



# STAKEHOLDERS

As a shipping company, we have many responsibilities — to our employees, contractors and partners, the government and regulators, industry partners and to our communities.

Working together with our stakeholders allows us to appreciate different viewpoints and maintain a global perspective. It also helps us build mutually beneficial and long-lasting relationships and create opportunities that are aligned with their interests. This is fundamental towards helping us continue

to improve our company. We use a variety of mechanisms to engage our stakeholders, including internal and external meetings, senior executive speeches and press releases, email communications, publications such as the Annual Report and investor presentations.



## EMPLOYEES

Our employees are the drivers for our continued business success. We keep our employees informed about the context within which they work and have established channels for our employees to raise concerns across our group of companies. We have an ongoing dialogue with our employees about a wide range of issues, including benefits, development opportunities and diversity.



## INDUSTRY

We work through industry groups to help establish standards and address complex energy challenges, and we are members of industry bodies such as The International Convention for the Prevention of Pollution from Ships. Our Group Companies are also members of the industry associations relevant to their operations.



## SUPPLIERS, CONTRACTORS AND PARTNERS

Like our industry peers, Gulf Navigation rarely works in isolation. Safe and responsible operations depend on the capability and performance of our suppliers, contractors and partners. To this end, we set operational standards through legally binding agreements. Training and dialogue also help build the capability of our contractors.



## GOVERNMENTS AND REGULATORS

We engage with the local and federal government on many fronts and aim to maintain dialogue with all relevant government agencies, ministries at every stage of our operations. We engage in policy debates that are of concern to us and the communities in which we operate, such as climate change and energy, water management and security.



## CUSTOMERS

Gulf Navigation customers range from Livestock producers to large-scale industrial producers of oil, natural gas and petrochemicals. Through our concerned Group Companies, we engage with customers about supply chain management, GHG emissions and the sustainability of our vessels across their life cycle.



# INTERNATIONAL CONVENTION FOR THE PREVENTION OF POLLUTION FROM SHIPS (MARPOL)

The International Convention for the Prevention of Pollution from Ships (MARPOL) is the main international convention covering prevention of pollution of the marine environment by ships from operational or accidental causes.

The MARPOL Convention was adopted on 2 November 1973 at IMO. The Protocol of 1978 was adopted in response to a spate of tanker accidents in 1976-1977. As the 1973 MARPOL Convention had not yet entered into force, the 1978 MARPOL Protocol absorbed the parent Convention. The combined instrument entered into force on 2 October 1983. In 1997, a Protocol was adopted to amend the Convention and a new Annex VI was added

which entered into force on 19 May 2005. MARPOL has been updated by amendments through the years.

The Convention includes regulations aimed at preventing and minimizing pollution from ships - both accidental pollution and that from routine operations - and currently includes six technical Annexes. Special Areas with strict controls on operational discharges are included in most Annexes.

### Annex I Regulations for the Prevention of Pollution by Oil

entered into force 2 October 1983

Covers prevention of pollution by oil from operational measures as well as from accidental discharges; the 1992 amendments to Annex I made it mandatory for new oil tankers to have double hulls and brought in a phase-in schedule for existing tankers to fit double hulls, which was subsequently revised in 2001 and 2003.

### Annex II Regulations for the Control of Pollution by Noxious Liquid Substances in Bulk

entered into force 2 October 1983

Details the discharge criteria and measures for the control of pollution by noxious liquid substances carried in bulk; some 250 substances were evaluated and included in the list appended to the Convention; the discharge of their residues is allowed only to reception facilities until certain concentrations and conditions (which vary with the category of substances) are complied with.

In any case, no discharge of residues containing noxious substances is permitted within 12 miles of the nearest land.

### Annex III Prevention of Pollution by Harmful Substances Carried by Sea in Packaged Form

entered into force 1 July 1992

Contains general requirements for the issuing of detailed standards on packing, marking, labelling, documentation, stowage, quantity limitations, exceptions and notifications.

For the purpose of this Annex, "harmful substances" are those substances which are identified as marine pollutants in the International Maritime Dangerous Goods Code (IMDG Code) or which meet the criteria in the Appendix of Annex III.



# ENVIRONMENT – OUR STRATEGY FOR CLIMATE CHANGE & ENVIRONMENTAL SUSTAINABILITY

Transporting petrochemical products and livestock is a challenge we face every day to meet our customers' needs while upholding stringent environmental and safety standards.

We work responsibly, implementing sustainable practices, procedures and policies based on good corporate governance, integrity and care for the environment. These are reflected in the way we take decisions, interact with one another and behave with our customers and stakeholders.

Gulf Navigation's environmental strategy and approach to sustainability demonstrate a clear commitment to running a responsible business while respecting the environment and embracing precautionary efforts to mitigate broad global climate change and environmental impacts.

To achieve its vision, Gulf Navigation promotes a strategic focus on cleaner seas, land and cargo through monitoring and maintaining Inventory of Hazardous Materials (IHM) in line with IMO Hong Kong Convention 2009 on Recycling of Ships and EU SRR 2013, and by investments in innovative lowcarbon technology, energy efficiency and operational efficiency. Additionally, Gulf Navigation fleet was greatly enhanced in recent years by a retrofitting

programme. We have invested extensively in the latest generation of marine technologies, such as new energy-efficient propellers and bows to reduce fuel consumption and therefore improve our energy efficiency.

Our commitment to pass cleaner environment to our future generation is displayed by our continues efforts to not only meet prevailing Statutory requirements but also to act proactively to forth coming requirements. Above mentioned IHM requirements not only ensure controls of hazardous material during ship building and operational life of the ship, but also ensure environmentally safe recycling of the ships too.

We continuously monitor our environmental performance and have implemented a number of operational measures to further reduce our CO<sub>2</sub> emissions to meet expected new regulations, including those to be adopted by the International Maritime Organization (IMO).

## Annex IV Prevention of Pollution by Sewage from Ships

entered into force 27 September 2003

Contains requirements to control pollution of the sea by sewage; the discharge of sewage into the sea is prohibited, except when the ship has in operation an approved sewage treatment plant or when the ship is discharging comminuted and disinfected sewage using an approved system at a distance of more than three nautical miles from the nearest land; sewage which is not comminuted or disinfected has to be discharged at a distance of more than 12 nautical miles from the nearest land.

## Annex V Prevention of Pollution by Garbage from Ships

entered into force 31 December 1988

Deals with different types of garbage and specifies the distances from land and the manner in which they may be disposed of; the most important feature of the Annex is the complete ban imposed on the disposal into the sea of all forms of plastics.

## Annex VI Prevention of Air Pollution from Ships

entered into force 19 May 2005

Sets limits on sulphur oxide and nitrogen oxide emissions from ship exhausts and prohibits deliberate emissions of ozone depleting substances; designated emission control areas set more stringent standards for SO<sub>x</sub>, NO<sub>x</sub> and particulate matter. A chapter adopted in 2011 covers mandatory technical and operational energy efficiency measures aimed at reducing greenhouse gas emissions from ships.

REGULATION	AIM & EFFECTIVE DATE	GULF NAVIGATION'S RESPONSE
<b>IMO Ballast Water Management Convention</b>	Sets standards for proper management of ballast water and sediments to prevent the spread of harmful marine species. Effective Date: 8 Sep 2017.	Installation of advanced ballast water treatment systems in one of our vessels. With the aim to be installed across our entire fleet by 2022.
<b>IMO 2020 enhanced global sulphur limit (MARPOL Annex VI, regulation 14)</b>	Enhances existing limits for sulphur content in marine fuel to reduce emissions of sulphur oxides and other pollutants. Effective Date: 1 Jan 2020.	Installation of Exhaust Gas Cleaning Systems (EGCS); evolving fuel strategy including use of Low Sulphur Fuel Oil (LSFO).
<b>IMO Data Collection System (DCS)</b>	Requires collection of fuel consumption data for ships 5,000 GT or over as part of the mandatory Ship Energy Efficiency Management Plan. Effective Date: 1 Mar 2018 for data collection from 1 Jan 2019.	Initiated advanced data acquisition across fleet.
<b>EU Monitoring, Reporting &amp; Verification (MRV)</b>	Requires collection of CO <sub>2</sub> emissions data for ships over 5,000 GT calling at EU/EFTA ports. Effective Date: 1 Jul 2015 for data collection from 1 Jan 2018.	Initiated advanced data acquisition across fleet