

# ESG REPORT 2021



# Message from our CEO

We have decided to publish our first annual Environmental, Social and Governance (ESG) report. We are very happy and proud that our company has been developing in parallel with the industry and focusing even more in keeping the environmental, social and governance aspects of our business at the core of our operations. This belief is shared between all employees of our company. We, of course adhere to all international regulations pertaining to the shipping industry and welcome all efforts of the United Nations (UN) and International Maritime Organization (IMO) to further improve the ESG picture of our industry. We are more focused than ever to the industry's de-carbonization process for our fleet, the digitalization of our company and the well-being of all our employees.

The COVID19 outbreak has had a major impact on the shipping industry. Caring for our shore and ship personnel has become extremely difficult due to the pandemic. Our first ESG report comes at the right time as we acknowledge the difficulties and act accordingly to keep our personnel safe and well, despite the challenges that we faced during the year. Even though some of the company's normal activities have been severely impacted or restricted, we have been able to find new ways to adapt to the new norms. We expect that in the post-COVID19 era, there will be an increasing need on strong ESG practices and this is also our focus for the future.

Our plan for the future is to renew and expand our fleet with younger and environmentally friendlier vessels, whilst at the same time reaping the rewards of our competitive strengths which include an experienced management team, cost efficient vessel operations and strong relationships with customers and financial institutions. We are confident that the combination of our ESG principles in tandem with our afore-mentioned competencies will result in improved returns for our shareholders too.

This year's ESG report forms the basis from which we will continuously strive to further improve our footprint. In this report, we have tried to explain and quantify, wherever possible, the company's policies, procedures, decisions, and future aspirations. Key Performance Indicators (KPI's) are provided in order to depict the company's annual performance and form the basis for future comparison.

We are committed to continuing our sustainability journey and doing our part to contribute to the de-carbonization of the maritime sector and to create a fair and just future for seafarers and communities.

H. Hakki DEVAL  
Chief Executive Officer

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# Who we are

Devbulk Gemi Isletmeciligi A.S. is a global shipping Company providing worldwide seaborne transportation solutions in the drybulk section and employs its vessels on spot and period charters.

At the end of 2022, the Company owned a fleet of 8 vessels, including 1 Supramax 7 handysize. These 8 bulk carriers have a total DWT of 289,500 and an average age of 9,5 years.



- ▶ 1x Supramax: Avg. Age: 8 years, Carrying Capacity: 57.000 DWT
- ▶ 7x Handysize: Avg. Age: 11 years , Carrying Capacity: 232.500DWT
- ▶

Devbulk Company's background is supported by the members of the Deval Family whom have a vast experience and connection in worldwide bulk shipping.; as per its established policies and adhere to the requirements of the International Safety Management (ISM) Code for the Safe Operation of Ships and for Pollution Prevention.

# ESG at Devbulk Gemi Isletmeciligi A.S.

The Company’s vision is to grow for the benefit of its shareholders whilst at the same time committing to a sustainable growth, digital innovation and protection of the environment in line with the nature of the industry and always in compliance with the international regulations in place and even exceeding them where possible.

Devbulk’ business strategy is focused on providing consistent shareholder returns by carefully selecting the timing and the structure of its investments in bulk carriers vessels and by reliably, safely and competitively operating the vessels owned.

Representing a continuous ship owning and management history that dates back to the 19th century, Devbulk’believes that one of its competitive advantages is its ability to select and operate safely and economically vessels of any age. Devbulk continuously evaluates sale-and-purchase opportunities, as well as long term employment opportunities for its vessels. Devbulk plans to expand its fleet to increase its revenues and make its drybulk fleet more cost efficient, environmentally friendly and attractive to its customers.

The company’s aim is to implement an ESG strategy aligned with the IMO’s Green House Gas (GHG) emission reduction targets and the UN’s Sustainability Development Goals (UN SDG’s). We are looking forward to the SDGs’ full achievement ensuring that we act as active supporters by promoting an inclusive , diverse, healthy and safe working environment (both onboard our ships and ashore) and building a responsive, profitable and sustainable business which is governed with consistency and transparency.

This report covers Devbulk’ operations in 2022 and is based on the Sustainability Accounting Standards Board (SASB) standards. Additional criteria have been considered as well, such as the Global Reporting Initiative (GRI) and UN’ SDGs, in compiling the report content.



Source: UN site

# Key figures\*

Number of seaboard  
Personnel

325\*\*

Number of operating  
days

2,489<sup>1</sup>

Total distance travelled  
by vessels (nm)

458,032

Average vessels in fleet

8

Number of port calls

210

Deadweight  
tonnage/Average

508,731 /  
74,562 DWT

Twenty-foot equivalent  
unit capacity/Average

N/A

\*These figures are based on a total number of 8 vessels operated throughout the period from 1 January to 31 December 2022.

Figures for DWT represent the fleet as of 31 December 2022.

\*\*Total pool of seafarers is approx. 1,800

<sup>1</sup> Operating days are calculated as the number of available days in a reporting period minus the aggregate number of days that the vessels are off-hire due to unforeseen circumstances (i.e., a measure of days in a reporting period during which vessels actually generate revenue).

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# CORPORATE GOVERNANCE

# Our Board of Directors

- The Board of Directors (BoD) of Devbulk is committed to its fiduciary responsibility to represent shareholder interests and setting high standards for the Company's directors, officers, and employees.
- The procedures and standards adopted by the Board of Directors to fulfill its responsibilities are recorded in the charters of the Board Committees, our policies and in various guideline documents, all of which are available in the Corporate Governance section of the Company's website.
- The Board of Directors has established an Audit Committee which is summarized below and decided to act as a whole on matters of Compensation and Nomination:
- Our Audit Committee consists of 3 independent directors and is responsible to represent and assist the Company's BoD in its general oversight of the Company's accounting and financial reporting processes, audits of the financial statements, and internal control and audit functions. More specifically the audit committee is responsible for (a) the preparation, presentation and integrity of the Company's financial statements; (b) accounting and financial reporting principles; (c) the Company's internal controls and procedures designed to promote compliance with accounting standards and applicable laws and regulations; and (d) the performance evaluation of the Company's independent auditors and internal audit function. Another significant role of the Audit Committee is to identify and monitor financial business risks as well as ensure that we fully meet all the disclosure requirements of regulatory authorities.

**The Company promotes transparency and accountability and is committed to conduct business ethically.  
We stand by our code of ethics & anti-bribery , our anti-fraud policy and our whistleblower policy.**

## **An ethical workplace**

We have adopted and communicated our code of ethics & anti-bribery policy to our employees, directors, officers and agents. The code covers the following key topics:

- Conflicts of Interest
- Corporate Opportunities
- Related Party Transactions
- Confidentiality and Privacy
- Honest and Fair Dealing
- Protection and Proper Use of Company Assets

- Compliance with Laws, Rules and Regulation
- Securities Trading
- Disclosure
- Procedures Regarding Waivers
- Internal Reporting and Whistleblower policy



# BoD Members and Executives structure

Our Board of Directors and manager , as of the date of release of this report, are the following:

BoD composition	Role	Committees
H.Hakki DEVAL	Director	Audit committee Chairman
Orhan DEVAL	Director	Audit committee

Manager	Capacity
Capt. Koray TEMIR	Fleet Manager
Capt. Suleyman EVLICE	Safety & Quality Manager
Demirhan GUCLU	Technical Manager
Selcuk CAGLAYAN	Financial Manager

# Corporate Governance structure

## Code of ethics

- All of our employees are required to follow our code of ethics & anti-bribery policy and, in case of any suspected violations, they may report to the Director of the Audit Committee openly, confidentially, or anonymously – as per our internal reporting and Whistleblower policy.
- During FY2021, no bribery, fraud, or other whistleblowing incidents were recorded; neither were any violations of our ethical principles or anti-corruption policy.
- We recognize that exposure to corruption risks may vary by geography. In 2021, **no port of calls** were in countries in the 15 lowest rankings of Transparency International’s Corruption Perception Index (CPI).

## Internal controls

- In order to ensure robust governance practices, disciplined business processes, and high levels of transparency and disclosure, we have developed a rigorous and effective internal control environment. The Company’s independent auditing firm is responsible for performing an audit of the consolidated financial statements in accordance with generally accepted auditing standards.
- We have also a dedicated Internal Audit team responsible for monitoring and testing our internal procedures to ensure that risk management practices, controls, and overall governance processes are adhered to.
- The Audit Team is tasked with continuously improving our control environment, and to ensuring that the quality of our internal controls on financial reporting meets and exceeds compliance requirements under Sarbanes-Oxley (SOX).
- The Internal Audit team reports to the Audit Committee, making recommendations and/or suggesting corrective actions that will assist in accomplishing our business objectives.
- During 2022, a total of **98 internal controls** were tested. No material weaknesses or significant deficiencies were identified, however **3 deficiencies** were raised.

Risk management:  
The key risks associated with our business are grouped into the following 5 categories:



**External Environment**  
External Environment risks, arise when there are external factors or influences that could impact our business operations.

**Operations**  
Operations risk, is the risk that our operations are inefficient and/or ineffective in executing our business strategy and/or subject to human error and meeting our customers’ needs.

**Financial**  
The risk that cash flows and financial risks are not managed cost-effectively such as to maximize cash availability, etc.

**Information Technology**  
The risk that information technologies used by the Company are not operating as intended, or are compromising the integrity and reliability of data and information, etc.

**Fraud**  
Risks associated with management fraud, employee fraud, illegal and/or unauthorized acts, any or all of which could lead to legal action against us and/or to reputational damage in the market.

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**OPERATIONAL EXCELLENCE**

# Operational excellence

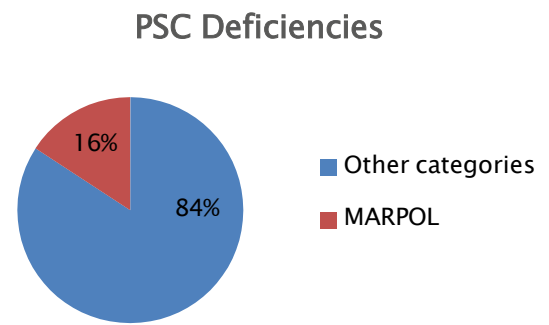
We consider Health and Safety to be an essential value and safeguarding it is our top priority. Alongside our commitment to protect the environment in our daily operations, we are focused on maintaining and promoting a safe and healthy workplace for all employees.

Safety at work is a basic human right, and working conditions affect our employees directly and their families and the communities in which they live in, indirectly. We care for our people and we aim to meet and exceed compliance requirements in order to provide a safe working environment for all personnel both ashore and onboard our vessels. Our operations promote safety and aim to protect human health, the environment, and property.

To achieve this, we:

- Comply with all applicable laws and regulations, and apply responsible standards of best practice where laws and regulations do not exist.
- Identify and mitigate risks that potentially affect employees, contractors, or the public.
- Share industry insights about health and hygiene risks within our employees.
- Seek medical services for the treatment of employee occupational illnesses or injuries and for the handling of medical emergencies.
- Implement programs, trainings and appropriate protective measures to control risks.
- Support voluntary health and hygiene promotion campaigns aimed at improving employees' well-being and increasing personal safety.

Type	Description	Total	Average per vessel
Internal figures	Onboard drills	716	98
	Near misses	192	27
	Internal audits	10	1.4
Port State Control (PSC)	Detentions	0	
	Inspections	16	2.3
	Inspections with no defects	4	
	Deficiencies	19 from which 3 MARPOL and 16 other categories	1.7 (normalized)
Classification Society	Conditions of Class	3	0.3



# Our response to the COVID-19 pandemic

Health and Safety of our people has been our top concern during the COVID19 outbreak. The rapid spread of Coronavirus has had a major impact in the shipping industry. In order to address this critical threat, we designed effective response strategies and procedures, that helped us continue our worldwide operations uninterrupted, while also ensuring the safety of our employees. As part of our COVID-19 response we:

- Developed and implemented on board all our vessels a Covid-19 management manual and continuously alerted and educated our crew on board on safety and health procedures.
- Provided in a timely manner supplies of safety equipment and disinfectants to all ships and offices.
- Introduced a remote work program for our shore employees and implemented COVID-19 prevention policies within our office as per the guidance of the World Health Organization and National authorities.
- Suspended most business travelling of our employees.
- Crew changes were arranged following the enhanced health and safety procedures and measures
- Supplied our vessels in a timely way with the necessary provisions, stores and spares in order not to disrupt their operations.
- Employed local surveyors to perform external vessel audits and introduced processes and systems to carry out internal audits remotely.
- Promoted remote training to ensure continuous education



# Safety at sea

A safe environment aboard our ships is of paramount importance for us. Our goal is to manage and eliminate safety risks associated with our activities, and protect the safety of our employees and others involved in our operations, by preventing accidents, injuries, and occupational illnesses.

In order to achieve these goals, and increase safety awareness among all our employees and through our operations, we:

- Comply with all applicable laws and regulations, and apply responsible standards where laws and regulations do not exist.
- Encourage ongoing training to employees throughout the organization.
- Evaluate our safety risks and establish appropriate safety measures.
- React promptly, effectively, and with attention to emergencies or accidents resulting from our operations.
- Continuously review and assess our procedures and apply additional measures where deemed necessary.

We invest in our people, policies, and equipment as we try to protect both our people and the environment in an effort to meet our significant goal of **zero** spills and incidents.

Our older vessels are regularly audited by **Rightship** ensuring compliance with latest regulations, evidencing our commitment to safety and to quality services. During the reporting period, we recorded **no fatalities** and **no marine casualties**.

**RIGHTSHIP**

We aim to our safety policies and increase the safety awareness of our employees through training, seminars, campaigns, and team activities in our purpose to minimize safety risks.

## Cyber security

We are concerned of the latest technological advancements' side effects of greater exposure to cyber attacks. In an effort to protect the Company's information and computer systems from possible threats, the Company has developed a cyber security manual and relevant procedures that include protection measures and users' guidelines.

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ENVIRONMENT

We are committed to protecting our environment and this commitment is reflected in our Environmental Protection, Safety and Quality Policy. We seek to minimize the impacts of our operations on both air quality and the marine environment. To support our policy, we have an environmental management system in place, incorporated in our HSEQ manual, to define our objectives, action plans, strategic ambition, and the corresponding deadlines for our work to reduce potential negative impacts.



# Ecological impact and regulations

EuroDry Ltd embraces all efforts to mitigate its footprint on the environmental change and in this regard the following Company's responses have been summarized:

Regulation	Objective	EuroDry response
Ballast Water Management (BWM)	Sets standards for proper management of ballast water and sediments to prevent the spread of harmful marine species. Entry into force Sept 8 <sup>th</sup> ,2017.	We implement the requirements and keep valid BWM plans onboard and update BW record books . 6 of our vessels (86%) have Ballast water treatment plants (BWTP) installed on-board. We expect the installation of the last BWTP by 2022.
IMO DCS (Data Collection System)	Mandates the collection of fuel consumption data for ships of 5000 gt or larger as part of the SEEMP. Entry into force March 1 <sup>st</sup> ,2018 for data collection Jan 1 <sup>st</sup> 2019.	All the vessels have valid SEEMPs onboard and periodically calculates the EEOI. The Company is in compliance with the regulation and monitors the vessels' performance and emissions through the pre-verifier (Helintec) and finally the verifier, RINA
EU MRV (Monitoring, Reporting and Verification)	A regulation requiring the monitoring, reporting and verification of carbon dioxide emissions from ships of more than 5000 GRT operating in EU ports, aiming to minimize it. Entry into force July 1 <sup>st</sup> ,2015.	The Company is in compliance with the regulation and constantly monitors the vessels' performance and emissions through the pre-verifier (Helintec) and finally the verifier, RINA
IMO strategy on reduction of GHG emissions from ships	Targets the reduction in total GHG emissions from international shipping by at least 50% by 2050 compared to 2008 . Entry into force : October 2018	We are committed to meet the IMOs' ambitious 2050 targets by working with industry peers and stakeholders to make decarbonized deep-sea shipping commercially viable.
MARPOL annex VI	A regulation intended to reduce the amount of sulphur oxide emissions from ships-either by adopting alternate fuels or installing EGC systems (scrubbers) or by using fuel oil with a sulphur content of no more than 0.50% m/m . Entry to force Jan 1 <sup>st</sup> ,2020	We have switched to high quality , low-sulphur fuels to meet the sulphur emissions limits.
Inventory of Hazardous Materials (IHM)	A regulation to control hazardous materials onboard ships for the safe and environmentally sound recycling of ships . Any ship which is 500gt or over regardless of Flag will require a valid and certified IHM onboard if calling at an EU port or anchorage. Entry into force December 31 <sup>st</sup> ,2020	All vessels have received the approval letter for the IHM plan. The on scene survey for certification will be concluded onboard all ships within 2021.



# Ecological impact and regulations

<p>UK MRV (Monitoring, Reporting and Verification)</p>	<p>UK MRV – This Regulation applies to ships above 5,000 gross tonnage in respect of CO2 emissions released during their voyages from their last port of call to a port of call in the United Kingdom and from a port of call in the United Kingdom to their next port of call, as well as within UK ports of call for these voyages</p>	<p>The Company is in compliance with the regulation and constantly monitors the vessels' performance and emissions through the pre-verifier ( ODDY Crasship ) and finally the verifier, LR</p>
<p>Energy Efficiency Existing Ship Index (EEXI) and CII rating</p>	<p>From 1 January 2023 it will be mandatory for all ships to calculate their attained Energy Efficiency Existing Ship Index (EEXI) to measure their energy efficiency and to initiate the collection of data for the reporting of their annual operational carbon intensity indicator (CII) and CII rating.</p>	<p>The Company is in compliance with the regulation and constantly monitors the vessels' performance and emissions through the pre-verifier ( ODDY Crasship ) and finally the verifier, LR</p>

# Environmental change

In an effort to accurately monitor the fleets' performance and air emissions, we have introduced performance software modules and a specialized team to report and evaluate the effectiveness of such. In addition, **86 %** of the fleet is equipped with digital mass flow meters and we are planning the gradual installation of telemetric equipment for high frequency data collection aiming to better monitoring the fleets' fuel consumption and to grow our digitalization front.

We aim to work with reliable and well-qualified suppliers. We are in the process of establishing standard procedures to ensure that our suppliers comply with the International Hazardous Material (IHM) resolutions (which include specifications on chemicals, hazardous materials etc.) and that the materials supplied are in compliance with IMO Resolution MEPC.269(68) and are supported by a Material Declaration Form.

Our fleet of ships operates globally, which means that keeping them properly supplied presents challenges of logistic nature. In order to reduce both our costs and our environmental footprint, we focus on combining supply shipments as much as possible. During the reporting period, **95 %** of supply shipments (from a total of **997** were consolidated mostly on a 3-month basis).

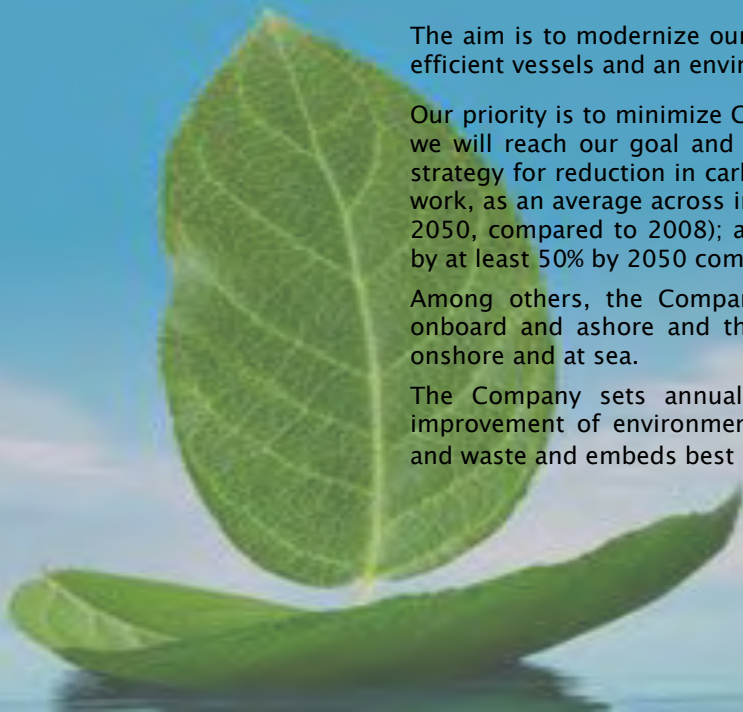
## Supporting the UN SDGs targets

The aim is to modernize our fleet with new vessels and newer technologies which will lead to more energy efficient vessels and an environmentally friendlier footprint to the industry.

Our priority is to minimize CO<sub>2</sub> emissions through our fleet and by renewing our fleet we are confident that we will reach our goal and support the SDG 13 of the 2030 UN targets and the IMO's Green House Gas strategy for reduction in carbon intensity of international shipping by reducing CO<sub>2</sub> emissions per transport work, as an average across international shipping, by at least 40% by 2030, pursuing efforts towards 70% by 2050, compared to 2008); and that total annual GHG emissions from international shipping to be reduced by at least 50% by 2050 compared to 2008.

Among others, the Company periodically holds environmental campaigns in order to raise awareness onboard and ashore and thus promoting an environmental culture and an energy-efficiency focus both onshore and at sea.

The Company sets annual targets, which are monitored on a semi annual basis and include the improvement of environmental performance, energy efficiency, minimization of GHG emissions, discharge and waste and embeds best practices for operational management.



4

SOCIAL

# Our Crew onboard

The quality and commitment of our seafarers are fundamental to the success of our business. Consequently, we consider the safety and development of our crew essential to our operations.

Our Company prioritizes the fair treatment of our employees, providing equal opportunities, assuring a safe working environment and practicing non-discrimination. We have policies in place that ensure that we have no tolerance on these sensible subjects while doing our outmost to ensure compliance. These include the Anti-bullying and anti-harassment policy, our occupational health and safety policy as well as the training and development policy.

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**During 2021, we employed 325 seafarers onboard our ships, drawn from a pool of more than 1,800\* professionals.**

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We communicate regularly with our seafaring personnel, gathering information regarding any concerns or expectations they might have, and providing training opportunities to enhance their capabilities and provide opportunities for career development. We remunerate our crew fairly, and in accordance with their expertise, experience, and the responsibilities of their respective positions.

In order to increase motivation, social inclusion, and improve crew retention we offer additional recreational and wellness opportunities such as gym, pool, karaoke and team activities. We also plan on increasing the recreational internet access onboard.

The average age of our seafarers is **39 years old**, with the majority being **Turkish**.

- Our aim is to ensure attractive working conditions for all our employees. Our crew **retention rate was 88 %**, and our goal is to increase this rate over time. The average service time onboard was **7.5 months**. This was increased due to the COVID19 restrictions.
- Seaman wages are above ILO (International Labour Organization) levels.
- We also try to acknowledge hard work at an individual level, promoting seafarers accordingly. **9 promotions** (average 1.2 per vessel) were carried out within the reported period of both officers and ratings.

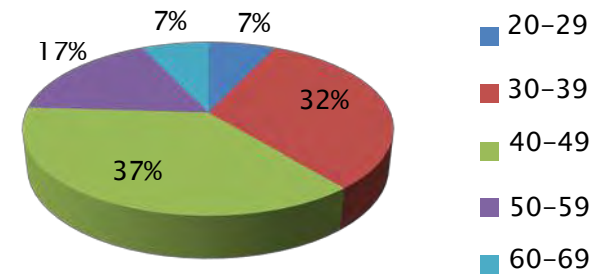
# Our shore-based staff\*

Our shore-based staff has significant experience and expertise in the shipping industry in general, and in bulk carrier owning in particular. The value and commitment of our personnel is critical to the employment and smooth operation of our fleet. The high employee retention rate is an important indicator of employees' satisfaction which is evident by the employees' **average time in the Company which is 9.6 years.**

We aim to promote a work environment encouraging commitment among our staff – with practices cultivating mutual respect, equal opportunities, diversity, empowerment, career-advancement, and fundamental human rights. For the reported period:

- We employed 20 shore-based staff, 20% of whom under full-time contracts
- 30% of our shore-based staff have seafaring experience
- The retention rate was 81.5%, with only 10 employees parting.

### Age group of shore based staff



### Gender of shore based staff



We invest in our people, aiming to support the continuous improvement of their skills and promote further education.

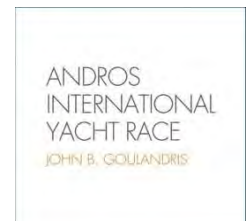


**90 hours of training** were provided to our employees in 2022 (average per employee of 2 hrs), with the following goals:

- ✓ To develop the practical and personal skills of our employees,
- ✓ To inform and educate our employees regarding the latest developments in regulations and industry practices and,
- ✓ To raise the environmental awareness of our employees, with a focus on energy efficiency and the growing regulatory environment.

# Social responsibility

- Our Company participates in various fundraising athletic competitions providing its own teams formed from its employees through Eurobulk Ltd. We have participated in the Andros International sailing race , the race for the cure (a non-profit organization supporting awareness for breast cancer) and to the Rowing race organized by Hill Dickinson for charity every year. These activities, in addition to their social contribution, build stronger bonds among employees which is an important feature of the Company. Unfortunately this year these initiatives were placed on hold due to COVID19 pandemic.
- May 2021, the USCG granted the AMVER award to 8 Company vessels for 2021. Our Company's fleet vessels have renewed/received the QUALSHIP21 award for the period 21-23.
- The Company is committed to keep the employees and the seamen environmentally and socially aware. Our team through Devbulk in collaboration with TURK ARMATORLER BIRLIGI organizes various activities in order to support efforts to keep the local coastlines clean.
- Through our management Company, we have also participated in the "ADOPT A SHIP" program by the NGO "PROJECT CONNECT" initiative allowing young people to connect with seafarers in order to become familiar with the profession and the maritime industry.



## GREENHOUSE GAS EMISSIONS

CO <sub>2</sub> emissions	Unit of Measure	Data	
Gross global Scope 1 emissions	Metric tons CO <sub>2</sub> -e <sup>A</sup>	129,506	
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	Discussion and Analysis	Page 16	
Energy consumed			
(1) Total energy consumed	Gigajoules (GJ) <sup>B</sup>	1750	
	Percentage of energy from heavy fuel (%)	90% (HFO/LFO) 10%(MGO/MDO)	
	Percentage of energy from renewable/low-carbon sources (%)	Not available	
EEDI			
Average Energy Efficiency Design Index (EEDI) for new ships	Grams of CO <sub>2</sub> per ton-nautical mile	4.65	
Fleet average Energy Efficiency Operational Indicator (EEOI): weighted average	Grams of CO <sub>2</sub> per ton-nautical mile <sup>C</sup>	6.19	Additional



## AIR QUALITY

Other emissions to air	Unit of Measure	Data	
(1) NO <sub>x</sub> (excluding N <sub>2</sub> O)	Metric tons	2355,13	
(2) SO <sub>x</sub>	Metric tons	362	
(3) Particulate matter (PM)	Metric tons	Not available	

## ECOLOGICAL IMPACT

Marine protected areas	Unit of Measure	Data	SASB Code
Shipping duration in marine protected areas or areas of protected conservation status	Number of travel days <sup>D</sup>	Not available	
Implemented ballast water			
(1) Exchange	Percentage (%)	14%	
(2) Treatment	Percentage (%)	86%	
Spills and releases to the environment			
(1) Number	Number	1	
(2) Aggregate volume	Cubic metres (m <sup>3</sup> )	0.2	

# SASB data disclosures

## EMPLOYEE HEALTH & SAFETY

Lost time incident rate	Unit of Measure	Data	
Lost time incident rate (LTIR)	Rate <sup>E</sup>	0	
Lost time incident frequency (LTIF)	Rate	0	

## BUSINESS ETHICS

Corruption index	Unit of Measure	Data	
Number of calls at ports in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	Number	0	
<b>Corruption</b>			
Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	Reporting currency	0	

# SASB & Additional data disclosures

## ACCIDENT & SAFETY MANAGEMENT

Marine casualties	Unit of Measure	Data	
Marine casualties	Number <sup>F</sup>	0	
Very serious marine casualties	Percentage (%)	0	
Conditions of class			
Number of conditions of class or recommendations	Number <sup>G</sup>	9	
Port state control			
(1) Deficiencies	Rate <sup>H</sup>	1.2	
(2) Detentions	Number	0	

## ADDITIONAL GRI STANDARD

Employment	Section	Page	Code
New employee hires and turnover	Social	21	GRI 401-1
Training and education			
Average hours of training per year per employee	Social	21	GRI 404-1
Diversity and equal opportunities			
Diversity of governance bodies and employees	Social	21	GRI 405-1
General disclosures			
Statement from the senior decision maker	Message from our CEO	2	GRI 402-14
Governance structure	Corporate governance	8	GRI 402-18

# Assumptions

- A. **CO<sub>2</sub> emissions:** Calculations are based on IMO emission factors and fuel consumed, for the reporting period. The financial control approach has been applied for Scope 1.
- B. **Energy consumption:** Calculations are based on tonnes of oil equivalents (toe), using DEFRA conversion factors to calculate energy consumed in gigajoules (GJ).
- C. **Energy Efficiency Operational Indicator (EEOI):** The EEOI measures the fuel efficiency of a ship in operation and is estimated based on fuel consumed, cargo carried, and distance travelled (nm).
- D. **Marine protected areas:** Information on duration of our ships in marine protected areas was not available for the reporting period as it requires extensive data mining from records kept on board our vessels.
- E. **Lost time incident rate (LTIR):** The rate is calculated based on (lost time incidents) / (1,000,000 hours worked), and includes incidents resulting in absence from work beyond the date or shift when it occurred.
- F. **Marine casualties:** The definition of a marine casualty is based on the United Nations International Maritime Organization (IMO)'s Code of International Standards and Recommended Practices for a Safety Investigation into a Marine Casualty or Marine Incident Resolution MSC 255(84), paragraph 2.9, chapter 2 of the General provisions.
- G. **Conditions of class:** The data provided represent the number of Conditions of Class or Recommendations Devbulk has received from a Flag Administration or a Recognized Organization (RO) that has been delegated the authority to issue such findings. The scope of disclosure includes all Conditions of Class regardless of whether they resulted in withdrawal, suspension or invalidation of a vessel's Class certificate.
- H. **Port state control:** Deficiency rate is calculated using the number of deficiencies it received from regional port state control (PSC) divided by total number of port state control inspections.
  - i. Reflects the fleet as per 31 December 2021.

*Disclaimer: Information was gathered to the best of our knowledge basis the tools and resources we have in hand. Although we believe that information provided herein is reasonable, no assurance can be given and we expressly disclaim any obligations or undertaking for any discrepancy that may appear.*