hours applying to the period concerned. (In accordance with OCIMF, "Marine Injury Reporting Guidelines").	Less than 2.8		
		3. Contractors LTIF		Less than 2		
		4. Contractors TRCF		Less than 2.8		
		5. Near misses reported per vessel per year.	Basis all reports received from internal external auditors, shipboard and shore-based personnel relating to near misses which however have not caused any actual injury or harm to personnel, environment, property or process.	2/month		
		6. Near Misses to be reported annually by Superintendents & Managers during visits on-board		10/year		
		7. Number of fatalities	Basis all Fleet Vessels.	0		
		8. Best practices to be identified per year across the fleet	Basis Reports including NCR, RA, NM, Audits, Reviews, Observations, Complaints, etc, received	6		



**QUALITY, SAFETY & ENVIRONMENTAL DEPARTMENT**

S/N	OBJECTIVES	PARAMETERS (KPIs)	REMARKS	TARGET FOR 2023	RESPONSIBLE	RESULT FOR PERIOD
		9. Calculate Free Incident days.	Days without the occurrence of any incident are calculated, with aim to achieve the highest incident free days per vessel.		QSE Manager	
		10. BBS Observation report to be prepared per vessel per month	BBS safety behavioural tools	1		
Q2	To ensure that no time delays occur to any of the vessels due to any failure of the Management System.	1. Additional external audits initiated by flag state or other inspections.	Basis all external audits failures or delays causing a major non-conformity which could require an additional audit.	0	QSE Manager	
		2. At least four (4) onboard visits per year by the MD and at least (8) eight by the Company's Managers.	Company's Managers will arrange also regular on-board visits to monitor the safety standards and training across the fleet.	4/8		
Q3	To monitor, evaluate and improve on vessels' performance during, Internal and inspections.	1. Number of internal non-Conformities issued per vessel.	Basis all reports of non-Conformities generated by internal audits.	More than 3	QSE Manager	
		2. Number of external non-Conformities issued per audit.	Basis all reports of non-Conformities generated external audits for each vessel.	Less than 3		
		3. Average Navigation deficiencies during external inspections/audits.	Basis all Non-Conformities generated from external audits (PSC/Vetting/3rd Party) for each vessel	3		

**QUALITY, SAFETY & ENVIRONMENTAL DEPARTMENT**

S/N	OBJECTIVES	PARAMETERS (KPIs)	REMARKS	TARGET FOR 2023	RESPONSIBLE	RESULT FOR PERIOD
Q4	To monitor, evaluate and improve on vessels' performance during, Flag State inspections.	1. Average number of deficiencies per inspection.	To be calculated basis the deficiencies issued during Flag State control Inspections.	Less than 2	QSE Manager	
Q4	To monitor, evaluate and improve on vessels' performance during, Flag State inspections.	2. Average number of deficiencies per inspection.	N/A	0%	QSE Manager	
Q5	To monitor, evaluate and improve on vessels' performance during PSC inspections.	1. Average number of deficiencies per inspection per vessel.	To be calculated basis data relating to Paris MOU, Tokyo MOU, USCG authorities including CoC/ TVE examinations and Security Boardings. Benchmarking: EQUASIS, Paris MOU, USCG public data.	Less than 2	Marine S/T	
		2. Percentage of inspections with nil deficiencies.		30%		
		3. Percentage of inspections with detention.		0		

**ACTIONS**

- Action 1:** Continuously record and investigate all incidents and identify weak areas through root cause analysis Share corrective actions with fleet
- Action 2:** Training of all key shore personnel in Inc. Inv., R.A.
- Action 3:** Initiation of behavioural based tools (TAKE 5 etc.) to promote QSE behaviours across the fleet. Measure effectiveness by taking feedback from the vessels and Company personnel boarding.
- Action 4:** TAKE 5, BBS and other safety intervention techniques (Stop Work Authority, Unsafe Act Awareness and Intervention, etc.) to be discussed during the ships' Safety Committee meetings. Senior Officers to provide feedback on their effectiveness.
- Action 5:** NCRs and Near Misses to be distributed across the fleet. These to be discussed in the Safety Committee meeting onboard
- Action 6:** Establish a system to measure the safety culture per vessel and for the whole fleet based on NM reporting, Crew Wellness Survey Results, Trade, Type of Vessel, LTIF/TRCF, Drills, Safety Culture Survey Results, etc.
- Action 7:** At least two certified crew onboard on incident investigation
- Action 8:** Train shore personnel in Company EMS procedures and include same in pre-boarding training and environmental training in CBT onboard.
- Action 9:** Company's list of best practices to be forwarded onboard.
- Action 10:** At least two training seminars on the definition of best practices, their identification and purpose. Examples to be provided for understanding.

# **SUSTAINABILITY STANDARDS**



## PARADISE - APPENDIX

### GRI Index

GRI 1: 1-3.7.a, 1-3.8

<b>Statement of use</b>	Paradise Navigation S.A. has reported in accordance with the GRI Standards for the period starting the 01 <sup>st</sup> of January 2022 and ending the 31 <sup>st</sup> of December 2022.
<b>GRI 1 used</b>	GRI 1: Foundation 2021

GRI Standard or other sources	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement omitted	Reason	Explanation	
<b>GENERAL DISCLOSURES</b>						
<b>GRI 2: General Disclosures 2021</b>	2-1 Organizational details	Page 12, back cover	<b>Omissions are not permitted. GRI sector standard is not applicable.</b>			
	2-2 Entities included in the organization's sustainability report	Page 6				
	2-3 Reporting period, frequency, and contact point	Page 6				
	2-4 Restatements of information	No restatements. 1 <sup>st</sup> ESG report.				
	2-5 External assurance	No external assurance				

GRI Standard or other sources	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement omitted	Reason	Explanation	
<b>GRI 2: General Disclosures 2021</b>	2-6 Activities, value chain and other business relationships	Pages 12, 16 to 17	N/A	N/A	N/A	
	2-7 Employees	Pages 72 to 74	N/A	N/A	N/A	
	2-9 Governance structure and composition	Pages 94 to 95	N/A	N/A	N/A	
	2-15 Conflicts of interest	Page 99	N/A	N/A	N/A	
	2-16 Communication of critical concerns		N/A	N/A	N/A	
	2-22 Statement of sustainable development strategy	Pages 8 to 9	N/A	N/A	N/A	
	2-23 Policy commitments	Pages 42, 78 to 80, 99, 109	N/A	N/A	N/A	
	2-24 Embedding policy commitments	Pages 42, 78 to 80, 99, 109	N/A	N/A	N/A	
	2-25 Processes to remediate negative impacts	Pages 43, 68 to 69	N/A	N/A	N/A	
	2-27 Compliance with laws and regulations	Pages 66 to 67, 97 to 103	N/A	N/A	N/A	
	2-28 Membership associations	Page 21	N/A	N/A	N/A	
2-29 Approach to stakeholder engagement	Pages 24 to 25	N/A	N/A	N/A		
<b>MATERIAL TOPICS</b>						
<b>GRI 3: Material Topics 2021</b>	3-1 Process to determine material topics	Page 28	N/A	N/A	N/A	
	3-2 List of material topics	Pages 30 to 38	N/A	N/A	N/A	
<b>ANTI-CORRUPTION</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Page 97	N/A	N/A	N/A	N/A

GRI Standard or other sources	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement omitted	Reason	Explanation	
<b>GRI 205: Anti-corruption 2016</b>	205-2 Communication and training about anti-corruption policies and procedures	Pages 96 to 97	N/A	N/A	N/A	N/A
	205-3 Confirmed incidents of corruption and actions taken	No incidents of corruption identified and reported	N/A	N/A	N/A	N/A
<b>ENERGY</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Pages 42 to 46, 48 to 49, 54 to 55	N/A	N/A	N/A	N/A
<b>GRI 302: Energy 2016</b>	302-2 Energy consumption outside the organization	Pages 51 to 53	N/A	N/A	N/A	N/A
	302-4 Reduction of energy consumption	Pages 51 to 53	N/A	N/A	N/A	N/A
	302-5 Reductions in energy requirements of products and services	Pages 54 to 55 (short, mid and long-term actions)	N/A	N/A	N/A	N/A
<b>WATER AND EFFLUENTS</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Pages 56 to 65	N/A	N/A	N/A	N/A
<b>GRI 303: Water and effluents 2018</b>	303-1 Interactions with water as a shared resource	Page 56 to 57	N/A	N/A	N/A	N/A
	303-2 Management of water discharge related impacts	Pages 60, 62 to 65	N/A	N/A	N/A	N/A
<b>BIODIVERSITY</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Pages 62 to 65	N/A	N/A	N/A	N/A

GRI Standard or other sources	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement omitted	Reason	Explanation	
<b>GRI 304: Biodiversity 2016</b>	304-2 Significant impacts of activities, products and services on biodiversity	Pages 62 to 63	N/A	N/A	N/A	N/A
<b>EMISSIONS</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Page 47	N/A	N/A	N/A	N/A
<b>GRI 305: Emissions 2016</b>	305-1 Direct (Scope 1) GHG emissions	Page 50	N/A	N/A	N/A	N/A
	305-2 Energy indirect (Scope 2) GHG emissions	To be reported in ESG report 2023	N/A	N/A	N/A	N/A
	305-3 Other indirect (Scope 3) GHG emissions	To be reported in ESG report 2023	N/A	N/A	N/A	N/A
	305-4 GHG emissions intensity	To be reported in ESG report 2023	N/A	N/A	N/A	N/A
	305-5 Reduction of GHG emissions	Pages 54 to 55	N/A	N/A	N/A	N/A
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx) and other significant air emissions	Pages 51 to 53	N/A	N/A	N/A	N/A
<b>EFFLUENTS AND WASTE</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Pages 56 to 57, 60 to 61,	N/A	N/A	N/A	N/A
<b>GRI 306: Effluents and Waste 2016</b>	306-3 Significant spills	Pages 42 to 43, 112	N/A	N/A	N/A	N/A
<b>WASTE</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Pages 56 to 57	N/A	N/A	N/A	N/A

GRI Standard or other sources	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement omitted	Reason	Explanation	
<b>GRI 306: Waste 2020</b>	306-2 Management of significant waste-related impacts	Pages 56 to 57	N/A	N/A	N/A	N/A
	306-3 Waste generated	Pages 58 to 59	N/A	N/A	N/A	N/A
<b>SUPPLIER ENVIRONMENTAL ASSESSMENT</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Pages 56 to 57	N/A	N/A	N/A	N/A
<b>EMPLOYMENT</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Pages 72 to 73	N/A	N/A	N/A	N/A
<b>GRI 401: Employment 2016</b>	401-1 New employee hires and employee turnover	Pages 72 to 74	N/A	N/A	N/A	N/A
<b>OCCUPATIONAL HEALTH AND SAFETY</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Pages 78 to 79	N/A	N/A	N/A	N/A
<b>GRI 403: Occupational Health and Safety</b>	403-1 Occupational health and safety management system	Pages 78 to 79	N/A	N/A	N/A	N/A
	403-2 Hazard identification, risk assessment, and incident investigation	Pages 111 to 113	N/A	N/A	N/A	N/A
	403-3 Occupational health services	Pages 79, 98	N/A	N/A	N/A	N/A
	403-4 Worker participation, consultation and communication on occupational health and safety	Page 79	N/A	N/A	N/A	N/A
	403-5 Worker training on occupational health and safety	Pages 76 to 77	N/A	N/A	N/A	N/A
	403-6 Promotion on worker health	Page 82	N/A	N/A	N/A	N/A

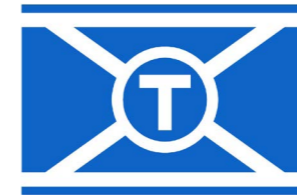
GRI Standard or other sources	Disclosure	Location	Omission			GRI Sector Standard Ref. No.
			Requirement omitted	Reason	Explanation	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Page 112	N/A	N/A	N/A	N/A
	403-9 Work-related injuries	Page 112	N/A	N/A	N/A	N/A
<b>TRAINING AND EDUCATION</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Page 75 to 77	N/A	N/A	N/A	N/A
<b>GRI 404: Training and Education</b>	404-1 Average hours of training per year per employee	Page 75	N/A	N/A	N/A	N/A
	404-2 Programs for upgrading employee skills and transition assistance programs	Pages 100	N/A	N/A	N/A	N/A
<b>NON-DISCRIMINATION</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Page 98	N/A	N/A	N/A	N/A
<b>GRI 406: Non-discrimination 2016</b>	406-1 Incidents of discrimination and corrective actions taken	No incidents of discrimination	N/A	N/A	N/A	N/A
<b>CUSTOMER PRIVACY</b>						
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	Pages 107 to 110	N/A	N/A	N/A	N/A
<b>GRI 418: Customer Privacy 2016</b>	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	No complaints of customer privacy and losses of customer data	N/A	N/A	N/A	N/A

## SASB Index

(for Marine Transportation)

TOPIC	ACCOUNTING METRIC	CODIFIED METRIC CODE	LOCATION
<b>Greenhouse Gas Emissions</b>	Gross global Scope 1 emissions	TR-MT-110a.1	
	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-110.a.2	Pages 54 to 55
	1) Total energy consumed, 2) percentage heavy fuel oil, 3) percentage renewables	TR-MT-110a.3	Page 50
<b>Air Quality</b>	Air emissions of the following pollutants: (1) NO <sub>x</sub> (excluding N <sub>2</sub> O), (2) SO <sub>x</sub> and (3) particulate matter (PM <sub>10</sub> )	TR-MT-120a.1	Pages 51 to 53
<b>Ecological Impacts</b>	Percentage of fleet implementing ballast water (1) exchange and (2) treatment	TR-MT-160a.2	Pages 64 to 65
	(1) Number and (2) aggregate volume of spills and releases to the environment	TR-MT-160a.3	Page 110
<b>Employee Health and Safety</b>	Lost time incident rate (LTIR)	TR-MT-320a.1	LTIF reported Page 112

TOPIC	ACCOUNTING METRIC	CODIFIED METRIC CODE	LOCATION
<b>Business Ethics</b>	Number of calls at ports in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	TR-MT-510a.1	0
	Total amount of monetary losses as a result of legal proceedings associated with bribery and corruption	TR-MT-510a.2	0
<b>Accident &amp; Safety Management</b>	Number of marine casualties, percentage classified as very serious	TR-MT-540a.1	0
	Number of Conditions of Class or Recommendations	TR-MT-540a.2	
	Number of PSC deficiencies and detentions	TR-MT-540a.3	Page 114



## PARADISE NAVIGATION S.A.

4-6 Solomou Street,  
3rd Floor, Stoa Center,  
15451 Neo Psychiko,  
Athens, Greece

Tel: +30-210-6912010,  
Fax: +30-210-6912272,  
Tlx: 215433 PARA GR,  
E-mail: [paradise@paradisenet.gr](mailto:paradise@paradisenet.gr)

