Sustainability Report 2020

Towards a zero-emission future
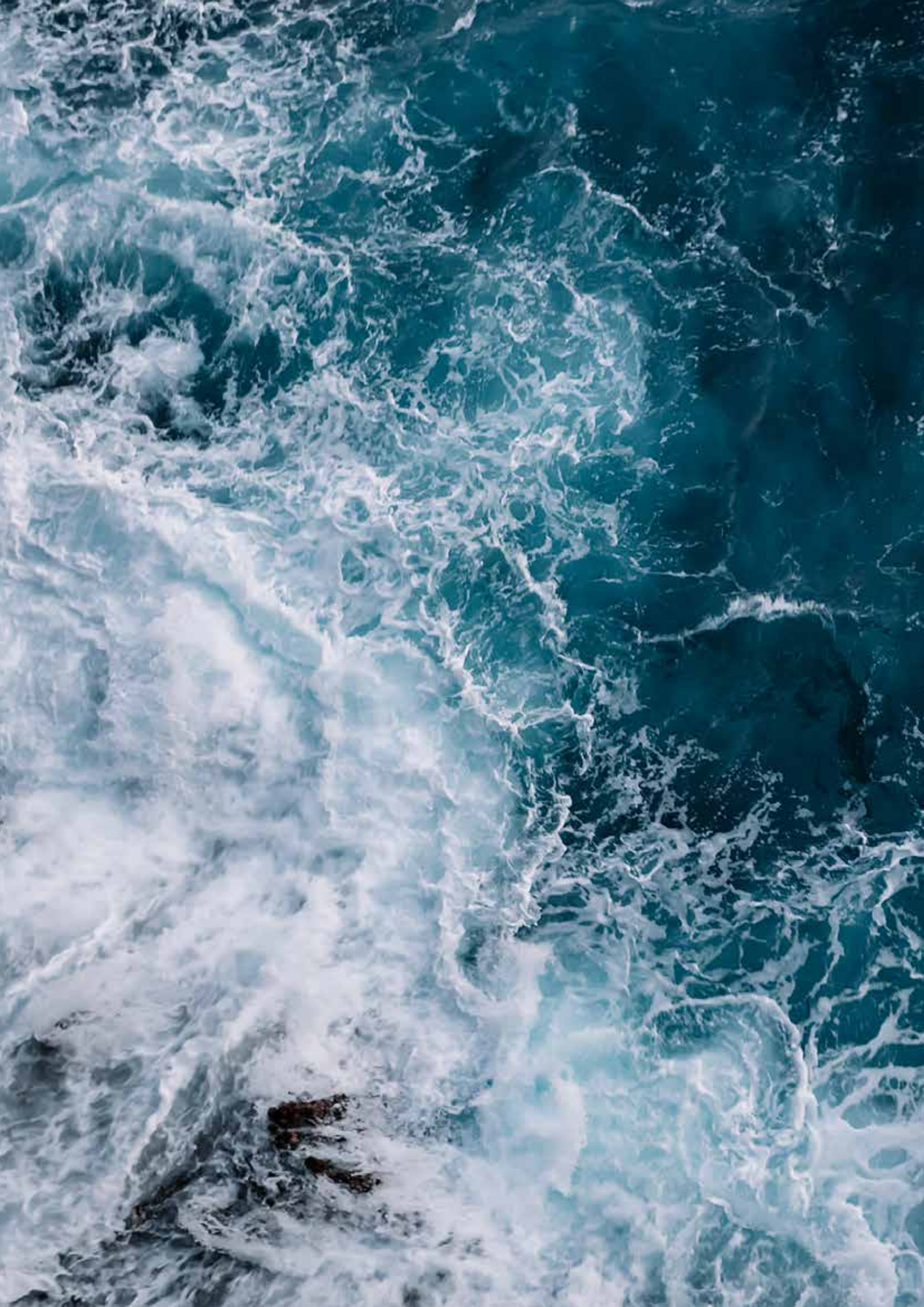
Contents

Letter from our CEO

GRI 102-14

2020 was an extraordinary year. As in many other industries, the global COVID-19 pandemic has had an unprecedented impact on us and on our stakeholders, testing our endurance and strengthening our capacity to adapt to new reality and working patterns. Onboard our vessels, international travel restrictions have made crew changes particularly challenging, and we have been working tirelessly since the crisis began to find solutions that reduce and mitigate the impact of such travel restrictions on our crews. In our offices ashore, teleworking, teleconferences and remote trainings and surveys/assessments have become the new norm, with a potential to stay. Meanwhile, we have continued to demonstrate premium quality safety records and operational standards.

On the emissions' front, 2020 has seen increased scrutiny on the shipping industry's greenhouse gas (GHG) emissions, paving the way to new regulations, from both the International Maritime Organization (the Energy Efficiency Index for Existing Ships and the Carbon Intensity Indicators) and the European Union (the upcoming inclusion of shipping in the Emissions Trading Scheme). These have already induced enhancements and upgrades to our vessels and our management systems, so to ensure our customers and charterers are already best positioned to address their environmental footprint. In line with IMO's target to reduce the carbon intensity of transport work by at least 40% by 2030 and 70% reduction by 2050 compared to 2008, I am pleased to note that our Annual Efficiency Ratio (defined consistently with the Poseidon Principles) shows an improvement of more than 3% year-on-year, exceeding our own previously set target. In 2020, we have also become members of the 'Getting to Zero Coalition'. In addition, we have partnered with a UK-based engineering company to develop an on-board CO_2 capture solution. We are also investigating innovative solutions to minimize the CO_2 emissions from our existing fleet, while exploring alternative 'net-zero' fuels for new-buildings, and continuing to reduce and offset our own office's GHG emissions.

Being a leading ship investor and ship-manager in the global product tanker and gas carrier markets, always striving to be ahead of the curve, we have engaged an independent consultant to develop our first sustainability action plan, as the start of a multi-year path to consolidate our sustainability standing towards the topics that matter most to society and to our stakeholders.

I look forward to updating you on our next sustainability efforts.

Stathis Topouzoglou
Chief Executive Officer

About this report

GRI 102-50

This sustainability report is our first Environmental, Social, and Governance (ESG) report. We have decided to produce it voluntarily, to inform our stakeholders on our performance on key sustainability issues which are material to them, and therefore to us. For the preparation of the report, we have taken into consideration the GRI Standards and the SASB standard for Marine Transportation. More information about the content of this report and references with regards to the GRI disclosures and standards can be found in the Appendix section.

This report covers our ship-management activities, as well as the performance of the ships invested-in by our management team - organized separately to us under our wider "Prime" trading name – and third parties to the extent such ships are technically managed by us, in the period from January 1, 2020 through December 31, 2020. In this report, we communicate our approach to maritime sustainability issues, our actual performance against our ESG management targets and the aggregated performance of the vessels we manage.

This report focuses on ESG issues identified as material both by us and by our stakeholders. Furthermore, it links our activities with helping our customer's meet the greenhouse gas ("GHG") emissions reduction objectives established by the International Maritime Organization ("IMO").

The present report was prepared with the consulting support of the Climate Change and Sustainability Services Practice of ERNST & YOUNG (HELLAS) CERTIFIED AUDITORS-ACCOUNTANTS SA ("EY"). Prime Marine is responsible for the calculation, collection and consolidation of quantitative data as well as for the accuracy and completeness of the quantitative and qualitative data included in this report. EY shall not bear any responsibility or liability against any third party for the contents of this report.

About Prime Marine

Business overview

GRI 102-1, GRI 102-2, GRI 102-3, 102-4, GRI 102-5, GRI 102-6, GRI 102-7, GRI 102-4, GRI 102-6, GRI 102-8, SASB TR-MT-000.A

Prime Tanker Management Inc. (hereafter "Prime Tanker") & Prime Gas Management Inc. (hereafter "Prime Gas"), together and hereafter "Prime Marine", is a leading international ship-management company with its headquarters in Athens, Greece, manning agencies in Riga and Odessa, as well as crew training centres in Athens and Odessa, employing directly 145 highly skilled and educated professionals ashore and indirectly 844 crew personnel on board, recruited within our experienced crew pool. Prime Marine companies are incorporated and registered in the Marshall Islands with business activities in Athens, Greece.

Founded in 1999 with original focus on tanker management, and until 2006 combination carriers and bulkers, Prime Marine corporate structure was reorganized in 2013 into Prime Tanker Management Inc. and Prime Gas Management Inc.

Prime Tanker operates one of the largest commercial management platforms for LR1 tankers, controlling nearly 10% of global market share, and maintains healthy and mutually beneficial business relationships with the majority of national and international oil companies and international commodity traders.

Prime Gas entered the gas sector in 2007 by managing the order of 4 newbuilding mid-sized gas carriers, which, since delivery, are successfully serving a big ammonia shipment contract for one of the largest chemical fertilizer producers, exporting cargoes from Ukraine to Europe and North Africa.

About Prime Marine

Our managed fleet

GRI 102-7, SASB TR-MT-000.B, SASB TR-MT-000.D, TR-MT-000.E, SASB TR-MT-000.F

As at end 2020, we provide integrated technical, operational and/or commercial management services to 41 third-party-owned and chartered-out vessels, of which 34 tankers and 2 new buildings managed by Prime Tanker and 7 gas carriers managed by Prime Gas:

Medium Range (MR) Tankers

x5 | Total DWT: 235,000
Average DWT: 47,000 | Average age **12** years

Long Range 1 (LR1) Tankers

x25 | Total DWT: 1.857,100
Average DWT: 74,284 | Average age **12** years

Suezmax Tankers

x2 | Total DWT: 320,000
Average DWT: 160,000 | Average age **3** years

Long Range 2 (LR2) Tankers

x2 | Total DWT: 447,340
Average DWT: 111,835 | Average age **7** years

+ 2 new-buildings

Gas Carriers
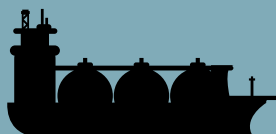
x7* | Total DWT: 204,900
Average DWT: 29,271 | Average age **12** years

* Prime Marine provides technical management services to only 5 of such vessels

TOTAL 41 | Total DWT: 3,064,340 | Average age **11** years

+ 2 new-buildings

Total distance travelled by vessels (nautical miles)

2.101.723 (2019)
2.059.204 (2020)

Number of vessel port calls

1.451 (2019)
1.462 (2020)

About Prime Marine

Our services

Commercial Management

Prime Marine's commercial management services include chartering, sale and purchase, post-fixture administration, accounting, freight invoicing & collection, and insurance.

Our commercial team handles marketing, negotiation and contract fixing of the fleet. Employment opportunity optimization and customer satisfaction are the targets.

Technical Management

Prime Marine's technical management services include the management of repairs, maintenance and inspections, safety and quality, crewing and training, as well as supply provisioning.

Prime Marine's planned maintenance systems have been designed to optimize safety with operating efficiency and ensure structural integrity. Continuous vessel upgrades drive maximum utilization and overall reliability.

Operations

Prime Marine's operates voyages at any time at every possible place in the world. The operations team, set up by Prime Marine, consists of ex-mariners with proven experience in the industry at sea and ashore.

Newbuildings

Prime Marine's Projects Department deals with shipbuilding contracts and specifications, design plan approval and supervision of construction.

Training

At Prime Marine, we have recognized the importance of providing quality training to our seafarers and the difference it makes towards them and ultimately the performance of the vessels they operate.

More information about this section can be found in the **"Provision of employee training and development"** chapter.

Our supply chain

GRI 102-9

Our supply chain for our onshore management activities includes catering, utilities (electricity, water), health (in-house office doctor, healthcare provision for the home office employees and the on-board seafarers, Covid19 testing), insurance (staff and building), IT (hardware and software), subscriptions and office supplies providers. In addition to our own suppliers, Prime Marine also manages the relationships with the suppliers to the vessels it manages including banks, insurers, shipyards, brokers, port agents, ship chandlers, bunker suppliers, flag administrations, classification societies, certification companies, and manning agencies. Such relationships form a strong network of suppliers which all contribute to Prime Marine's leading business operations.

Our mission, vision and values

GRI 102-16

Prime Marine provides comprehensive first-class ship-management services, with the highest standards of safety performance and reliability, always strictly complying with the international rules and regulations of the flag administration and the maritime industry.

We are striving for continuous improvement and excellence, and are committed to meet or exceed safety, environmental, legal and customer requirements and to conduct our operations in a manner that protects human health, safety, environment and property in carrying, caring and delivering goods around the world.

We envision to be a leader in the ship management industry by continuously:
- achieving ZERO Incident and ZERO Spill tolerance,
- adopting new technologies to reduce our and our customers' impacts on the environment,
- exploiting new horizons and new markets through new and strengthened strategic alliances,
- realizing maximum efficiency superior Client Service through management excellence.

We believe that an ecologically sound and safe seaborne trade contributes to:
- promote world peace,
- support a unique form of communication between Nations and
- assist the development of People who strive to improve their standards of living.

We are committed to accountability, honesty and transparency, and value and invest equally in:
- **our people:** their welfare, training and expertise is core to our success and their developing is embedded in our health and safety policies. We foster strong ethical values and a team spirit that rewards, commit to loyalty and initiative, and embrace respect for the environment, and
- **our ISO-certified management systems:** we commit to state-of-the-art IT and remote monitoring systems, keep high maintenance standards, closely monitor vessels conditions.

About Prime Marine

External initiatives, memberships and participations

GRI 102-12, GRI 102-13

Initiatives

- World's 1st ship manager with an ISO-certified GHG emission monitoring system
  Since 2016
- Inclusion within the Environmental Ship Index
  Since 2017
- 1st US Coast Guard Qualship 21 & E-Zero ship designation
  Since 2018
- Worlds 1st ship manager with carbon neutral-certified office activities
  Since 2019

Memberships

HELMEPA
A Greek NGO marine environment protection
Since 2007

GREEN ANGELS
Since 2016

Getting to Zero Coalition
Since 2020

Distinctions

GREEN4SEA
GREEN4SEA Tanker Operator Award
2018

Materiality analysis and stakeholder engagement

GRI 102-40, GRI 102-42, GRI 102-43, GRI 102-44

We define our stakeholders as the entities or individuals who may reasonably be dependent on or influenced by Prime Marine's activities, or those who may reasonably affect the company's ability to implement its business strategy as well as achieve its goals.

Stakeholder engagement is, and will continue to be, core to the formulation of our ESG strategy. Feedback from stakeholder engagement informs our targets, risk management, and resource allocation in order to the meet stakeholders' expectations and address their concerns, while helping us to better understand:

- The impact of our activities; and how to manage positive impact and mitigate negative impact in a responsible and constructive manner.
- The potential risks and opportunities associated with each stakeholder group; and how we can manage those risks and opportunities both proactively and effectively.
- The effectiveness, and required evolution, of our ESG strategy.

The key stakeholder groups with which we engage include:

Employees
(management, office personnel, and crew personnel)

Shipping investors
(our customers)

Charterers
(our customers' customers)

Classification societies

Flag administrations

**Suppliers and partners
to our customers**

Business community

**Scientific and academic
community**

Local community

Wider society

Stakeholder input drives the formulation of our ESG "materiality matrix", which in turn informs our ESG strategy.

Materiality analysis and stakeholder engagement

GRI 102-46, GRI 102-47

Based on the GRI Sustainability Reporting Standards (GRI Standards) and its Reporting Principles for defining report content (Stakeholder Inclusiveness, Sustainability Context, Materiality and Completeness), we conducted a materiality analysis. In particular, as part of developing our first Sustainable Development Report, this process was realized in the following three phases:

A. Identification of relevant ESG topics

For the identification of the most relevant Sustainable Development/ESG topics, Prime Marine has reviewed the following:

- The identified peers' sustainable development topics
- The sustainable development international standards and initiatives: GRI Standards, SASB 2018 (Marine Transportation), RobecoSAM (Transportation and Transportation Infrastructure), Global Maritime Issues Monitor 2020, Sustainable Shipping Initiative-A case for more action (2013), European Maritime Safety Agency (Sustainable Shipping).
- Media review for 2020
- Internal documents related to policies, strategies, business management systems and risk management systems.
- The Sustainability / ESG risk register (Risk appetite, likelihood, impact of the risks).

B. Prioritization of the identified ESG topics

To prioritize the most material Sustainable Development/ESG topics, we conducted a survey addressed to our stakeholders, based on the following 2 assessment criteria:

- The extent to which the topic influences their assessment and decisions.
- The extent to which the topic reflects Prime's significant wider economic, environmental and social impacts.
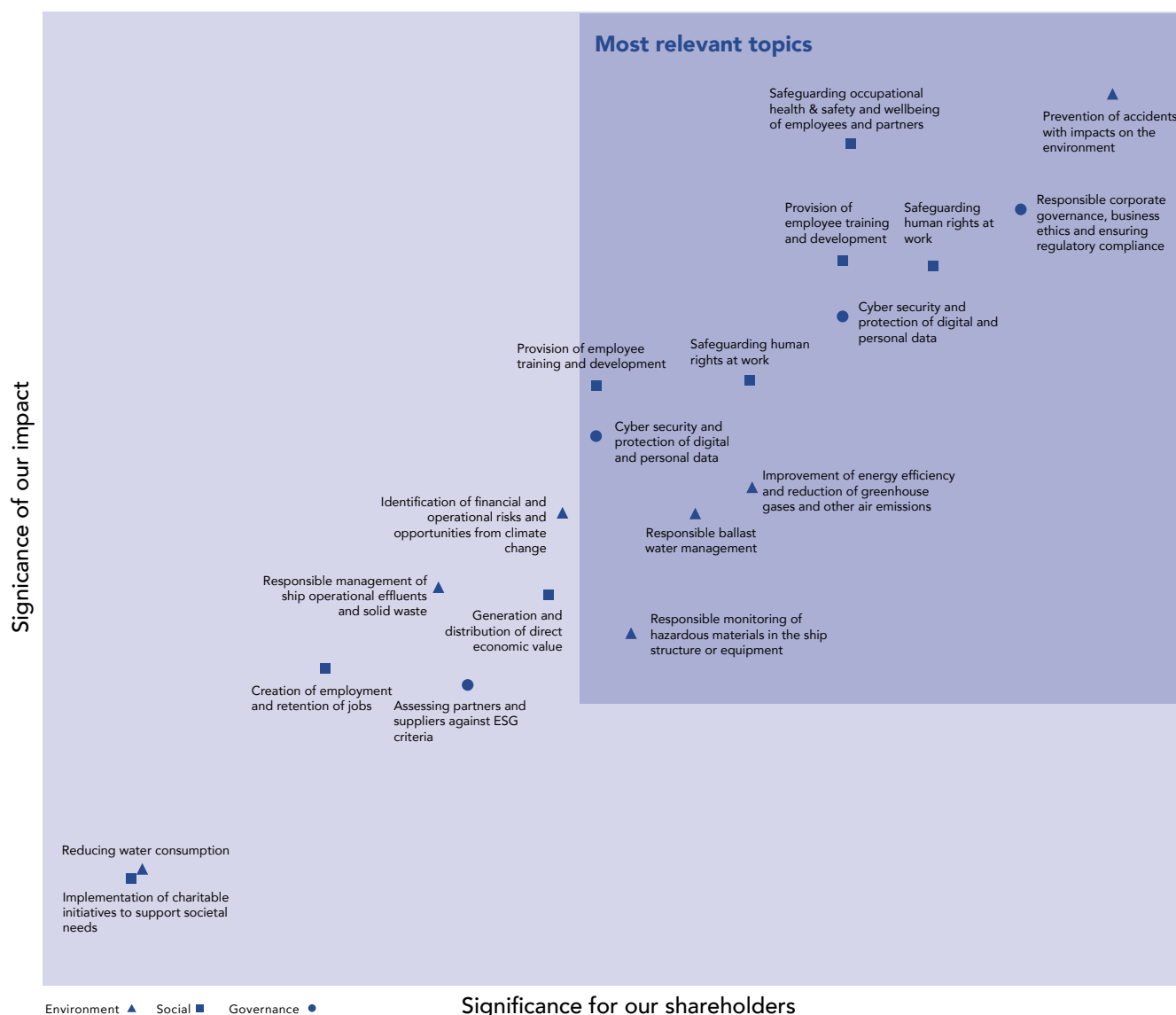
C. Validation of results

- The results of this survey were validated by Prime's Management Team. The analysis led to the identification of 9 material topics on which Prime focuses its strategy and which are included in this report. The material topics were grouped in the three ESG pillars: Environment, Social and Governance.

Materiality analysis and stakeholder engagement

Our Materiality Map summarizes the outcome of our materiality analysis.

It illustrates the degree of significance to our stakeholders of our relevant Environmental, Social, and Governance topics, versus the degree of impact our activities have on such topics.

It enhances nine topics which are deemed most material, and which are therefore considered critical to our sustainable success:

Most relevant topics

Safeguarding occupational health & safety and wellbeing of employees and partners

Prevention of accidents with impacts on the environment

Provision of employee training and development

Safeguarding human rights at work

Responsible corporate governance, business ethics and ensuring regulatory compliance

Cyber security and protection of digital and personal data

Provision of employee training and development

Safeguarding human rights at work

Cyber security and protection of digital and personal data

Improvement of energy efficiency and reduction of greenhouse gases and other air emissions

Identification of financial and operational risks and opportunities from climate change

Responsible ballast water management

Responsible management of ship operational effluents and solid waste

Generation and distribution of direct economic value

Responsible monitoring of hazardous materials in the ship structure or equipment

Creation of employment and retention of jobs

Assessing partners and suppliers against ESG criteria

Reducing water consumption

Implementation of charitable initiatives to support societal needs

Signicance of our impact

Significance for our shareholders

Environment ▲   Social ■   Governance ●

The following sections of this report highlights our performance and our management processes and systems with regards to these priority areas.

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GRI 102-11

Prevention of accidents with impact on the environment

GRI 103-1

Prime Marine regards the topic of the prevention of accidents with impact on the environment as material, not only because it is important for its efficient operation but primarily owing to its prevention being significant for the safety and wellbeing of its people, local communities and the environment.
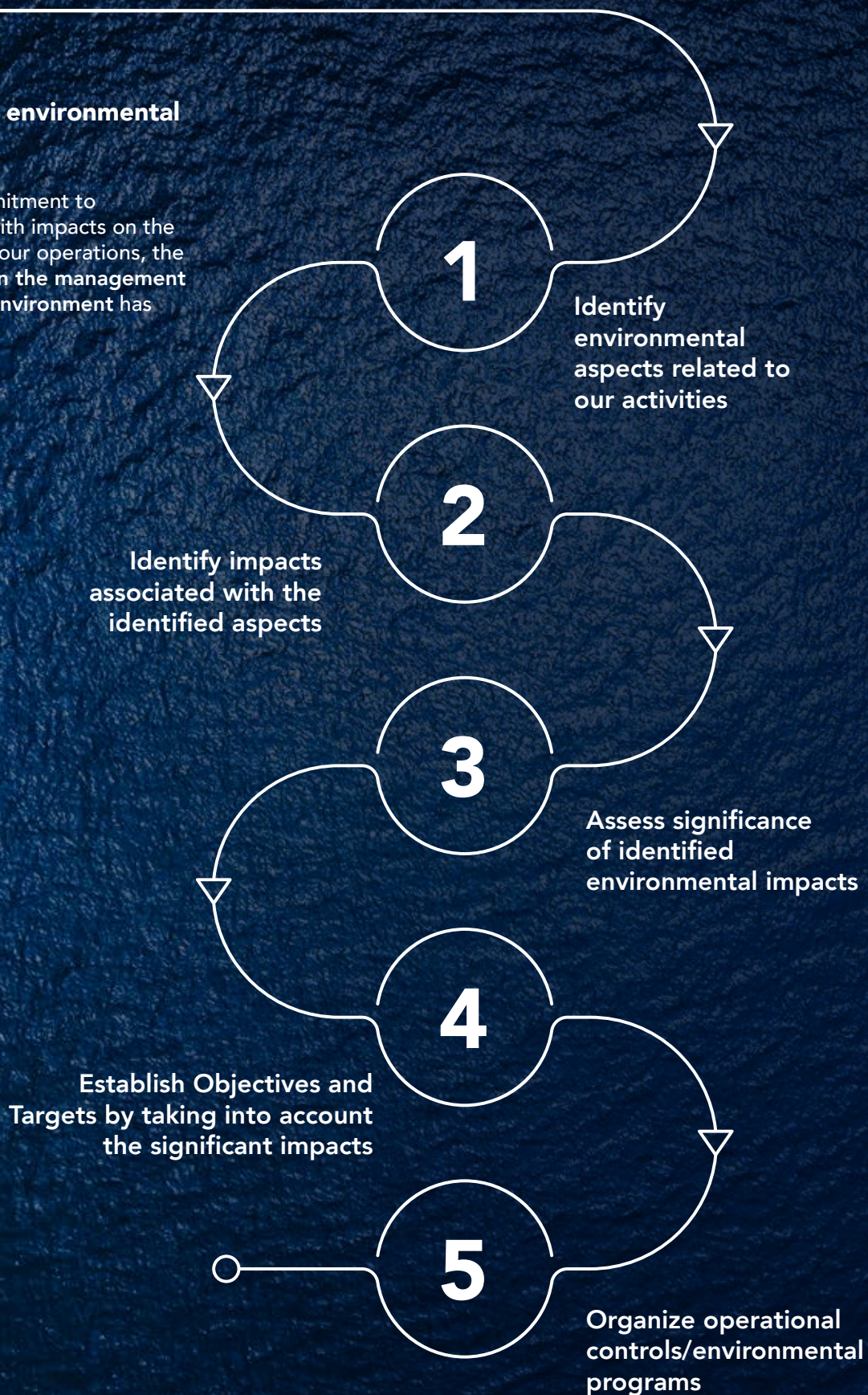
GRI 103-2

At Prime Marine, we are committed in maintaining a system for safe and pollution-free operating practices. To this end, all our employees comply with the pollution prevention regulations & operating procedures at all times, so as to achieve our high-level goal of zero spills at sea and continuous reduction of emissions/releases to the environment, as referred to in our Environmental Protection and Energy Efficiency Policy. This policy further includes our commitment on the provision of providing the necessary resources and assigning appropriate responsibilities and authority.

We are also operating within the framework of our IMS and implement a Quality, Safety and Health Policy that is based on the relevant ISO 14001, 45001 and 50001 standards. One of our principal objectives outlined in this Policy, is to prevent pollution of the environment while ensuring that safe practices and procedures are followed onboard. In this context, it is of our utmost priority to maintain our quality goals and objectives for the supply of reliable services which meet and exceed the expectations of charterers and ship-owners.

To achieve this objective, we adhere to statutory rules and regulations and take into account applicable codes, guidelines and standards recommended by the International Maritime Organization, flag administrations, classification societies and maritime industry organizations. We take care of providing our employees full information about these standards by means of clear communications, detailed instructions, adequate training and familiarization in all operational fields.

Management of environmental impacts

As part of our commitment to prevent accidents with impacts on the environment within our operations, the following **process on the management of impacts on the environment** has been established:

1 Identify environmental aspects related to our activities

2 Identify impacts associated with the identified aspects

3 Assess significance of identified environmental impacts

4 Establish Objectives and Targets by taking into account the significant impacts

5 Organize operational controls/environmental programs

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People: we acknowledge our people play a critical role in achieving our environmental goals and objectives. Therefore, they are recruited with the appropriate skills and experience to be able to proactively identify and manage environmental risks associated with our business operations. And we provide them with the appropriate means in order to advance their ability to identify those risks, including training on health, safety, welfare environmental and energy performance matters.

Actions: we acknowledge the risks of potential environmental pollution and therefore implement actions to reduce risks to ALARP and assign responsibilities for risk mitigation with systemic and technical controls in place.

Procedures: our Emergency Procedures Manual includes stringent procedures to prevent accidents with environmental impacts: drills are regularly carried out in order to test the response in potential environmental incidents and we have procedures on handling corrective and preventive actions related to any environmental non-conformity.

United States Coast Guard Qualship 21 Program

All our managed vessels are proudly certified under the United States Coast Guard Qualship 21 Program since 2018, which distinguishes ships with highest quality operational records (less than 10% of all non-US–flagged ships operating in the US meet its eligibility requirements).

One managed vessel was further awarded the additional "E-Zero Designation", which recognizes such exemplary vessels that have consistently adhered to environmental compliance, while also demonstrating an immense commitment to environmental stewardship.

Technically managed vessels		QUALSHIP 21-certified vessels	of which, QUALSHIP 21 & E-Zero certified vessels	Managed vessels that have not sailed to the United States in the last 24 months and are not eligible to QUALSHIP 21	Total	
Tankers	34	23	9	11	34	100%
Gas Carriers	5	1	0	4	5	100%
Total	39	24	9	15	39	100%

Prime Marine has made **no spill or releases from its head office** into the environment, and closely monitors the same for the fleet of technically and operationally managed vessels, with a strict zero tolerance to any release.

Any potential accidents, incidents and near misses with potential impact on the environment of the fleet of vessels it manages are fully investigated, root cause analyses are carried out and corrective and preventive actions are implemented, which are also reviewed by external auditors. Prime Marine is **externally audited** as part of its ISO 14001 and ISO 50001 certifications, including its emergency response procedures and the technical/marine-vetting department collects data related to incidents from other companies in order to **benchmark performance.**

SASB TR-MT-160a.3.: (1) Number and (2) aggregate volume of spills and releases to the environment

	2020	2019
Total number of spills and releases to the environment	2	1
The aggregate volume of spills and releases to the environment	$0.01 m^3$ for the bunkering spill	$0.0001 m^3$
Breakdown of spills and releases by type	• 1 spill during bunkering in Singapore • 1 black smoke notification incident in Amsterdam	1 minor leakage observed in the manifold reducer between the reducer and the vessel's manifold during cargo loading.
Breakdown of spills and releases by their proximity to land (#)	2	1

Improvement of energy efficiency and reduction of greenhouse gases and other air emissions

GRI 103-1

Prime Marine recognizes that climate change, as manifested in the gradual rise in average global temperature or the increasing frequency of exceptional and extreme weather conditions, constitutes a challenge for the global business community, presenting both risks and opportunities to the design and application of business models. Prime Marine therefore regards the improvement of energy efficiency and reduction of greenhouse gases and other air emissions as material owing to its likely impact upon Prime's ability to continue to create value and therefore impacting upon all those participating in its supply chain as well as wider society.

ENVIRONMENT

GRI 103-2

As included in our Environmental Protection and Energy Efficiency Policy, we aim to continuously reduce our permitted releases to the environment, providing the necessary resources and assigning the appropriate responsibilities and authority.

We operate a strict policy of zero incidents and zero spills or releases to the environment, sea and land. Furthermore, we aim to conserve and protect the environment from marine, atmospheric and other forms of pollution, including office-based waste, and to continuously improve our performance in this respect.

ISO-certified Integrated Management System

Our ISO-certified Integrated Management System (IMS) includes the management and minimization of any potential impact of all our activities, in compliance with all applicable rules, regulations, codes, guidelines and standards. We set and review the targets & objectives our managed vessels and our office, including through a Company Energy Efficiency Management Plan (CEEMP) and Ship Energy Efficiency Management Plans (SEEMP) for each managed ship, while actively promoting environmental and energy efficiency awareness. We are proudly the 1st shipping company globally approved by ABS for its Monitoring, Reporting and Verification (MRV) plan, and the 1st and sole shipping company ISO 14064-certified for its office-related GHG emission management system.

Getting to Zero Coalition

We are a member of the Getting to Zero Coalition since May 2020. This powerful alliance of more than 130 organizations is a partnership between the Global Maritime Forum, the Friends of Ocean action, and the World Economic Forum. It aims for commercially viable Zero-Emission Vessels (ZEVs) operating along deep-sea trade routes by 2030, supported by the necessary infrastructure for scalable net zero-carbon energy sources including production, distribution, storage and bunkering. We ambition the development and dissemination of a shared knowledge base covering in terms of necessary ship technology, fuels, market drivers, and policies, so to make ZEVs a reality.

Poseidon Principles

We support the Poseidon Principles, and answer to any request from our ship-owners or their financiers on our managed fleet's performance against this trajectory. The Poseidon Principles establish a framework for assessing and disclosing the climate alignment of ship finance portfolios. They are consistent with the policies and ambitions of the IMO, including the reduction of shipping's GHG emissions by at least 50% by 2050. The Poseidon Principles enables financial institutions to align their ship finance portfolios with responsible environmental behavior and incentivize shipping's decarbonization towards a better future for the shipping industry and the wider society.

Sea Cargo Charter

We support the Sea Cargo Charter, and answer to any request from our charterers on the alignment of our managed fleet's performance against this charter. The Sea Cargo Charter provides a global framework for aligning chartering activities with responsible environmental behavior to promote international shipping's decarbonization. It establishes a framework for assessing and disclosing the climate alignment of ship chartering activities around the globe. It sets a benchmark for what it means to be a responsible charterer in the maritime sector and provides actionable guidance on how to achieve this.

GRI 103-3

Environmental Monitoring and Evaluation

Our Environmental Monitoring and Evaluation plan has been established to ensure our continued commitment to this topic which includes energy efficiency and emissions monitoring and benchmarking on a daily, weekly and monthly basis. An Environmental Management Review report is prepared on a quarterly basis in order to benchmark vessels and office environmental performance. We are additionally externally audited as part of our ISO 14001, ISO 50001 and ISO 14064 certifications with our emissions being verified and we participate in voluntary indexing of vessels' environmental performance against EEOI/EEDI by IMO, ESI by World Port Climate Initiative and EVDI by RightShip.

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GRI 302-3: Energy intensity (office, by employee)

Office Electric Energy Consumption
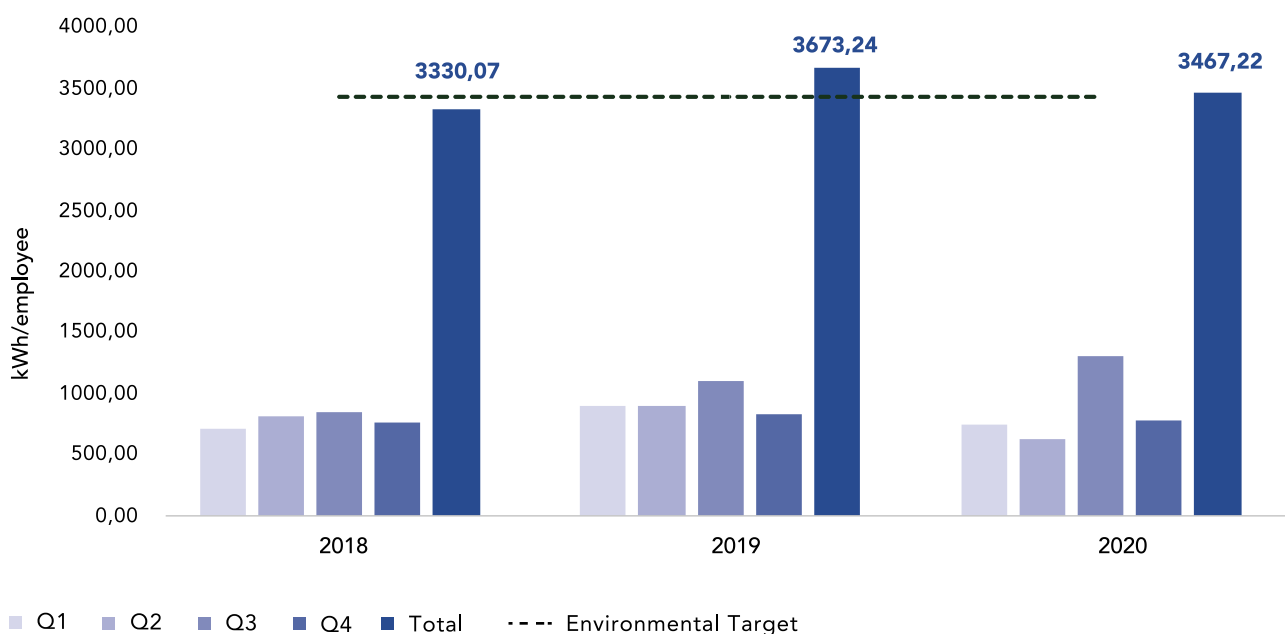
GRI 305-1: Direct (Scope 1) GHG emissions
GRI 305-2: Energy indirect (Scope 2) GHG emissions
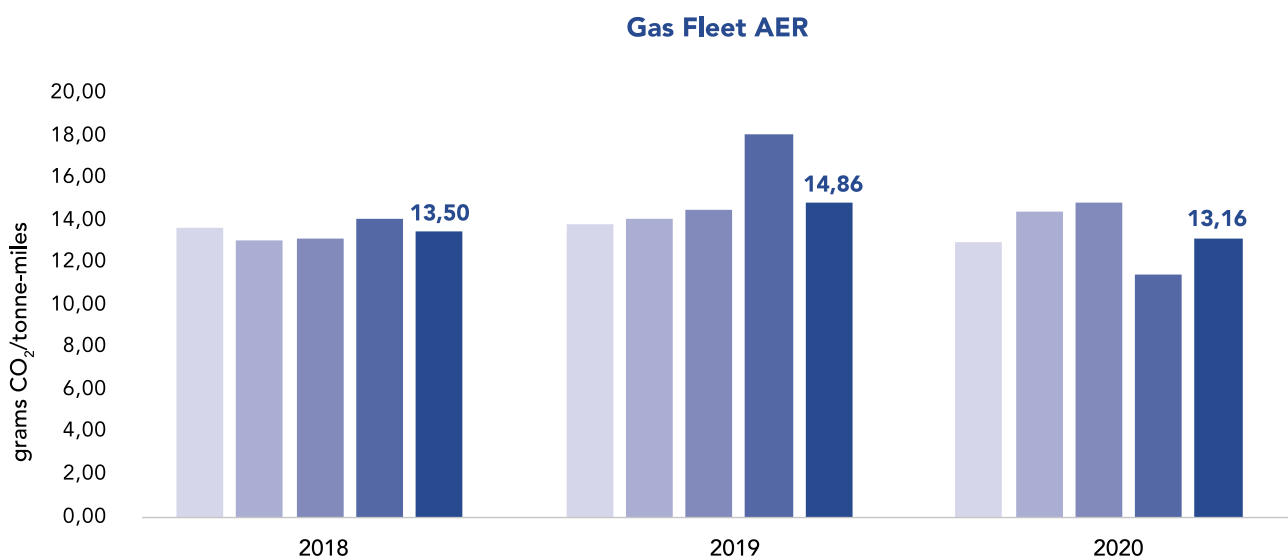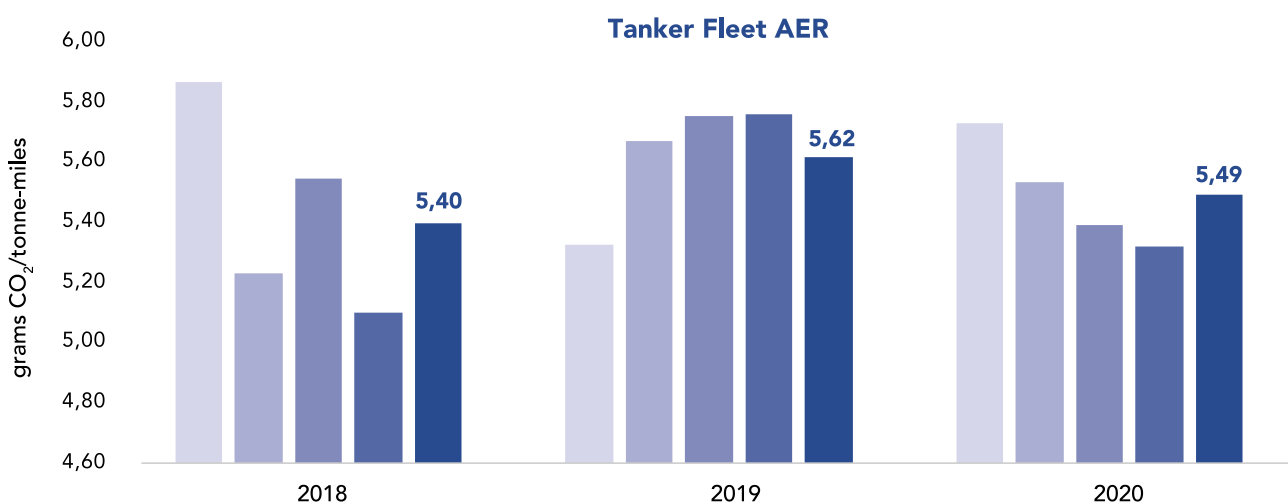GRI 305-3: Other indirect (Scope 3) GHG emissions

Prime Marine	2020	2019	Difference
305-1: Scope 1 emissions			
Gross GHG emissions (tCO$_2$)	0	31	
Voluntary Emission Reductions (tCO$_2$)*	0	-31	
Total:	0	0	
305-2: Scope 2 emissions			
Gross GHG emissions (tCO$_2$)	301	324	
Voluntary Emission Reductions (tCO$_2$)*	-301	-324	
Total:	0	0	
305-3: Scope 3 emissions**			
Main office: Gross GHG emissions (tCO$_2$)	149	471	
Voluntary Emission Reductions (tCO$_2$)*	-149	-471	
Vessels: Gross CO$_2$ emissions (tCO$_2$)	858,476	922,574	
Total:	858,476	922,574	-7%

*Prime Marine offsets all the GHG emissions from its headquarters using the Verified Carbon Standard and 3rd party certification. More details on sponsored projects are available on the VERRA Registry.
**This only includes the GHG emissions from our main office (business travels, employee commute, office waste management & disposal and office water consumption) and the CO$_2$ emission from the vessels we technically manage

In addition to the above, we also monitor the Annual Efficiency Ratio of all the vessels we technically manage, in line with the Poseidon Principles. Results as follows:

Tanker Fleet AER

grams CO_2/tonne-miles

6,00		
5,80		
5,60	5,62	
5,40	5,40	5,49
5,20		
5,00		
4,80		
4,60	2018	2019	2020

Gas Fleet AER

grams CO_2/tonne-miles

20,00		
18,00		
16,00		
14,00	13,50	14,86
12,00		13,16
10,00		
8,00		
6,00		
4,00		
2,00		
0,00	2018	2019	2020

■ Q1   ■ Q2   ■ Q3   ■ Q4   ■ Total

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SASB TR-MT-110a.4: Average Energy Efficiency Design Index (EEDI) for new ships

The EEDI set design standard for energy emission standards by defining the permitted maximum amount of CO_2 emissions per ship type, size, cargo and distance (i.e. gr. CO_2/tonne-mile). The regulation has 3 phases, each progressively requiring less energy consumption (and thus CO_2) to perform the same amount of transport work. The EEDI targets for new ships are as follows:

Phase 0
Ships built from 2013 to 2015, are required to have a design efficiency at least equal to the baseline.

Phase 1
Ships built from 2015-2020 are required to have a design efficiency, at least, 10% below the reference line.

Phase 2
Ships built from 2021 to 2025 are required to have a design efficiency, at least, 20% below the reference line.

Phase 3
Ships built after 2025 are required to have a design efficiency, at least, 30% below the reference line.
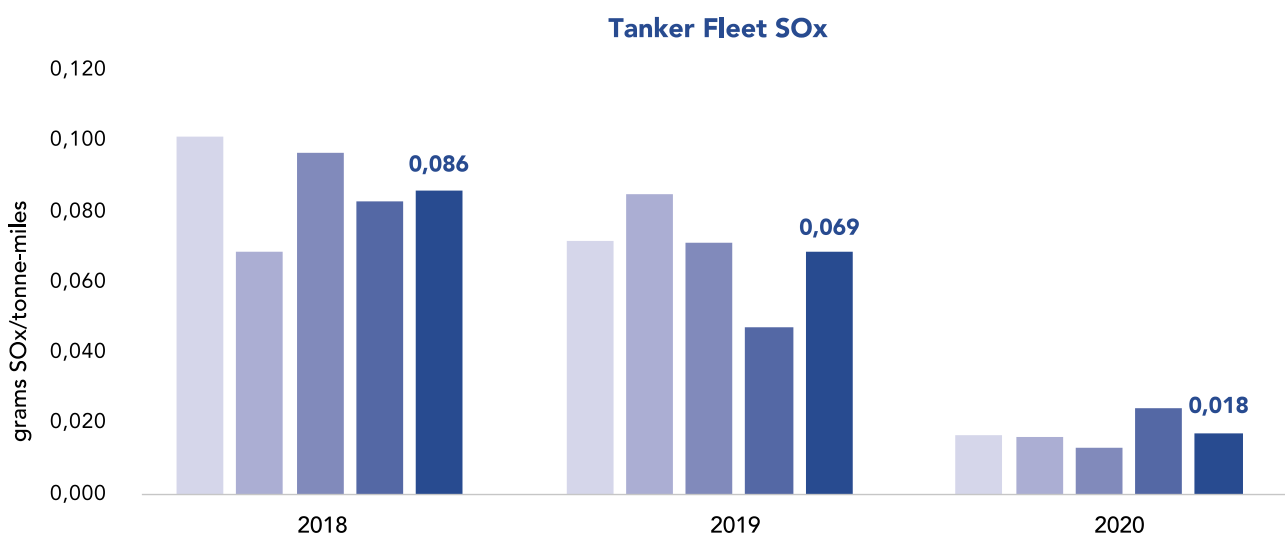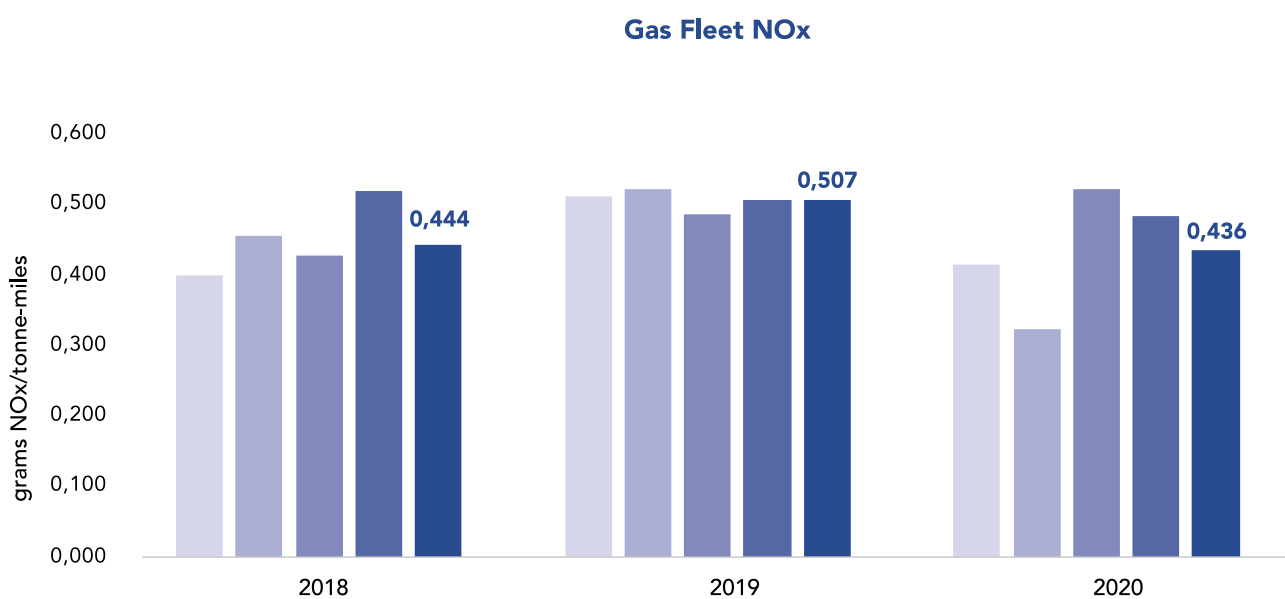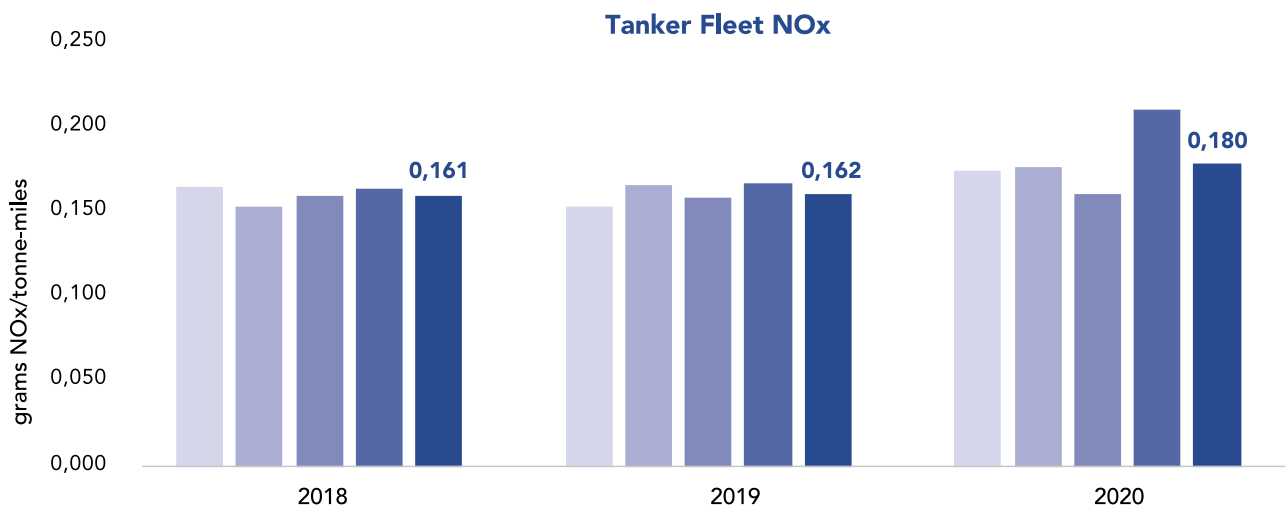
During 2020, Prime Marine supported FSL Trust on the construction of its two LR2 product tanker new-buildings.

Although required to comply with Phase 1 only, the vessels have reached an average EEDI of **2.878 gCO$_2$/t.nmile**, and are both already compliant with IMO Phase 3 targets already, 4 years ahead of time. This was achieved as a result of recommended hull and propeller design optimization so to reduce fuel consumption and achieve the maximum efficiency. The vessels are furthermore equipped with electronic NOx Tier III main engines, fitted with exhaust gas cleaning systems, propeller boss cap fins, mass Coriolis flow meters and Pythia Online Monitoring Systems that can provide instant access to all the main engine parameters, the navigational data, the flow meters readings, the AMS and EGCS alarms and the bunker tanks level indications.

Compliance with the EEDI ahead of time underlined the focus of both FSL Trust Management, as the trustee-manager of FSL Trust, and Prime Marine, as managers of the vessels, on reducing CO_2 emissions and the environmental impact of the vessels' operations. Both companies are member of the Getting To Zero Coalition.
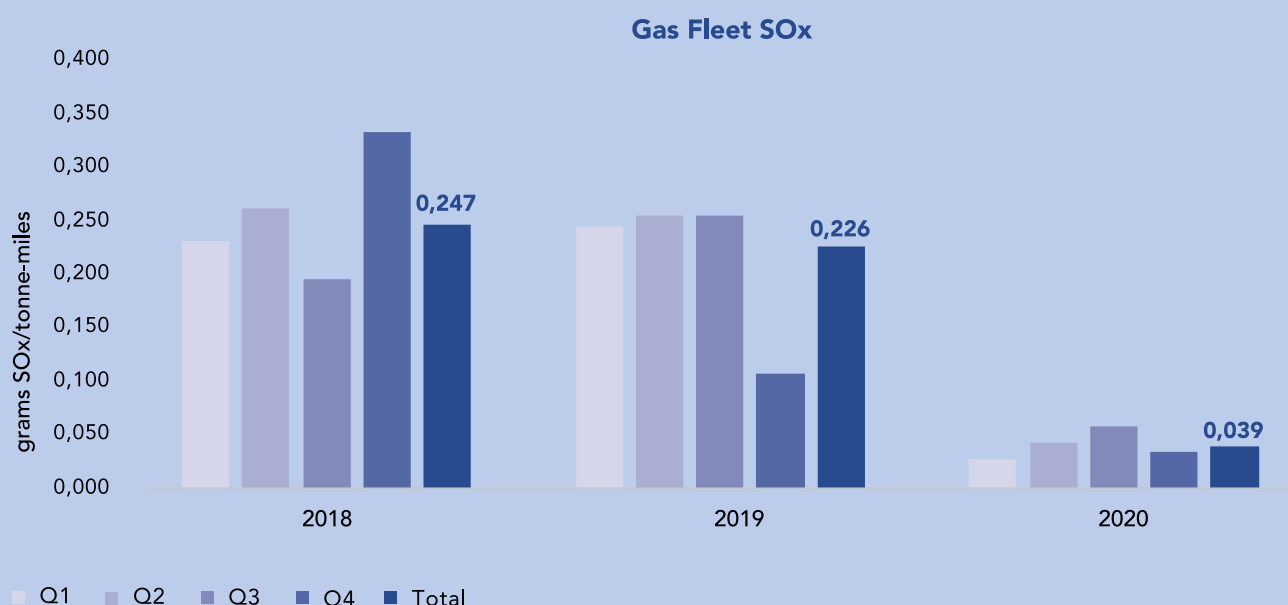
The following KPIs are shared with a consulting company that anonymously collects data from maritime companies and shares them by vessel's category in order to benchmark performance: Energy Efficiency Operational Indicator (EEOI), SOx emissions indicator, NOx emissions indicator, PM indicator, emissions from the use of incinerators, emissions of CFCs and ozone depleting substances of refrigerants, emissions of VOCs, kg of fuel burnt (m³) of cargo discharged and number of LED lamps.

Tanker Fleet NOx

Gas Fleet NOx

Tanker Fleet SOx

■ Q1 ■ Q2 ■ Q3 ■ Q4 ■ Total

ENVIRONMENT

Gas Fleet SOx

grams SOx/tonne-miles

	2018	2019	2020
Total	0,247	0,226	0,039

Q1   Q2   Q3   Q4   Total

Flue-gas desulphurization for existing ships and newbuildings

On 1 January 2020, a new limit on the sulphur content in the fuel oil used on board ships came into force, marking a significant milestone to improve air quality, preserve the environment and protect human health. The resulting reduction in sulphur oxide (SOx) emissions from ships is having major health and environmental benefits for the world, particularly for populations living close to ports and coasts.

As soon as the Regulation was adopted, Prime Marine has examined relevant compliance solutions, including various Marine Exhaust Gas Cleaning Systems (EGCS) types, for retrofits and installation on NB vessels. Among the hybrid and closed/open loop types, the open-loop scrubber was selected as the most appropriate of such retrofit/newbuilding projects, based on a series of parameters taken into consideration including installation and operational costs.

Following the open-loop scrubber type selection, Prime Marine contacted the scrubber manufacturers to present their solutions. Langh Tech was selected as the manufacturer of choice for retrofit projects based on cost, experience (the system was already in use on other vessels), and references obtained. For the newbuilding projects, Kangrim was selected for the same reasons.

Prime Marine prepared a life-cycle cost analysis considering the operational profile of the vessels and fuel price scenarios for High Sulphur Heavy Fuel Oil (HSHFO), Low Sulphur Heavy Fuel Oil (LSHFO) and Low Sulphur Marine Gas Oil (LSMGO). The results were presented to the vessels' owners explaining the financial profit and environmental benefit of the scrubber installation. The owners of 4 managed tankers agreed to install the open-loop EGCS in line with Prime Marine's proposal. FSL Trust was also convinced to use the selected open loop scrubbers in 2 newbuilding LR2 tankers.

Following above approvals, Prime Marine supervised the whole project from design assessment to installation, including the purchase of the equipment and supporting materials, the selection of the appropriate yard to undertake the installation and the budget follow up of the project till completion.

Responsible ballast water management

GRI 103-1

Responsible ballast water management constitutes a material topic for Prime Marine's path to sustainable development, particularly for its operation as an environmentally responsible organization. Responsible ballast water management concerns the activities of Prime Marine, its employees, suppliers, and partners both in Greece and abroad. An irresponsible management of ballast water may cause negative impacts both for local communities (e.g. contamination of the local environment, harm to local biodiversity, reduction in local's quality of life) and nations, as well as to Prime's operations, which is why responsible ballast water management is regarded with the upmost importance.

GRI 103-2

At Prime Marine, we have established our Environmental Protection and Energy Efficiency Policy as part of our ISO 14001 and ISO 50001 management systems. Taking into consideration ballast water and the possibility of aquatic organisms or water-borne pathogens being transported in the ship's water ballast, we have integrated commitments regarding this issue within our company's Integrated Management System from the top management.

Ballast Water Management Plans

With the purpose to meet the requirements for the control and management of vessel's ballast water and sediments in accordance with the Guidelines for Ballast Water Management and the Development of Ballast Water Management Plans (G4) resolution MEPC.127 (53), Prime Marine has established its Ballast Water Management Plans for vessels.

Cargo and Ballast Handling Simulator

To ensure that responsible ballast water management remains a priority throughout our operations, Prime Marine has established a Cargo and Ballast Handling Simulator wherein our crew are trained on cargo and ballast handling with the effectiveness of this training being monitored through surveys.
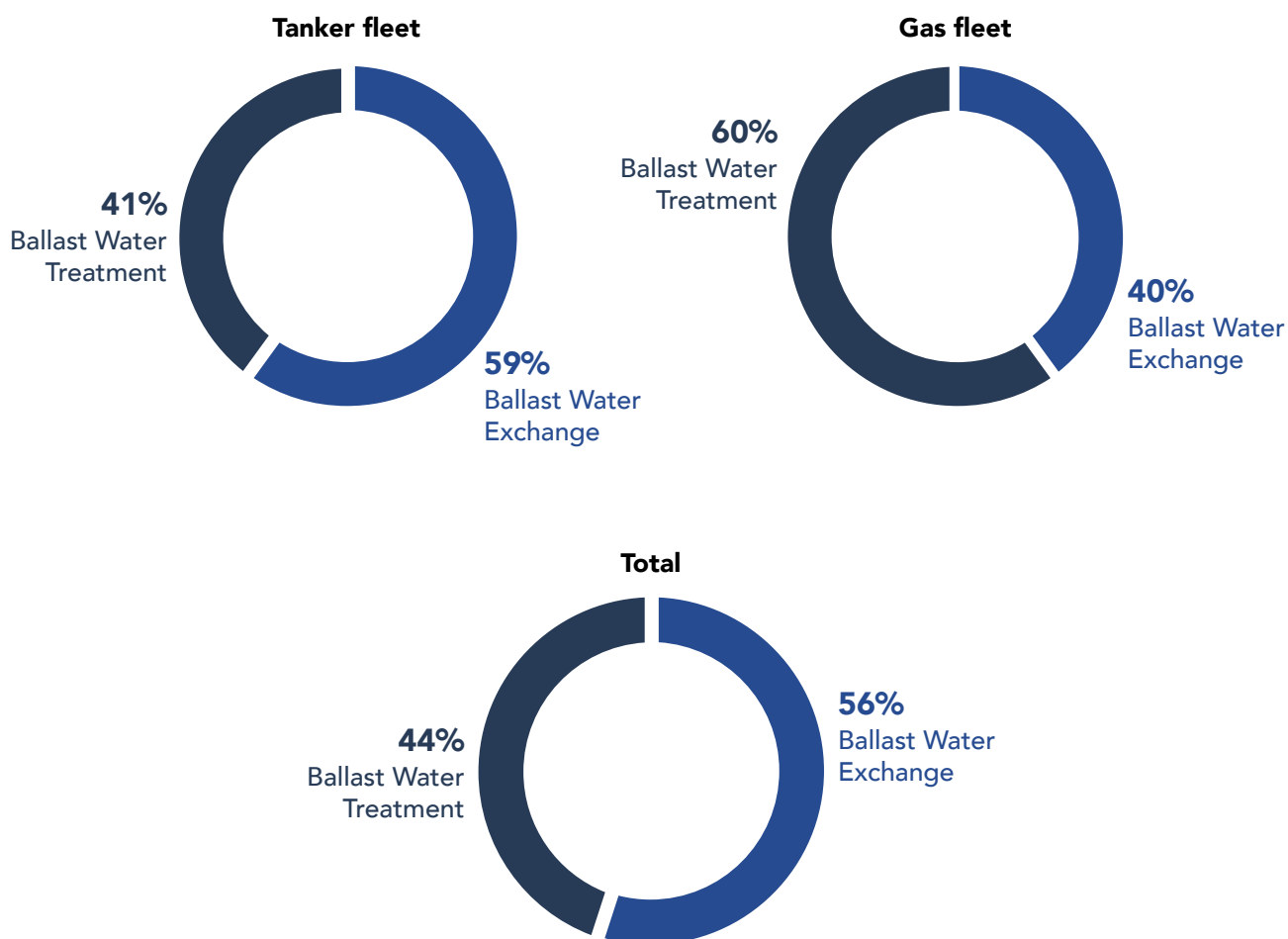
ENVIRONMENT

GRI 103-3, Prime's Indicator

Environmental Monitoring and Evaluation Plan

To further cement our commitment to this topic, Prime Marine has established an Environmental Monitoring and Evaluation Plan which includes the monitoring of ballast operations and the quantity of ballast water discharged/handled per vessel. In addition to this, Prime Marine is regularly audited by state authorities on our ballast water management and treatment process and we are externally audited as part of our ISO 14001 certification.

SASB TR-MT-160a.2.: Percentage of fleet implementing ballast water (1) exchange and (2) treatment for year 2020

Tanker fleet

41%
Ballast Water
Treatment

59%
Ballast Water
Exchange

Gas fleet

60%
Ballast Water
Treatment

40%
Ballast Water
Exchange

Total

44%
Ballast Water
Treatment

56%
Ballast Water
Exchange

Responsible monitoring of hazardous materials in the ship structure or equipment

GRI 103-1

At Prime Marine, processes to manage hazardous materials and continuously develop and maintain awareness surrounding this topic is crucial to its operations. Owing to the significant impact that hazardous materials can have towards not only the environment, but to the wide range of its stakeholders, acting with responsibility and accountability towards this topic is essential for the business continuity of Prime Marine.

GRI 103-2

Inventory of Hazardous Materials (IHM)

To address responsible monitoring of hazardous materials in the ship structure or equipment, we maintain a certified Inventory of Potentially Hazardous Materials (IHM) present onboard each vessel, in compliance with the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships and the applicable EU Regulation on Ship Recycling.

• protect human health and safety,
• prevent environmental pollution at Ship Recycling Facilities,
• allow easy identification of risks during ship operations,
• ensure preparedness to respond to any incident or accident.

We further deliver compliance training to personnel on the management of the IHM.

Our policies and procedures ensure responsible monitoring of hazardous materials, including:

our 009-EMS-Environmental Manual-Ship Recycling describes the
IHM management processes, and the ship recycling plan preparation processes.

our 009 EMS-Environmental Manual-2-Miscellaneous Pollution Sources
outlines how hazardous materials/waste are to be handled as per the applicable requirements.

our 002-Procedures Manual-08-Purchasing procedure
outlines the process to forward goods to the vessels for IHM compliance requirements.

GRI 103-3, Prime Marine's indicator

Ensuring the continuous monitoring and evaluation of our hazardous materials in the ship structure or equipment, we measure potentially hazardous paints and coating systems, equipment and machinery containing potentially hazardous materials, and the structure and hull containing potentially hazardous materials.

In 2020, no items or components with potentially hazardous materials has been loaded/supplied on-board any of our managed vessels.

SOCIAL

SOCIAL

Our people
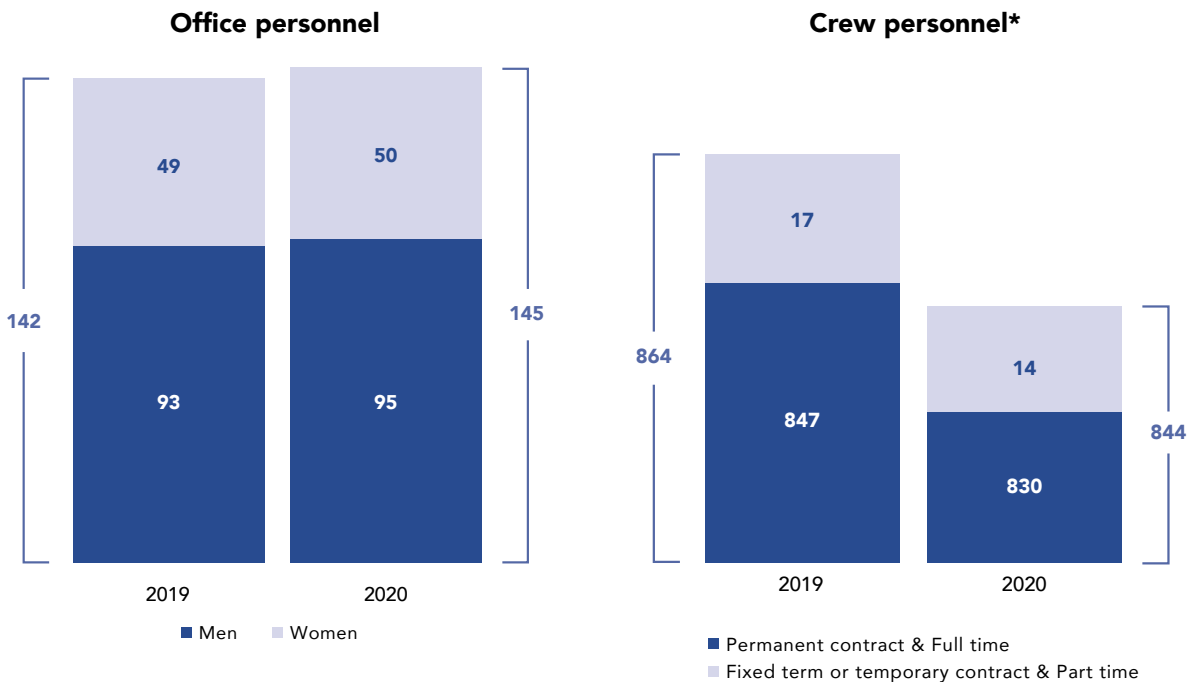
GRI 102-7, GRI 102-8, GRI 102-41, SASB TR-MT-000.A

In Prime Marine, we believe that our people play a vital role in every aspect of our shipping business. Especially today with digitization, it is people who ensure that smooth business operations are conducted with safety and security. Talent recruitment, employee engagement and retention, learning and development, workforce management and organizational effectiveness are some of the most important areas we concentrate our efforts on in order to retain a competitive and satisfied workforce.

All our office personnel are based in our Athens office and are contracted on a permanent, full-time, basis, with full benefits as per Law.

Information on employees and other workers

All our employees (100%) are covered by collective bargaining agreements for 2019 and 2020.

All our crew personnel are men, and occasionally women.

Office personnel

	2019	2020
Women	49	50
Men	93	95
Total	142	145

■ Men ■ Women

Crew personnel*

	2019	2020
Fixed term or temporary contract & Part time	17	14
Permanent contract & Full time	847	830
Total	864	844

■ Permanent contract & Full time
■ Fixed term or temporary contract & Part time

*Variation occurs on the temporary placement as a result of: Deck cadets' placements, trainee officers, extra crew due to trade or operation requirements, or due to maintenance upkeep.

SOCIAL

Safeguarding occupational health & safety and wellbeing of employees and partners

GRI 103-1

Prime Marine's employees are our most important priority since they are the contributors of its growth and business continuity, thus making the safeguarding of occupational health and safety and wellbeing of employees and contractors a MUST issue. In addition to the harm that an occupational accident could have to Prime's highly-valued employees and partners, an incident could have adverse effects both on an operational and a financial level.

GRI 103-2

At Prime, we are fully committed not only to provide healthy and safe working conditions for all employees, crewmembers and contractors, but also to ensure their welfare and well-being. To this end, we expect all to comply with the company's safety objectives, so as to achieve the high-level goal of **Zero incidents**.

This commitment is fundamentally maintained by the company's **IMS** and **Quality, Safety and Health Policy** and our commitment to maintain a System for safe and pollution-free operating practices, complying with International Regulations and Requirements, such as ISO 9001 and OHSAS 1800, and conducting businesses within the Law and the prevailing Business Ethics. Prime Marine's principal objective pertaining to occupational health & safety matters, is to eliminate injuries and illnesses by ensuring that safe practices and procedures are followed onboard, by providing continuous training-covering health, safety, welfare environmental & energy performance matters-to its employees and by reviewing and modifying its the Company Policy, Procedures & System by Masters' and Management Reviews. The Policy also extends to our contractors, who are expected to follow Prime Marine's standards and values.

To this end, we have established safeguards against identified risks, unsafe or potentially unsafe conditions and practices, risks which are assessed within the Company Hazard Register List and actioned upon through the implementation of ALARP. We adhere to statutory rules and regulations, and take into account applicable codes, guidelines and standards recommended by the International Maritime Organization, flag administrations, classification societies and maritime industry organizations. We provide all employees full information about these Standards by means of clear communications, detailed instructions, adequate training and familiarization in all operational fields.

Occupational Health and Safety management planning

The Occupational Health and Safety management planning, part of the Integrated Management System (IMS), follows the "Plan-Do-Check-Act" (PDCA) Management Model, according to the International Standard ISO 45001, as follows:

PLAN
Determine and assess OH&S risks, OH&S opportunities and other risks and other opportunities, establish OH&S objectives and processes necessary to deliver results in accordance with the company's OH&S policy.

DO
Implement the processes as planned.

ACT
Take actions to continually improve the OH&S performance to achieve the intended outcomes.

CHECK
Monitor and measure activities and processes with regard to the OH&S policy and objective, and report the results.

The Company utilizes the Risk Assessment and the Management of Change procedures for the ongoing hazard identification, risk assessment and determination of necessary controls. The Company's methodology for Hazard Identification and Risk Assessment is defined with respect to its scope, nature and timing to ensure that it is proactive rather than reactive and are used in a systematic way. It also provides for the identification, prioritization and documentation of risks, and the application of controls, as appropriate. Regarding the Management of Change procedure, the Company identifies the occupational health and safety hazards and occupational health and safety risks associated with changes in the Company, the Integrated Management System, or its activities, prior to the introduction of such changes.

Medical care provision to our on-board seafarers and office employees

Prime Marine has in place medical care services to all its seafarers through an external experienced healthcare provider, which entail a team of 28 doctors coordinated by our in-house doctor, 24/7 consultation by telephone or e-mail, on any medical incident, or issue appearing on board. All medical information concerning the medical history and medical incidents form the medical e-file of the crew member.

Prime Marine also organizes medical care for its office employees through the regular in-house physical presence of doctor. We offer an evaluation of the annual check-up of office employees, as well as a second opinion on medical issues they confront. In such a case, a medical e-file containing the employee's medical history, events etc. is created and kept for future use. Furthermore medical information is provided by bulletins, cd, dvd, lectures, seminars, etc. Furthermore, Prime Marine office personnel are covered by a comprehensive medical insurance policy from private insurance over and above the state health system.

SOCIAL

COVID-19 pandemic response

The COVID pandemic has had a major impact on the shipping industry in general, and on our operations.

Since the beginning of the pandemic, we have established an effective COVID management plan in compliance with governmental laws, instructions and directives, and WHO and IMO instructions and directives, so to minimize the risk of COVID transmission to seafarers and others onboard our ships, and to our office employees, while also covering actions to be taken in case of infection.

To safeguard the health and safety of our crew,
- all shore leaves, crew changes and supply of provisions were initially suspended at ports of heavy epidemic countries,
- a Covid presentation by our company's healthcare provider was circulated in March 2020 to all the vessels,
- a detailed COVID-19 Management Plan has been circulated since April 2020, and updated as new information has become available,
- all vessels were supplied with necessary COVID-19 personnel protective equipment (face shields, masks, gloves, medical aprons), medical supplies (disinfectants, temperature measurement devices, rapid tests, etc.) and informations posters from the WHO and other health organizations, as per the guidance of our company's doctor,
- a series of COVID-19 drills forms has been developed, and carried out on a rotating basis once a month, in order to improve our Crew preparedness to various scenarios,
- training on the above was provided to our seafarers in 2020 and in 2021, and their reporting is monitored to ensure full compliance.

To safeguard the health and safety of our office employees, we introduced from the very beginning of the crisis teleworking measures, taking advantage of our ICT systems and governance, so to effectively and efficiently work remotely to the extent appropriate as the pandemic has evolved, considering all available guidance or advice given from national health officials. Acting proactively, we have developed a systematic risk-based plan for bringing our employees safely back to our office. To this end, we also used the ABS "Restart Risk Model" which is based on sound risk management principles, guidance from CDC, OHSA, EU-OSHA, and the World Health Organization.

To the date of this report, there has been no fatalities related to Covid-19 within our employees and on-board seafarers.

Employee consultation and participation on health and safety matters

The Company has established, implements and maintains procedures for Company's personnel consultation and participation at all levels and functions, and where they exist, employees' representatives, in the development, planning, implementation, performance evaluation and actions for improvement of the occupational health and safety matters of the Integrated Management System.

GRI 103-3

At Prime Marine, we carry out internal audits and inspections, and take appropriate corrective actions to any identified non-conformance and ensures that all ISM-related tasks are performed in accordance with established procedures. The maintenance of vessels' hull and machinery is important to keep them in good operating condition. In addition to this:

- Any potential accidents, incidents and near misses are fully investigated, root cause analyses are conducted and corrective-preventive actions are carried out, which are also reviewed by external auditors.
- Prime is externally audited as part of its ISO 9001 and OHSAS 18001 certifications, including its emergency response procedures.
- We have established an "Employee Suggestion Policy", which encourages office employees to offer suggestions that lead to improved and safer working conditions.
- Crew Happiness Surveys are carried out. In February 2019, 38 Prime vessel crews were asked to rate their happiness in different aspects of their life on-board. In addition, we carried out our Safety4Sea Crew Wellness Survey.
- Terminals are asked to fill in Terminal Satisfaction Reports, which include an assessment of the safety performance, crew courtesy and hospitality, etc.
- The safety performance is benchmarked through Intertanko Benchmarking and by participating in the HiLo Scheme, which consists of Risk Based Benchmarking with a pool of peer companies that are subscribed to the Scheme. In short, the scheme uses predictive modelling to prioritize the risk of undesired events (High Impact – Low Frequency Events which are called "Undesired Events").

GRI 403- 8: Workers covered by an occupational health and safety management system

All our office workers (145 as at end 2020, up from 142 as at end 2019) and all our crew workers (844 as at end 2020 and 864 at end 2019) are covered by our occupational health and safety management system that has been both internally audited and externally certified by Lloyd's Register to follow the ISO 45001-2018 standard.

SOCIAL

SASB TR-MT-540a.1.: Number of marine casualties, percentage classified as very serious &
GRI 403- 9: Work-related injuries

Work-related injuries within our managed crew	2019	2020
Number of hours worked*	7.631.208	7.509.247
Number of fatalities as a result of work-related injury	1	0
Rate of fatalities as a result of work-related injury	~0%	0%
Number of high-consequence work-related injuries (excluding fatalities)	2	2
Rate of high-consequence work-related injuries IR (excluding fatalities)	~0%	~0%
Number of recordable work-related injuries (excluding fatalities)	7	8
Rate of recordable work-related injuries (excluding fatalities)	~0%	~0%
LWC - Lost work cases	7	8
RWC - Restricted work cases	3	5
PPD - Permanent Partial Disability	3	2

* Including the exposure hours to H&S risks on-board outside of work hours.

Safeguarding human rights at work

GRI 103-1

Safeguarding human rights at work is vital for Prime Marine and the communities within which it operates. Potential allegations of any violation of fundamental rights and freedoms held by its employees, partners and stakeholders could result in fine or penalty levying. As a responsible company, Prime Marine recognizes that the violation of human rights at work could directly affect society, the environment and the economy in which it operates.

GRI 103-2

At Prime Marine, we show and behave in full respect of the international and human rights, as set forth in the United Nations Universal Declaration of Human Rights, ILO Conventions, IMO Conventions and MLC 2006. We ensure that there are no cases of discrimination based on race, color, religion, gender, age, national origin, sexual orientation or any other characteristic protected by applicable laws regarding recruitment, development and advancement of employees. We show zero tolerance for any form of harassment, discrimination, intimidation or any other behavior that may be regarded as disrespectful, threatening or degrading.

To further cement our commitment to safeguarding human rights at work, Prime Marine has established a procedure as per the MLC requirements which includes issues including: work rest hours, entitlement to leave, repatriation, seafarer compensation for the ship's loss or foundering and lay-up. We have implemented additional measures presented below.

Employee handbook procedures

Our Employee Handbook includes the following procedures with regards to human rights protection:

- fair treatment and complaint procedures: outlines the process according to which employees can submit and discuss their complaints,
- collegial relations and behavior: states requirements on proper treatment of colleagues, policies on non-discrimination, sexual harassment, aggressive behavior, indecent language and more,
- diversity in the workplace: demonstrating Prime Marine's strict 'Respect Towards All' attitude.

Sexual harassment policy

Each and every one of our employees has the right to be treated with dignity and respect and to be free of all forms of harassment in the workplace. To protect our employees as well as our third-party staff from any behavior that may be considered as sexual harassment towards themselves or another employee, our sexual harassment policy strongly encourages reporting relevant incidents as soon as possible.

Any office and on onboard employee may officially address his/her complaints to the HR Department in the office or to the Master onboard. An email address for reporting is provided also.

Disciplinary actions may be implemented for proven cases of sexual harassment, ranging from a warning to an immediate dismissal of the harasser depending on the seriousness of the case.

SOCIAL

Anti-bullying policy

We consider workplace bullying unacceptable and we don't tolerated any relate incidents. For this reason, we implement our anti-bullying policy, to promote a healthy workplace culture, where all employees, ashore and onboard, regardless of their status (managerial, employee, full-time or part–time, external contractors), are able to work in an environment free of bullying behavior.

We encourage all our employees, who may witness any such behaviors, irrespective of reporting relationship, to immediately report this conduct to the human resources department (for office employees) or to the Master and DPA (for Shipboard Employees). To any proven cases of bullying, we ensure to restore discipline that may lead to immediate work termination. We further encourage all employees to formally report any concerns of assault, battering or other bullying behavior to a dedicated email. In either case, we take all necessary measures to protect any employee who reports bullying conduct from retaliation or vengeance.

GRI 103-3

In the monitoring and evaluation of safeguarding human rights at work, we at Prime Marine have established various KPIs related to human rights, including: Number of promotions, average job retention rates, turnover rates, number of complaints from crew for welfare items, nationality of seamen, average age, non-rehirable per rank, discipline cases (e.g. blackmail, assault), crew experience, crew changes and reasons. We also review the compliance of the recruitment and selection processes with our company policies and we participate in regulatory audits.

GRI 406-1: Incidents of discriminations and corrective actions taken

In 2019 and 2020, there were no cases of human rights abuses and/or violations been reported at Prime Marine and no cases of discrimination on the grounds of race, religion, sex, age, disability, nationality, political beliefs, etc., including incidents of abuse to all our activities.

GRI 412-2: Employee training on human rights policies or procedures

- 64 hours devoted to training on human rights policies or procedures concerning aspects of human rights that are relevant to operations in 2020.
- 15% of the crew trained in human rights policies or procedures concerning aspects of human rights that are relevant to operations. In addition, all our office staff in the Safety & Quality department and the Crew department, as well as all our Marine Superintendents, have taken a training on human rights within 12 months of them entering into such positions in 2020.

Provision of employee training and development

Prime Marine's growth and position as a prominent entity within the field of ship management is mainly due to its people's ability to plan and implement its corporate mission. Our human capital constitutes the driving force actively contributing to the achievement of our mission and commitment to provide the highest quality services. Therefore, we recognize the provision of employee training and development as material and foster this throughout our operations.

In Prime Marine, we believe that training and carrier development are the key to operating safe and efficient ships on greener seas with high standards and top quality operations, as embedded in particular in our Quality, Safety and Health Policy and our Environmental Protection and Energy Efficiency Policy.

Training Plan

Our Training department issues every January and regularly updates a comprehensive training plan to provide guidance for both ship-borne and shore-based personnel training. Such plan, which is position specific, ensures that our shipboard personnel are properly and timely trained to meet new international requirements (e.g. ISPS Code, ECDIS, and MLC 2006, etc.) and a separate HR budget has been allocated in 2020 and 2021 specifically to office employee skills and abilities.

Crew training and development

Our vessels officers undergo an extensive training program in Prime Marine's training centers for a minimum period of one week. Our Maritime Assessment & Training Center located in our Athens office went into operation in April 2011 and is certified by the American Bureau of Shipping, and the Marshall Islands Flag Administration which enables Prime Marine to award training certificates recognized by them. This center includes 3 bridge simulators, 1 latest technology ECDIS simulator for navigation officers, 1 engine simulator for engineers, and 1 cargo operations simulator for deck officers. Our other training center recently opened in Odessa is equipped with the latest Kongsberg K-Sim bridge simulator to operate 2 bridges with full inventory of electronic charts in real ECDIS.

Our seafarers undergo computer based training ("CBT') and psychometric tests and are obligated to repeat them every 36 or 48 months.

Seminars are regularly organized in person or remotely with extensive (officers and ratings) participation in order to discuss Prime Marine's policies and performance, exchange suggestions for improvements and ensure objectives are aligned with our health, safety, environment and quality goals.

Office staff training and development

Our office employees are encouraged to choose to attend in-house and external seminars in order to improve their knowledge and awareness and consequently their professional performance. External speakers are regularly being invited for in-house seminars mainly from classification societies or other industry key parties to provide their valuable insights and facilitate knowledge-sharing. The performance of on-shore staff is evaluated on an annual basis in order to detect potential training needs and organize the relevant training.
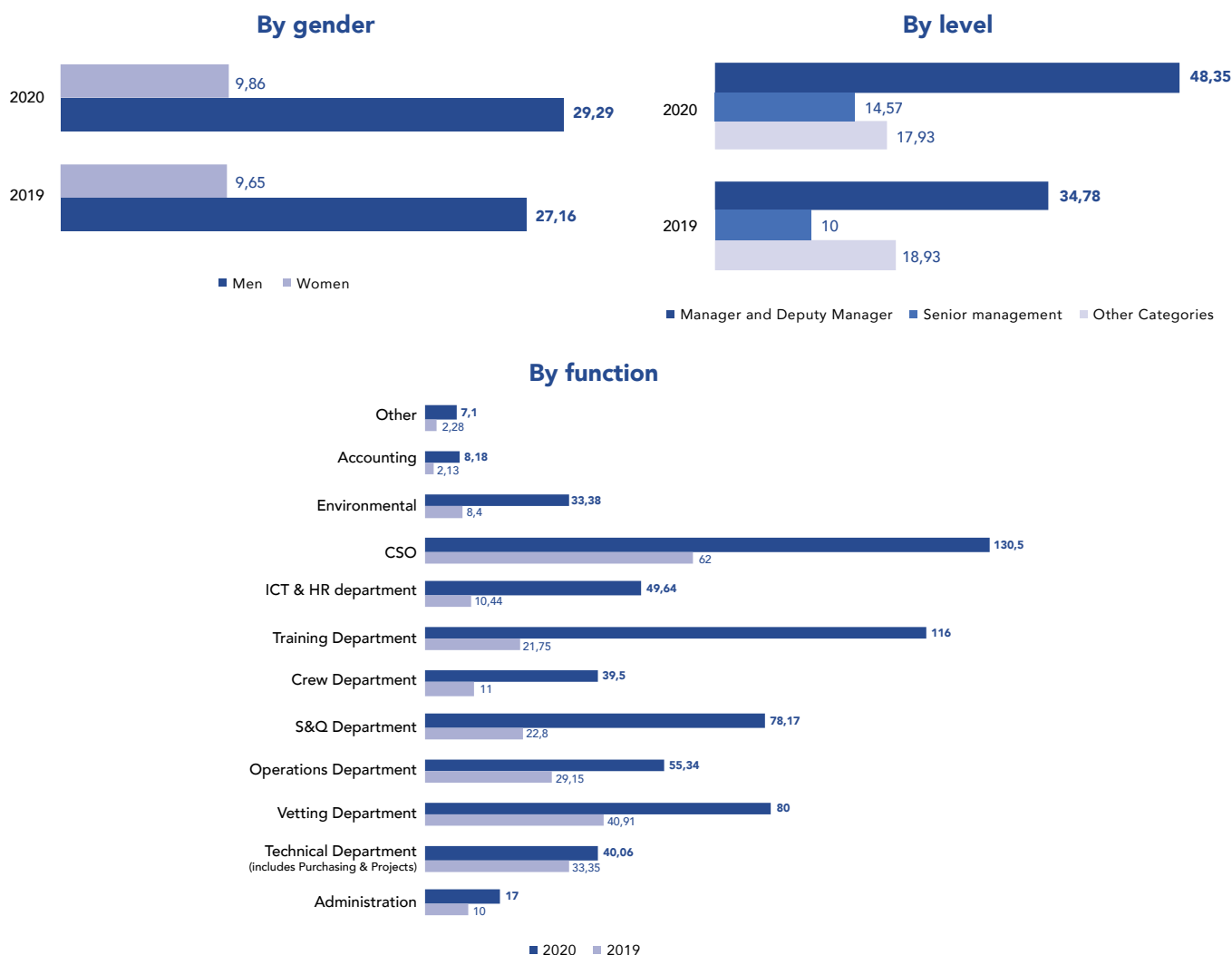
SOCIAL

Employee Suggestion Policy

Our Employee Suggestion Policy, and associated procedures, enables all our employees to make suggestions, also regarding training and development, for evaluation by the Human Resources department and, if recommended, consideration by the CEO, Co-CEO for approval. Successful employees through this procedure may receive non-monetary awards (time off with pay, certificates of recognition, gifts, memberships, etc.) and/or even monetary awards when appropriate.

GRI 103-3

As part of our monitoring and evaluation of the provision of employee training and development, training targets are regularly audited during internal, external audits and management review meetings. In addition, our mentoring program for Senior Officers ensures strict evaluation and performance monitoring for crew members.

Average training hours per employee

By gender

	Women	Men
2020	9,86	29,29
2019	9,65	27,16

■ Men ■ Women

By level

	Manager and Deputy Manager	Senior management	Other Categories
2020	48,35	14,57	17,93
2019	34,78	10	18,93

■ Manager and Deputy Manager ■ Senior management ■ Other Categories

By function

	2020	2019
Other	7,1	2,28
Accounting	8,18	2,13
Environmental	33,38	8,4
CSO	130,5	62
ICT & HR department	49,64	10,44
Training Department	116	21,75
Crew Department	39,5	11
S&Q Department	78,17	22,8
Operations Department	55,34	29,15
Vetting Department	80	40,91
Technical Department (includes Purchasing & Projects)	40,06	33,35
Administration	17	10

■ 2020 ■ 2019

Our engagement with society

We are involved in a wide-range of external social engagement initiatives.

These include the financial support and donations to the following:

Στέγη Αγάπης

"Shelter of Love"(in Greek) provides accommodation and care for the elderly in its facilities in Greece.

Σύλλογος Γονέων & Κηδεμόνων & Φίλων Αυτιστικών Ατόμων «ΑΓΙΟΣ ΝΙΚΟΛΑΟΣ»

The "Association of Parents Guardians & Friends of Autism People" supports the specialized boarding school"Saint Nicholas"in Peania, Attica, Greece, dedicated to people with autism.

ΑΣΥΛΟΝ ΑΝΙΑΤΩΝ
ΕΤΟΣ ΙΔΡΥΣΕΩΣ 1893

The"Hospice for Neuro-disability"(in Greek) provides since 1893 specialized medical care for patients from all over Greece suffering from chronic neuro-diseases, and accommodation for those incapable of self-care.

METAdrasi
ACTION FOR MIGRATION & DEVELOPMENT

"METAdrasi"provides reception and integration services for refugees and migrants in Greece, with focus on unaccompanied minors, since 2009.

The support of above institutions is also supplemented with support on an individual basis to people and families that are in need, mainly medical, that come to our knowledge.

GOVERNANCE

GOVERNANCE

GRI 102-16, GRI 102-18

Responsible corporate governance, business ethics and ensuring regulatory compliance

GRI 103-1

Operating in the field of seaborne transportation that is subject to a strict regulatory environment both in Greece and internationally, Prime Marine regards compliance with all national and international laws and regulations as a priority for its responsible business operation. Both our employees and all parties pertaining to our operation, must comply with the legal and regulatory framework whilst participating in responsible corporate governance and upholding the highest standards of business ethics.

GRI 103-2

Prime Marine's Integrated Management System

Prime Marine's Integrated Management System ("IMS") describes the system for the safe operation of ships, crews and for controls and measures for pollution prevention. We have established, documented, implemented and maintained the IMS and continually improves its effectiveness, reviews and updates its contents in accordance with the applicable requirements. The scope and boundaries of the IMS include the ship management of oil/chemical tankers and the gas carriers and is available and maintained as documented information. The IMS applies to all our departments ashore and to all vessels under our management.

Our IMS is certified against the International Safety Management code, the International Ship and Port Facility Security code, and the Maritime Labour Convention 2006. Our IMS is also certified by Lloyd's Register to be in accordance with the ISO standards for Safety & Quality performance (ISO-9001:2015), the Environmental Practices (ISO 14001:2015), the Occupational Health & Safety Management System (ISO 45001:2018), the Energy Management System (ISO 50001:2018) and for the GHG emissions (CO_{2e}) related to the office operations (ISO 14064:2012).

The company's internal governance documents

At all times, we ensures that our policies, vision & mission statements are maintained as documented information and are communicated to, understood by, applied by and maintained by all the office and shipboard employees. They are also communicated to all stakeholders and other third parties involved in our activities. These statements are reviewed on an annual basis, during our management review meetings to ensure that they are still effective, remaining relevant to our activities and still appropriate to our purpose and context, and that they still support our strategic direction.

GOVERNANCE

Organizational roles, responsibilities and authorities

Our Chief Operating Officer (COO) as well as the Deputy COO is responsible to ensure that management roles and individual responsibilities are clearly established, assigned, communicated, understood and documented. All our personnel, both on shore and onboard, are given clearly worded, unambiguous definitions of their responsibilities and authority, and the level of competence for the tasks involved has been clearly stated enabling them to have a full and clear understanding of what is expected of them. What is more, our Senior Management team is responsible to ensure that shore and shipboard Personnel are adequately, certified, qualified and experienced to undertake their duties.

With regards to the responsibilities for the implementation of the environmental and energy matters of the IMS, the following parties are responsible:

• Top Management
• Environmental and Energy Management Representatives
• Office and Shipboard Organization Levels (as per Organization Chart)
• Company Environmental and Energy Committee (CEC)
• Shipboard Environmental and Energy Committee (SEC)

Whistle-blowing mechanisms

GRI 102-7

We are committed to maintaining an open reporting culture with the highest standards of honesty and accountability. Our **shipboard whistle-blowing Policy** encourages our shipboard personnel to disclose information which they believe that it indicates true or even suspected malpractice, unethical conduct or illegal practices onboard or ashore, and at any location worldwide, where the Company operates and trades. Reported disclosures may include, but are not limited to, any criminal offence, breach of regulations, company's policies, unethical conduct etc.

Our **office whistle-blowing Policy** encourages our office personnel who has knowledge of or concern of illegal or dishonest fraudulent activity-violations of local and international laws, violations of the Prime Marine's safety policies, billing for services not performed or for goods not delivered and other fraudulent actions, to contact his/her Department Manager or the Human Resources Manager. Whistleblower protections are provided in two important areas: confidentiality and against retaliation. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.

Compliance obligations

We take compliance obligations, legal requirements and other requirements into serious account when establishing, implementing, maintaining and continually improving our IMS. We therefore maintain "documented Information" for our compliance obligations. There is a current database of applicable Statutory, Class and International Bodies / Associations legal and other requirements and updates, related or affecting our Operation, Safety, Health, Quality, Environmental, Energy behavior.

Having established KPIs to monitor and evaluate our commitment to responsible corporate governance, business ethics and regulatory compliance, Prime Marine is regularly externally audited and conducts continuous monitoring of its regulatory compliance.GRI 205-2: Communication and training about anti-corruption policies and procedures

Like all our other policies, our anti-bribery policy is readily available for review in the IMS Manual in the relevant Appendices, in the officers' and crew mess rooms in hard copy folders (in English and Russian) as it relates also to the vessels, and in the Employee Handbook (for Office Staff). All office and shipboard personnel are familiarized with the Policies on employment, as confirmed in our checklists.

Our anti-bribery policy is also accessible to all our stakeholders in our website in English. Beyond that, we communicate our policies to all internal and external stakeholders involved in ISM-related tasks (i.e. manning agents, contractors etc.) either through familiarization checklists onboard or at their premises, during official meetings and audits. More specifically, all our 4 Executive Committee members and all our office staff have been communicated our anti-corruption policies and procedures upon entry into their roles.

GRI 205-3: Confirmed incidents of corruption and actions taken

In Prime Marine, during 2019 and 2020:

• There were no confirmed incidents of corruption.
• There were no employees dismissed or disciplined for corruption.
• There were no confirmed incidents when contracts with business partners were terminated or not re newed due to violations related to corruption.
• There were no public legal cases regarding corruption brought against the organization or its employees

GOVERNANCE

Cyber security and protection of digital and personal data

GRI 103-1

Cyber security and the protection of digital and personal data is a significant topic for all of Prime Marine's people and its business operations. In a constantly changing regulatory environment, Prime Marine deems it necessary to take all precautionary measures to protect all its stakeholders from potential breaches which may harm them or Prime's business continuity.

GRI 103-2

We are committed to provide all necessary resources to achieve our Cyber Security objectives, by establishing and maintaining the required office and vessel Cyber Security protection measures to safeguard the confidentiality, integrity and availability of Information, Information Systems and IT/OT equipment, in order to promote the Safety and Security of persons and property onboard.

Our Cyber Security policy requires all our employees to comply with the requirements relating to Cyber Security Risk management described in Tanker Management and Self- Assessment ("TMSA") 3 – Element 13 as well as in MSC.428 (98) Maritime Cyber Risk Management in Safety Management Systems. All our employees are familiar with their relevant Cyber Security duties and responsibilities and the measures required to protect the Organization from any loss of confidentiality, integrity and availability of information. Our other Cyber Security policy, Removable Media policy, Social Media policy, CCTV policy, General Data Protection policy, Computer E-mail and Internet Usage policy and Mobile Phone Use Policy further describe how we use technology in a safe and ethical way.

Our ICT department is responsible for monitoring cyber security issues and for the provision of necessary Hardware and Software which are able to support the requirements of the IMS. Additionally, we conduct a risk assessment on IT Security aspects owing to these being part of Prime Marine's "Company Register List" and with the assistance of a major industrial information security company, a complete cybersecurity assessment was conducted in 2020 combined with a pen test on the Athens premises and two vessels, the findings of which resulted in a redesign of Prime Marine's intranet, policies, processes and procedures on information security and cybersecurity.

GRI 103-3

We demonstrate our commitment to this topic through our monitoring and evaluation in the form of KPIs which measure level of preparedness of network devices, security incidents along its network and phishing attack success. Further to this, Prime Marine is in the process of ISO 27001 accreditation during 2021, GDPR assessment during 2021 as well as being the subject of regular auditing for Cybersecurity matters by Lloyds Register during annual Document of Compliance audit and by Oil Majors during TMSA audits.

GRI 418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data

During 2019 and 2020, there were no substantiated complaints regarding breaches of customer privacy and losses of customer data.

APPENDIX

The content of this report references the below GRI Standards and Disclosures*:

GRI Standards	GRI Disclosures	Comments-Omissions
	Organizational profile	
	GRI 102-1 Name of the organization	N/A
	GRI 102-2 Activities, brands, products, and services	
	GRI 102-3 Location of headquarters	4, Possidonos Avenue 176 74 Kallithea, Athens, Greece Tel: +30 210 9464 800 Fax: +30 210 9464 900, E-mail: reception@prime-marine.net, Web: www.prime-marine.net
	GRI 102-4 Location of operations	N/A
	GRI 102-5 Ownership and legal form	
	GRI 102-6 Markets served	
	GRI 102-8 Information on employees and other workers	N/A
	GRI 102-9 Supply chain	
GRI 102: GENERAL STANDARD DISCLOSURES 2016	GRI 102-10 Significant changes to the organization and its supply chain	This is our first sustainability report. There were no significant changes to the organization and its supply chain.
	GRI 102-11 Precautionary principle	N/A
	GRI 102-12 External initiatives	
	GRI 102-13 Membership of associations	
	Strategy	
	GRI 102-14 Statement from the senior decision-maker	N/A
	Ethics and Integrity	
	GRI 102-16 Values, principles, standards, and norms of behavior	N/A
	Governance	
	GRI 102-18 Governance structure	N/A

*Additionally, the content of this report references Disclosures GRI 103-1, 103-2 and GRI 103-3 from the GRI 103: Management Approach 2016 Standard.

GRI Standards	GRI Disclosures	Comments-Omissions
GRI 102: GENERAL STANDARD DISCLOSURES 2016	**Stakeholder engagement**	
	GRI 102-40 List of stakeholder groups	N/A
	GRI 102-41 Collective bargaining agreements	
	GRI 102-42 Identifying and selecting stakeholders	
	GRI 102-44 Key topics and concerns raised	
	Reporting practice	
	GRI 102-45 Entities included in the consolidated financial statements	Prime Tanker Management Inc. and Prime Gas Management Inc.
	GRI 102-46 Defining report content and topic Boundaries	N/A
	GRI 102-47 List of material topics	
	GRI 102-48 Restatements of information	This is our first sustainability report. There are no restatements of information.
	GRI 102-49 Changes in reporting	This is our first sustainability report. There are no changes in reporting.
	GRI 102-50 Reporting period	N/A
	GRI 102-51 Date of most recent report	This is our first sustainability report.
	GRI 102-52 Reporting cycle	Annual
	GRI 102-53 Contact point for questions regarding the report	This is a GRI-referenced report
	GRI 102-54 Claims of reporting in accordance with the GRI Standards	N/A
	GRI 102-55 GRI content index	
	GRI 102-56 External assurance	Prime Marine will not receive external assurance for the Sustainable Development Report 2020

GRI TOPIC-SPECIFIC STANDARDS	Material Topics	
GRI 205: ANTI-CORRUPTION 2016	GRI 205-2 Communication and training about anti-corruption policies and procedures	N/A
	GRI 205-3 Confirmed incidents of corruption and actions taken	
GRI 302: ENERGY 2016	GRI 302-3 Energy intensity	
GRI 305: EMISSIONS 2016	GRI 305-1 Direct (Scope 1) GHG emissions	
	GRI 305-2 Energy indirect (Scope 2) GHG emissions	
	GRI 305-3 Other indirect (Scope 3) GHG emissions	
	GRI 305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	
GRI 403: OCCUPATIONAL HEALTH & SAFETY 2018	GRI 403-8 Workers covered by an occupational health and safety management system	
	GRI 403-9 Work-related injuries	
GRI 404: TRAINING AND EDUCATION 2016	GRI 404-1 Average hours of training per year per employee	
GRI 406: NON-DISCRIMINATION 2016	GRI 406-1: Incidents of discriminations and corrective actions taken	
GRI 412: HUMAN RIGHTS ASSESSMENT 2016	GRI 412-2: Employee training on human rights policies or procedures	
GRI 418: CUSTOMER PRIVACY 2016	GRI 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	

SASB INDEX

Topic	Code	Accounting metric
Greenhouse Gas Emissions	TR-MT-110a.4	Average Energy Efficiency Design Index (EEDI) for new ships
Ecological Impacts	SASB TR-MT-160a.2	Percentage of fleet implementing ballast water (1) exchange and (2) treatment
	TR-MT-160a.3	(1) Number and (2) aggregate volume of spills and releases to the environment
Accident & Safety Management	TR-MT-540a.1	Number of marine casualties, percentage classified as very serious

Topic	Code	Activity metric
Activity metrics	TR-MT-000.A	Number of shipboard employees
	TR-MT-000.B	Total distance travelled by vessels
	TR-MT-000.D	Deadweight tonnage
	TR-MT-000.E	Number of vessels in total shipping fleet
	TR-MT-000.F	Number of vessel port calls

PRIME

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