Attica
Group

Corporate
Responsibility
Report
2018

CONTENTS

I. Message from the CEO

> Our main aim is to remain committed
> to the principles of Corporate Responsibility
> we have adopted, evaluate our performance
> according to internationally recognized indicators
> and set challenging new objectives, with transparency
> and accountability...

Dear Readers,

Within this decade, the need for critical decisions on behalf of Greek companies in the passenger shipping industry has become imperative, mainly due to the continuous increase in marine fuels' prices as well as intense competition, which affect both financial results and long-term viability. At the same time, however, the favorable dynamics resulting from the increase of tourist arrivals from abroad and the anticipated recovery of the Greek economy are considerable optimistic signs for the industry's companies.

In addition to all above which affect the passenger shipping industry in general, 2018 was a milestone year for Attica Group, as we completed the acquisition of 98.83% of Hellenic Seaways' capital share, within the context of our long-term commitment to have a constant growth orientation for our operations. This acquisition significantly strengthens our competitive position among the major European companies in the industry, while at the same time poses new challenges regarding the functional integration of Hellenic Seaways into our Group and continue our operations seamlessly.

For all of us at Attica Group, our business activity is directly linked to Corporate Responsibility, which means operating in a responsible manner as professionals and thinking long-term as citizens. In practice, this is associated with our Group's financial success, combined at the same time with our efforts to incorporate responsibility into our daily management practices, support prosperity of society, establish positive employment conditions, ensure our passenger safety and reduce our environmental impact.

Our main aim is to remain committed to the principles of Corporate Responsibility we have adopted, evaluate our performance according to internationally recognized indicators and set challenging new objectives, with transparency and accountability.

Within this context, we were the first passenger shipping company worldwide to develop a Corporate Responsibility Report in accordance with the Global Reporting Initiative's Sustainability Reporting Standards. This year's Corporate Responsibility Report in your hands constitutes the outcome of all our efforts and compiles our footprint for 2018, as it describes our actions, achievements and areas for improvement, makes reference to 84 GRI disclosures and presents 225 quantitative indicators in total, most of which refer to all Group companies. Indicatively, within 2018, we:

· Communicated Regulation of Professional Behavior to all our employees and had no violation cases concerning our main principles and rules of professional behavior.

· Distributed over €569 million in economic value to our Stakeholders and implemented or supported societal support activities in 100% of the islands we serve, such as the Science on Board activity and the 'Agoni Grammi Gonimi' program.

· Employed 100% of our employees with full time employment contracts and conducted internal drills on Health and Safety issues to all marine employees.

· Were subject to 49 food hygiene and safety vessel inspections from local authorities, with no recorded non-compliance incidents.

· Informed over 1.2 million customers on Corporate Responsibility issues, such as environmental protection, and conducted internal drills on environmental protection issues to 100% of marine employees.

Our obvious commitment is to continue our efforts to further disseminate Corporate Responsibility within the Group, as reflected in our Vision, Mission and Values, but above all in our employees' ethical behavior, as they are called upon every day to overcome themselves.

Have a pleasant reading,

Spyridon Paschalis
Chief Executive Officer Attica Group

II. Overview

ATTICA GROUP

We are the largest passenger shipping group in Greece, the third in the Mediterranean Sea and among the 10 largest in Europe

23 years of continuous presence in our Seas

We operate 29 modern vessels in the Eastern Mediterranean Sea (and 1 more on the Morocco – Spain route)

We handled 4,357,237 reservations for journeys in the Eastern Mediterranean Sea (and 130,639 more on the Morocco – Spain route), through our central reservation systems

MANAGEMENT

We have communicated Regulation of Professional Behavior to 100% of our employees

No violation cases concerning our main principles and rules of professional behavior occurred

We informed 100% of office employees about our anti-corruption policies and procedures

No corruption incidents occurred

No bribery incidents related to our employees occurred

We were subjected to 82 external audits regarding Management Systems used by Blue Star Ferries and Superfast Ferries, with no recorded non-compliance incident

No non-compliance incident was recorded during audits of our contractors' Management Systems

We increased by 7% the number of quantitative indicators we make reference to within the Report

SOCIETY

We distributed over €569 million in economic value: over €91.6 million to employees (for salaries, benefits and insurance payments), €71.3 million for taxes (including VAT and port taxes), €59.3 million to providers of capital (for interest and return payments), €20.6 million to agents (for commissions), €196.6 million to suppliers (for purchases of goods and services), €2.2 million to society (for discount tickets, implemented programs, sponsorships and donations) and €128 million for investments

We increased the number of Blue Star Ferries and Superfast Ferries sales network employees trained by 16.6% and over four times the number of total training hours

We implemented or supported societal support activities in 100% of the islands we serve

We increased the total number of discount tickets offered through Blue Star Ferries and Superfast Ferries by 11.8%

We increased the total value of societal support activities through Blue Star Ferries and Superfast Ferries by 14.7%

We allocated 47% of sponsorships and donations to local communities

We collected 251 blood units through our voluntary blood donation programs in the last three years

We welcomed 1,290 young people from schools and universities visiting our vessels

We supported the development of 83 students in Merchant Navy's Officer academies

We maintained the percentage of procurement expenditure to local suppliers over 90%

We allocated 28.7% of total procurement expenditure to small and medium-sized enterprises (up to 250 employees)

EMPLOYEES

We employ 100% of our employees with full time employment contracts

100% of employees in Director positions are Greek

No grievances regarding our marine employees' living conditions were filed

100% of our employees received their annual leave, as planned

We conducted internal drills on Health and Safety issues (such as response to emergency situations) to 100% of marine employees

We increased the number of employees trained and training hours in Blue Star Ferries and Superfast Ferries by 124.6% and 35.1% respectively

CUSTOMERS

We conducted internal drills and trainings on passenger safety procedures to 100% of marine employees

We were subjected to 49 inspections from local authorities for food hygiene and safety, with no recorded non-compliance incidents

We maintain 5 corporate websites, with over 4.9 million unique visitors annually and handle 3 mobile applications with over 130,000 downloads

We dispatched 851 notifications to serve passengers with reduced mobility to our vessels

We dispatched 2,411 notifications to serve passengers to Blue Star Ferries and Superfast Ferries vessels, out of which 17 concerning passengers with sensitivity to allergens

The average score of evaluations registered through dedicated devices onboard Blue Star Ferries and Superfast Ferries vessels reached 3.82 on a 5 point scale

We kept Blue Star Ferries and Superfast Ferries vessels' departure time in 61.8% and Hellenic Seaways vessels' departure time in 89.5% of our scheduled journeys

We increased our seasmiles loyalty and reward program members by 8.2%

ENVIRONMENT

We conducted internal drills on environmental protection issues to 100% of marine employees

We informed 70% of our office employees on environmental protection issues

80% of monitors and 40% of personal and laptop computers we use have energy-saving specifications

We use refrigerants that do not affect the ozone layer (such as R134a, R404a, R407a) in 100% of refrigerators and freezers onboard our vessels

We reduced the total quantity of refrigerant materials used from Blue Star Ferries and Superfast Ferries by 29.6%

We reduced the consumption of plastic bags in our offices by 13.3%

We informed over 1.2 million customers on Corporate Responsibility issues, such as environmental protection

We used 28.1% recycled paper for all purposes from Blue Star Ferries and Superfast Ferries

We used 69.8% recycled toners/ink cartridges

We reduced the paper used for commercial purposes from Blue Star Ferries and Superfast Ferries by 15.2%

We reduced the paper used for all purposes from Blue Star Ferries and Superfast Ferries by 12.5%

We transported from Islands free-of-charge over 153 tonnes of materials for recycling

We reduced water consumption from Blue Star Ferries and Superfast Ferries by 13.3%

III. Attica Group

The leader in passenger and freight maritime transportation in the Eastern Mediterranean Sea and the fastest growing company in the Morocco – Spain route

WE ARE

23
years of presence
in our seas

6.7
million passengers
annually in the Eastern
Mediterranean Sea

29
modern vessels in the Eastern
Mediterranean Sea (and
1 more in the
Morocco – Spain route)

953
thousand private vehicles
annually in the Eastern
Mediterranean Sea

362
thousand freight units
annually in the Eastern
Mediterranean Sea

2.2
million nautical miles
annually (101 times around
the Earth)

1,823
employees

WE OFFER

We serve 59 unique destinations and reach 71 ports in Greece and Italy,
through our Blue Star Ferries, Hellenic Seaways and Superfast Ferries brands,
which are known for their high level of service, as well as the Morocco – Spain
route, through our Africa Morocco Links (AML) brand.

Attica Group

SUPERFAST FERRIES®

Blue Star Ferries®

HELLENIC SEAWAYS

AML AFRICA MOROCCO LINK®

1. The Passenger Shipping Industry

Coastline and Greek Islands　ⓘ

Greece has the 11th largest coastline worldwide (13,676 km), just behind China (with a coastline of 14,500 km). This unusual extent is attributed to its unique geographical relief and morphology, which includes 6,000 islands and islets scattered in the Aegean and Ionian Seas. With over 1,500,000 registered inhabitants in 227 islands (approximately 12.3% of the country's population), Greek islands:

· Contribute 11.6% to the Greek Gross Domestic Product (GDP).

· Support over 13.4% of total job positions.

· Are traditionally one of the most popular tourist destinations, both for Greek citizens and foreign visitors.

· Have approximately 60%-65% of the country's hotel beds.

Seasonality of Passengers and Vehicles Transportation

Q1
- 11
- 12
- 21
- 18
- 16
- 10

Q2
- 26
- 21
- 29
- 34
- 26
- 25

Q3
- 48
- 51
- 28
- 24
- 40
- 51

Q4
- 15
- 16
- 23
- 24
- 18
- 14

■ Passengers (%)
■ Private vehicles (%)
■ Freight units (%)
■ Buses (%)
■ Camper vans (%)
■ Motorbikes (%)

Source: Hellenic Statistical Authority

About the Industry

Passenger shipping is one of the most important industries in the Greek economy, as the use of passenger and car-passenger vessels is required to connect islands with the mainland, as well as to connect Greece with Italy. Based on a 2016 study conducted by the Foundation for Economic and Industrial Research (IOBE) published in 2017:

· Greece has the highest number of ports for maritime passenger transport and the port of Piraeus has the largest passenger transportation volume among the 28 European Union countries.

· The number of transported passengers and vehicles in domestic lines reached approximately 16 million and 3 million respectively, increased by 1.6% and 13% respectively (approximately 255,000 passengers and 341,000 vehicles) compared to 2015, mainly due to the increased tourism in Greece. However, despite the 8% increase compared to 2012, passenger transportation volume in 2016 was lower by 21.2% and 15.8% compared to 2007 and 2009 respectively.

· The number of transported passengers and vehicles in Adriatic Sea lines reached approximately 1.5 million and 688,000 respectively, reduced by 12.6% and 14% respectively (approximately 220,000 passengers and 112,000 vehicles) compared to 2015 or by 33% and 20% respectively compared to 2009.

· Passenger shipping industry contributes approximately €16.1 billion in the Greek economy (9.2% of the country's GDP) and supports approximately 349,000 job positions, without including short domestic routes and cruise lines.
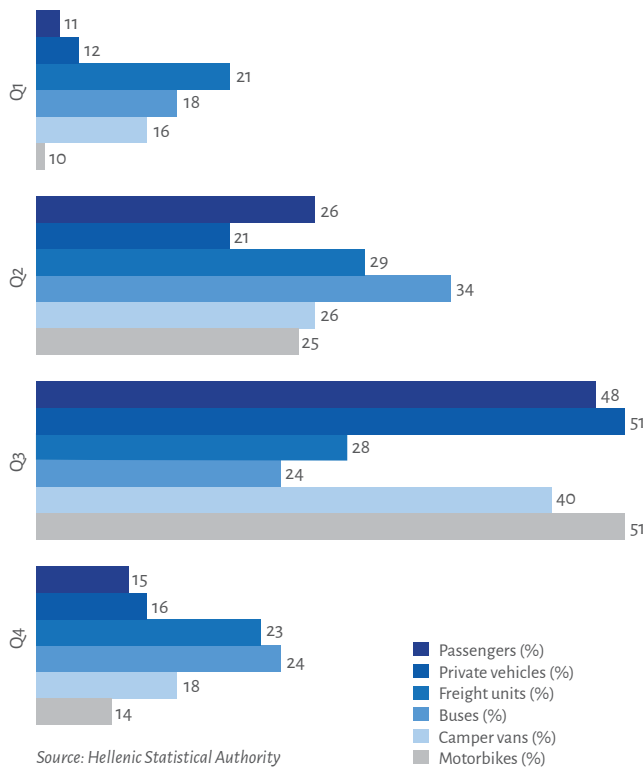
The industry demonstrates intense seasonality regarding transportation of passengers and private vehicles, as there is higher transportation volume during July to September and reduced transportation volume during January to March. On the other hand, there is lower seasonality regarding transportation of freight units, as their transportation volume is equally distributed throughout the year. Nonetheless, domestic passenger shipping companies maintain adequate and consistent shipping services throughout the year, in cooperation with local authorities and the relevant Ministry.
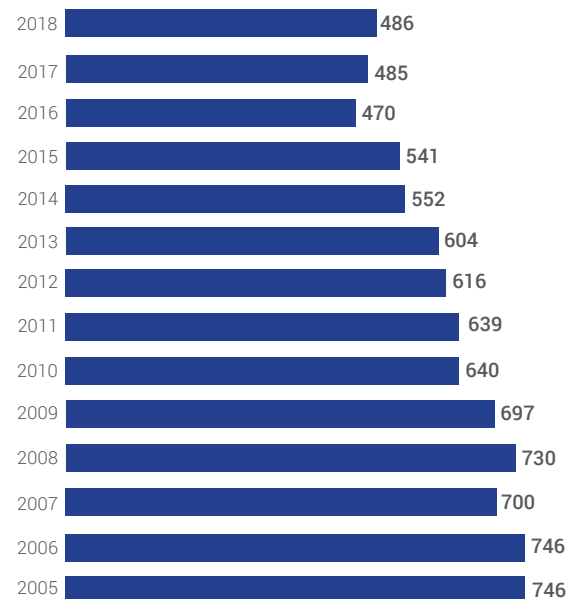
The Greek Passenger Shipping Industry contributes 9.2% to the Greek GDP and 9.7% to the total job positions in Greece

Arrivals and Spending

Based on Bank of Greece's data, the number of 2018 non-resident arrivals in Greece reached approximately 33.1 million, 9.6% more than 2017, while travel revenues and average spending per trip also increased by 10.3% and 0.2% respectively compared to 2017, reaching €16.1 billion and €486 respectively. However, the average spending per trip continues to remain significantly lower than previous years, while the average length of stay per trip has also decreased to 7 days in 2018, compared to 10 days in 2008 and 8.1 days in 2013 (30% and 13.6% lower respectively), with the decrease being partially attributed to the increased ticket prices due to the cumulative VAT increase by 11 percentage points during 2015-2016 and Greece currently has the second highest VAT in domestic lines in Europe (24%) according to European Union's data, which is significantly higher than the 6%-10% VAT in countries with high domestic passenger transportation volume (e.g. Sweden, Italy, Finland). According to the Foundation for Economic and Industrial Research's (IOBE) estimates, reduction of VAT (e.g. to 14% or 6%), fully passed on to ticket prices, would increase transported passengers and travel revenues, as well as significantly benefit island economies due to increase of local GDP and job positions.

Average Spending from Abroad Visitors

Year	Average spending per trip (€)
2018	486
2017	485
2016	470
2015	541
2014	552
2013	604
2012	616
2011	639
2010	640
2009	697
2008	730
2007	700
2006	746
2005	746

■ Average spending pre trip (€)

Source: Bank of Greece

2. About Attica Group

Who we are

Our Group is active in the passenger shipping industry and operates on the Cyclades, Dodecanese, North-East Aegean islands, Saronic, Sporades and Crete domestic routes through our subsidiaries and commercial brands Blue Star Ferries and Hellenic Seaways, as well as on the Greece – Italy routes through Superfast Ferries. Furthermore, we participate with 49% share in 'AFRICA MOROCCO LINKS' (AML), which connects Morocco with continental Europe. The Group is listed on the Athens Stock Exchange, is a member of the international investment holding company Marfin Investment Group (MIG) and its offices are located in Kallithea, Athens.
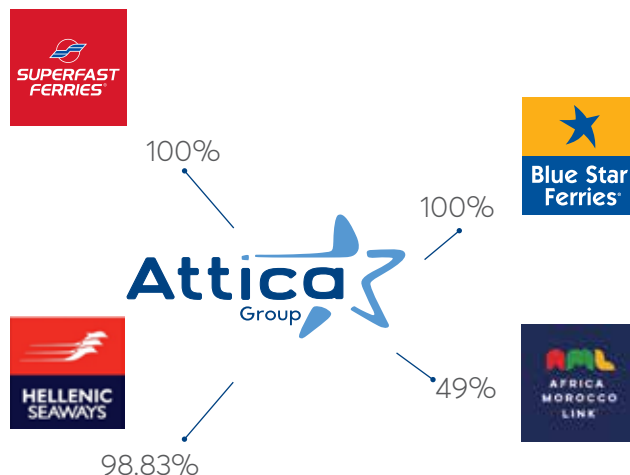
Shareholder Structure

Shareholder	Share*
MIG Shipping S.A.	69.08%
Marfin Investment Group	10.31%
Piraeus Bank	11.84%
Other Shareholders	8.77%

*Data refer to 31/12/2018.

We are the largest passenger shipping group in Greece, the third in the Mediterranean Sea and among the 10 largest in Europe
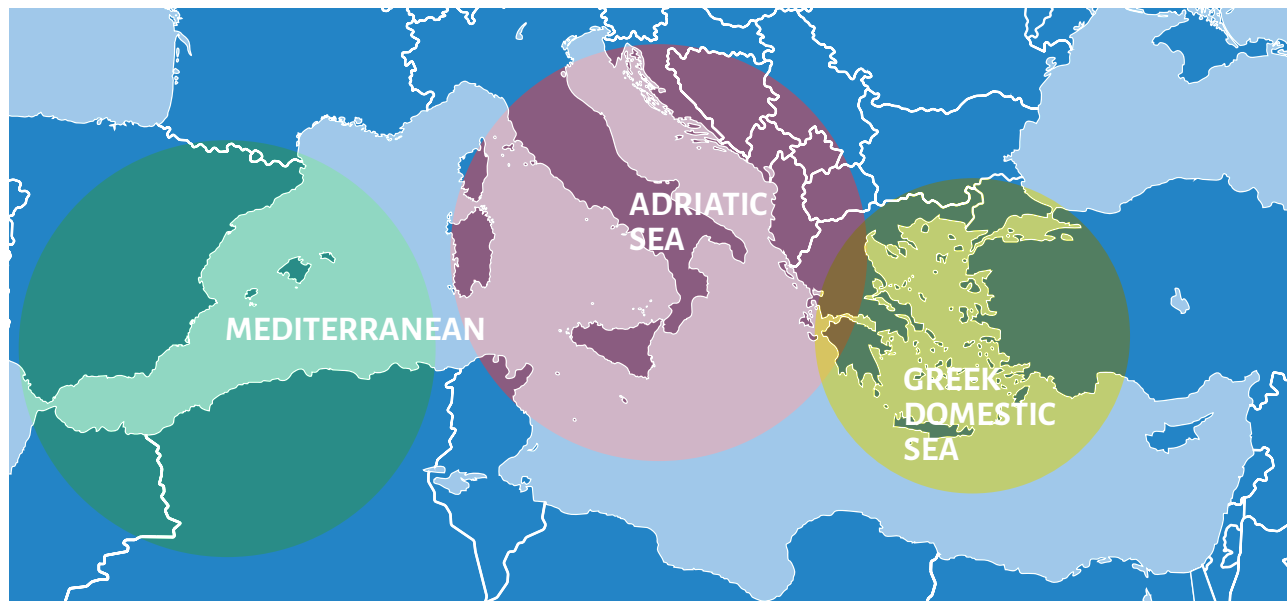
Our culture

VISION

'To strengthen the Group's leading position and value, through profitable expansion into new markets and activities, as well as provide high quality services which exceed market expectations'

MISSION

'Attica Group is an international Shipping Group, which offers high quality shipping services with innovative and aesthetic vessels. The Group's activities generate added value for shareholders and employees, reduce where feasible our environmental footprint and operate for our partners' and local communities' benefit'.

STRATEGIC DEVELOPMENT PRINCIPLES

· Being customers' first choice.
· Offer reliable services and continuously improve our products' quality.
· Create solid and long-term relationships with customers, our partners and local communities.
· Manage responsibly our resources and actively contribute to our Group's healthy, sustainable and profitable growth.

VALUES

Corporate Responsibility
Integrity
Transparency
Innovation
Reliability
Quality

Our history

1918
Incorporated as 'General Company of Commerce and Industry of Greece'

1924
Listed on the Athens Stock Exchange

1992
Change of ownership and name to 'Attica Enterprises S.A.', later renamed to 'Attica Enterprises'

1993
Establishment of subsidiary 'Attica Maritime S.A.', later renamed to 'Superfast Ferries Maritime S.A.'

Order of the first Superfast ferries in Germany, being the first fast car-passenger vessel worldwide

1995
Delivery and routing of Superfast I and Superfast II in the Patra - Ancona route, reducing sailing time by up to 40%

1998
Launch of Patra-Igoumenitsa-Bari route

1999
Acquisition of 'Strintzis Lines Shipping S.A.' and rebranded to Blue Star Ferries

2001
Launch of operation in the Baltic Sea market between Germany and Finland. Sailing time reduced to 22h from 32-34h

2002
Launch of the North Sea route between Scotland and Belgium

2005
Entrance in the RoRo market with the acquisition and routing of two RoRo vessels between Germany and Finland

2007
Marfin Investment Group (MIG) acquires majority shareholding stake of Attica Group

2008
Sale of RoRo vessels and exit from the Baltic and North Sea market

2011-2014
Superfast - ANEK Joint Venture for Ancona and Herakleio routes (2011) expanded to Bari, Venice and Chania (2014)

2015
Superfast Ferries celebrated 20 years since its first journey

2016
Entrance in Africa – Europe market with the establishment of Africa Morocco Links

Relocation of main offices to new address

Restructure of Group organizational structure

2017
Agreement to acquire 98.83% of Hellenic Seaways' share capital

2018
Attica Group celebrated 100 years since its first Shareholders General Assembly

Completion of acquisition for 98.83% of Hellenic Seaways' share capital

During 2018, we completed the acquisition of 98.83% of Hellenic Seaways' capital share, as part of our strategic business plan to achieve long-term viability. Within the context of the agreement and following the Hellenic Competition Commission's necessary approval, we sold one Superfast vessel and one Hellenic Seaways vessel to other passenger shipping companies. Furthermore, we added new routes to Greek islands which were not at all or occasionally served, as we increased the weekly routes to Symi and Leipsoi (throughout the year) and Limnos (during the summer season) by one and two weekly approaches respectively and created a new connection between Santorini and Symi.

Our fleet

Our fleet consists of 29 car-passenger (ro-pax) vessels in the Eastern Mediterranean Sea and 1 more in the Morocco – Spain route, out of which 29 are privately-owned and 1 is on long-term contract. It must be noted that:

· 14 of our 29 privately-owned vessels are tailor-designed by our Group for the specific routes we operate and have been built in first-class European, South Korean and Australian shipyards, in accordance with the highest shipbuilding standards.

· 29 vessels are registered in the Greek ship registry.

· The average age of our vessels in the Eastern Mediterranean Sea is 22 years, while the average age of our vessels is 22.5 years.

· 5 vessels jointly operate with ANEK LINES's vessels, within the context of the 'ANEK S.A. - SUPERFAST ENDEKA (HELLAS) INC. & Co. Joint Venture', specifically for the Crete and Adriatic Sea routes.

Vessel Capacity

	Superfast Ferries	Blue Star Ferries	Hellenic Seaways	AML	TOTAL
Vessels (number)	3	9	17	1	30
Passengers (number)	3,697	15,505	16,978	935	37,115
Beds (number)	1,452	3,264	1,567	32	6,315
Garage lane length (meters)	6,927	9,594	8,416	700	25,637

Transportation Volume

	2016	2017	2018*
Passengers (million)	4.04	4.13	6.70
Private vehicles (thousand)	601.72	635.83	953.00
Freight units (thousand)	290.43	300.61	362.00

Data refer to Eastern Mediterranean Sea routes during the period 01/01/2018-31/12/2018 for Blue Star Ferries and Superfast Ferries and 01/06/2018-31/12/2018 for Hellenic Seaways.

23 years of continuous presence in our Seas <>

We operate 29 modern vessels in the Eastern Mediterranean Sea (and 1 more on the Morocco – Spain route) <>

The way we operate

We utilize products and services from our suppliers, both for the operation of our offices (materials, equipment, services and know-how), as well as for our vessels (fuels, materials, foodstuffs and equipment). At the same time, we closely collaborate with port authorities and the local communities in the departure and arrival ports of our vessels.

Customers purchase travel services through our extensive sales network, which includes:

· The corporate websites www.bluestarferries.com, www.superfast.com, www.hellenicseaways.gr and www.aml.ma, as well as mobile applications.

· 30 Premium Sales Agents and 81 Port agents for Blue Star Ferries, Superfast Ferries and Hellenic Seaways, as well as 13 Premium Sales Agents and 2 Port agents for AML.

· Two central reservation systems, with over 10,000 on-line connected travel agencies.

· The members of the International Union of Railways (UIC) for maritime transportation of passengers from trains (200 members from 5 continents).

We handled 4,357,237 reservations for journeys in the Eastern Mediterranean Sea (and 130,639 more on the Morocco – Spain route), through our central reservation systems

Our Sales Network

In order to provide our services in 2018, we used:

· 26 vessels in the Domestic lines to connect Piraeus with Cyclades, Dodecanese, Crete (Chania and Heraklion), N.E. Aegean islands, Saronic and Sporades.

· 3 privately-owned vessels in the Adriatic Sea lines (Patra – Igoumenitsa – Ancona and Patra – Igoumenitsa – Bari, with an intermediary approach in the port of Corfu during the summer months).

· 1 privately-owned vessel in the Morocco – Spain route (Tangier Med – Algeciras) and 1 vessel chartered during summer months for AML.

Our Value Chain

Main Offices
Attica Group

Suppliers

Customers

Ports

Local Communities

Sales Network

Materials
Equipment
Services
Know-how

Travel
Services

Information
Systems

Information
Systems

Travel
Services

Fuels
Materials
Foodstuffs
Equipment
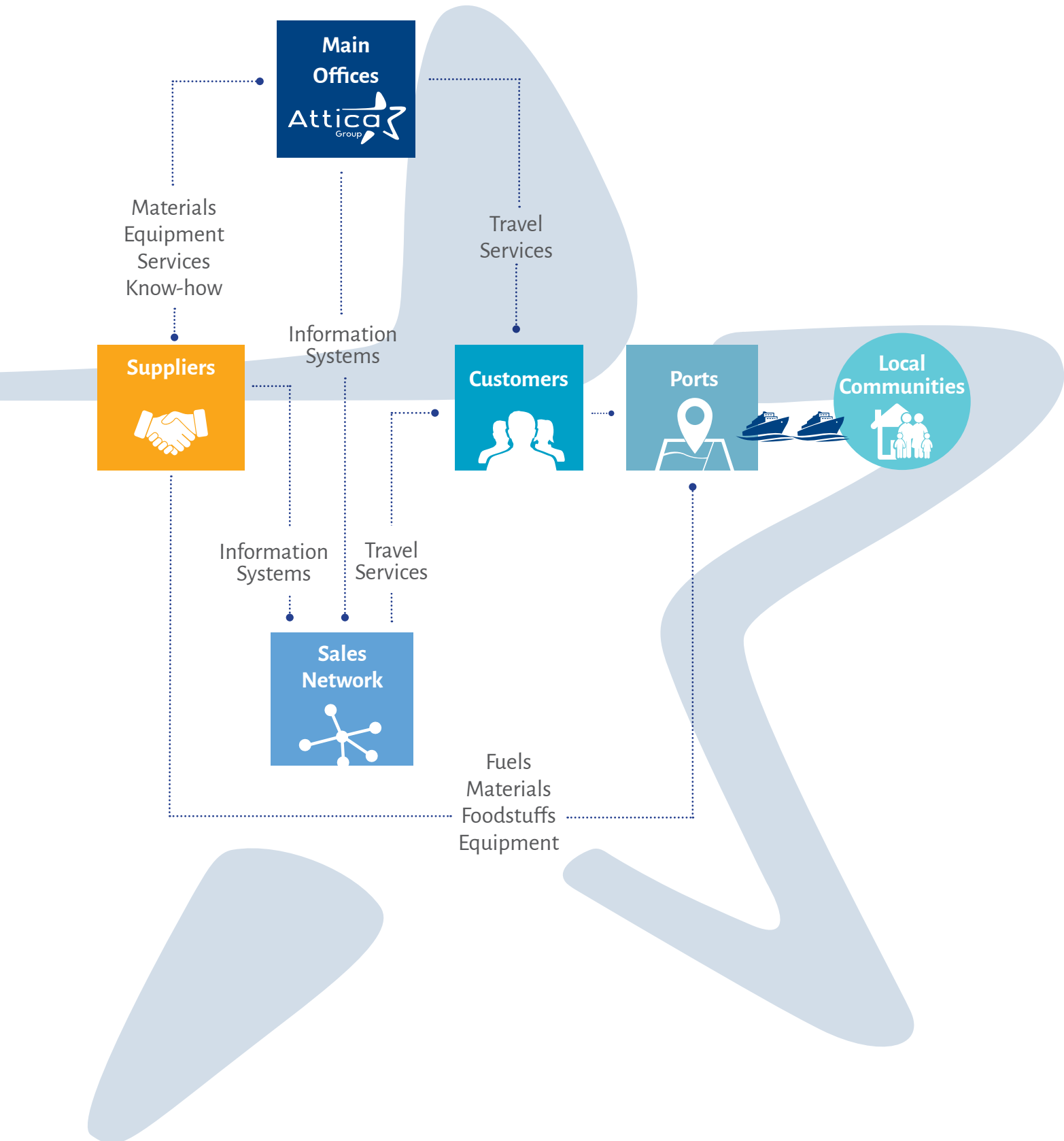
IV. MANAGEMENT

Incorporate Responsibility into our daily management practices

WE ARE

5

pillars of Corporate
Responsibility

11

Stakeholder groups

'Core'

in accordance option of Report
with the GRI Standards

42

future objectives
in the Report

WE COMMIT TO

Adopt responsible policies and practices in our operations and to harmoniously cooperate with our Stakeholders, in order to create mutual long-term value.

84

GRI disclosures
in the Report

WE FOLLOW

Principles of the United Nations'
Global Compact

/10/ Work against all forms of corruption, including extortion and bribery

WE ACHIEVED

· We have communicated Regulation of Professional Behavior to 100% of our employees.

· No violation cases concerning our main principles and rules of professional behavior occurred.

· We informed 100% of office employees about our anti-corruption policies and procedures.

· No corruption incidents occurred.

· No bribery incidents related to our employees occurred.

· We were subjected to 82 external audits regarding Management Systems used by Blue Star Ferries and Superfast Ferries, with no recorded non-compliance incident.

· No non-compliance incident was recorded during audits of our contractors' Management Systems.

· We increased by 7% the number of quantitative indicators we make reference to within the Report.

RESPONSIBLE MANAGEMENT

Shareholders

SOCIETY SUPPORT

Economic Growth
Societal Support
Responsible Procurement

Citizens
Associations and Unions
Suppliers
Local Communities

EMPLOYMENT CONDITIONS

Human Resources & Employment
Health & Safety
Equality & Diversity
Training & Development

Employees

PASSENGER SAFETY

Safety & Security
Responsible Communication
Quality & Satisfaction

Customers
Sales Network
Media

ENVIRONMENTAL IMPACT

State
Environment
NGOs

Air Quality & Energy
Raw Materials & Solid Waste
Water & Liquid Waste

1. Corporate Governance

We operate based on best Corporate Governance practices

Attica Group has developed and implements a Corporate Governance Code, in accordance with the applicable legislation and the Hellenic Capital Market Commission's directives, which was updated within 2018. Attica Group's Board of Directors (BoD) is responsible to decide on all strategic aspects, manage corporate issues and approve the Group's long-term strategy. The current BoD's composition was elected by the Shareholders General Assembly on 26/06/2018 and amended after the resignation of Mr. Hercules Simitsidellis (executive member) due to his retirement on 03/04/2019:

Board of Directors

Name*	Position
Kyriakos D. Mageiras	President - Executive member
Michael G. Sakellis	Vice-President - Independent Non-Executive member
Spyridon Ch. Paschalis	Chief Executive Officer (CEO) - Executive member
Panagiotis G. Dikaios	Executive member
Panagiotis K. Throuvalas	Non-Executive member
George E. Efstratiadis	Non-Executive member
Anastassios G. Kyprianidis	Independent Non-Executive member

*Data refer to 03/04/2019.

- The Chief Executive Officer evaluates Managers' performance on an annual basis. Evaluation criteria include achievement of their objectives, their contribution to cultivate an excellent workplace and their personal characteristics.

- Remuneration for executive members is associated with the corporate strategy and achievement of pursued objectives, while remuneration for non-executive members is associated with their employment time and responsibilities, without being directly associated with business performance, in order to encourage freedom of opinion regarding taking increased business risks.

- The Board of Directors is supported by the **Audit Committee,** which is elected from the Shareholders General Assembly and consists of two independent non-executive members and one executive member, who meet at least quarterly, in order to:

  - Oversee compliance with legislation and regulatory requirements.

  - Ensure transparency of corporate operations.

  - Evaluate the effectiveness of internal control and risk management systems.

  - Monitor, review and evaluate the process of compiling financial information.

Corporate Governance Code { }

According to our Internal Regulation Code, the Corporate Governance Department is responsible to adhere to, update and implement the Corporate Governance Code.

- The Board of Directors consists between three to nine members, who are elected by the Shareholders General Assembly for two years, with the current seven-member BoD's term end date on 2020.
- BoD members elect the President, Vice-President and Chief Executive Officer, as well as the Authorized Director, if deemed necessary.
- Responsibilities of the President and the Chief Executive Officer are separate.
- At the moment, there are no consultation processes between Stakeholders and the BoD on sustainability issues. However, it must be noted that there were no critical concerns communicated to the BoD within 2018.
- The BoD is responsible for the Chief Executive Officer's performance evaluation.

Dependency Relationships for BoD Members { }

According to our Corporate Governance Code, we consider that a dependency relationship exists for candidate and actual independent, non-executive BoD members, when the member:

- Maintains business or other professional relationship with the Group or an affiliated company, which affects its business activity, especially in cases of being a major supplier or customer of the Group.
- Is BoD President or Manager within the Group, or has the above described attributes, or is an executive BoD member in an affiliate company, or has any form of employment or paid relationship with the Group or an affiliated company.
- Has up to second-degree relationship or is a spouse of an executive BoD member or a Manager or a shareholder who holds the majority share capital of the Group or an affiliated company.

Conflicts of Interests √

According to our Corporate Governance Code, BoD members and any other person with delegated BoD responsibilities are prohibited to pursue personal interests which conflict with business interests. In case such personal interests exist, they shall inform other members for actual or potential conflict of interests while performing their duties. The Shareholders General Assembly is responsible to approve any action of BoD members and Managers on their behalf or on behalf of third parties or participate as equal partners in companies which pursue objectives similar to those pursued by our Group.

We apply Principles and Regulation of Conduct

Regulation of Professional Conduct & Business Ethics: We have communicated our Regulation of Professional Conduct & Business Ethics to all office employees via e-mail, which is also placed on their computer desktop. The Code is also part of the introductory material provided to all new hired employees, who sign for its receive and acceptance, and outlines the principles and rules which govern our business activities on the following topics:

· Confidentiality – Privacy.

· Information Security – Insider Information.

· Personal Data and Information.

· Professional Behavior: Behavior towards customers, behavior among colleagues.

· Professional Appearance.

· Health & Safety.

· Conflict of interests.

· Engaging with Other Work Activities.

· Transparency of Activities.

· Respect for Property and Provided Resources.

· Group Representation in Media – Publications – Public Views.

· Report of Illegal Activities and Violations.

· Corporate Responsibility.

Employee Guidebook: At the same time, we have communicated the 'Improving the Best' information guidebook to all marine employees, who have signed the acceptance of the main principles of professional behavior towards colleagues and customers described within the guidebook, as well as crew duties, relevant regulations, professional appearance guidelines and general information about the Group and its vessels.

It must be noted that:

· All employees with permanent and fixed term employment contracts are obliged to follow the Regulation of Professional Conduct & Business Ethics and Employee Guidebook.

· We consider non-compliance with their principles as an occupational misconduct which may lead to termination of employment or even legal sanctions.

· We impose sanctions stated in our Codes of professional behavior in cases where safety rules and marine law regulations or Group regulations are violated.

· We require provision of undisputable evidence to confirm reports against any employee.

· All employees can seek advice or guidance from the Human Resources Department or directly to the Group's management, in case they consider that there might be a conflict of interest. No such cases have been reported within 2018.

· We prohibit any Manager-employee personal relationship within the same Department. Instead, we recommend that related employees or with any other personal relationship are employed in different Departments.

· Conduct relevant briefings to our employees, informing all office employees regarding our Regulation of Professional Conduct & Business Ethics in 2018, in parallel with a briefing regarding the new European Union General Data Protection Regulation (GDPR) (see Section VII-1), all of whom signed to understand, acknowledge and accept the respective Regulations.

We have communicated Regulation of Professional Behavior to 100% of our employees <>

- Monitoring of transactions from BoD members, Managers and persons with insider information.
- Public disclosure of significant transactions.
- Principles for transactions between affiliated companies.
· The integrated Enterprise Resource Planning (ERP) system we use to automate and computerize our operations.

Stock Trading Monitoring Procedure { }

According to the relevant legislation, we have compiled a list of people with access to privileged information, which is provided to the Hellenic Capital Market Commission upon request. We inform each person in the list for its obligations, as well as potential sanctions in case of information misuse.

No violation cases concerning our main principles and rules of professional behavior occurred <>

Risk Management: Within the context of our risk management system, we maintain and update annually our Risk Registry in cooperation with Directors and the Group's management, where records are assessed and prioritized according to risks that can affect our business plan. Based on the Registry's latest update, we have identified the following risks that may affect our operations depending on their significance.

We apply internal control and risk management systems

Internal Control: We apply an internal control system with the policies and process we apply to ensure our effective and efficient operation, the reliability of our financial information and our compliance with applicable laws and regulations. The Board of Directors monitors, assesses and ensures the adequacy of the internal control system (including financial statements), through:

· The Audit Committee.

· The Internal Audit Department, which reports directly to the BoD and is supervised by the Audit Committee. We have developed control systems and adhere to appropriate processes for its operation as an independent body, which enables the Department to audit our functions and procedures based on an annual audit plan or at the request of the Group's Management or Audit Committee, as well as monitor the Internal Regulation Code's implementation and enforcement.

· The Internal Regulation Code, which defines:

 - Departments' structure, their responsibilities and the relationship with the Group's management.

 - Responsibilities of BoD members.

 - Recruitment and performance evaluation process for Managers.

Risk Registry

	Risk Description
1	Reduction of available income and passenger volume due to financial recession.
2	Loss of personal data.
3	Increase of marine fuel prices.
4	Integration of Hellenic Seaways within the Group.
5	Business activity in Morocco.
6	Changes in vessel operating regulations.
7	Difficulties in financing investment goals and strategic plans.
8	Risks from governmental decisions concerning the shipping sector.
9	Data security.
10	Lack of vessel Officers (mainly engine vessel Officers).
11	Competition in domestic and international passenger shipping routes.
12	Risk from unsafe vessel approach to ports.
13	Risk from expansion to new routes.
14	Credit risk.
15	Refugee crisis.
16	Vessel maintenance.

Ensuring Business Continuity and Cybersecurity ✓

In order to ensure our infrastructure's and computer systems' uninterrupted operation, we:

· Operate an Alternative Information Systems and Telecommunications Center.

· Implement a specific on-site and off-site backup policy.

Furthermore, we have established cybersecurity process to maintain a secure online environment, in which we define our actions to protect office and vessel information systems from risks, such as:

· Computer viruses and malware.

· Internal attacks.

· Important data destruction due to employee negligence.

· External attacks (such as hacking and phishing).

· Attacks to disrupt services when connected to the Internet (Denial of Service – DOS).

We contribute to anti-corruption

Within the context of our efforts to combat and eradicate corruption, we:

· Have accepted and signed the UN Global Compact's 'Call for Action' initiative and commit to implement policies and practices to effectively tackle corruption incidents.

· Have developed our Anti-corruption Regulation with our main professional integrity and business ethics practices.

· Have placed our anti-corruption policies and procedures on all our office employees' computer desktop.

· Submit our positions regarding issues of public interest at national and international level either individually or through INTERFERRY (the international shipping association which represents the ferry industry worldwide) and SEEN (the Greek Shipowners Association for Passenger Ships), in order to transparently express our views and positions.

We informed 100% of office employees about our anti-corruption policies and procedures <>

No corruption incidents occurred <>

Anti-corruption Regulation ✓

Showcasing our commitment to operate with integrity and transparency throughout our business operations, in 2018 we developed our Anti-corruption Regulation, which is mandatory for all employees and communicates our zero tolerance towards corruption. The Regulation describes our principles regarding the following issues:

· Our position against corruption.

· Collaboration with Customers, Agencies, Suppliers and other third parties.

· Gifts and entertainment expenses.

· Professional Gifts.

· 'Facility Payments'.

· Conflict of interests.

· Correctness and Completeness of Archives.

· Donations/Sponsorships.

· 'Gray Areas'.

· Absence of Retaliation.

· Information mechanism for corruption issues.

According to the Regulation's provisions, we strictly prohibit all employees and anyone acting on our behalf to directly or indirectly offer or accept any item of value (with over €100 cumulative value per calendar year) to or from any person who directly or indirectly represents a customer, agent, supplier or any other Stakeholder, in order to obtain or attempt to obtain any personal benefit or business advantage through bribery, extortion or illegal procurement. In addition to potential legal actions, we immediately terminate the working relationship with any employee involved in a confirmed corruption incident.

All employees can report actual or potential corruption incidents to the BoD's Audit Committee, which ensures in all cases the anonymity of employees who submit such reports and protects them from any actions against them, since any form of retaliation is considered a violation of our Regulation of Professional Conduct & Business Ethics.

It must be noted that we did not made any donations to political parties in Greece within 2018.

No bribery incidents related to our employees occurred <>

We follow fair competition rules

We recognize the importance and our responsibility to follow fair competition rules and do not adopt anti-competitive practices. Within this context:

· We do not make negative comments about our competitors publicly.

· We do not engage in illegal partnerships or price fixing agreements, market sharing or entering new markets and customer segments.

· We do not allow our employees to reveal confidential information regarding our activities, relationships with our customers or their personal and financial data, as well as discuss future plans that are not publicly known or salary issues.

· We conduct briefings on legislative competition issues to our employees and Management Executives. In 2018, we trained one office employee on the relevant legislation and anti-competitive behavior.

Regarding previous legal cases, two complaints for anti-competitive behavior in 2015 and 2017 were rejected within 2018 by the competent judicial bodies.

We comply with regulatory framework

We closely monitor the regulatory and legal framework related to our activities, in order to apply its relevant provisions. Within 2018:

· There were no complaints or grievances regarding:
  - Labor practices.
  - Human rights violation.
  - Marine employees' living conditions onboard our vessels.
  - Privacy issues or personal data security on behalf of our employees or customers.
  - Anti-competitive behavior or anti-trust practices.
  - Overbooking.
  - Environmental legislation violation.
  - Vessels' acoustic impact.

· There were no incidents or cases of:
  - Corruption.
  - Bribery related to our employees.
  - Employee discrimination.
  - Dispute with the local communities of the islands we serve.
  - Non-compliance of products and services during the external audits conducted by the relevant health and market authorities.
  - Non-compliance with regulations regarding product and service use or their health and safety impacts.
  - Recalls of products and services due to health and safety impacts.
  - Non-compliance with regulations and voluntary codes concerning customers' personal data security.
  - Non-compliance with regulations and voluntary codes concerning marketing, advertising, promotion, product and service information and labeling.
  - Advertising campaigns being withdrawn.

· There were no legal cases related to corruption or personal data security related to our customers.

· There were no written notices by competent authorities regarding marketing, advertising, promotion, product and service information and labeling or environmental issues.

· The total value of fines imposed reached €78,700 due to:
  - A limited pollution incident.
  - Vessel fumigation.
  - Vessel departure delays.

· There were no significant fines (over €20,000) or other non-monetary sanctions imposed due to:
  - Corruption.
  - Anti-competitive behavior or anti-trust practices.
  - Impact of our operations on local communities.
  - Employee Health and Safety.
  - Overbooking.
  - Product and service use.
  - Health and safety impacts of our products and services.
  - Customers' personal data security.
  - Marketing, advertising, promotion, product and service information and labeling.
  - Other environmental issues.
 - Rippling impact of our vessels.

2. Corporate Responsibility

Corporate Responsibility

Our approach to Corporate Responsibility aims to align our business operations with the needs of society and the environment. Therefore, we design and implement initiatives to prevent potential negative impacts due to our operations and respond to opportunities through interaction with our Stakeholders.

We utilize appropriate organizational structures

To manage topics related to our responsible operation, we have created an organizational structure, as described in the figure below. This organizational structure is also used to collect data, which are used internally to evaluate our performance, and Stakeholders to do the same.
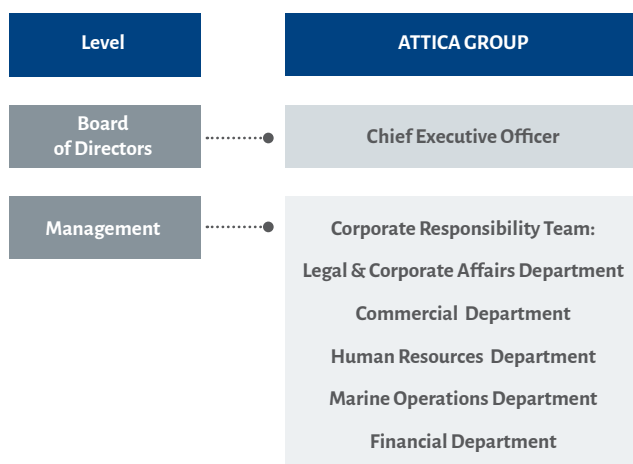
- At Board level, the Chief Executive Officer has the overall responsibility for Corporate Responsibility issues, including principles, policies and objectives.
- At Management level, the Corporate Responsibility Team is responsible to coordinate our overall Corporate Responsibility strategy. The Team consists of executives from the Legal & Corporate Affairs Department, the Commercial Department, the Human Resources Department, the Marine Operations Department and the Financial Department and cooperates with other Departments, in order to diffuse practices related to responsible operation. It must be noted that during 2018 we:
  - Added an executive from the Financial Department into our Corporate Responsibility Team, in order to include representative executives from all our main Departments within the Team.
  - Completed the documentation of our Corporate Responsibility Team's responsibilities, more specifically within the Group's formal organizational structure for one member and in the formal job descriptions for the other four members.

Managing Corporate Responsibility

Level	ATTICA GROUP
Board of Directors	Chief Executive Officer
Management	Corporate Responsibility Team: Legal & Corporate Affairs Department Commercial Department Human Resources Department Marine Operations Department Financial Department

Global Compact Principles ✓

Our Regulation of Professional Conduct & Business Ethics reflects our commitment to the 10 Principles of the United Nations' Global Compact, as it includes their acknowledgement and acceptance.

UN GLOBAL COMPACT

WE SUPPORT

Sustainable Mobility ✓

Since 2011, we have signed the International Union of Railways' (UIC) Declaration on Sustainable Mobility and Transport, which is aligned with the United Nations' Global Compact and constitutes a public commitment to implement and report on sustainable development practices through regular and transparent progress reports. Furthermore, we are members of UIC's Sustainable Mobility Group to strengthen sustainability in the transportation sector and participated in the 'UIC Sustainability Survey: Good Practice Examples' on good practices related to sustainable development.

'European Enterprise Manifesto 2020' √

Since 2015, we have signed the European Enterprise Manifesto 2020, part of the joint initiative 'Enterprise 2020' of the Hellenic Network for Corporate Social Responsibility (CSR Hellas), the European Business Network for Corporate Social Responsibility (CSR Europe) and 42 CSR Networks across Europe. The Manifesto promotes cooperation and initiatives in three strategic areas:

· Enhance employability and social inclusion.

· Promote new sustainable production and consumption methods, as well as improve living conditions.

· Increase transparency and respect for human rights.

Training on Corporate Responsibility √

In order to further manage Corporate Responsibility, during 2018 we organized a half-day Corporate Responsibility training seminar to approximately 60 management executives, including the Chief Executive Officer, Top Management members, Directors and Managers from all departments and the Corporate Responsibility Team, on the following topics:

· Definition and importance of Corporate Responsibility.

· Managing Corporate Responsibility in a systematic way.

· Review of Corporate Responsibility Report, including strengths, areas for improvement and suggestions for the next Report.

At the same time, we invited all Blue Star Ferries and Superfast Ferries office employees to participate in the interactive e-learning course 'Let's Think...' on key concepts and thinking on Corporate Responsibility issues to help them increase their awareness, facilitate their thinking process and adjust their behavior related to Corporate Responsibility. It must be noted that approximately 35% of all participants achieved a score of over 80%.

Corporate Responsibility Strategy √

Since 2017, we have initiated a process to develop and implement our Corporate Responsibility Strategy & Action Plan 2018-2020, in order to improve our performance. Within this context, we utilized an online tool to quantitatively measure our Group's current Corporate Responsibility maturity level in:

· 7 Areas (Management, Owners, Employees, Suppliers, Customers, Communities and Environment).

· 41 sub-Areas.

· 4 Dimensions (Policies, Processes, Performance and Perception).

Based on replies to over 1,000 potential questions based on criteria from internationally recognized systems (such as GRI, AA1000, ISO26000 and EFQM) and good practices from leading organizations worldwide, we quantitatively assessed our Corporate Responsibility maturity and identified the Areas and Dimensions with the lowest scores where we have to focus.

The results were presented during a half-day Strategy Workshop to approximately 60 management executives, including the Chief Executive Officer, Top Management members, Directors and Managers from all departments. After the presentation, participants determined which Areas, sub-Areas and Dimensions we should focus on, and defined the quantitative targets for each Area, forming the Corporate Responsibility Strategy 2018-2020.

During 2018, each department defined the future actions and responsible employees for each action included in our Corporate Responsibility Action Plan 2018-2020, which are integrated in the Group's objectives. Within the framework of our Corporate Responsibility Strategy and Action Plan, we record monthly and evaluate annually the implementation of the respective actions, in order to monitor their achievement.

We operate based on Management Systems

We use the following certified Management Systems for our business operations:

· International Safety Management (ISM) Code.
· International Vessel and Port Facility Security (ISPS) Code.
· Maritime Labour Convention (MLC).
· ISO 9001 Quality Management System.
· ISO 14001 Environmental Management System.
· ISO 50001 Energy Management System (refers only to Hellenic Seaways).
· ISO 22000 Food Safety Management System (contractors).

We were subjected to 82 external audits regarding Management Systems used by Blue Star Ferries and Superfast Ferries, with no recorded non-compliance incident <>

No non-compliance incident was recorded during audits of our contractors' Management Systems <>

We are members in national and international organizations

We are members in the following institutions and organizations:

· INTERFERRY.
· Greek Shipowners Association for Passenger Ships (SEEN). The Vice-President of BoD and the Chief Executive Officer are President of BoD and Vice-President of International Routes in the BoD of SEEN.
· Hellenic Chamber of Shipping (HCS). The Vice-President of BoD and the Chief Executive Officer are BoD Members of HCS.
· Greek Tourism Confederation (SETE).
· Hellenic Network for Corporate Social Responsibility (CSR Hellas).
· Hellenic Marine Environment Protection Association (HELMEPA).
· Travel Technology Initiative.
· International Union of Railways (UIC).
· International Rail Transport Committee (CIT).
· EURAIL Group GIE.
· United Nations' Global Compact.
· Hellenic-Italian Chamber of Commerce.

Our efforts are recognized

We consider the recognition of our efforts related to Corporate Responsibility as an important moral award, which also highlights our commitment to continue our relevant practices and initiatives. In 2018, we were proud to receive:

· The inclusion in Greece's largest corporate reputation survey **Most Admired Companies 2018** by Fortune magazine as one of the most admired companies in Greece, where we ranked 18th in the respective list regardless of industry, based on nine criteria (Innovation, Human Resources Management, Corporate Resources Management, Corporate Social Responsibility, Characteristics-Quality Management, Economic Viability, Long-term Investment Value, Quality of Products and Services Offered, Extroversion/Competitiveness).

· An award in ECOCITY's **Environmental Awareness Awards ECOPOLIS 2018**, in the category 'Business Awards', sub-category 'Environmental Policy', for our systematic and responsible operation on environmental issues, being the first passenger shipping group in Greece with this award.

· The Silver Award in Boussias Communications' **Loyalty Awards 2018** in the category 'Best in Loyalty & Engagement (Travel)', for our loyalty and reward program seasmiles.

· Three awards in Boussias Communications' **Tourism AWARDS 2018**:

  - The Gold Award in the category 'Local community support / CSR activities' for our overall social contribution and our social responsibility program 'with you as our destination'.

  - The Silver Award in the category 'Technology enhanced experience' for the infotainment platform @sea in our vessels (see Section VII-3), the first such platform in the Greek passenger shipping industry.

  - The Silver Award in the category 'Loyalty Programs' for our loyalty and reward program seasmiles (see Section VII-3).

· The Silver Award in Ethos Media's **Greek Hospitality Awards 2018** in the category 'Best Greek Domestic Passenger Shipping Company', among the Greek hotels and tourism companies distinguished for their innovative practices, robust management and willingness to offer top-level tourist services to visitors according to international standards.

3. Materiality and Stakeholders

We identify Material Topics

We have created the following Corporate Responsibility Framework, as a result of an internal analysis and interaction with our Stakeholders, in order to systematically organize and manage Corporate Responsibility issues.

Corporate Responsibility Framework

Economic Growth
Societal Support
Responsible Procurement

Citizens
Associations and Unions
Suppliers
Local Communities

SOCIETY SUPPORT

Human Resources & Employment
Health & Safety
Equality & Diversity
Training & Development

Employees

EMPLOYMENT CONDITIONS

RESPONSIBLE MANAGEMENT

Shareholders

PASSENGER SAFETY

Customers
Sales Network
Media

Safety & Security
Responsible Communication
Quality & Satisfaction

ENVIRONMENTAL IMPACT

State
Environment
NGOs

Air Quality & Energy
Raw Materials & Solid Waste
Water & Liquid Waste

In each one of the areas of Corporate Responsibility, we focus on Material Topics, identified through a respective Materiality Analysis, during which:

· We identified potential topics, based on the industry's regulatory framework, current global conditions and practices and future trends, developing a pool of over 90 topics to be considered.

· We analyzed the associated risk for each topic, based on:

  - Their potential impact (for our Stakeholders).

  - Their probability of occurrence.

· We utilized our Stakeholders' expectations as far as our responsible operation is concerned, where available, taking into consideration Stakeholder engagement input from various sources (e.g. relevant surveys).

· We combined the associated risk and Stakeholders' expectations for each topic, taking into consideration the Group's Corporate Responsibility Strategy 2018-2020 and the identified Areas where we should focus more through the implementation of our Corporate Responsibility Strategy & Action Plan 2018-2020 (see Section IV-2), as well as a relevant workshop to develop our Materiality Analysis.
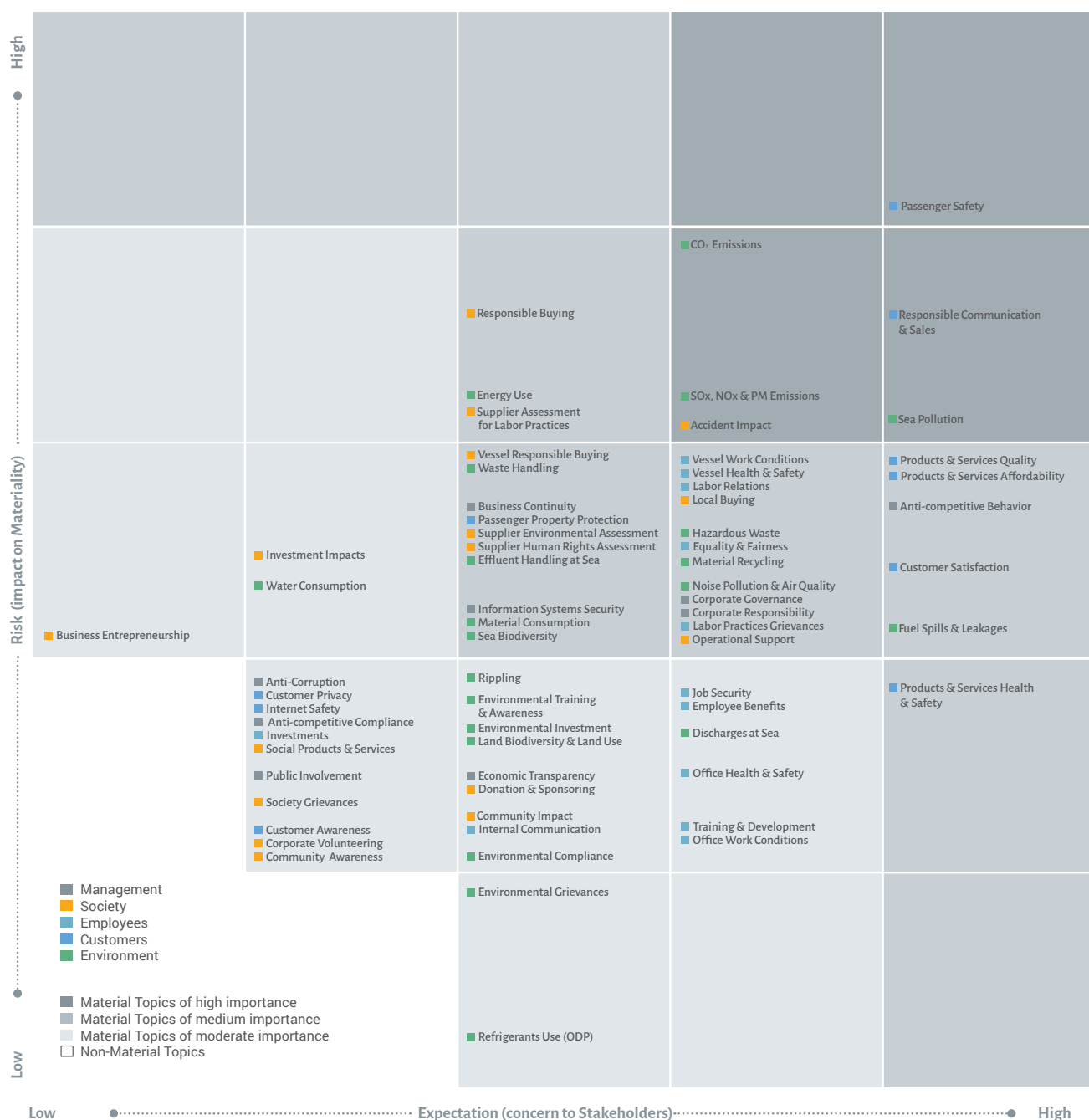
Development of Corporate Responsibility Materiality Analysis

For the first time during the annual Corporate Responsibility meeting we organize in the last four years, in 2018 we asked our management executives to share their views and collectively develop our Group's Corporate Responsibility Materiality Analysis. As part of a specialized half-day workshop, over 110 management executives, including the Chief Executive Officer, Top Management members, Directors and Managers from all departments, were divided into 6 theme areas (Owners, Employees, Suppliers, Customers, Society and Environment) and analyzed the risk and our Stakeholders' expectations on each topic, in order to determine the Material Topics we should focus our efforts.

The Materiality Analysis was approved by the Corporate Responsibility Team and the Chief Executive Officer, who also approved the Corporate Responsibility Report. Through this Analysis, we have identified the following Material Topics for 2018 (all Topics that were not deemed Material are not referenced in detail):

Corporate Responsibility Materiality Analysis

Risk (impact on Materiality) — vertical axis (Low to High)
Expectation (concern to Stakeholders) — horizontal axis (Low to High)

■ Passenger Safety

■ CO₂ Emissions

■ Responsible Buying

■ Responsible Communication & Sales

■ Energy Use
■ Supplier Assessment for Labor Practices

■ SOx, NOx & PM Emissions
■ Accident Impact

■ Sea Pollution

■ Vessel Responsible Buying
■ Waste Handling

■ Vessel Work Conditions
■ Vessel Health & Safety
■ Labor Relations
■ Local Buying

■ Products & Services Quality
■ Products & Services Affordability

■ Business Continuity
■ Passenger Property Protection
■ Supplier Environmental Assessment
■ Supplier Human Rights Assessment
■ Effluent Handling at Sea

■ Hazardous Waste
■ Equality & Fairness
■ Material Recycling

■ Anti-competitive Behavior

■ Investment Impacts

■ Water Consumption

■ Noise Pollution & Air Quality
■ Corporate Governance
■ Corporate Responsibility
■ Labor Practices Grievances
■ Operational Support

■ Customer Satisfaction

■ Information Systems Security
■ Material Consumption
■ Sea Biodiversity

■ Fuel Spills & Leakages

■ Business Entrepreneurship

■ Anti-Corruption
■ Customer Privacy
■ Internet Safety
■ Anti-competitive Compliance
■ Investments
■ Social Products & Services

■ Rippling

■ Environmental Training & Awareness
■ Environmental Investment
■ Land Biodiversity & Land Use

■ Job Security
■ Employee Benefits

■ Products & Services Health & Safety

■ Public Involvement

■ Economic Transparency
■ Donation & Sponsoring

■ Discharges at Sea

■ Society Grievances

■ Community Impact
■ Internal Communication

■ Office Health & Safety

■ Customer Awareness
■ Corporate Volunteering
■ Community Awareness

■ Environmental Compliance

■ Training & Development
■ Office Work Conditions

■ Environmental Grievances

■ Refrigerants Use (ODP)

Legend:
■ Management
■ Society
■ Employees
■ Customers
■ Environment

■ Material Topics of high importance
■ Material Topics of medium importance
■ Material Topics of moderate importance
□ Non-Material Topics

We interact with Stakeholders

The way we operate, as well as our decisions, affect a wide range of people, groups and organizations, who comprise our Stakeholders. The following table describes our Stakeholder groups, which influence or are influenced by our operations, the methods we apply to continuously communicate and interact with them, the main topics raised by them, as well as the sections within our Report, where we respond to these topics. Within 2018, we identified our Stakeholders' expectations related to our responsible operation, mainly through the following surveys:

· Qualitative Greek Domestic Lines Survey, with group discussions of 64 people who travelled by vessel in the past 12 months or who often travel by vessel to specific destinations, while it must be noted that we included additional questions regarding our Corporate Responsibility performance (e.g. responsible product and service promotion, personal data protection, society support, management of environmental impact) in the 2018 survey.

· Quantitative Greek Domestic Lines Survey, with telephone interviews to 1,050 people in selected areas (Attica, Rhodes, Kos, Tinos, Mykonos, Syros, Paros, Naxos and Santorini) who travelled by vessel in the past 12 months.
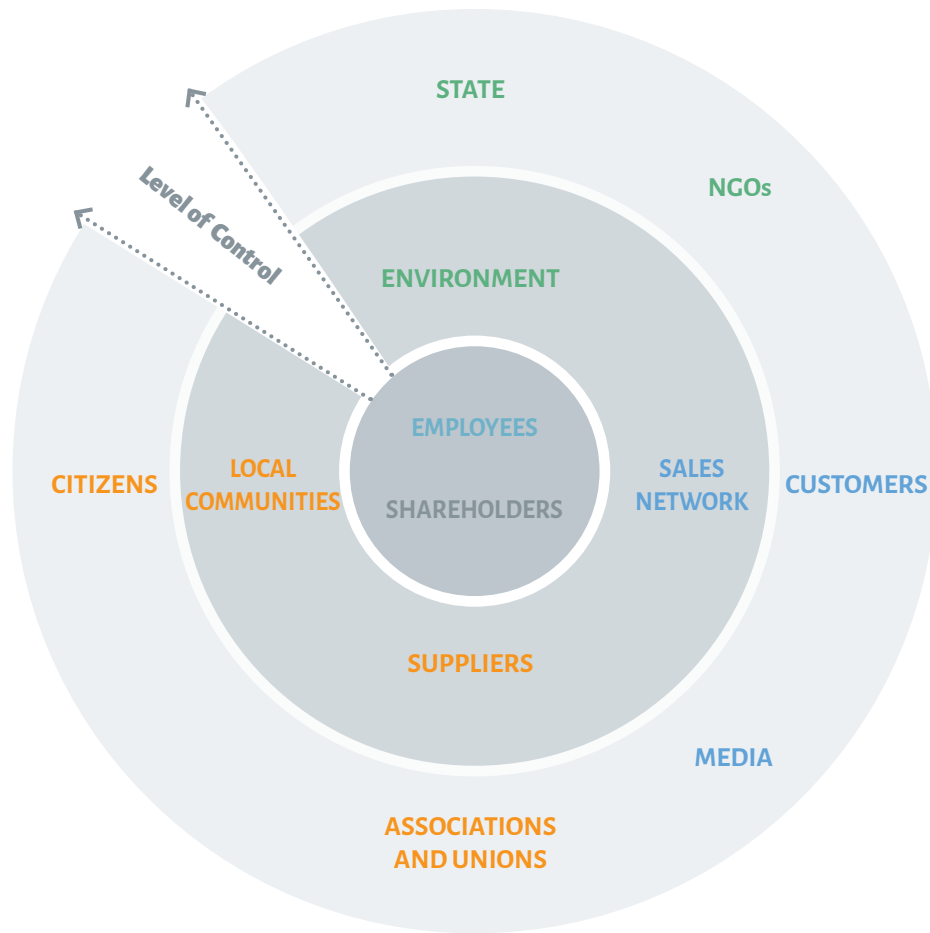
Stakeholder Engagement

Stakeholder	Methods of interaction through continuous activities (unless indicated otherwise)	Main issues of interest (reference in Report)
DIRECT		
Employees	· Events / Meetings · Training · Negotiations with Employee Unions (through Greek Shipowners Association for Passenger Ships – SEEN)	· Job Security (VI-1) · Training & Development (VI-4) · Vessel Health & Safety (VI-2) · Office Health & Safety (VI-2) · Vessel Work Conditions (VI-1-4) · Employee Benefits (VI-3) · Equality & Fairness (VI-3) · Labor Practices Grievances (IV-1, VI-3) · Office Work Conditions (VI-1-4) · Labor Relations (VI-3) · Environmental Training & Awareness (VIII-1-3) · Internal Communication (VI-1)
Shareholders	· Shareholders General Assembly (annually) · Websites · Meetings	· Passenger Safety (VII-1) · Community Impact (V-2) · Corporate Responsibility (IV-2) · Accident Impact (V-2, VIII-1) · Corporate Governance (IV-1) · Business Continuity (IV-1) · Investments (VI-3) · Anti-corruption (IV-1) · Information Systems Security (IV-1, VII-1) · Economic Transparency (IV-1, V-1) · Public Involvement (IV-1)
Customers	· Qualitative Greek Domestic Lines Survey (annually) · Quantitative Greek Domestic Lines Survey (annually) · Customer Services Division · Websites · Satisfaction / Complaints Questionnaires · Social media · Information leaflets	· Passenger Safety (VII-1) · Products & Services Quality (VII-1, 3) · Products & Services Health & Safety (VII-1) · Products & Services Affordability (VII-3) · Responsible Communication & Sales (VII-2) · Customer Satisfaction (VII-3) · Accident Impact (V-2, VIII-1) · Anti-competitive Behavior (IV-1) · Passenger Property Protection (VII-1) · Information Systems Security (IV-1, VII-1) · Customer Privacy (VII-1) · Internet Safety (VII-1) · Customer Awareness (V-2, VIII-1-3)

Stakeholder	Methods of interaction through continuous activities (unless indicated otherwise)	Main issues of interest (reference in Report)
DIRECT		
Sales Network	· Events / Meetings · Information systems · Travel agents' online portal · Websites	· Passenger Safety (VII-1) · Products & Services Quality (VII-1, 3) · Responsible Communication & Sales (VII-2) · Customer Satisfaction (VII-3) · Anti-competitive Behavior (IV-1)
Suppliers	· Supplier evaluation · Meetings · Contracts	· Operational Support (V-3) · Responsible Buying (V-3) · Local Buying (V-3) · Vessel Responsible Buying (V-3) · Supplier Assessment for Labor Practices (V-3) · Supplier Human Rights Assessment (V-3) · Supplier Environmental Assessment (V-3)
INDIRECT		
State (e.g. Ministries, Local Authorities, Public Services, Port Authorities)	· Discussion with representatives at local and national level · Meetings / Presentations · Participation in organizations and associations · Vessel inspections · Formal communication	· Passenger Safety (VII-1) · Sea Pollution (VIII-2, 3) · Fuel Spills & Leakages (VIII-3) · Accident Impact (V-2, VIII-1) · Corporate Governance (IV-1) · Anti-competitive Behavior (IV-1) · Rippling (VIII-3)
Associations and Unions (e.g. Industry Associations, Hoteliers' Associations)	· Participation in associations · Meetings / Presentations · Discussion with representatives at local and national level · Formal communication	· Passenger Safety (VII-1) · Products & Services Quality (VII-1, 3) · Products & Services Affordability (VII-3) · Anti-competitive Behavior (IV-1)
Local Communities (e.g. islands)	· Qualitative Greek Domestic Lines Survey (annually) · Quantitative Greek Domestic Lines Survey (annually) · Meetings / Presentations · Local events and programs	· Community Impact (V-2) · Sea Pollution (VIII-2, 3) · Fuel Spills & Leakages (VIII-3) · CO_2 Emissions (VIII-1) · Effluent Handling (VIII-3) · Waste Handling (VIII-2) · Discharges at Sea (VIII-2, 3) · Hazardous Waste (VIII-2) · SO_2, NO_x & PM Emissions (VIII-1) · Noise Pollution & Air Quality (VIII-1) · Environmental Grievances (IV-1) · Environmental Compliance (IV-1) · Accident Impact (V-2, VIII-1) · Donation & Sponsoring (V-2) · Investment Impacts (V-2) · Business Entrepreneurship (V-2) · Corporate Volunteering (V-2) · Rippling (VIII-3) · Society Grievances (IV-1, V-2) · Community Awareness (V-2)

Stakeholder	Methods of interaction through continuous activities (unless indicated otherwise)	Main issues of interest (reference in Report)
INDIRECT		
Citizens	· Qualitative Greek Domestic Lines Survey (annually) · Quantitative Greek Domestic Lines Survey (annually) · Websites · Social media	· Passenger Safety (VII-1) · Products & Services Quality (VII-1, 3) · Energy Use (VIII-1) · Sea Pollution (VIII-2, 3) · Fuel Spills & Leakages (VIII-3) · CO_2 Emissions (VIII-1) · Environmental Training & Awareness (VIII-1) · Material Consumption (VIII-2) · Material Recycling (VIII-2) · Products & Services Affordability (VII-3) · Responsible Communication & Sales (VII-2) · Accident Impact (V-2, VIII-1) · Social Products & Services (V-2)
Non-Governmental Organizations (NGOs)	· Collaborations · Meetings / Presentations	· Sea Pollution (VIII-2, 3) · Fuel Spills & Leakages (VIII-3) · Effluent Handling (VIII-3) · Waste Handling (VIII-2) · Discharges at Sea (VIII-2, 3) · Water Consumption (VIII-3) · Sea Biodiversity (VIII-3) · Land Biodiversity & Land Use (VIII-3) · Noise Pollution & Air Quality (VIII-1) · Refrigerants Use (ODP) (VIII-1) · Environmental Grievances (IV-1) · Environmental Compliance (IV-1) · Vessel Health & Safety (VI-2) · Accident Impact (V-2, VIII-1) · Vessel Work Conditions (VI-1-4) · Equality & Fairness (VI-3) · Labor Practices Grievances (VI-3) · Office Work Conditions (VI-1-4) · Rippling (VIII-3) · Anti-corruption (IV-1) · Labor Relations (VI-3) · Investments (VI-3) · Environmental Training & Awareness (VIII-1)
Media	· Press releases · Press conferences · Websites	· Passenger Safety (VII-1) · Products & Services Quality (VII-1, 3) · Community Impact (V-2) · Sea Pollution (VIII-2, 3) · Fuel Spills & Leakages (VIII-3) · Responsible Communication & Sales (VII-2) · Accident Impact (V-2, VIII-1) · Donation & Sponsoring (V-2) · Environmental Investment (VIII-1) · Anti-competitive Compliance (IV-1)

STATE

NGOs

Level of Control

ENVIRONMENT

EMPLOYEES

CITIZENS · LOCAL COMMUNITIES · SHAREHOLDERS · SALES NETWORK · CUSTOMERS

SUPPLIERS

MEDIA

ASSOCIATIONS AND UNIONS

We focus on quantitative data and results

We focus to continuously include and publish more quantitative indicators and objectives, in order to respond to our Stakeholders' requirement for greater transparency and their need to be able to evaluate our performance. Aiming to systematically report on our performance, we have completed and finalized our Corporate Responsibility Report's quantitative indicators and initiated accordingly the design of our Enterprise Resource Planning (ERP) system.

Quantitative Data within the Corporate Responsibility Report
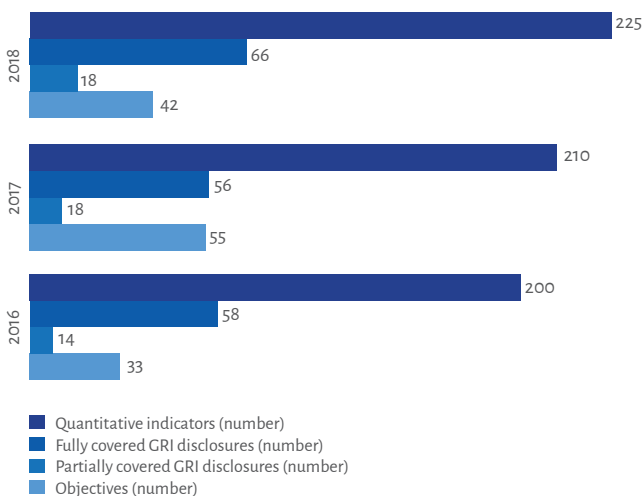
2018
225
66
18
42

2017
210
56
18
55

2016
200
58
14
33

■ Quantitative indicators (number)
■ Fully covered GRI disclosures (number)
■ Partially covered GRI disclosures (number)
■ Objectives (number)

> **We increased by 7% the number of quantitative indicators we make reference to within the Report** <>

4. Achievements 2018 and Future Objectives

We committed	Progress	We aim	By
To improve our overall performance on Corporate Responsibility issues by 24% (by 2020).	25%	To improve our overall performance on Corporate Responsibility issues by 24%.	2020
To improve our performance on Corporate Responsibility issues related to Owners by 10% (by 2020).	75%	To improve our performance on Corporate Responsibility issues related to Owners by 10%.	2020
To improve our performance related to Management of Corporate Responsibility issues by 25% (by 2020).	25%	To improve our performance related to Management of Corporate Responsibility issues by 25%.	2020
To conduct a Stakeholder Engagement process on issues related to Corporate Responsibility (by 2019).	25%	To conduct a Stakeholder Engagement process on issues related to Corporate Responsibility.	2019
To include Corporate Responsibility Team's responsibilities within its members' formal job descriptions.	100%		
To conduct trainings or briefings related to the Regulation of Professional Conduct & Business Ethics.	100%		
To develop an Anti-Corruption Code.	100%		
To include our Corporate Responsibility Report's quantitative indicators in our SAP ERP.	0%	To include our Corporate Responsibility Report's quantitative indicators in our SAP ERP.	2021
To develop a Corporate Responsibility Strategy and Action Plan 2018-2020, based on quantitative assessment and target setting.	100%		
To integrate the Corporate Responsibility Strategy 2018-2020's target assessment score within the overall Group Strategy.	50%	To integrate the Corporate Responsibility Strategy 2018-2020's target assessment score within the overall Group Strategy.	2020
To include the Corporate Responsibility Strategy 2018-2020's quantitative assessment score as target in the formal appraisal process for Top Management members and at least one Board of Directors member (by 2019).	0%	To include the Corporate Responsibility Strategy 2018-2020's quantitative assessment score as target in the formal appraisal process for Top Management members and at least one Board of Directors member.	2019
To develop a process to identify, prioritize and include Corporate Responsibility issues in local and international investment agreements.	0%	To develop a process to identify, prioritize and include Corporate Responsibility issues in local and international investment agreements.	2019
To establish a comprehensive Business Continuity Plan to ensure continuation of our operations following unexpected events (by 2020).	0%	To establish a comprehensive Business Continuity Plan to ensure continuation of our operations following unexpected events.	2020
To include perception measurement questions regarding our Corporate Responsibility performance (e.g. responsible promotion of products and services, personal data protection, society support) in our market surveys.	100%		

V. SOCIETY

We support prosperity of Society

WE ARE

€365.4
million turnover

€569.6
million economic value distributed

€2.2
million social contribution

75,322
discount tickets

WE COMMIT TO

Combine our business success with our country's and partners' development, as well as support local communities affected by our operations, in order to contribute to improving the quality of life and prosperity of our society in general.

113
blood units from volunteer blood donators

WE FOLLOW

Principles of the United Nations' Global Compact

/1/ Support and respect protection of internationally proclaimed human rights
/2/ Ensure not to be complicit in human rights abuses
/4/ Eliminate all forms of forced and compulsory labour
/5/ Abolish effectively child labour
/8/ Promote greater environmental responsibility

WE ACHIEVED

· We distributed over €569 million in economic value: over €91.6 million to employees (for salaries, benefits and insurance payments), €71.3 million for taxes (including VAT and port taxes), €59.3 million to providers of capital (for interest and return payments), €20.6 million to agents (for commissions), €196.6 million to suppliers (for purchases of goods and services), €2.2 million to society (for discount tickets, implemented programs, sponsorships and donations) and €128 million for investments.

· We increased the number of Blue Star Ferries and Superfast Ferries sales network employees trained by 16.6% and over four times the number of total training hours.

· We implemented or supported societal support activities in 100% of the islands we serve.

· We increased the total number of discount tickets offered through Blue Star Ferries and Superfast Ferries by 11.8%.

· We increased the total value of societal support activities through Blue Star Ferries and Superfast Ferries by 14.7%.

· We allocated 47% of sponsorships and donations to local communities.

· We collected 251 blood units through our voluntary blood donation programs in the last three years.

· We welcomed 1,290 young people from schools and universities visiting our vessels.

· We supported the development of 83 students in Merchant Navy's Officer academies.

· We maintained the percentage of procurement expenditure to local suppliers over 90%.

· We allocated 28.7% of total procurement expenditure to small and medium-sized enterprises (up to 250 employees).

Economic Growth
Societal Support
Responsible Procurement

Citizens
Associations and Unions
Suppliers
Local Communities

SOCIETY SUPPORT

EMPLOYMENT CONDITIONS

Human Resources & Employment
Health & Safety
Equality & Diversity
Training & Development

Employees

RESPONSIBLE MANAGEMENT

Shareholders

PASSENGER SAFETY

Safety & Security
Responsible Communication
Quality & Satisfaction

Customers
Sales Network
Media

ENVIRONMENTAL IMPACT

State
Environment
NGOs

Air Quality & Energy
Raw Materials & Solid Waste
Water & Liquid Waste

1. Economic Growth

We achieve financial results

Holding a leading position in the provision of maritime transportation services, we achieve positive financial results, which are indicatively presented below for the period 2016-2018 (additional financial information can be found in our Annual Financial Reports at www.attica-group.com).

Financial Results

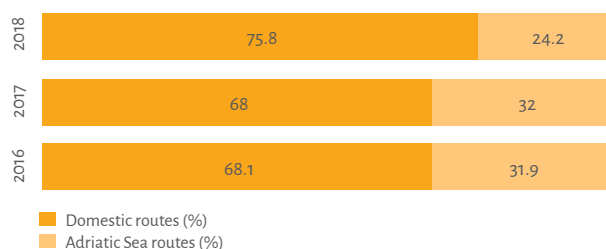|	2016	2017	2018*
Turnover (total sales with VAT) (million €)	268.61	271.54	365.4
Operating costs (million €)	187.76	211.52	290.8
Earnings before interest, taxes, depreciation and amortization (EBITDA) (million €)	70.03	59.55**	57
Profits after taxes (million €)	20.25	1.25	17.27
Corporate taxes (thousand €)	745	307	264.4
Total taxes (including corporate taxes, VAT and port taxes) (million €)	48.68	49.43	71.3
Payments to providers of capital (million €)	60.94	34.7	59.3
Payments to suppliers (million €)	145.1	130.75	196.6
Cost of employees (including salaries, benefits and insurance payments) (million €)	60.59	61.61	91.6
Commissions to agents (million €)	14.91	15.27	20.6
Investments (million €)	4.06	7.18	128

* *Data refer to the period 01/01/2018-31/12/2018 for Blue Star Ferries and Superfast Ferries and 01/06/2018-31/12/2018 for Hellenic Seaways.*

** *Earnings before interest, taxes, depreciation and amortization (EBITDA) for 2017 have been restated.*
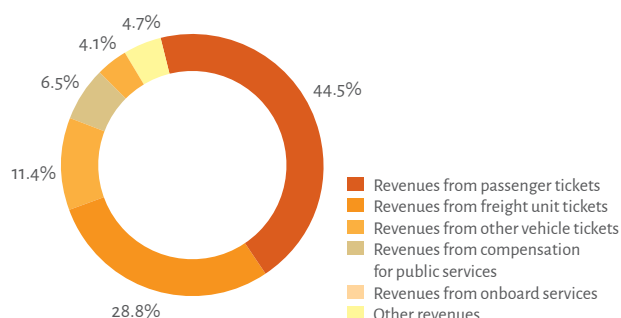
It must be noted that during 2018, the total financial compensation received from the Greek State and grants from the European Union amounted to €23.87 million, compared to €11.69 million in 2017, due to public service contracts awarded, as Blue Star Ferries and Hellenic Seaways participated in open public tenders by the Ministry of Shipping and Island Policy to operate shipping routes which connect remote islands with the mainland.

We distributed over €569 million in economic value: over €91.6 million to employees (for salaries, benefits and insurance payments), €71.3 million for taxes (including VAT and port taxes), €59.3 million to providers of capital (for interest and return payments), €20.6 million to agents (for commissions), €196.6 million to suppliers (for purchases of goods and services), €2.2 million to society (for discount tickets, implemented programs, sponsorships and donations) and €128 million for investments

Turnover per Market

- Domestic routes (%)
- Adriatic Sea routes (%)

	Domestic	Adriatic
2018	75.8	24.2
2017	68	32
2016	68.1	31.9

Revenue Structure

- 44.5% Revenues from passenger tickets
- 28.8% Revenues from freight unit tickets
- 11.4% Revenues from other vehicle tickets
- 6.5% Revenues from compensation for public services
- 4.1% Revenues from onboard services
- 4.7% Other revenues

We contribute to economic growth

Our business operations ensure we return significant economic value back to our Stakeholders, mostly through purchases (towards our suppliers), commissions (towards our agents), salaries, benefits and insurance payments (towards our employees), taxes (towards the State) and investments, while we transport food products and materials to islands, in order to develop local economies and tourism.

Economic Value Distribution

- Taxes** €71.3 million
- Capital Providers €59.3 million
- Agents €20.6 million
- Distributed Economic Value €569.6 million
- Suppliers €196.6 million
- Society*** €2.2 million
- Employees* €91.6 million
- Investments €128 million
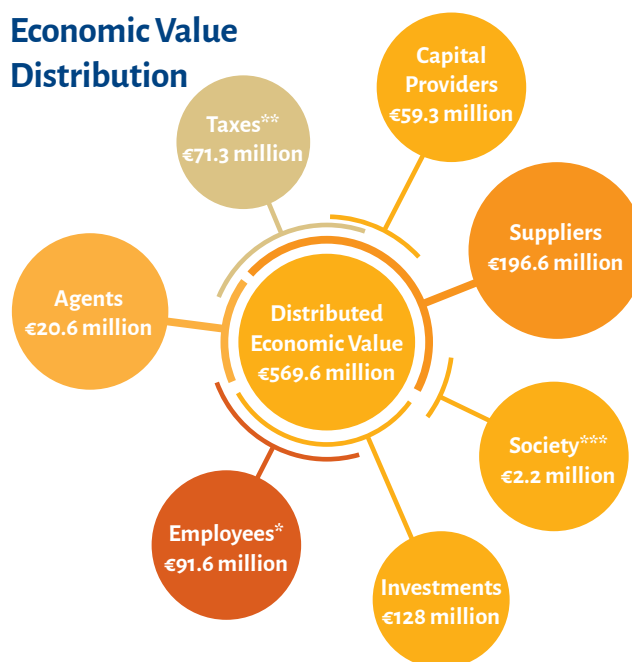
* *The amount refers to gross salaries, benefits and insurance payments.*

** *The amount refers to total taxes, including VAT and port taxes.*

*** *The amount refers to value of discount tickets, implemented programs, sponsorships and donations.*

We help our sales network develop

The current challenging economic situation makes every effort to create direct and indirect job positions particularly important. Therefore, we contribute to our network's commercial success by developing their employees' skills, through:

· Training on issues, such as:
  - Customer management.
  - Familiarization with new features of existing reservation programs.
  - Familiarization with new reservation programs.
· Presentations-briefings for new products and services.

We increased the number of Blue Star Ferries and Superfast Ferries sales network employees trained by 16.6% and the number of total training hours by over four times <>

Sales Network Training
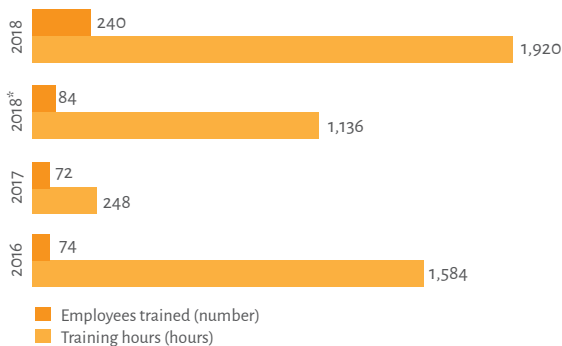
Year	Employees trained (number)	Training hours (hours)
2018	240	1,920
2018*	84	1,136
2017	72	248
2016	74	1,584

■ Employees trained (number)
■ Training hours (hours)

* Data refer to Blue Star Ferries and Superfast Ferries.

Besides trainings conducted to the Blue Star Ferries, Superfast Ferries and Hellenic Seaways sales network, we conduct training programs to employees of AML's sales network, without however any relevant trainings within 2018.

2. Society Support

We support society

Identify Local Community Needs √

According to a formal process to identify and determine local community needs, we:

· Identify their potential needs, through:

 - Daily written, electronic and telephone communication with local authorities, associations and unions.

 - Our partners, such as our sales network agents and suppliers.

 - Non-profit organizations.

 - Social networks.

 - The Media.

 - The qualitative and/or quantitative market surveys we implement.

 - On-the-spot visits.

· Filter and evaluate their needs, in accordance with our capabilities and importance to local communities.

· Select the activities to support or plan new activities in-house or in cooperation with third parties.

Within the context of our societal contribution, we designed and implemented or supported over 130 societal support activities in 2018, focusing on local communities of islands we serve, through:

· Provision of discount tickets.

· Donations to charitable organizations through collection boxes in our vessels.

· Social programs to improve the life of residents in islands.

· Monetary sponsorships and donations.

We implemented or supported societal support activities in 100% of the islands we serve <>

Furthermore, we donate surplus equipment to schools and charitable organizations, and more specifically in 2018:

· 8 personal computers, 4 computer monitors, 4 computer mice and 4 keyboards to three schools in Attica Prefecture.

· 1 mobile phone to a 'Greek Communities of Italy' program partner.

· 1 computer monitor and 1 laptop to the Traffic Police Authority of Piraeus.

We offered over €195,800 to various social groups, organizations and sport associations during 2018, out of which over €34,000 to NGOs and over €30,700 were infrastructure investments to local communities, with the following indicative examples being the:

· The Holy Diocese of Chios-Psara-Oinousses.

· The 'Agoni Grammi Gonimi' program.

· The Safe Water Sports initiative.

· The Sport Association Kolossos Rhodes.

· The Sport Association Foinikas Syrou.

· The Heraklion Sailing Club.

· The Olympic sailing team P. Mantis – P. Kagialis.

· The Institute for Alternative Policies.

· The reconstruction of Symi's Kindergarten, which was completely destroyed by devastating floods in November 2017.

Social Contribution

	2016	2017	2018*	2018
Value of discount tickets (€)	1,296,656	1,436,386	1,598,602	1,982,089
Value of donations from passengers to charitable organizations through collection boxes in vessels (€)	3,371	2,605	3,433	3,433
Value of implemented social programs (€)	0	4,730	42,995	42,995
Value of sponsorships and donations (€)	98,409	155,639	190,092	195,802

* Data refer to Blue Star Ferries and Superfast Ferries.

Society Support

2018	2,224,319
	75,322
2018*	1,835,122
	53,748
2017	1,599,360
	48,052
2016	1,398,436
	44,747

■ Value of societal support activities (€)
■ Discount tickets (number)
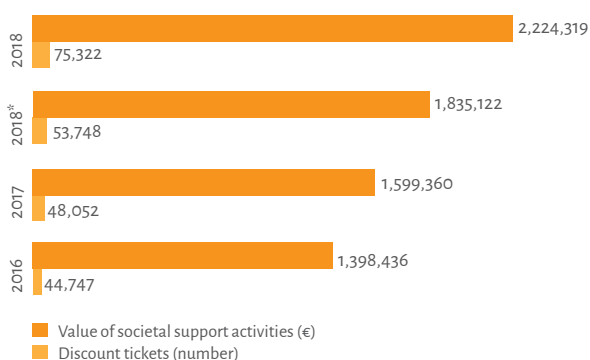
* Data refer to Blue Star Ferries and Superfast Ferries.

Sponsorships and Donations
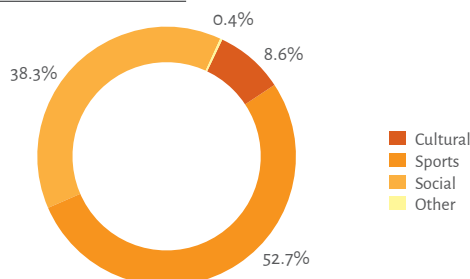
0.4%
8.6%
38.3%
52.7%

■ Cultural
■ Sports
■ Social
■ Other

We increased the total number of discount tickets offered through Blue Star Ferries and Superfast Ferries by 11.8%

<>

We increased the total value of societal support activities through Blue Star Ferries and Superfast Ferries by 14.7%

<>

Provision of Discount Tickets

✓

We offer discount tickets to various NGOs, associations, local authorities and local communities, in order for them to attend sport, cultural or educational activities outside their islands or local activities and events, as well as in cases of emergency. Indicative examples include:

· 30% discount to passenger and private vehicles and motorcycle tickets for those with at least four overnight stays in Lesvos, Chios, Leros and Kos (see Section VII-3).

· 50% discount for newly enrolled students in higher education institutions and their families for their first trips to register and find a home.

· 50% discount for substitute teaching faculty appointed to islands.

· 30%-100% discount for 327 residents in Cyclades, Dodecanese, Saronic islands, Sporades and North Aegean islands, as well as 64 residents in Crete who travel regularly due to serious health issues and do not have the necessary financial means.

· 30% discount for three children families in Crete routes.

· 50% discount for permanent residents of Ydra, Spetses, Poros and Ag. Eustratios to specific routes.

· 100% discount to passenger tickets for over 100 pregnant women and their escorts from remote islands to areas with medical presence on behalf of the non-profit organization HOPEgenesis, which is active in the health and social care sector and strives to reverse the birth deficit trend in Greece.

Furthermore, we provided discount tickets for the AELIA professional empowerment workshop trips to Aegean islands to implement the 'My Island 12 Months' program and support activities by professionals in their islands (e.g. small conferences, cultural or athletic events, experiential tourism), which could attract visitors to islands, even during the low tourist season. Within the context of the program, we supported the organization's activities in three islands (Astypalaia, Amorgos and Antiparos), where 42 people received counseling/educational support and gained valuable knowledge.

Overall, it is estimated that during 2018, we offered 75,322 discount tickets for sport, cultural and educational activities and additionally benefitted thousands of citizens who participated or attended those events and activities.

Donations to Charitable Organizations

✓

As part of our societal contribution, we support various charitable organizations which:

· Are committed to support children.

· Have limited resources.

Therefore, we place collection boxes at the Reception desks onboard all Blue Star Ferries and Superfast Ferries vessels with the name of the supported organization indicated, in order to collect donations from passengers. Each month, we gather these donations and deposit them into the organization's bank account. Within this context, we supported the following charitable organizations in 2018:

· Smile of the Child.

· Amnesty International.

· Lions Club Rhodes.

Furthermore, we collaborate with the 2 Blue Tomatoes company to sell t-shirts in Blue Star Ferries and Superfast Ferries vessel shops, which feature unique and original printed stamps to promote local traditional foods and recipes. The total value of 98 units sold in vessel shops reached approximately €1,900 and 2 Blue Tomatoes offered part of their revenues to support the non-profit organization 'Desmos' (www.desmos.org) to create sustainable solidarity networks and cultivate social and humanitarian responsibility.

Design and Implementation of Educational and Cultural Activities

Besides our support to societal support activities, we design and implement additional activities, within the context of contributing socially, as in 2018 we:

· Collaborated with the National Centre for Scientific Research 'Demokritos' for the Science on Board activity, which was conducted onboard a vessel during its stay at the port of Rhodes, where approximately 600 primary school students were informed about chemistry, biology, computing and robotics, in order to expand their knowledge and understand the importance of technological achievements, observation, experimentation and the value of scientific process for society. Furthermore, we organized a tour for the students onboard our vessel and informed them about the importance of the Greek shipping sector.

· Launched the initiative of two-day educational visits of 5th and 6th grade students from Aegean islands to cultural centers and institutions in Athens, during which 31 students and their escorts from primary schools of Amorgos visited and participated in a tour at the Acropolis Museum, the Stavros Niarchos Foundation Cultural Center to attend a robotics training program, and the Planetarium, while we welcomed students, tutors and teachers on a tour in one of our vessels.

· Collaborated with the Greek Gastronomy Guide and implemented the internet campaign 'Serving Aegean' to promote the history, geography, products, cuisine and traditional dishes of 18 Aegean islands (Crete, Rhodes, Kos, Kalymnos, Astypalaia, Patmos, Santorini, Ios, Tinos, Mykonos, Naxos, Paros, Syros, Lesser Cyclades, Amorgos, Ikaria, Chios and Lesvos), while further information about each island's local producers, taverns, restaurants and cafes, local festivals, markets and sights can be found in the website www.greekgastronomyguide.gr.

· Collaborated with the pculiar platform's photographic team Reflex Photographers to implement the cultural activity 'The unseen Aegean beauty' and created an online photo album with photos of Aegean islands and their customs available at www.bluestarferries.com, in order to highlight their cultural richness and present more information about each island's culture and customs.

· Launched the initiative 'Greek Communities of Italy' and collaborated with the Greek Language Center, the Greek Communities Emilia Romagna and Marche and the European School-Greek Section of Parma to proliferate the Greek language and Greek culture, during which school students and adults learnt Greek, participated in experiential workshops, tasted Greek traditional dishes, danced, sang and read Greek literature. At the same time, we expanded the children's library in the Greek community of Marche with books from well-known Greek writers.

· Hosted the events of the Association of Carpathians and the Federation of Lesbian Associations of Attica (OLSA) in our vessels at Piraeus, as well as the Dodecanese Regional Scout Ephorate's conference on our vessel at Rhodes.

First Aid Training Courses

During 2018, we continued to support the Volunteer Crisis Rescue Team (VCRT) programs in Amorgos, which was established through the original First Aid training program we initiated in 2014 and since then has provided significant rescue assistance, especially during the refugee crisis. Within this context, we supported a two-day First Aid seminar in Naxos to train 114 people from various Security Agencies.

'Agoni Grammi Gonimi'

To ensure participation of small island residents in educational and cultural events, we supported the 'Agoni Grammi Gonimi' program for the 12th consecutive year, which is the largest educational and cultural program of remote Aegean islands. Within 2018, the program featured cultural activities in 6 islands (Astypalaia, Donousa, Naxos, Thirasia, Kithira and Santorini) with 7 different creative workshops (jewelry making, automatic control and robotics, spinning top and kite demonstration, chess, sailing modeling, singing and choir management), with the participation of approximately 167 children and 20 adults, compared to 161 children and 56 adults in 2017.
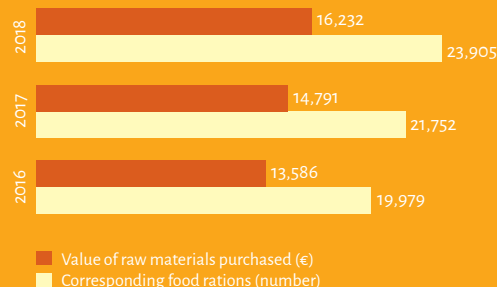

Support to Underprivileged Social Groups

We strive to support various social groups in need, in collaboration with NGOs, specialized authorities and organizations. Since September 2012, we support the Holy Diocese of Chios-Psara-Oinousses to provide meals to sensitive social groups, by purchasing required raw materials for food rations.

Provision of Meals to Underprivileged Citizens

Year	Value of raw materials purchased (€)	Corresponding food rations (number)
2018	16,232	23,905
2017	14,791	21,752
2016	13,586	19,979

■ Value of raw materials purchased (€)
■ Corresponding food rations (number)

We allocated 47% of sponsorships and donations to local communities

At the same time, we participated in efforts by the Greek government and non-governmental organizations to assist refugees, as we:
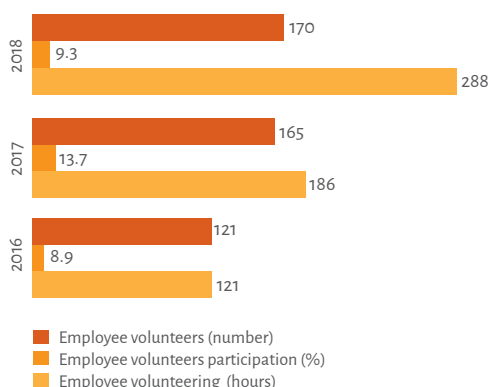
· Provided 1,369 free tickets to NGO 'Metadrasi', which aims to protect unaccompanied minors and provide interpretation and intercultural mediation services.
· Provided free tickets to organizations and associations for 72 humanitarian aid shipments, during which we transported over 1,700 packages, boxes, parcels and pallets.

We cultivate the importance of volunteer contribution

We believe that it is our responsibility to cultivate the importance of volunteer contribution to our employees, in order to integrate the concept of responsibility in their behavior. Within this context, we participated in the 2nd charity race 'No Finish Line' with a team of 85 volunteer runners to support the association 'Together for Children' and covered a total distance of 1,306 km. Overall, participant runners covered a total distance of approximately 95,000 km to financially support of poor families with children.

Employee Participation in Societal Support Activities

Year	
2018	170 / 9.3 / 288
2017	165 / 13.7 / 186
2016	121 / 8.9 / 121

■ Employee volunteers (number)
■ Employee volunteers participation (%)
■ Employee volunteering (hours)

'Blood Ties' ✓

Since 2009, we implement a voluntary blood donation program called 'Blood Ties', in order to respond to needs of remote Greek island residents and to personal emergencies of our employees and their families. Within 2018, we continued the program for the 10th consecutive year with 3 employee voluntary blood donations, in cooperation with the 'G. Gennimatas' General Hospital and ELPIS Hospital and gathered in total 113 blood units, out of which 49 units were utilized for our employees' and their families' needs and 3 units from local community members.

Voluntary Blood Donation
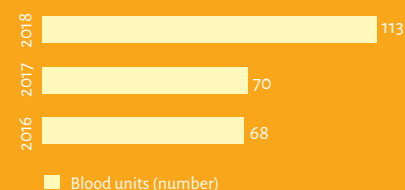
Year	Blood units
2018	113
2017	70
2016	68

■ Blood units (number)

We collected 251 blood units through our voluntary blood donation programs in the last three years <>

We support professional growth of young people

We focus on educational contribution and supporting professional growth of young people, as we:

· Welcome school and university students to inform them about career prospects in the shipping industry and employment opportunities in the passenger shipping industry, as well as promote their environmental awareness.

· Participate in periodic student internship programs of the Merchant Navy's Officer academies (for Engine and Deck cadets) who are required to successfully complete a one-year internship onboard a vessel prior to their graduation, as well as in periodic field journey programs for Coast Guard students (Ensign cadets) to familiarize themselves with their future duties.

· Implement internship programs for university students and graduates to acquire professional experience and develop skills and competencies which advance their personal and professional development.

Supporting Professional Growth

Year	
2018	1,290 / 83 / 0
2017	739 / 87 / 0
2016	866 / 124 / 108

■ Visiting school and university students (number)
■ Students and Merchant Navy's academies (number)*
■ Coast Guard students (number)
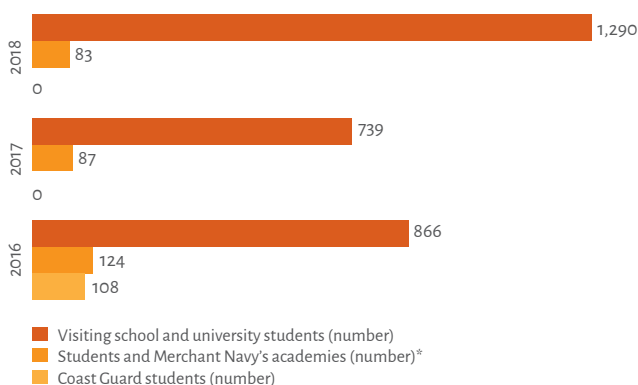
* Number of students from Merchant Navy's academies for 2017 has been restated.

We welcomed 1,290 young people from schools and universities visiting our vessels <>

We supported the development of 83 students in Merchant Navy's Officer academies <>

We care for the impact of our operations

We strive to ensure that our operations have the least possible impact on local communities we operate in. For this reason, we:

· Have included the risk of significant potential or actual negative impacts on local communities from our operations in our annual risk assessment.

· Monitor and continuously assess our vessels' Safety Management System.

· Conduct security risk assessments when deemed necessary.

· Trained 40% of office security personnel on our human rights policies and procedures, which accounted for 8.2% of total training hours, without however conducting relevant trainings to marine security personnel.

· Outline tasks related to security in job descriptions.

· Have developed an Emergency Plan, which includes measures to deal with negative impacts (e.g. pollution) and regularly train marine employees on such issues.

· Have developed a 'Crisis Communication Plan', in order to ensure seamless information flow during emergencies and responsible communication to interested parties, beyond what is already specified within our Safety Management System for crisis and emergencies management.

Within 2018:

· A slight collision incident between Blue Horizon and Blue Galaxy during departure at the port of Piraeus occurred, with only minor damages to both vessels and no injury caused. The two vessels were classified as seaworthy following required inspections by the vessels' classification society and continued their journeys.

· A collision of the right stern passenger ramp of Blue Star Paros at the port of Syros occurred due to extremely strong side winds during departure without any injuries. The vessel continued its scheduled journeys following minor damage repairs and the respective classification society's inspections.

· A slight collision of Flying Cat 4 at the port bow of Rafina during departure handling occurred, due to technical problem in the vessels' engines without causing any injury among its passengers and crew members or marine pollution.
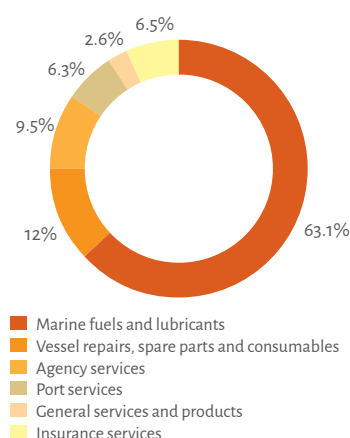
3. Responsible Procurement
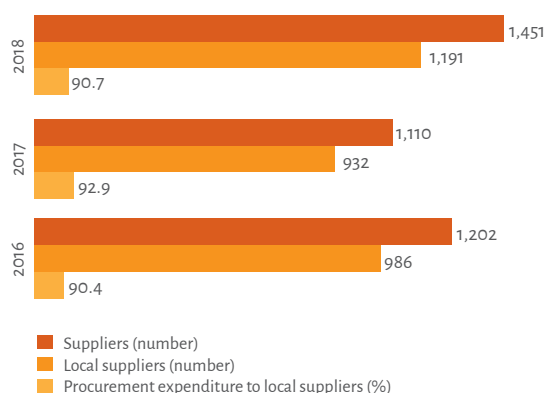
We give priority to local suppliers

Our suppliers are 1,451 throughout Greece and abroad, with 82.1% of them being local suppliers. Based on their turnover, we consider 108 of them as major suppliers, out of which 74 are local suppliers. For 2018:

· The average supplier payment time was 114 days, compared to 57 days in 2017.

· 100% of payments for undertaken contractual obligations were made according to the terms in our contract agreements, as in 2017.

Supplier Categories

- 63.1%
- 12%
- 9.5%
- 6.3%
- 2.6%
- 6.5%

■ Marine fuels and lubricants
■ Vessel repairs, spare parts and consumables
■ Agency services
■ Port services
■ General services and products
■ Insurance services

Suppliers and Procurement Expenditure

2018
1,451
1,191
90.7

2017
1,110
932
92.9

2016
1,202
986
90.4

■ Suppliers (number)
■ Local suppliers (number)
■ Procurement expenditure to local suppliers (%)

We maintained the percentage of procurement expenditure to local suppliers over 90% <>

We allocated 28.7% of total procurement expenditure to small and medium-sized enterprises (up to 250 employees) <>

Allocation of Purchases per Region*

2018   9 | 88.1 | 2.9
2017   7 | 90.2 | 2.8
2016   17.7 | 65.5 | 16.8

■ Abroad (%)
■ Local - Urban(%)
■ Local - Rural (%)
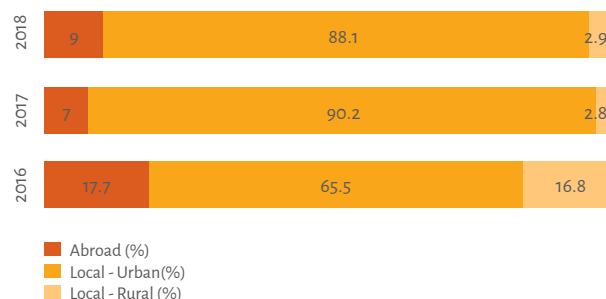
Percentages for 2018 and 2017 refer to the procurement expenditure of all suppliers, while percentages for 2016 refer to the number of significant suppliers.

We responsibly select our suppliers

As our suppliers influence our responsible operation, we fully acknowledge our moral obligation to positively influence our supply chain and promote the principles of Corporate Responsibility to our suppliers. So far, we have not identified any suppliers with significant actual or potential negative environmental, labor practices and human rights impacts or impacts on society.

Furthermore, since March 2016 we evaluate our new suppliers' performance with an annual spending of over €10,000, without however conducting a respective assessment within 2018 due to the integration of Hellenic Seaways into the Group, the restructuring of the Procurement Department and the development of a single procurement process. The performance evaluation process utilizes specific criteria in five areas, based on which we approve our suppliers:

· Quality
· Cost
· Availability
· Service – Support – Adaptability
· Credit Policy

It must be noted that:

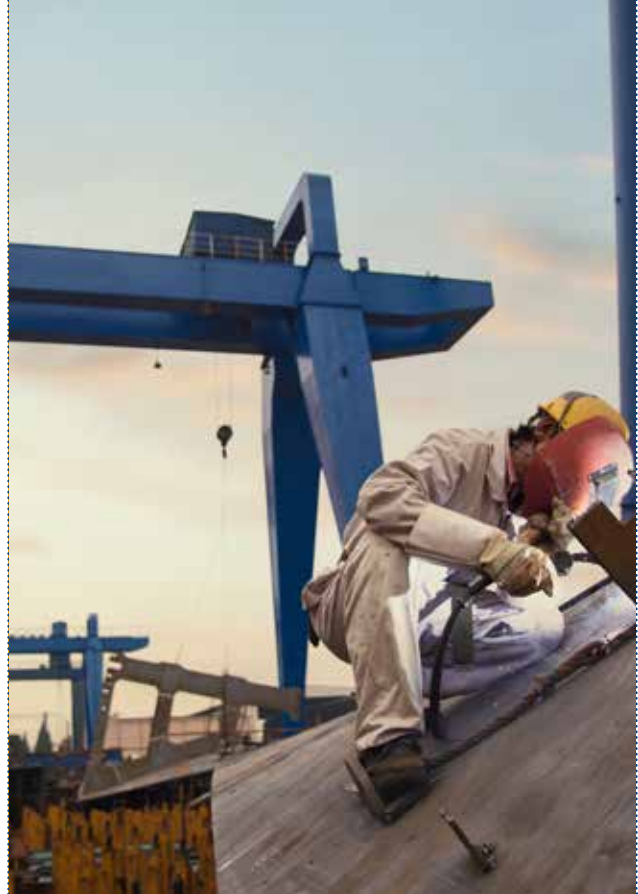· We have completed the development of a single Procurement Process and a Code of Conduct for Suppliers / Partners, which also describes our policy for our Contractors' Suppliers, for which their final approval is currently pending.

· For each tender we require at least three offers, except for direct selection cases, either because they exactly match our technical specifications or only one unique supplier exists.

· We assess new suppliers' performance prior to our collaboration, according to available and applicable criteria, without initiating collaboration with any new suppliers within 2018.

· We evaluate the exclusive representatives of manufacturing companies based on all above criteria, although there is no option to substitute them, due to their exclusivity.

· We inform suppliers with low scores they need to improve their performance, in order to continue our collaboration, as they will otherwise be rejected, without however conducting a respective assessment within 2018.

· We immediately re-evaluate a supplier's performance and proceed with appropriate measures in case a supplier provides unsuitable or dangerous products, demonstrates unethical behavior or does not fulfill our cooperation agreement. It must be noted that within 2018, we did not discontinue our collaboration with any supplier as a result of actual or potential compliance issues, such as anti-competitive behavior, environmental protection, product health and safety and labour practices.

· We select suppliers for materials or services among approved suppliers, based on the performance evaluation conducted. It must be noted that we send product samples to a certified laboratory depending on the materials and needs (e.g. we send samples of marine fuels 10 times per vessel per year), in case we cannot determine whether product specifications match the ones agreed with the supplier, in order to analyze and verify their specifications.

Responsible Vessel Buying ✓

We follow the most recent safety regulations during buying and building of our vessels, without however ignoring potential future safety regulations, which may affect their operation. At the same time, we focus on vessels' energy efficiency and strive to implement innovative technologies.

4. Achievements 2018 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility issues related to Community by 10% (by 2020).	75%	To improve our performance on Corporate Responsibility issues related to Community by 10%.	2020
To improve our performance on Corporate Responsibility issues related to Suppliers by 180% (by 2020).	0%	To improve our performance on Corporate Responsibility issues related to Suppliers by 180%.	2020
To consolidate/review the various procurement processes per Department and establish a single Procurement Process.	75%	To consolidate/review the various procurement processes per Department and establish a single Procurement Process.	2019
To develop a Policy for our Contractors' Suppliers (by 2019).	75%	To develop a Policy for our Contractors' Suppliers.	2019
To develop a Code of Conduct for Suppliers, including selection criteria to become a supplier.	75%	To develop a Code of Conduct for Suppliers, including selection criteria to become a supplier.	2019
To integrate contractual clauses for Corporate Responsibility issues into contracts with significant suppliers (by 2019).	0%		
To integrate Corporate Responsibility issues in selection criteria to become a supplier (by 2019).	75%	To integrate Corporate Responsibility issues in selection criteria to become a supplier.	2019
To increase sales network employees' training hours by 5%.	100%		
To apply a process to identify and define needs of local communities in products, services or donations, as well as support the activities of organizations with a charitable purpose.	100%		
To support the activities of charitable organizations and NGOs.	100%	To support the activities of charitable organizations and NGOs.	2019
To implement at least 2 volunteer activities with the participation of our employees.	100%	To implement at least 2 volunteer activities with the participation of our employees.	2019
To design and implement 5 programs / activities to address local communities needs in the areas of sports, culture, education or health.	100%	To design and implement 2 programs / activities to address local communities needs in the areas of sports, culture, education or health.	2019

VI. EMPLOYEES

We establish positive
Employment Conditions

WE ARE

1,823
employees

15.5%
women

100%
of employees with full time employment contracts

100%
of employees informed regarding Corporate Responsibility issues

WE COMMIT TO

Cultivate a workplace focused on respect, equality, safety and merit, as well as offer training opportunities to our employees, in order to facilitate their personal and professional development.

100%
of employees covered by voluntary benefits

WE FOLLOW
Principles of the United Nations' Global Compact

/1/ Support and respect protection of internationally proclaimed human rights
/2/ Ensure not to be complicit in human rights abuses
/3/ Recognize freedom of association and right to collective bargaining
/4/ Eliminate all forms of forced and compulsory labour
/5/ Abolish effectively child labour
/6/ Eliminate discrimination in respect to employment and occupation

WE ACHIEVED

· We employ 100% of our employees with full time employment contracts.
· 100% of employees in Director positions are Greek.
· No grievances regarding our marine employees' living conditions were filed.
· 100% of our employees received their annual leave, as planned.

· We conducted internal drills on Health and Safety issues (such as response to emergency situations) to 100% of marine employees.
· We increased the number of employees trained and training hours in Blue Star Ferries and Superfast Ferries by 124.6% and 35.1% respectively.

Human Resources & Employment
Health & Safety
Equality & Diversity
Training & Development

Employees

EMPLOYMENT CONDITIONS

Economic Growth
Societal Support
Responsible Procurement

Citizens
Associations and Unions
Suppliers
Local Communities

SOCIETY SUPPORT

RESPONSIBLE MANAGEMENT

Shareholders

PASSENGER SAFETY

Safety & Security
Responsible Communication
Quality & Satisfaction

Customers
Sales Network
Media

ENVIRONMENTAL IMPACT

State
Environment
NGOs

Air Quality & Energy
Raw Materials & Solid Waste
Water & Liquid Waste
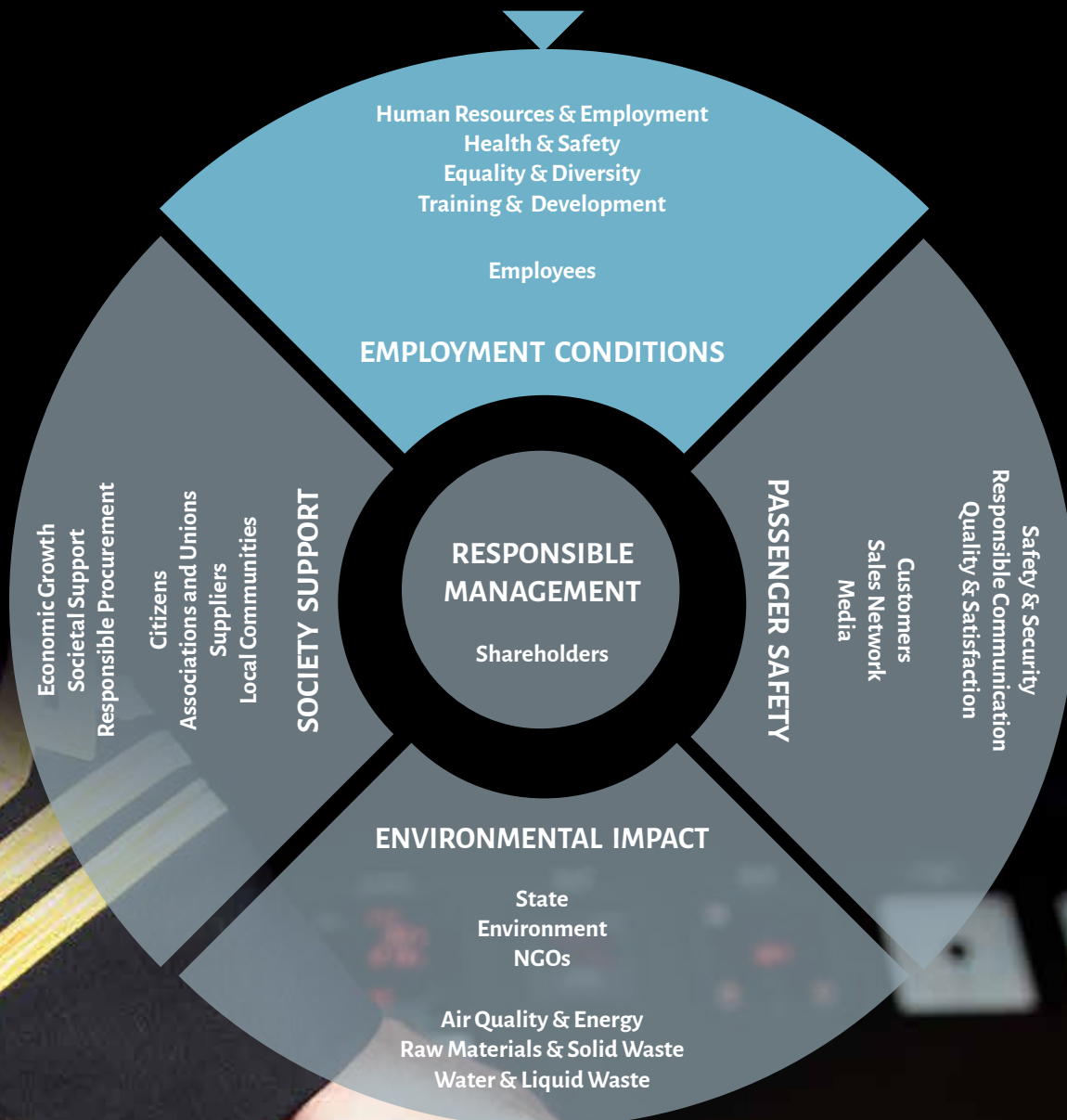
1. Human Resources and Employment

We sustain job positions

Our business success is directly associated to our employees, therefore we strive to create job positions, as well as lessen unemployment. Our activity also supports indirectly hundreds of job positions throughout our value chain and the passenger shipping industry in general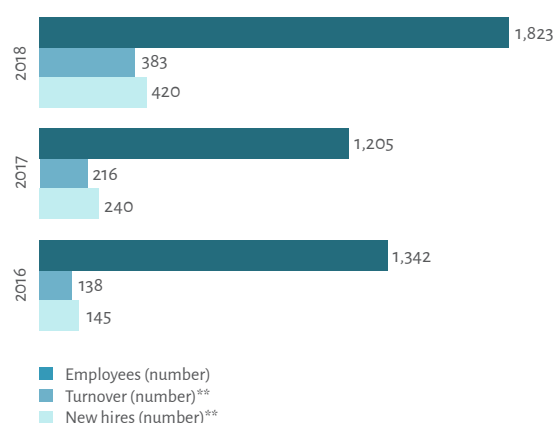. It must be noted there are seasonal variations in employment numbers onboard our vessels, as the number of marine employees during spring and summer months was higher by 37.9% compared to the autumn and winter months (1,782 employees compared to 1,292).

Human Resources*

Year	Employees (number)	Turnover (number)**	New hires (number)**
2018	1,823	383	420
2017	1,205	216	240
2016	1,342	138	145

- Employees (number)
- Turnover (number)**
- New hires (number)**

* Data refer to 31/12/2018 for office employees and to the average of 01/03/2018 and 01/07/2018 for marine employees.

** New hires and turnover for the period 2016-2018 do not include university students and cadets in Merchant Navy's Officer and Coast Guard academies onboard our vessels (who complete their internship under fixed term employment contracts), as well as our marine employees' re-hiring within the same year (for whom a standardized dismissal and re-hiring process is in place).

Human Resources*

Employment Type	Permanent	Fixed Term	Full time	Part time
Employees (number)	1,580	243 (13.3%) (16 women in total) (235 marine employees)	1,823	0

Gender	Female	Male		
Employees (number)	282	1,541		

Age	<30	30-50	>50	
Employees (number)	238	1,186	399	

Categories	Nationalities	Disabilities	Foreigners	
Number	3	0	5	

Education Level	Public School – High School	Higher / Highest Education	Postgraduate Education	
Employees (number)	1,440	355	28	

New Hires**	Female	Male	<30	30-50	>50
Employees (number)	91	329	172	205	43

Turnover**	Female	Male	<30	30-50	>50
Employees (number)	90	293	146	178	59

Turnover**	Resignations	Redundancies	Other	
Turnover reason (%)	60.3	39.7	0	

Working Place	Offices	Vessels		
Employees (number)	286	1,537		

Hierarchy	Top Management***	Directors***	Employees	Total
Employees (number)	43	72	1,708	1,823

* Data refer to 31/12/2018 for office employees and to the average of 01/03/2018 and 01/07/2018 for marine employees.

** New hires and turnover for 2018 do not include university students and cadets in Merchant Navy's Officer and Coast Guard academies onboard our vessels (who complete their internship under fixed term employment contracts), as well as our marine employees' re-hiring within the same year (for whom a standardized dismissal and re-hiring process is in place).

*** Top Management includes the Chief Executive Officer, Executive Directors and vessel Masters. Directors include office Directors, Staff Captains and Chief Engineers.

It must be noted that:

· The average age of office and marine employees is 44.5 and 40.9 years respectively.
· The average employment tenure for office and marine employees is 14.8 and 9.5 years respectively.
· The turnover rate of office employees was 17.8% (out of which 0.7% redundancies and 17.1% resignations) and 21.6% for marine employees (out of which 9.8% redundancies and 11.8% resignations).
· There were 2 office employees who left before completing 12 months of employment, while the respective turnover rate of marine employees was 10.9% (besides the cadets in Merchant Navy's Officer and Coast Guard academies onboard our vessels, who complete their internship under fixed term employment contracts).
· The turnover rate of female office employees is lower by 4.9% compared to male office employees, while the turnover rate of male marine employees is lower by 61.5% compared to female marine employees.
· The majority of our employees are from the prefecture of Attica, while there were was one worker under freelance arrangement working within the Group during 2018.

We ensure proper living conditions for marine employees

We recognize the importance to establish proper living conditions for our marine employees and their relation with a safe work environment and the crew's psychology. Therefore, we:

· Have placed crew cabins above the main deck, in order to reduce noise impact.
· Ensure proper temperature, ventilation and lighting conditions in accommodation areas.
· Provide individual cabins to vessel Masters and Officers.
· Have created and equipped entertainment halls with various recreation means (library, TVs, film projectors, board games) in all vessels, which are accessible by all marine employees.
· Systematically clean and sanitize accommodation areas.

We handle work-life balance

Indicating our commitment to support our employees and maintain work-life balance, we:

· Ensure that all employees receive their entitled leaves.
· Record and monitor work hours for all marine employees.
· Have defined rest hours for marine employees.
· Ensure timely crew changes, in case it is required.
· Ensure that all fees provided allow decent livelihood.
· Compensate overtime work and do not force employees to work overtime, under the threat of salary reduction, dismissal or any other sanction.
· Pay the entire wage to female employees in childbirth and maternity leave without any deduction as a maternity bonus after their return to work, exceeding the relevant legislative requirements.

Within 2018:

· 100% of marine employees worked at least once beyond the typical work hours and there was no overtime work on behalf of our office employees.
· The average overtime work for Blue Star Ferries and Superfast Ferries marine employees was 1.2 hours.
· All 2 women who received their maternity leave, returned and continued their work within our Group.
· 9 women employees were granted reduced working hours due to raising a child.

We transparently inform our employees

Regardless of their employment type, we inform all new hired office employees about:

· Our organizational structure and culture.
· Our Regulation of Professional Conduct & Business Ethics.
· The Emergency Situations Response Plan for offices.
· The terms and conditions of the Group Insurance program, which applies to employees with over 6 months employment contracts.
· Main work issues and procedures, such as leaves and absences, training, communication and performance appraisal.
· Corporate Responsibility issues.

Furthermore, it must be noted that:

· Our employment contracts include documents which describe the way we expect employees to behave (e.g. corporate manuals).
· Prior to their employment, all employees receive their employment contracts.
· We have informed all employees at least once regarding Corporate Responsibility issues.
· We conducted 8 internal communication activities regarding Corporate Responsibility issues to all Blue Star Ferries and Superfast Ferries employees in 2018, compared to 6 in 2017.

2. Health and Safety

We ensure Health and Safety onboard our vessels

Our main commitment is to create a safe work environment for our marine employees. Therefore, we:

· Have established Safety Committee in each vessel, which consists of all supervisors and represents all work areas onboard vessels (departments). The Committee also discusses Health, Hygiene and Safety issues during its monthly meetings and notifies the Group regarding its findings.
· Do not include Health and Safety issues in our employment contracts, since respective issues are covered by national or industry collective agreements and international hygiene, accommodation and safety agreements, which have been incorporated in the relevant national legislation, as well as national or industry collective agreements, which are available in our vessels.
· Require marine employees to hold competency certificates in training areas such as vessel safety, rescue equipment, firefighting and first aid, prior to their employment onboard our vessels, and oblige them to maintain valid certificates.
· Continuously train our marine employees on Health, Hygiene and Safety issues (such as response to emergency situations), during which 121 employees were trained on serious diseases prevention and 1,141 employees on the proper use of personal protective equipment within 2018.

· Provide the necessary personal protective equipment to all marine employees and monitor its proper use.
· Ensure proper employment conditions, such as temperature, ventilation, lighting and sanitation.
· Have equipped our vessels with the appropriate equipment and conduct audits on alcohol consumption to all marine employees. No such non-compliance incidents occurred within 2018.
· Record and monitor accidents and Health and Safety incidents, in order to take corrective actions and eliminate respective risks.
· Immediately replace injured and sick marine employees with other employees, in order not to have crew numbers lower than legal requirements.

We ensure Health and Safety in offices

Besides creating a safe work environment for marine employees, we are also committed to ensure Health and Safety for our office employees. Within this context, we:

· Comply with the provisions of Law 1568/85 regarding employee Health and Safety.

· Have developed a comprehensive Security Measures Plan.

· Have created a Hygiene and Safety Division, which is responsible to properly implement security measures.

· Maintain an Incident Book and record any accidents and incidents within workplace, in order to apply measures to prevent Health and Safety risks.

· Have communicated via e-mail and placed on all office employees' computer desktop specific instructions for emergency situations, such as:

  - Fire.

  - Earthquake.

  - Bomb threat.

  - Robbery.

  - Hostage situation.

  - Sabotage.

  - Arson.

  - First Aid.

  - Heat wave.

  - Flood.

· Have communicated instructions for emergency situations and preventive protection measures. Within this context, we trained 204 employees on Health and Safety issues, such as emergency situations, use of proper protective equipment, First Aid and evacuation procedures, for a total duration of 451 training hours.

· Have defined and communicated office evacuation plan with predetermined assembly points, in order to safely evacuate office employees, visitors and external collaborators.

· Have appointed Fire Safety Team and Emergency Care Team and clearly defined their members' responsibilities.

· Have installed loudspeaker system to signal evacuation in emergency situations.

· Ensure that emergency exits are clear of obstructions and are clearly marked.

· Have installed anti-slip strips in staircases.

· Establish favorable employment conditions to support susceptible office employee groups, such as pregnant employees and employees working in night shifts (for whom we ensure additional security measures).

· Ensure proper employment conditions, such as security, air conditioning, ventilation, lighting and sanitation.

· Ensure equal access from persons with disabilities to our offices, via parking space with ramp, wheelchair and properly designed WC.

· Expect from subcontractors who work on our behalf to provide health insurance from a public social institution to their employees, with the respective percentage reaching 100% in 2018.

The following table summarizes our overall Health and Safety performance. It must be noted that:

· There are no employees with high incidence or risk of disease associated with their work, while there were no occupational diseases among our employees.

· There were only minor accidents with minor injuries involving our employees within 2018, without any accidents to office employees.

· There was no difference in the total absenteeism rate for male and female office employees.

· Three cases of marine employees' injuries were closed following out of court settlement within 2018.

· Two lawsuits for marine employees' injuries are expected to be discussed within 2019.

Health and Safety

	2016	2017	2018*	2018**
Employees' fatal accidents (number)	0	0	0	0
Collaborators' fatal accidents (number)	0	0	0	0
Accidents (number)	19	14	27	32
Men	19	14	24	29
Women	0	0	3	3
Accidents with absence >1 day (number)	NR	12	26	31
Accidents with absence <3 days (number)	0	2	5	5
Accidents with absence >3 days (number)	19	12	22	27
Absence from work due to accidents (hours)	0	0	0	0
Average days of absence per injury (days)	41.9	23.5	47.85	46.5
Medical treatment cases (number)	NR	68	78	114
Injury Rate (rate)***	1.07	0.78	1.47	NR
Men	1.2	0.88	1.49	NR
Women	0	0	1.33	NR
Occupational Disease Rate (rate)****	0	0	0	0
Men	0	0	0	0
Women	0	0	0	0
Lost Days Rate due to injuries or occupational diseases (rate)*****	45	18.44	70.43	NR
Men	50.44	20.66	71.39	NR
Women	0	0	63.58	NR
Absenteeism Rate due to injuries and occupational diseases (rate)******	340.31	157.9	408.52	NR
Men	376.49	177.72	419.58	NR
Women	0	0	337.35	NR

*   Data refer to Blue Star Ferries and Superfast Ferries.
** Data refer to the period 01/01/2018-31/12/2018 for Blue Star Ferries, Superfast Ferries and Hellenic Seaways.
*** Injury Rate (IR): Number of injuries x 200,000 work hours / Total work hours.
**** Occupational Disease Rate (ODR): Number of occupational diseases x 200,000 work hours / Total work hours.
***** Lost Days Rate due to injuries or occupational diseases (LDR): Total work days lost x 200,000 work hours / Total work hours.
****** Absenteeism Rate due to injuries and occupational diseases (AR): Total absent work days x 200,000 work hours / Total work days.
NR: Not reported

We conducted internal drills on Health and Safety issues (such as response to emergency situations) to 100% of marine employees

3. Equality and Diversity

We commit to meritocracy

Our commitment towards meritocracy follows the principle to treat all our employees equally, which enables their professional development to depend solely on their performance and skills. We do not allow any kind of discrimination due to gender, religion, age, ethnic group, social or national origin, disability, beliefs, sexual orientation, or participation in employee unions, as we take into consideration each employee's experience, personality, performance, skills and qualifications regarding any work aspect (e.g. salaries, professional advancement). Furthermore, we do not allow any comments among employees for all issues above, in order to prevent any form of harassment (e.g. sexual).

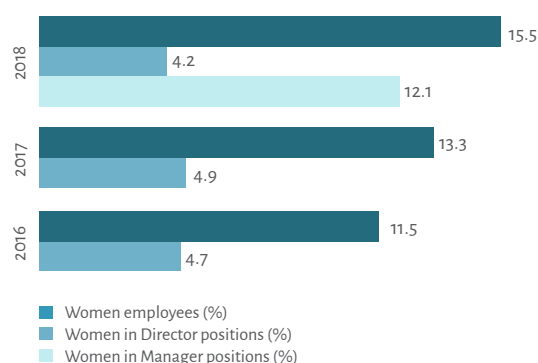As a result of our focus on the equal treatment of women:

· The overall percentage of women in office and vessels is 54.2% and 8.3% respectively.

· The percentage of women in management positions (including supervisors) in offices and vessels is 42.1% and 6% respectively.

· The percentage of female office and marine employees in Director positions is 7.1% and 3.5% respectively, without any female office and marine employees in Top Management positions.

· The percentage of female office and marine employees with fixed term employment contracts compared to male office and marine employees is lower by 50% and 35% respectively.

· The total training hours of female office employees compared to male office employees are higher by 73.8%, while the total training hours of Blue Star Ferries and Superfast Ferries female marine employees compared to male marine employees are lower by 95%.

Percentage of Women

Year	Value 1	Value 2	Value 3
2018	15.5	4.2	12.1
2017	13.3	4.9	
2016	11.5	4.7	

■ Women employees (%)
■ Women in Director positions (%)
■ Women in Manager positions (%)

We do not tolerate child, forced and compulsory labor

We respect the internationally recognized principles of human rights, as described within the Universal Declaration of Human Rights and the ten Principles of the UN Global Compact we have signed. At the same time, we are certified and audited according to the Maritime Labour Convention's respective principles. Based on these principles, we are committed not to:

· Employ any person below the legal age work limit.

· Encourage or tolerate any forced and compulsory labor in any of our premises.

· Employ any person through organizations or agencies involved in trafficking or other forms of forced labor.

In 2018:

· No areas or operations were assessed for child or compulsory labor risks.

· There were no significant investment agreements and contracts with clauses on human rights.

We respect the right of employees to participate in unions and strikes

Although there is no employee union within our Group, we respect the right of employees to freedom of association and participate in employee unions, while no operations in which the respective rights may be at significant risk have been identified. It must be noted that:

· 100% of marine employees participate in employee unions related to their job position and through them to the Panhellenic Seamen's Federation (PNO). Also, three office employees are elected members of the Panhellenic Federation of Shipping and Tourism Employees (PASENT), to which all office employees belong.

· 100% of employees are covered by individual agreements, based on industry collective agreements.

· The minimum notice period regarding operational changes for marine employees is 3 days, with a minimum notice period of 24 hours for Domestic lines and 7 days for Adriatic Sea lines included in employment agreements. We follow, as a minimum, the relevant regulatory requirements regarding operational changes for office employees.

· All our Blue Star Ferries and Superfast Ferries marine employees' work was interrupted during the 6 strikes or lock-outs organized by the Panhellenic Seamen's Federation (PNO) within 2018, due to their opposition to the tax and insurance revisions by the Greek government, with the time lost due to strikes being 1,500 mandays, which corresponds to approximately 0.45% of marine employees' total working time. No office employees participated in any strike or lock-out within 2018.

We ensure confidentiality of personal data

We respect the right of employees to safeguard their personal data and we are committed to implement a wide range of technical and organizational measures, which non-exhaustively include:

· Have authorized the use of specific surveillance systems to monitor crucial access areas to our offices (such as staircases, outside perimeter, central cashier and parking garage) and vessels according to the respective legislation (such as garages), which include CCTV system with cameras and security cards to monitor access to office areas such as servers and UPS, and we only allow employees from the Hygiene and Security Division to access the surveillance footage.

· Do not monitor any office work areas and we monitor certain vessel work areas for security purposes (such as garages and engine room), without collecting any personal data.

· Require written consent on behalf of employees, in case required to disclose personal data to any person with preferential relationship (such as doctors or lawyers).

· Do not withhold personal documents (such as identification cards, passports or any other personal papers).

We apply a fair and transparent salary system

One of our main objectives is to equally reward our employees' contribution, to both maintain high levels of satisfaction, as well as attract highly qualified workforce. For this reason, our employees' remuneration system is aligned with the applicable industry labor agreement on the basis of transparency and equal treatment. At the same time, we compensate all employees within the agreed time period and we do not deduct salaries due to disciplinary offenses or other deductions except those stipulated by law.

It must be noted that in 2018:

· The minimum salary is equal to the lowest salary defined in the industry labor agreement in force.

· The average salary for Blue Star Ferries and Superfast Ferries male office employees and Managers compared to female office employees and Managers is higher by 6.8% and 49.7% respectively, while the average salary for Hellenic Seaways male office employees and Managers compared to female office employees and Managers is higher by 18.8% and 36.2% respectively, due to factors such as professional experience, qualifications and expertise.

· The average salary for Blue Star Ferries and Superfast Ferries male office Directors compared to female office Directors is lower by 27.4%.

· There are no differences between the average salary for male and female marine employees in all job positions, as their salary solely depends on their specialization.

· The ratio of annual total compensation for the highest-paid individual to the median of annual total compensation for all Blue Star Ferries and Superfast Ferries office and marine employees (excluding the highest-paid individual) is 9:1 and 3.8:1 respectively.

· The ratio of percentage increase in annual total compensation for the highest-paid individual to the median percentage increase in annual total compensation for all Blue Star Ferries and Superfast Ferries office employees (excluding the highest-paid individual) is 5.8:1, while the ratio of percentage decrease in annual total compensation for the highest-paid individual to the median percentage decrease in annual total compensation for all Blue Star Ferries and Superfast Ferries marine employees (excluding the highest-paid individual) is 1.8:1.

· The ratio of annual total compensation for the highest-paid individual to the median of annual total compensation for all Hellenic Seaways office employees (excluding the highest-paid individual) is 4.8:1, while the ratio of percentage increase in annual total compensation for the highest-paid individual to the median percentage increase in annual total compensation for all Hellenic Seaways office employees (excluding the highest-paid individual) is 0.5:1.

· There were 10 lawsuits filed by marine employees for labor disputes (with claims over €30,000), which are expected to be discussed within 2019.

We offer additional benefits

We offer a number of voluntary benefits, which cover all our office and marine employees. It must be noted that 100% of our office and marine employees, as well as all subcontractors' employees working on our behalf in our offices are covered by private sickness insurance program, with an additional retirement program for office Top Management members and Directors, for which over €310,000 were spend in 2018.

Additional Benefits

	Marine Employees	Office Employees
Expanded life insurance to all employees, their spouses and their children		✓
Coverage against disability/incapacitation		✓
Postgraduate program support		✓
Christmas cheques for every child up to 14 years old		✓
Annual Christmas festive event		✓
Provision of free passenger and private vehicle tickets and meals onboard our vessels (upon availability)	✓	✓
Discount for passenger and private vehicle tickets for first-degree relatives (upon availability)	✓	✓
Discount for certain items from vessel shops	✓	✓
Food arrangement		✓

4. Training and Development

We develop our employees

Internal Advancements: Our priority is to support our employees' development and cover job openings from existing employees. As a result of this policy, the percentage of permanent job openings in offices covered by internal candidates reached 7.5% within 2018, compared to 5.5% in 2017.

Job Rotation: We have established a job rotation program for office employees, in order to keep them motivated and offer the opportunity to acquire additional knowledge and experience, without however any job rotations taking place within 2018.

Job Descriptions: In our attempt to ensure individual and organizational effectiveness and maximize employee satisfaction, we have started to record in written job descriptions and responsibilities for all employees. During 2018, we updated our office employees' job descriptions, a process completed for 92% of Blue Star Ferries and Superfast Ferries office employees, while a detailed job description is available for 100% of Blue Star Ferries and Superfast Ferries marine employees, without at the moment any corresponding job descriptions for Hellenic Seaways employees.

We train our employees

Training Program: To design our annual Training Plan, we consider:

· Identified training needs.

· Responsibilities and requirements for every job position.

· Changes in the shipping industry (e.g. legal framework).

We deliver a wide range of training programs and seminars for our marine and office employees each year, which indicatively include:

· Marine employees:

- Mobilization and motivation.
- Excellent customer service.
- Technical and sales skills.
- Foreign languages.
- Safety and security issues.

- Response to pollution incidents.
- Fire fighting.
- Cleaning processes.

· Office employees:

- Shipping.
- Finance / Taxation.
- Management issues (e.g. Strategy, Protection of Personal Information, Human Resources, Internal Audit, Legal).
- Information Technology.

- Customer service.
- Marketing.
- Foreign languages.
- Safety.
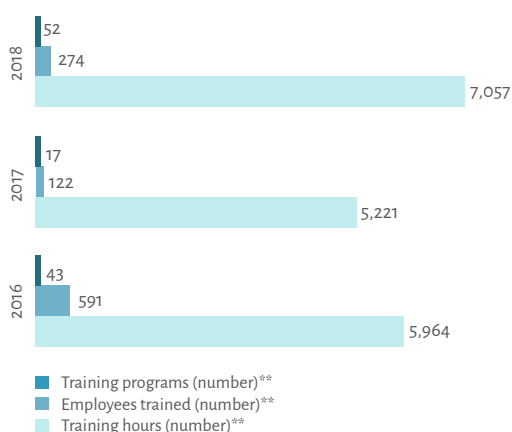- Corporate Responsibility (e.g. environmental protection).

The following data summarize the results of our training practices and overall performance. It must be noted that data do not include internal drills conducted onboard our vessels. Within 2018:

· We trained at least one time, over 80% and 12.4% of Blue Star Ferries and Superfast Ferries office and marine employees respectively.

· We conducted trainings on our human rights policies and processes to all Blue Star Ferries and Superfast Ferries office employees, with a total duration of 302 training hours, without any relevant trainings to marine employees.

· We conducted training programs on Corporate Responsibility issues, with the participation of 40.1% of employees, 72.9% of Managers and 90.5% of Directors and Top Management members of Blue Star Ferries and Superfast Ferries. No relevant training programs were conducted to marine employees.

· We trained 114 Blue Star Ferries and Superfast Ferries marine employees on management issues.

· Total cost of training programs exceeded €54,200, compared to over €38,000 in 2017.

Employee Training*

2018
52
274
7,057

2017
17
122
5,221

2016
43
591
5,964

- ▉ Training programs (number)**
- ▉ Employees trained (number)**
- ▉ Training hours (number)**

*   Data refer to Blue Star Ferries and Superfast Ferries.
** Training data include office employees and marine employees who were trained on management issues; they do not include marine employees' training to renew or receive new competency certificates and/or internal drills conducted on vessels.

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We increased the number of employees trained and training hours in Blue Star Ferries and Superfast Ferries by 124.6% and 35.1% respectively

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Employee Training*

Averages	2016	2017	2018
Office employees			
Training per employee (hours)	14.5	24.8	30.1
Training per male employee (hours)	17.4	19.4	23
Training per female employee (hours)	11.9	29.5	36.6
Training per employee in Top Management positions (hours)	12.1	50.1	30
Training per employee in management positions (hours)	20.7	34.5	39.3
Training per employee in administrative positions (hours)	20.1	29.6	53.3
Marine employees**			
Training per employee (hours)	2.4	0.2	1.1
Training per male employee (hours)	2.3	0.2	1.1
Training per female employee (hours)	2.6	0.1	1.1
Training per employee in Top Management positions (hours)	3	4	2.6
Training per employee in management positions (hours)	5.8	0.3	3.2
Training per employee in administrative positions (hours)	2.9	0.5	1.2

*   Data refer to Blue Star Ferries and Superfast Ferries.
** Average training hours for marine employees refer to training on management issues and do not include marine employees' training to renew or receive new competency certificates and/or internal drills conducted on vessels.

We appraise our employees

We implement a Performance Appraisal System for our office and marine employees, with a three-phase Performance Appraisal System for office employees to identify their strengths and areas for improvement and improve their overall performance:

At the same time, we appraise all vessel Officers and marine employees (including employees whose employment tenure onboard our vessels has expired) four times per year, in order to ensure efficient crew selection and proper vessel manning. The appraisal results are included in a relevant Report which is forwarded to the Marine Personnel Department and assesses marine employees' performance, skills and diligence throughout their service onboard our vessels.

Performance Plan

STAGE 1

Performance Management / Guidance

STAGE 2

STAGE 3

Annual Assessement

The Performance Appraisal System for office employees consists of 5 main areas:

1. Performance Criteria.
   - Personal Objectives.
   - Performance Standards (one of which is Compliance with Procedures).
   - Attributes (Common Attributes and Team Leading Position Attributes).
2. Appraisal Summary.
3. Employee Professional Requirements.
4. Training and Development Activities.
5. Comments.

Performance Appraisal

Year		
2018	0	
	0	
		100
2017	0	
	0	
		100
2016	0	
	0	
		100

- ■ Office employees appraised (%)*
- ■ Office Managers appraised (%)*
- ▫ Marine employees appraised (%)

* No performance appraisal for office employees took place for the period 2016-2018, as the Performance Appraisal System was under review.

5. Achievements 2018 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility issues related to Employees by 6% (by 2020).	**75%**	To improve our performance on Corporate Responsibility issues related to Employees by 6%.	**2020**
To conduct performance appraisal for 100% of office employees with a new Performance Appraisal System (by 2019).	0%	To conduct performance appraisal for 100% of office employees with a new Performance Appraisal System.	**2019**
To include specific Corporate Responsibility objectives in formal appraisal process for employees, Managers and at least one Board of Directors member (by 2019).	0%	To include specific Corporate Responsibility objectives in formal appraisal process for employees, Managers and at least one Board of Directors member.	**2019**
To include specific Corporate Responsibility objectives in Top Management members' formal appraisal process (by 2020).	0%	To include specific Corporate Responsibility objectives in Top Management members' formal appraisal process.	**2020**
To conduct the Skills Development Program to 20 employees in all hierarchical levels (by 2019).	0%	To update our employees' job descriptions according to our new organizational structure.	**2019**
To conduct an Employee Satisfaction Survey (by 2019).	0%		
To integrate Corporate Responsibility issues into the other categories of in-house training courses (by 2019).	0%	To integrate Corporate Responsibility issues into the other categories of in-house training courses.	**2019**
To define Managers formally responsible to manage Corporate Responsibility issues within their formal job description.	**100%**		
To train all Managers on Corporate Responsibility.	**75%**		
To conduct a Corporate Responsibility e-learning course for our office employees.	**100%**	To conduct a Corporate Responsibility e-learning course for our new office employees.	**2019**
To apply a process to monitor health and safety incidents (e.g. injuries, diseases, absences, fatal accidents) of subcontractors' employees working in our offices (by 2019).	0%	To apply a process to monitor health and safety incidents (e.g. injuries, diseases, absences, fatal accidents) of subcontractors' employees working in our offices.	**2019**

We ensure our Passenger Safety

8,307
journeys annually

49
vessel inspections from local authorities (for food hygiene and safety)

824,757
calls to customer service phone lines

982
questionnaires in vessels

WE COMMIT TO

Safeguard the health and safety of our passengers and offer them the best possible travel experience, in order to meet their needs and expectations during their journey.

262,444
members in the Loyalty & Reward program seasmiles

WE FOLLOW

Principles of the United Nations' Global Compact

/7/ Support a precautionary approach to environmental challenges
/8/ Promote greater environmental responsibility

WE ACHIEVED

· We conducted internal drills and trainings on passenger safety procedures to 100% of marine employees.

· We were subjected to 49 inspections from local authorities for food hygiene and safety, with no recorded non-compliance incidents.

· We maintain 5 corporate websites, with over 4.9 million unique visitors annually and handle 3 mobile applications with over 130,000 downloads.

· We dispatched 851 notifications to serve passengers with reduced mobility to our vessels.

· We dispatched 2,411 notifications to serve passengers to Blue Star Ferries and Superfast Ferries vessels, out of which 17 concerning passengers with sensitivity to allergens.

· The average score of evaluations registered through dedicated devices onboard Blue Star Ferries and Superfast Ferries vessels reached 3.82 on a 5 point scale.

· We kept Blue Star Ferries and Superfast Ferries vessels' departure time in 61.8% and Hellenic Seaways vessels' departure time in 89.5% of our scheduled journeys.

· We increased our seasmiles loyalty and reward program members by 8.2%.

Safety & Security
Responsible Communication
Quality & Satisfaction

Customers
Sales Network
Media

PASSENGER SAFETY

SOCIETY SUPPORT

Economic Growth
Societal Support
Responsible Procurement

Citizens
Associations and Unions
Suppliers
Local Communities

RESPONSIBLE MANAGEMENT

Shareholders

EMPLOYMENT CONDITIONS

Employees

Human Resources & Employment
Health & Safety
Equality & Diversity
Training & Development

ENVIRONMENTAL IMPACT

State
Environment
NGOs

Air Quality & Energy
Raw Materials & Solid Waste
Water & Liquid Waste

1. Safety and Security

We ensure passenger safety onboard our vessels

We consider passenger health and safety onboard our vessels as our indisputable obligation. Therefore, we:

· Were subjected to extensive vessel inspections from external bodies (Merchant Vessels Inspection and classification societies) in 2018.

· Have established Safety Committee in each vessel, in order to examine and assess health and safety issues.

· Train our employees on passenger safety procedures.

· Comply with the International Convention for the Safety of Life at Sea's (SOLAS) standards regarding use of fire extinguishing equipment, such as fire extinguishing systems in engines and all cabins, public areas and garages, and we train marine employees on the location and use of fire protection systems.

· Carry out regular maintenance of rescue equipment.

· Demonstrate use of lifejackets and display informative videos regarding use of lifejackets, assembly stations and rescue equipment.

· Ensure that fire doors are not blocked from luggage, chairs or other items.

· Have placed clear signs with fundamental safety information.

· Have equipped all our vessels with the necessary medical and pharmaceutical equipment.

· Have made the Cardio Express telemedicine support service available to all Blue Star Ferries and Superfast Ferries vessels for the initial assessment of medical incidents at sea.

· Prohibit transportation of explosives, flammable, combustible and hazardous materials in general, except those permitted by the relevant legislation.

· Strictly prohibit smoking in areas such as cabins, elevators, warehouses and garages.

· Allow staying in vessel garages only to marine employees responsible to facilitate vehicles' loading and unloading.

· Operate 2 reservation and ticketing systems, which are certified by the relevant authorities and ensure that the number of issued tickets do not exceed the respective maximum number.

Regarding previous legal cases, within 2018:

· A case of passenger injury onboard vessel in 2016 closed following out of court settlement.

· Exemption decisions were issued for two court proceedings against a Company of the Group and its associates for passenger injuries onboard vessels in 2015 and 2016, as well as an overbooking violation in 2013.

· Two lawsuits for passenger injuries onboard vessels in 2013 and 2015 were rejected by the competent judicial bodies.

· Expected to be discussed within 2019:

  - Three lawsuits for passenger injuries onboard vessels in 2012, 2016 and 2017.

  - An investigative procedure regarding a professional driver's injury from a truck driver during vehicle loading onboard vessel in 2016.

We conducted internal drills and trainings on passenger safety procedures to 100% of marine employees <>

Emergency Response Team ✓

We have created an Emergency Response Team to offer guidance to vessels and communicate with third parties on their behalf (such as the Ministry of Shipping and Marine Policy's Search and Rescue Center, rescue teams, experts and Media), in order for vessels to focus on handling potential emergency situations, while at the same time, we have established a substitute Emergency Response Team.

In 2018, the Emergency Response Team's members met for an internal drill onboard Nissos Rodos regarding response to a fire incident.

Addressing Infectious / Transmittable Diseases ✓

According to an established procedure and the internal drills conducted as required onboard all Blue Star Ferries and Superfast Ferries vessels to address incidents of infectious / transmittable diseases, we immediately notify and request assistance from the respective port authorities and external authorities (e.g. Hellenic Center for Disease Control and Prevention) in case of respective incidents and lead the vessel to the nearest port. The patient is then rushed to the vessel's infirmary, where we record in detail personal information and medical history and apply the necessary precautions for the crew or the doctor (such as hand disinfectant, surgical gloves and mask, disposable waterproof suit and apron and infectious waste disposal bags). Upon arrival, the patient is escorted outside the vessel and handed over to the respective authorities (e.g. HCDCP), while we disinfect the cabins and areas visited by the patient and place all items handled in appropriate bags, which we hand over to an external specialized company, following the competent authorities' agreement. No incident of patient with infectious / transmittable disease was reported in 2018.

Missing Onboard Person Search ✓

Each Blue Star Ferries and Superfast Ferries vessel has developed a Missing Person Response Plan (SAA), in order to respond to confirmed cases of missing passengers onboard. According to this procedure, we inform all passengers regarding an incident and set up a search team to search throughout vessel areas (initially cabins, lounges, decks and WCs and subsequently engine room, crew premises, garages and warehouses). In case the missing person is not found until the port of arrival, port authorities thoroughly check all passengers and search all vehicles during passenger disembarkation. Within 2018:

· There was one reported missing person incident onboard Nissos Rodos, without any indication about its traces until today, despite the respective search by port authorities.

· An investigative procedure regarding a missing person incident onboard Blue Horizon in 2015, whose body was later found and identified, is expected to be completed within 2019.

· We immediately responded and participated in port authorities' search to locate a passenger of Blue Star Naxos who jumped from the vessel's deck to end his life while at sea.

We offer safe products and services

We strive to provide quality and safe products and services, in order to ensure our long-term business success. Therefore:

· Contractors comply with the requirements of ISO 9001 Quality Management System and ISO 22000 Food Safety Management System, in order to eliminate risks (such as materials or ingredients) that could potentially harm human health. Within this context, we are informed regarding regular audit results conducted by contractors and proceed with corrective actions if required.

· Audit our Management Systems (Quality, Environmental and Food Safety Management Systems), as well as the quality of products and services itself.

· Record audit findings and potential corrective actions with specific remediation time plan, which are communicated to all involved parties.

· Are annually audited by ABS (American Bureau of Shipping) for Blue Star Ferries and Superfast Ferries vessels and LRQA (Lloyd's Register Quality Assurance) for Hellenic Seaways vessels regarding ISO certificates, with respective audits to contractors for their ISO 22000 certificates taking place from their own certification bodies.

· Perform a 'Mystery Passenger' survey in 17 and 19 service categories in three stages of three visits per year onboard our vessels in Domestic and Adriatic Sea lines respectively, in order to ensure effective vessel operation, quality services and prompt response to customer needs, without however conducting the survey within 2018, as in 2017.

Food hygiene and safety: We have defined specific food hygiene and safety procedures, in order to provide high quality products. Within this context, our food and catering contractors apply food safety management systems. More specifically, we:

· Have the necessary cleaning/sanitation and food storage areas, as well as specific catering areas.
· Provide employees with the necessary clothing during food preparation, such as uniforms and head caps.
· Specify the use of disposable gloves to prepare cold kitchen meals (such as sandwiches and salads) and warm kitchen portions and we prohibit use of the same gloves to handle fresh and cooked foodstuffs, according to respective procedures.
· Require employees to wash their hands before starting and finishing their work, and after waste handling, use of cleaners or chemicals, as well as after every contact with a phone, money, fresh foodstuffs or doorknobs, according to respective procedures.
· Strictly prohibit smoking in food preparation areas.
· Dining areas are daily inspected.
· On average, audit compliance with our procedures and practices once per month per vessel. These inspections resulted in no findings or corrective actions taken within 2018, as in 2017.
· Our contractor carried out 141 inspections during 2018 in areas of interest, such as kitchens and bars, with no findings registered or corrective actions being required, as was the case also in 2017.

Hotel services hygiene and safety: We focus to provide high quality hotel services onboard our vessels, since customer satisfaction is directly associated with their safe accommodation. Therefore, we systematically sanitize public and accommodation areas.

Vessel Inspections from Local Authorities ✓

Besides ourselves inspecting our vessels, we are subjected to additional scheduled or unscheduled inspections from local authorities. These inspections address our vessels' Hotel Operations & Customer Services Department for health issues or hygiene certificates, either when the vessel is docked or at sea. Upon inspection completion, we proceed with the required corrective actions, according to the results from the draft audit report, which is filed in the vessel's inspection archive. We assess inspection results for each vessel twice a year, in order to:

· Identify repeated comments or cases of non-compliance.
· Assess corrective actions already taken.
· Proceed with further corrective actions, if deemed necessary.

We were subjected to 49 inspections from local authorities for food hygiene and safety, with no recorded non-compliance incidents

'PURE CABIN' ✓

We were the world's first passenger shipping company to introduce the 'PURE CABIN' category in one Adriatic Sea line vessel in 2010. Since 2011, we have expanded its use in three additional vessels in Domestic lines and we added 4 cabins per vessel in two more vessels in 2017. Approximately 2.3% of all cabins onboard Blue Star Ferries and Superfast Ferries vessels are 'PURE CABINS' and 1% of our overall passenger volume in these vessels travel within 'PURE CABINS', which are provided at an extra charge. 'PURE CABINS' feature a state-of-the-art air and surface purifying system, in order to offer improved accommodation conditions to passengers sensitive to airborne particles. After each use, 'PURE CABINS' are purified and a cleaning certificate with the corresponding inspection date is issued.

We ensure protection of personal items

Indicating our commitment to ensure our passengers' safety, safeguard their personal items and offer a quality travel experience, we:

· Provide safe storage for any property, money and valuables whose value does not exceed €500 within each vessel's Purser Office.
· Utilize loudspeaker announcements to inform about safety of personal items during their journey.
· Intensify inspections to luggage areas with additional marine employees on routes with increased passenger volume.
· Have established a formal procedure to handle lost and found items.
· Compensate passengers in cases marine employees are responsible for damaged or ruined luggage or vehicle during boarding/disembarkation or during the journey.

Compensations

	2016	2017	2018
Lost/found or damaged items (number)	4,642	5,027	5,078
Adriatic Sea lines (number)	525	291	382
Domestic lines (number)	4,117	4,736	4,696
Compensations paid for luggage and other damages (€)	33,777	52,438	32,937
Compensations paid for vehicle damages (€)	45,080	45,461	57,800

Regarding previous legal cases:
· A lawsuit for lost luggage onboard vessel in 2014 was rejected.
· Expected to be discussed within 2019:
  - Three lawsuits due to vehicles damages within vessel garages during vessel loading/unloading.
  - A lawsuit due to a delivery delay of a transported private vehicle.

Items and Luggage Found ✓

According to a formally established lost and found items procedure, we keep small and high value items which were found onboard a vessel for 21 and 30 days respectively.

More specifically, we:

· Destroy various items after 21 days have elapsed, except for books (which are provided to the crew's library), as well as foodstuffs, medicines and personal hygiene items (which are either immediately destroyed or after 3 days, depending on their kind).
· Keep travel and personal documents for 7 days and then hand them over to port authorities.
· After 30 days have elapsed for valuable items, we:
  - Deposit monetary amounts to the charitable organization supported by each vessel (see Section V-2).
  - Send electronic equipment for recycling by the Information Technology and Telecommunications Division, according to a specific procedure. There were over 80 electrical devices collected and forwarded for recycling within 2018.

We ensure protection of personal data

Protection of Personal Data { }

According to our Regulation of Professional Conduct & Business Ethics, we collect, process, use and store personal data only to the extent required for their intended purpose or to fulfill our contractual obligations in accordance with our policies and procedures, as well as the legal and regulatory framework which governs our operation.

We strive to ensure protection of our customers' personal data, in order to establish solid and concrete trust relationships. Therefore, we:

· Within the context of the European Union's new General Data Protection Regulation (GDPR), we:

  - Have created a Project Team to properly and effectively respond to the protection of individuals regarding personal data processing and a Personal Data Protection Team to monitor the Regulation's proper implementation and compliance with its requirements.

  - Conducted a relevant training program and sent an informative guide for the new Regulation via e-mail to all office employees and posted a relevant informative leaflet on all our vessels' bulletin boards to inform marine employees.

  - Developed new policies and processes to comply with the new personal data protection requirements, such as the Employee Training Policy on GDPR Issues and the Personal Data Violation Management / Response to Personal Data Violation Incidents process.

  - Signed a contract with a specialized law firm to provide advisory services related to GDPR compliance issues.

  - Signed an insurance policy contract against cyber attacks.

  - Distributed a relevant Greek and English informative leaflet to our vessels.

  - Sent an informative subscription / unsubscription e-mail to members of our Loyalty and Reward program seasmiles.

  - Sent an additional personal data processing act to our partners, in order to ensure their compliance with the GDPR Regulation.

· Were certified according to PCI DSS SAQ D v3.2.1 standard (Data Security Standard) for our security methods, practices and processes to safely handle, process and store cardholders' data (including prevention, detection and response to cardholders' data breaches and losses), as a result of a relevant inspection and evaluation process within 2018.

· Keep personal data collected from customers, professionals and website visitors in a secure database.

· Do not disclose any information to third parties, unless required by law and/or competent authorities.

· Seek individual consent to process personal data, exclusively for communication, statistical analysis and service improvement purposes.

· Inform customers that incoming calls are recorded, prior to connect them with Customer Services and Call Center Divisions' representatives.

2. Responsible Communication

We responsibly advertise our products and services

We aim to ensure our communication material is fair, legal, sincere, corresponds to reality, does not display or promote stereotypes and respects people's diversity. Therefore, we:

· Follow the principles of the Hellenic Code of Advertising & Communication, issued by the Communication Audit Council.

· Have developed a Code for Responsible Marketing and Communication for our commercial activities, which will be incorporated into our future contracts.

· Do not use texts, audio or images that promote stereotypes.

· Ensure use of proper communication and advertisements for our products and services, in collaboration with the Marketing and Sales Departments.

· Have structured our Blue Star Ferries and Superfast Ferries websites, easily accessible by people with visual impairments.

· Do not sell or provide any products and services which are either banned or disputed in foreign markets.

Responsible Communication ✓

We have included our compliance with the principles and regulations of professional ethics and ethical behavior of the Hellenic Code of Advertising & Communication, issued by the Communication Audit Council, into our Regulation of Professional Conduct & Business Ethics and our Code for Responsible Marketing and Communication, which are also binding for collaborating advertising agencies, in order to ensure the responsible advertising and marketing promotion of our activities.

Furthermore, we state applicable conditions on Blue Star Ferries, Hellenic Seaways and Superfast Ferries websites regarding:

· Regulations and boarding processes.
· Reservations.
· Ticket issuing and cancellation.
· Transportation of pets.
· Storage of personal belongings.

We maintain 5 corporate websites, with over 4.9 million unique visitors annually and handle 3 mobile applications with over 130,000 downloads <>

At the same time, we maintain one corporate website and manage a mobile application for AML, with over 89,500 unique visitors and 8,900 downloads.

Labeling Allergens ✓

We require from prepackaged foodstuff suppliers to comply with the European Regulation for Food Labeling 1169/2011 and clearly display whether their products contain specific ingredients included in the allergens list, according to Directive 2003/89/EC. At the same time, we have placed clear and detailed signs to inform consumers about allergens for every non-prepackaged meal within our vessels (such as gluten, eggs, soy and milk).

In 2018, there were:

· 6 social and environmental informative messages in every Blue Star Ferries and Superfast Ferries vessel, regarding:
  - Water sports safety.
  - Fire prevention.
  - Ultraviolet radiation protection.
  - Voluntary blood donation.
  - 'Agoni Grammi Gonimi' program.
  - The 2 Blue Tomatoes program.
· A dedicated Greek and English poster to inform passengers who travel with a pet regarding responsible attitude towards the vessel and other passengers.

We ensure prompt communication

We strive to promptly inform our customers in case of cancellation or delays in scheduled routes, in order to minimize their potential discomfort. Within this context, we utilize a wide range of communication means, which include:

· The websites www.superfast.com, www.bluestarferries.com and www.hellenicseaways.gr.
· Radio.
· Port authority representatives.
· Various journal and information portals.
· Communication via SMS (in case they have registered their mobile number).
· Electronic newsletters.
· Social media.
· Phone calls.
· E-mails.

Furthermore, we proceed with at least Greek and English informative audio announcements in case of delays during the journey, which include their cause and the estimated delay time.

Informative SMS Messages

Year	Informative SMS messages sent (number)
2018	259,472
2018*	233,894
2017	91,482
2016	68,954

■ Informative SMS messages sent (number)
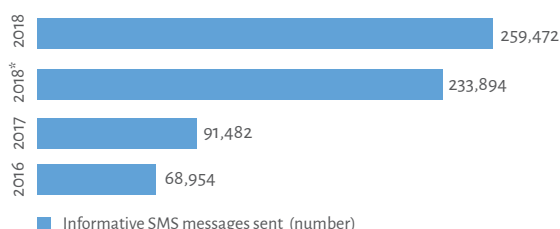
* Data refer to Blue Star Ferries and Superfast Ferries.

3. Quality and Satisfaction

Selection Criteria

According to a survey conducted to 500 people in Attica in 2018, ticket price is the **No 2** passenger shipping company selection criterion and among the top three selection criteria for **51.7%** of respondents.

Awareness

According to a survey conducted to 1,050 people in 2018, Blue Star Ferries, Hellenic Seaways and Superfast Ferries are the **No 1, No 4** and **No 5** passenger shipping companies in brand awareness respectively.

We ensure that our services are affordable

We recognize the unfavorable economic situation for thousands of Greek households and we strive to provide affordable prices for our services, without however compromising their quality, in order to overcome the financial crisis and maintain transportation volume. Depending on line and destination, we offer:

- Early booking tickets, with up to 20% discount.
- Ticket packages, with significant discounts.
- Discounts in tickets for children, teenagers, young people and people above 65 years old.
- Discounts in selected destinations throughout the year.
- Discounts throughout the year (such as Super Economy, Special Economy, Supersaver Economy, Saver Economy, for passengers and private vehicles, for Naval and Coast Guard retirees, for combined Domestic and Adriatic Sea routes, for Officers and soldiers).
- Discounts for members registered in our Loyalty and Reward program seasmiles.

Supporting Tourism in Islands

For the third consecutive year within 2018, we supported the effort to reverse the negative tourism trend and strengthen the transportation volume in Lesvos, Chios, Leros and Kos, caused by the refugee crisis. For this reason, we offered a 30% discount to 1,499 passenger and 367 private vehicles and motorcycle tickets for those with at least four overnight stays in these islands, in collaboration with local municipalities and hoteliers' associations.

We ensure equal treatment of customers

Equal Treatment

According to our Regulation of Professional Conduct & Business Ethics, we require from employees to equally treat all customers and partners, without any exceptions, and behave with caution and care during our transactions with vulnerable social groups.

We ensure equal treatment of all our customers, in order to enhance our customer-centric orientation. More specifically, we:

- Have equipped all our premises and vessels (except Flying Cat and Flying Dolphin vessel types) with the necessary infrastructure to facilitate access from people with disabilities.
- Do not impose extra charges on cabins for persons with disabilities.
- Are promptly informed about the number of passengers with disabilities on each route, in order to plan the availability of wheelchairs.
- Check that emergency switches in cabins for passengers with disabilities are fully operational before boarding.
- Require that food rations for persons with sensitivity to allergens are prepared with separate food preparation equipment (such as frying pans, cutting boards, knives).
- Have introduced procedures for clothing management and protection of passengers from allergens.
- Created 26 new pet accommodation facilities in 2 vessels.

We dispatched 851 notifications to serve passengers with reduced mobility to our vessels

We dispatched 2,411 notifications to serve passengers to Blue Star Ferries and Superfast Ferries vessels, out of which 17 concerning passengers with sensitivity to allergens

We ensure our customers' travel experience

Family Cabins with Children Cartoons ✓

We have introduced family cabins marked with the Bluestarino children cartoon and the Fasteritos children cartoons in all Blue Star Ferries and Superfast Ferries vessels respectively, for families with small children who have booked a 4-bed external cabin. Upon availability, Reception desks offer these specially decorated cabins to our child passengers without any extra charge.

Passenger Service Innovations ✓

As we strive to develop new approaches to serve our passengers and continuously improve the quality of our services, we:

· Have launched an e-ticket application on the Crete and Adriatic routes.

· Have specifically tailor-designed Blue Star Delos to address the needs of its route and facilitate passenger boarding, by introducing:

 - Wider boarding / disembarkation staircase with stair escalator, instead of two staircases on the vessel's left and right side.

 - Two vehicle ramps, one larger than the other, in order to select which one to use depending on the cargo requirements and port infrastructure.

 - Ability to reach appropriate speed, to perform a short-time journey.

'We do local' ✓

Operating with respect for local communities is our main objective and we strive to enhance the quality of services provided, while at the same time highlight local cultures' unique features. Within this context, we have certified Blue Star 2, Blue Galaxy and Superfast XI according to the 'We do local' standard, through which an organization:

· Promotes local customs and culture.

· Presents local cuisine.

· Supports local producers.

· Operates with respect towards the environment.

To this end, we implement the following indicative actions and initiatives:

· Support local communities and cultural events and suggest visits to local sites and museums, as well as promote cultural activities.

· Present local cuisine and support local producers of products such as talagani cheese from Mani, gruyere cheese from Crete, maceata spaghetti from Folegandros, skioufichta spaghetti from Crete, ouzo from Mytilene, Greek feta cheese and caper leaves from Naxos, while we also prepare Greek recipes in our vessels' restaurants such as shrimps saganaki with feta cheese, Greek Salad, traditional Cretan dakos, octopus with split peas and barley with seafood.

· Respect the environment and implement environmental protection practices, such as paper and batteries recycling corporate initiatives, as well as use of a photovoltaic unit onboard one vessel (see Section VIII-1).

· Employ Greek employees and support local workforce.

We listen to our customers

In order to effectively serve our customers, we have established mechanisms to communicate and receive comments and complaints, which are handled by our Customer Services Division. These mechanisms include:

· A call center and dedicated e-mail address for customers.

· Written communication from customers.

· Private meetings with customers.

· Comments form, complaints form, Pure Cabins questionnaire and A la Carte restaurants questionnaire, which are located in various vessel areas, such as the Reception desk and the bar, regarding quality, variety and service.

· A specific form which is completed by the Reception desk, in case verbal complaints are received or incidents are noted.

· The Complaints form, located in all vessels' restaurants.

· The dedicated devices in all Blue Star Ferries and Superfast Ferries vessels to evaluate the services provided.

Evaluations Onboard Vessels*
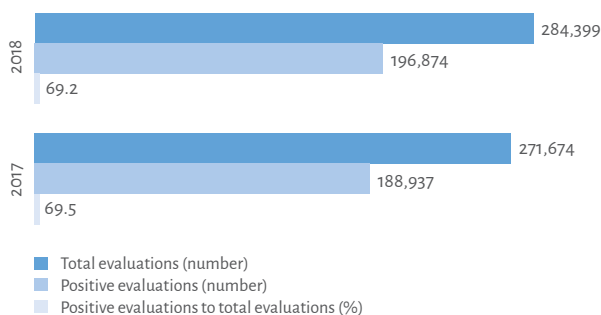
- Total evaluations (number)
- Positive evaluations (number)
- Positive evaluations to total evaluations (%)

* Data refer to Blue Star Ferries and Superfast Ferries.

@sea Portal ✓

In order to improve the services offered to our customers, we have launched the interactive and multifunctional @sea portal, where all Blue Star Ferries and Superfast Ferries passengers can connect with any device (laptop, smartphone or tablet) via the onboard WiFi network and can access free-of-charge recreational material such as music, TV and games, as well as information about:

· Weather conditions.

· Vessel location in real-time.

· Restaurant and bar menus.

· Ports and destination information.

· Loyalty and Reward program seasmiles.

Utilizing Questionnaires ✓

We have appointed a vessel Officer to collect and forward passenger questionnaires to the vessel's Master, who reviews them before being sent by the appointed vessel Officer to the Customer Services Division, which documents observations in a 'Passenger Observation Report'. The Report is forwarded monthly to our vessel Masters, the Divisions' directors and the catering contractor within each vessel and is the subject of meetings from all interested parties, in order to assess and define further corrective and preventive actions, if deemed necessary.

The average score of evaluations registered through dedicated devices onboard Blue Star Ferries and Superfast Ferries vessels reached 3.82 on a 5 point scale

We monitor our customers' satisfaction

Potential Travel with a Passenger Shipping Company

According to a survey conducted to 1,050 people in 2018, **84%** and **58%** of Attica residents would select or seriously consider to select Blue Star Ferries and Hellenic Seaways respectively for domestic destinations, with the respective percentages for island residents reaching **88%** and **48%**. At the same time, **69%** of Attica residents would select or seriously consider to select Superfast Ferries for a trip to Italy.

We recognize the importance and our responsibility to offer reliable and responsible customer services, in order to ensure our business success. Within 2018, we:

· Received over 824,500 calls in all our corporate customer service telephone lines (including unanswered calls), responding to 89.3% of incoming calls.

· Reduced unanswered calls from our Blue Star Ferries and Superfast Ferries Call Center Division by 53.3%.

· Sent 1,987 formal responses to customer complaints regarding product or service information (e.g. labeling, pricing) and product or service use (e.g. features), with no customer complaints regarding promotional activities (e.g. marketing, advertising, sales) and without including relevant e-mails and incoming phone calls.

Customer Service

	2016	2017	2018
Formal response letters to comments, complaints and requests (number)	726	619	1,987
Adriatic Sea lines	137	120	176
Domestic lines	589	499	1,811
Formal thank-you letters (number)	190	179	143
Adriatic Sea lines	40	27	47
Domestic lines	150	152	96
Questionnaires in vessels (number)	945	878	982
Total calls to customer service telephone lines (number)	NR	548,977	824,757
Calls to Customer Services Division (number)*	107,123	66,318	66,846*
Calls to Call Center Division (number)	176,456	162,813	232,583*
Calls to Help Desk Division (number)	NR	12,315	15,162*
Calls to Loyalty Division (number)	NR	49,728	59,382*
Calls to Capacity Domestic / Adriatic Division (number)	NR	194,999	141,156*
Calls to Cargo Domestic / Adriatic Division (number)	NR	62,804	64,405*

* Data refer to calls from Blue Star Ferries and Superfast Ferries customers.
NR: Not reported

Compensations

In case of journey delay, compensations are defined according to the European Union legislation and the Greek Passenger Charter of Rights and Obligations, with compensation being related to the journey duration. Indicatively, passengers are entitled to compensation for delays:

· Of at least 1 hour, for journeys of less than 4 hours.

· Of over 2 hours, for journeys between 4 and 8 hours.

· Of over 3 hours, for journeys between 8 and 24 hours.

More specifically, in case the scheduled departure is delayed for over 90 minutes, passengers are entitled to compensation according to their ticket, or to:

· Remain onboard and receive free light meals or refreshments until their destination is reached.

· Receive a free meal for delays of over four hours, as well as free on vessel or hotel accommodation, when feasible and necessary.

· Be compensated with 25% of the ticket value or other prior to agreement compensatory payment, in case they were forwarded to their destination with the same or another company vessel. Compensation depends on the delay itself (e.g. 1 hour for journeys up to 4 hours), with the compensation increasing to 50% of the ticket value, in case the delay is double.

· Be compensated with 200% of the ticket value and receive back the vehicle ticket value, in case on our own responsibility they were not forwarded to their destination with the same or another vessel within 24 hours from the scheduled departure time.

During 2018, there were:

· 59 journeys with delayed arrival, for which we fully compensated passengers according to their rights, while we acted beyond our obligations stipulated by the Passenger Charter of Rights and Obligations and offered additional benefits and compensations on 643 occasions of passenger compensations.

· Two passenger lawsuits with compensation claims due to a journey delay in 2018, which are expected to be discussed within 2019.

Seasmiles Program ✓

In 2011 we established the Loyalty and Reward program seasmiles, which provides members with exclusive benefits, gifts, special offers and high quality services, within three card levels (Blue, Silver and Gold). Members collect points for every ticket and product bought from bars, restaurants and vessel stores, which are automatically registered in their personal account and can be redeemed for future journeys, meals and drinks. It must be noted that in 2018, we installed Infokiosks on all Blue Star Ferries and Superfast Ferries vessels, where we will install an application specifically for online seasmiles registration, issue of plastic card for existing and new Blue level members, as well as inform members about their points.

Seasmiles Loyalty & Reward Program

Year	Members in seasmiles program (number)
2018	262,444
2017	242,483
2016	199,673

■ Members in seasmiles program (number)

4. Achievements 2018 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility issues related to Customers by 17% (by 2020).	**75%**	To improve our performance on Corporate Responsibility issues related to Customers by 17%.	**2020**
To establish a Customer Relationship Management system (CRM) (by 2020).	**0%**	To establish a Customer Relationship Management system (CRM).	**2020**
To categorize complaints per category (e.g. delays, price of tickets, price discrepancies) (by 2020).	**0%**	To categorize complaints per category (e.g. delays, price of tickets, price discrepancies).	**2020**
To systematically inform and train our customers on Corporate Responsibility issues.	**75%**	To systematically inform and train our customers on Corporate Responsibility issues.	**2019**
To further reduce unanswered calls from our Call Center by 50%.	**100%**		
To achieve an 'as scheduled' routes rate in Crete, Dodecanese and Ancona routes of over 90%.	**50%**	To achieve an 'as scheduled' routes rate in Crete, Dodecanese and Ancona routes of over 90%.	**2019**
To increase communication with our customers through SMS by 5%.	**100%**	To increase communication for early arrival at the port of Piraeus and changes or cancellations of scheduled journeys through SMS by 5%.	**2019**
To formalize our Responsible Communication Policy.	**100%**		
To apply a Responsible Marketing and Communication Code in our business activities.	**75%**	To apply a Responsible Marketing and Communication Code in our business activities.	**2019**
To apply a process to monitor potential recalls of products or services from subcontractors due to possible health and safety issues (by 2019).	**0%**	To apply a process to monitor potential recalls of products or services from subcontractors due to possible health and safety issues.	**2019**
		To extend the infotainment platform @sea to Hellenic Seaways vessels.	**2019**
		To install Infokiosks about the seasmiles program on 8 Hellenic Seaways vessels.	**2019**

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SUPERFAST

We reduce our Environmental Impact

WE ARE

€2.1
million environmental investment

13,791
TJ energy consumption

4,380
KWh energy produced from renewable energy sources

1.06
million tonnes eCO₂

WE COMMIT TO

Integrate sustainable development in our operations and apply environmentally friendlier business practices, in order to reduce, where feasible, our environmental impacts.

118,896
kgr paper consumption

WE FOLLOW

Principles of the United Nations' Global Compact

/7/ Support a precautionary approach to environmental challenges
/8/ Promote greater environmental responsibility
/9/ Encourage development and diffusion of environmentally friendly technologies

WE ACHIEVED

· We conducted internal drills on environmental protection issues to 100% of marine employees.

· We informed 70% of our office employees on environmental protection issues.

· 80% of monitors and 40% of personal and laptop computers we use have energy-saving specifications.

· We use refrigerants that do not affect the ozone layer (such as R134a, R404a, R407a) in 100% of refrigerators and freezers onboard our vessels.

· We reduced the total quantity of refrigerant materials used from Blue Star Ferries and Superfast Ferries by 29.6%.

· We reduced the consumption of plastic bags in our offices by 13.3%.

· We informed over 1.2 million customers on Corporate Responsibility issues, such as environmental protection.

· We used 28.1% recycled paper for all purposes from Blue Star Ferries and Superfast Ferries.

· We used 69.8% recycled toners/ink cartridges.

· We reduced the paper used for commercial purposes from Blue Star Ferries and Superfast Ferries by 15.2%.

· We reduced the paper used for all purposes from Blue Star Ferries and Superfast Ferries by 12.5%.

· We transported from Islands free-of-charge over 153 tonnes of materials for recycling.

· We reduced water consumption from Blue Star Ferries and Superfast Ferries by 13.3%.

Air Quality & Energy
Raw Materials & Solid Waste
Water & Liquid Waste

State
Environment
NGOs

ENVIRONMENTAL IMPACT

EMPLOYMENT CONDITIONS

Human Resources & Employment
Health & Safety
Equality & Diversity
Training & Development

Employees

PASSENGER SAFETY

Safety & Security
Responsible Communication
Quality & Satisfaction

Customers
Sales Network
Media

RESPONSIBLE MANAGEMENT

Shareholders

SOCIETY SUPPORT

Citizens
Associations and Unions
Suppliers
Local Communities

Economic Growth
Societal Support
Responsible Procurement

1. Air Quality and Energy

We operate in a systematic way

We are committed to operate responsibly regarding the environment and to minimize the negative environmental impact, which inevitably originates from our operations. Within this context, we:

· Record our environmental performance.

· Implement an Environmental Management System and evaluate our environmental impact annually.

· Were the first group in the Greek passenger shipping industry to implement ISO 14001 for our vessels and have certified all Blue Star Ferries and Superfast Ferries and 60% of Hellenic Seaways vessels (9 vessels) according to ISO 14001.

· Were the first passenger shipping group in Greece to submit the Monitoring Plans for all Blue Star Ferries and Superfast Ferries vessels and have certified all vessels for the proper and systematic monitoring, recording and disclosure of carbon dioxide emissions, much earlier than the projected deadlines of the European Regulation EU MRV 757/2015.

· Have certified two vessels with the 'Green Star' environmental protection certificate from a foreign classification society to ensure pollution prevention from all operations, such as environmental training for marine employees.

· Have Energy Efficiency certificates issued for all our vessels in international routes.

· Demand an asbestos non-use certificate from our suppliers.

· Discuss environmental protection issues during respective meetings of each Blue Star Ferries and Superfast Ferries vessel's Safety Committee.

· Train employees on environmental issues and conduct internal trainings for all marine employees in all our vessels, on issues such as waste management and responsible use of water. Within 2018, we conducted external trainings to 3 office employees on environmental issues, for a total duration of 28 hours, compared to 2 office employees and 32 hours in 2017.

· Have established a weekly drills and training plan for marine employees, in order to prevent pollution incidents (e.g. sea pollution) and train them to promptly and effectively respond to such incidents.

· Have sent letters to inform all Blue Star Ferries and Superfast Ferries office employees on materials recycling.

· Have appointed an employee to monitor climate change risks and identify potential areas to implement energy conservation initiatives, who prepares a relevant report at least annually or when deemed necessary.

We conducted internal drills on environmental protection issues to 100% of marine employees

We informed 70% of our office employees on environmental protection issues

In 2018:

· We invested over €2.1 million for Blue Star Ferries and Superfast Ferries environmental protection programs (solid and liquid waste disposal investments, materials and equipment to remediate pollution incidents, internal and external inspections and environmental performance certificates).

· There were no incidents or accidents with environmental impacts.

· An exemption decision was issued to a passenger complaint regarding claimed air pollution in 2018.

· Regarding previous legal cases, are expected to be discussed within 2019:

 - A recourse against fines with a total amount of €62,151 imposed by the Central Port Authority of Piraeus and the Central Port Authority of Ios due to a limited pollution incident caused by Blue Star Patmos in 2017.

 - Legal proceedings regarding a limited pollution incident caused by the vessel Artemis in 2016.

We manage our environmental footprint

In order to identify the sources from which we can reduce our environmental impact, we calculate greenhouse gas emissions per energy source used, which mainly include oil (both as marine fuels and for onboard electricity generation, as well as for offices) and electricity (for office operations):

Energy and Environmental Footprint

Source	Consumption 2017*	Energy Consumption 2017 (GJ)	Environmental Footprint 2017 (tn eCO$_2$)	Consumption 2018*	Energy Consumption 2018 (GJ)	Environmental Footprint 2018 (tn eCO$_2$)
Scope 1						
Oil (vessels)	243,832 tn	9,821,683	760,016	340,610 tn	13,783,552	1,064,011
MGO	7,855 tn	335,409	25,183	36,396 tn	1,554,109	116,686
LSHFO	194,549 tn	7,820,869	605,826	263,457 tn	10,590,971	820,405
HFO	41,428 tn	1,665,405	129,007	40,758 tn	1,638,472	126,920
Heating oil (offices)	3,200 lt	1,015	8.6	9,500 lt	3,013	25.4
Diesel (offices)	1,200 lt	44	3.2	0	0	0
Gasoline (corporate vehicles)	NR	NR	NR	6,121 lt	202	14
Scope 2						
Electricity (offices)	1,331,453 KWh	4,793	892.1	1,252,448 KWh	4,509	839.1
TOTAL		9,827,535	760,920		13,791,276	1,064,890

*   *Vessel data refer to all vessels we operated within the year and office and corporate vehicles data refer to Blue Star Ferries and Superfast Ferries.*
Sources of conversion factors: International Maritime Organization (MGO, LSHFO and HFO), GHG Protocol GHG emissions from stationary combustion Calculation Tool V 4.1 May 2015 (Heating oil), GHG Protocol GHG emissions from transport or mobile sources Calculation Tool V 2.6 May 2015 (Diesel, Gasoline), IEA - CO$_2$ Emissions from Fuel Combustion 2016 edition 1 (Electricity)
NR: Not reported

In order to manage our environmental footprint and achieve efficient energy consumption, which reached 8.3 GJ per nautical mile travelled by Blue Star Ferries and Superfast Ferries vessels, we:

· Have installed sunscreen films in our Blue Star Ferries and Superfast Ferries offices' ground floor and mezzanine.

· Have installed solar absorption systems in selected areas of our Blue Star Ferries and Superfast Ferries offices to improve energy efficiency.

· Have introduced automations into our Blue Star Ferries and Superfast Ferries offices' BMS for efficient cooling / heating and implemented various interventions to increase energy management efficiency, such as installation of specialized control sensors and definition, schedule and communication of critical alarms, as well as scheduled timetables to reduce energy costs.

· Have installed energy saving light bulbs (LED) in our Blue Star Ferries and Superfast Ferries offices with a 5-year warranty.

· Ensure optimum efficiency level for vessel engines to be used in each journey, in order to both preserve engines and avoid unnecessary fuel consumption.

· Used specialized low resistance silicone anti-fouling paint on Blue Star Patmos and Flying Cat 6 to reduce fuel consumption.

· Adjust electrical appliances (such as refrigerators and freezers) at optimum use and operation levels, according to both legislation and manuals.

· Deactivate electrical appliances when not in use.

· Regularly clean vessel hulls and propellers for improved energy efficiency.

· Lower or turn down air conditioning in empty cabins.

· Purchase office equipment (such as computers and monitors) with 'energy star' specifications.

· Exclusively purchase and install LED advertising signs in our vessels.

· Expanded monitoring of our corporate fleet's transportation impact, which reached 78,360 km total distance travelled by Blue Star Ferries and Superfast Ferries vehicles and 6.2 lt/100 km average fuel consumption.

80% of monitors and 40% of personal and laptop computers we use have energy-saving specifications

Installing Photovoltaic Panels ✓

Since 2014, we have installed a pilot photovoltaic panel unit onboard Blue Star Delos, in order to reduce fossil fuels used to generate electricity and gaseous pollutants in the long-term. During 2018, we continued its operation with positive results, as we reduced the use of vessel power generators for electricity and consequently prevented approximately 2,935 kgr of carbon dioxide emissions.

Energy Produced from Renewable Energy Sources

Year	Electricity produced (KWh)
2018	4,380
2017	4,380
2016	4,380

■ Electricity produced (KWh)

Participation in Programs ✓

We strive to be continuously informed about environmental protection issues, as we participate actively in European Union research programs and collaborate with internal combustion engine manufacturers (WNSD) in joint research projects to reduce emissions. At the same time, we participate in the European-funded programs Poseidon Med I and Poseidon Med II, which aim to explore the possibility to use environmentally friendlier marine fuels, as well as the MareBonus program. More specifically:

· Poseidon Med I aimed to establish the legal framework and conditions to use Liquefied Natural Gas (LNG) as a marine fuel in the Mediterranean and Adriatic Sea. Liquefied Natural Gas is odorless, non-toxic and non-corrosive and is considered the world's cleanest fossil fuel, as it has no SO_2 emissions and can achieve 95%-100% lower particulate matter emissions (PM), 85% lower NO_x emissions and 25% lower CO_2 emissions, compared to marine diesel oil. The program featured 19 partners from 5 member-States (Greece, Cyprus, Italy, Croatia and Slovenia) and our Group was actively involved to submit pilot projects regarding vessel upgrading and building new vessels.

· Poseidon Med II is a follow-up to 'Poseidon Med I' and 'Archipelago-LNG' programs and is funded by the European Union, with the participation of 26 partners from three member-States (Greece, Italy and Cyprus), in order to utilize LNG in six main European ports (Piraeus, Patra, Heraklion, Venice, Igoumenitsa and Limassol) and LNG station in Revithousa. The program features studies to introduce and use LNG as a marine fuel in Southeastern Mediterranean Sea and design LNG supply network and related infrastructure on a broader scale.

· MareBonus is a program of the Italian Ministry of Transportation, which is managed by RAM Spa to increase the use of vessels for freight transportation among Italian ports, in order to reduce traffic congestion on highways and air pollution.

Furthermore, we have signed a memorandum of understanding (MOU) with the Public Natural Gas Supply Company (DEPA) since 2016. Within this context, we continued our collaboration and information exchange to jointly examine parameters and conditions for use of LNG in our vessels and we seek to further develop our cooperation for new vessel design, based on the conclusions drawn.

We reduce our impact on the ozone layer

Buildings/Vessels: We cooperate with suppliers that do not use refrigerants which significantly affect the ozone layer (such as R22) during maintenance activities in offices and vessels, and instead exclusively use refrigerants that do not affect the ozone layer (such as CO_2, R134a, R404a, R407, R422).

Refrigerators/Freezers: As part of our efforts to reduce our impact on the ozone layer, we have placed refrigerators and freezers with environmentally friendlier refrigerants in our vessels.

At the same time, we replenish refrigerants and fire suppressant materials (which inevitably leak) in our offices and vessels with environmentally friendlier refrigerants, as their Ozone Depleting Potential (R-11 equivalent) is zero.

In 2018, the total quantity of refrigerants used by Blue Star Ferries and Superfast Ferries was 2,309 kgr, compared to 3,278 kgr in 2017.

<>

We use refrigerants that do not affect the ozone layer (such as R134a, R404a, R407a) in 100% of refrigerators and freezers onboard our vessels

<>

We reduced the total quantity of refrigerant materials used from Blue Star Ferries and Superfast Ferries by 29.6%

Refrigerants and CO_2

Liquids	2016		2017		2018	
	Stored (kgr)	Used (kgr)	Stored (kgr)	Used (kgr)	Stored (kgr)	Used (kgr)
Carbon dioxide (CO_2)*	33,797	0	49,678	0	86,884	0
Refrigerants with impact on the ozone layer (e.g. R11, R22)	0	0	0	0	0	0
Refrigerants without impact on the ozone layer (e.g. R134a, R404a, R407a)**	9,446.2	3,124.5	9,394	3,278	9,394	2,309
TOTAL	**43,243.2**	**3,124.5**	**59,072**	**3,278**	**96,278**	**2,309**

* Stored quantities include CO_2 in fire extinguishing systems. Stored quantity for 2017 and 2018 also includes CO_2 stored in rescue equipment activation cylinders.

** Data refer to Blue Star Ferries and Superfast Ferries.

We reduce our atmospheric impact

Our air pollutants (except carbon dioxide, which is described above) mainly emanate from vessel engines during their operation. To manage their impact, we:

· Use marine gas oil (MGO) with 0.1% sulphur content when vessels stay within ports for over 2 hours, as well as low sulphur heavy fuel oil (LSHFO) with up to 1.5% sulphur content when vessels are in European waters.

· Use machinery which complies with the legislative requirements regarding nitrogen oxides (NO_X) and particulate matter (PM) emissions from vessel engines.

· Perform the necessary maintenance activities to ensure proper machinery function, as well as regular internal and external inspections to certify their proper function through relevant certificates (such as the International Air Pollution Certificate).

· Have initiated a feasibility study to install exhaust purification systems on 5 vessels to further reduce sulfur oxide emissions (SO_X) from their exhausts.

· Proceed with corrective measures, if deemed necessary.

Reduce Air Pollutants ✓

In 2018, we were the first and only passenger shipping company operating in Adriatic Sea lines to accept and sign the voluntary agreement 'Ancona Blue Agreement', which was proposed by the Port Authority and Central Adriatic Ports Administration to further reduce emissions of air pollutants in the atmosphere due to marine fuels, the implementation of which began in end of 2018. The agreement includes measures beyond the relevant legislative requirements, such as:

· The use of marine fuel with 0.1% sulphur content from the vessel's approach to the port until the complete vessel's departure.

· Specific technical instructions to crews regarding the safe switching of fuels for the engines' smooth operation.

We monitor noise levels

We strive to reduce noise pollution, since vessel docking and operation can be a potential source of noise. Indicatively, we ensure the use of machinery and mechanical equipment, which comply with the required standards on noise levels.

We sensitize employees and customers

Employee awareness: We recognize the importance our employees to be aware about the environment, and therefore implement initiatives to adopt environmentally responsible practices within the workplace. Within this context, we have placed designated signs to remind all Blue Star Ferries and Superfast Ferries marine employees to turn off any unnecessary lights.

Reduce Consumption of Plastic Bags ✓

As we encourage our employees' active participation through ideas related to environmental protection, we have launched the initiative 'I want to be full before I leave...', which was proposed by an office employee to reduce the repercussions from the use of plastic bags.

More specifically, since 2017 we have distributed double-sided cards to all Blue Star Ferries and Superfast Ferries office employees with the inscription 'Please, do not replace me... / I want to be full before I leave...' and encouraged employees to place them over their individual office waste bin, in case the cleaning staff does not need to replace the bin's plastic bag. Hellenic Seaways office employees did not participate in this initiative during 2018, due to the integration of Hellenic Seaways into the Group.

<> We reduced the consumption of plastic bags in our offices by 13.3%

Customer awareness: We believe we are morally obliged to raise customer awareness regarding environmental protection, not only during their journey, but also in their daily activities. Within this context, we:

· Publish information and our activities related to environmental protection in our:

  - Corporate websites www.attica-group.com, www.bluestarferries.com, www.hellenicseaways.gr and www.superfast.com.

  - Corporate magazines 'On Blue' and 'Route'.

  - Companies' social media.

  - Relevant press releases.

· Distribute our own climate change brochure to all passengers onboard Blue Star Ferries and Superfast Ferries vessels, which suggests environmentally friendlier practices onboard, at home, as well as during driving.

· Have placed designated signs in all Blue Star Ferries and Superfast Ferries vessel cabins to encourage passengers to turn off lights when not in use.

We informed over 1.2 million customers on Corporate Responsibility issues, such as environmental protection

· Promote alternative and environmentally friendlier forms of transportation and travel, and offer travel packages which combine 'Train and Vessel' transportation for domestic and European destinations.

· Participate in most Eurail & Interrail Pass products and have created our own Interrail Greek Islands Pass for 5 destinations, which offers 5 free vessel journeys in Blue Star Ferries and Hellenic Seaways domestic routes to holders railway passengers.

· Display on Blue Star Ferries and Superfast Ferries vessel screens information on how to prevent forest fires, in cooperation with the General Secretariat for Civil Protection (GSCP), an agency within Ministry of Interior.

2. Raw Materials and Solid Waste

We manage raw materials

We recognize that raw materials are not inexhaustible, but finite, and prioritize the use of natural resources as efficiently as possible. To achieve this, we implement programs to:

· Monitor use of materials.
· Reduce materials used.
· Reuse materials.
· Recycle materials.
· Dispose materials properly.

Reduce Impacts from Consumption of Materials

Monitor Use of Materials			
Reduce Materials Used	Reuse Materials	Recycle Materials	Dispose Materials Properly
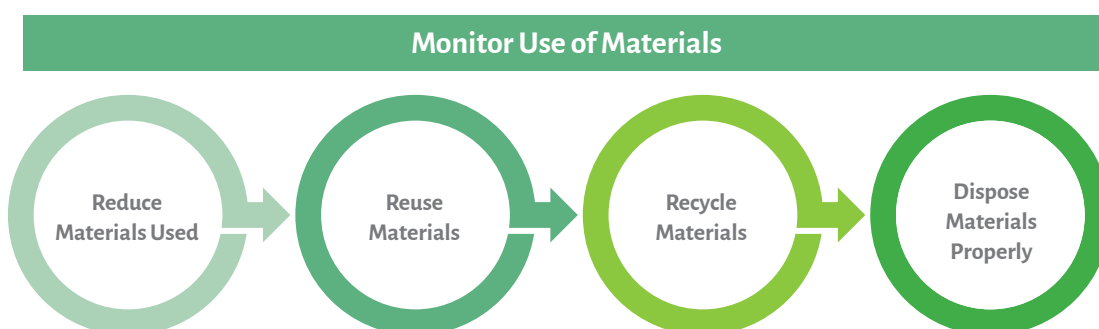
We reduce materials used

We implement initiatives to reduce use of materials, within the context of our efforts for efficient use of natural resources. Indicatively, we:

· Entirely use multifunction printers and photocopiers at our offices, whose 93% of mechanisms, spare parts and consumables are recycled and refurbished. Furthermore:

  - The percentage of recycled or certified paper and recycled toners/ink cartridges we used for Blue Star Ferries and Superfast Ferries was 28.1% and 72.9% respectively, compared to 24.4% and 79.3% respectively in 2017.

  - Besides using recycled paper and recycled toners/ink cartridges, we do not use any other recycled materials.

· Purchase refurbished electronic equipment, with 190 personal computers, 19 laptops, 35 telephone devices, 16 servers, 1 rack, 140 hard disks, 17 storage devices, 53 computer monitors and 18 server memory modules purchased for our offices and vessels during 2018.

· Have installed air dryers in WCs of all our vessels, in order to reduce use of paper for hand drying.

· Ensure the efficient use of spare parts and other supplies (such as consumables), in order not to store large quantities.

· Have installed chemical dosimeters onboard our Blue Star Ferries and Superfast Ferries vessels and train marine employees on their proper use, in order to ensure efficient use of cleaning chemicals.

We used 69.8% recycled toners/ink cartridges   <>

Paper Use for Commercial Purposes

- 2018: 93.5
- 2018*: 70.5 / 24.6
- 2017: 83.2 / 25.8
- 2016: 66.4 / 18.8

■ Paper use (tn)
■ Use of recycled or certified paper (%)
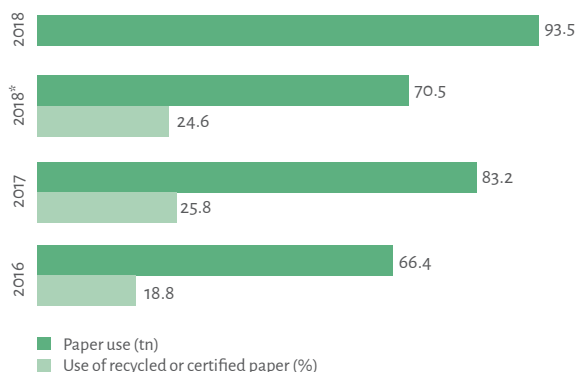
* *Data refer to Blue Star Ferries and Superfast Ferries.*

We used 28.1% recycled paper for all purposes from Blue Star Ferries and Superfast Ferries   <>

Paper Use for Printing
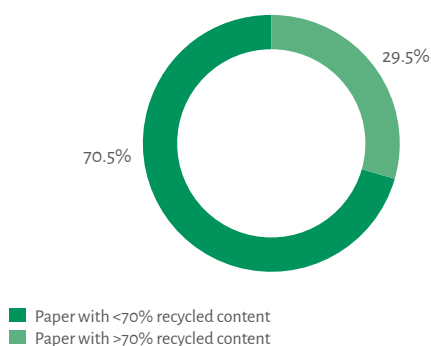
29.5%

70.5%

■ Paper with <70% recycled content
■ Paper with >70% recycled content

We reduced the paper used for commercial purposes from Blue Star Ferries and Superfast Ferries by 15.2%   <>

We reuse materials

We reuse consumables, where possible, as we:

· Return loading pallets back to our suppliers, in order to reuse them.

· Use clean damaged sheets, towels, pillowcases and other fabrics to clean various surfaces and as tows in the engine room, with 42,700 sheets, pillowcases, duvet cases and towels reused within 2018.

We recycle materials

Waste associated with our activities is a direct result primarily of our vessel operations, and secondary a result of our office operations (i.e. paper, toners):

Material Consumption and Recycling

Material	2017		2018	
	Consumption	Recycling	Consumption	Recycling
Paper	100,761.3 kgr	570 kgr*	118,896 kgr	3,970 kgr**
Toners/ink cartridges for printers/ faxes/photocopying machines	1,524 units (1,209 were recycled)	79 units	1,819 units (1,270 were recycled)	752 units**
Domestic batteries	353 kgr	25 kgr	289.2 kgr	54 kgr**
Vessel batteries	4,482 kgr	4,482 kgr	13,523 kgr**	9,723 kgr**
UPS batteries	3,663.6 kgr (in use) 7.9 kgr (consumption)	7.9 kgr	3,663.6 kgr (in use) 490.3 kgr (consumption)	490.3 kgr
IT equipment (computers, printers etc.) electrical equipment and light bulbs	226 units 27,934 light bulbs (558 kgr)	24 units from offices 7.4 m³ from vessels	782 units 18,781 light bulbs	21.1 m³ IT equipment (152 units) 12.2 m³ light bulbs
Cooking oils	48,380 lt	28 m³ from vessels	75,565 lt	37.7 m³ from vessels
Lubricants	1,580,414 lt	286.3 m³	2,397,160 lt	493.3 m³
Medicines and pharmaceuticals	9,715 units	321 units from vessels	6,603 units	743 units from vessels
Chemical substances	130,230 lt	NR	204,891 lt	NR

*   Due to technical reasons, the amount of paper recycling refers to end October until December 2017.
** Data refer to Blue Star Ferries and Superfast Ferries.
NR: Not reported

We reduced the paper used for all purposes from Blue Star Ferries and Superfast Ferries by 12.5%

<>

Hazardous waste: The total quantity of 6,973 m³ liquid and solid hazardous waste collected in 2018 (such as waste which contain oil or mercury, lubricants and biodegradable waste from kitchen and accommodation areas), was forwarded to specialized hazardous waste management companies, which comply with strict standards regarding environmental protection and apply proper treatment methods, while no hazardous waste was transported abroad.

Various materials: As part of our efforts to effectively manage material consumption and recycling, we:

· Have initiated a process to redesign management of all types of waste produced due to our activities.

· Have placed recycling bins in our Blue Star Ferries and Superfast Ferries offices and vessels to collect and forward for recycling paper, packaging cardboard, toners, electronic equipment, fluorescent lamps, domestic batteries, as well as UPS / laptop / mobile phones batteries, in order to promote recycling throughout daily activities of employees and passengers.

· Collect and forward for recycling used cooking oils from vessels.

Paper Recycling

i

Paper recycling can significantly contribute to reduce consumption of raw materials and energy, as the use of one tonne of recycled paper instead of one tonne of non-recycled paper:
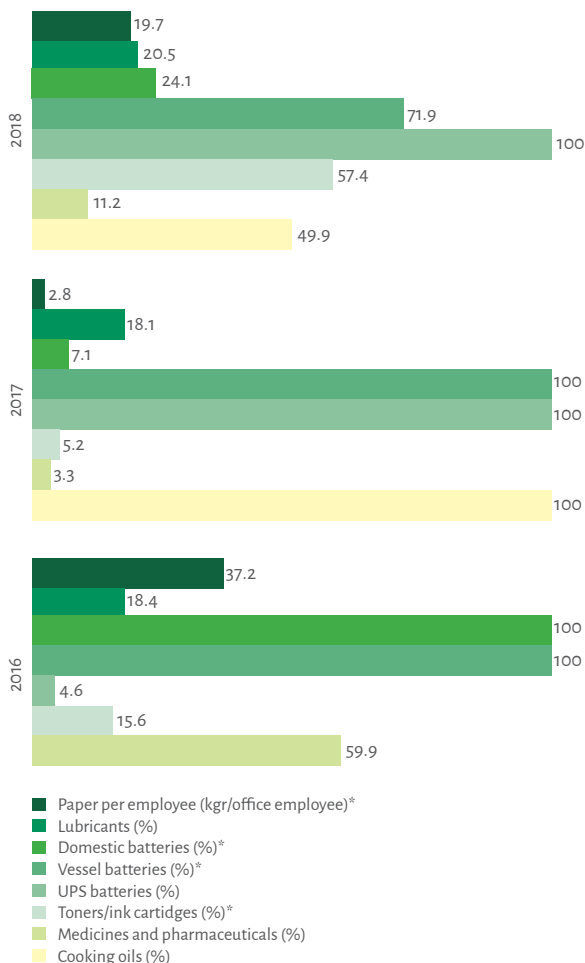
· Consumes approximately 40%-50% less energy and water.

· Reduces air pollution by 70%-75% and water pollution by 30% -40%.

· Prevents logging of 17-20 trees.

· Significantly reduces waste volume in landfills.

Medicines and pharmaceutical materials: We forward expired medicines to pharmacies that have joined the collection program, regardless whether these have been used. However, we do not forward pharmaceutical materials such as syringes, mercury thermometers, scalpels and serums.

Materials Recycling

2018
- 19.7
- 20.5
- 24.1
- 71.9
- 100
- 57.4
- 11.2
- 49.9

2017
- 2.8
- 18.1
- 7.1
- 100
- 100
- 5.2
- 3.3
- 100

2016
- 37.2
- 18.4
- 100
- 100
- 4.6
- 15.6
- 59.9

- ■ Paper per employee (kgr/office employee)*
- ■ Lubricants (%)
- ■ Domestic batteries (%)*
- ■ Vessel batteries (%)*
- ■ UPS batteries (%)
- ■ Toners/ink cartidges (%)*
- ■ Medicines and pharmaceuticals (%)
- ■ Cooking oils (%)

* *Data for 2018 refer to Blue Star Ferries and Superfast Ferries.*

We transported from Islands free-of-charge over 153 tonnes of materials for recycling <>

We properly manage solid waste

We recognize our obligation to protect the environment from solid waste and garbage, which mainly emanate from our vessels' operations. Therefore, we:

· Train our marine employees on our 'Waste Management Manual', which describes our waste collection procedures and is accessible by all employees.

· Do not allow any hazardous waste and garbage disposal at sea, even if allowed to be disposed at sea by relevant legislation.

· Do not discharge food or any related garbage at sea.

· Have placed designated signs to remind passengers and employees not to throw waste overboard.

· Have determined specific collection points for waste generated onboard our vessels.

· Deliver all garbage and solid waste from our Blue Star Ferries and Superfast Ferries vessels to appropriate reception facilities of licensed contractors within ports after each journey, exceeding the relevant legislative requirements. The respective volume collected and delivered in 2018 reached 38,501 m³, out of which 1% was recycled and 99% was transported to landfills, while no solid waste was transported abroad.

Solid and Hazardous Waste

2018
- 49,821
- 7,209
- 100

2017
- 36,071
- 9,000
- 100

2016
- 28,836
- 7,150

- ■ Solid waste (m³)
- ■ Solid waste indicator (m³ per milion passengers)
- ■ Hazardous waste management (%)
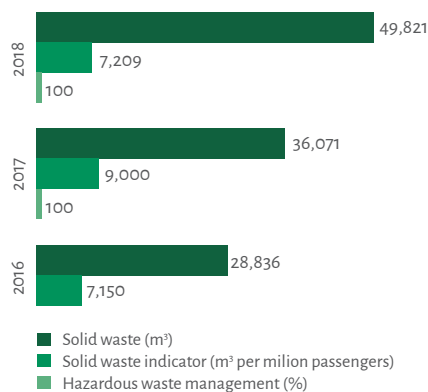
3. Water and Liquid Waste

We monitor water consumption

We aim to contribute to better manage water resources in the long-term, being aware of the responsible approach required on this issue. Therefore, we:

· Use extensively seawater onboard Blue Star Ferries and Superfast Ferries vessels after appropriate treatment, for activities such as cooling engines and cleaning decks.

· Perform only absolutely necessary external cleaning and washing activities, in cases of rainfalls or bad weather.

· Have installed photocell-operated water faucets in public WCs onboard Blue Star Delos and Blue Star Patmos.

· Have installed pilot flow control filters to conserve drinking water onboard Superfast I, Superfast II, Blue Star 1 and Blue Star 2.

· Plan and select the minimum number of hydrants to be used during water supply.

· Check water meters before water supply has began and after it has ended and have appointed a vessel Officer to monitor and confirm the actual water supply.

· Use pressure machinery, where possible, and ensure their proper maintenance.

· Ensure proper and regular maintenance of water production equipment and dictate immediate notification of any failures to the Technical Division.

· Have placed designated signs to remind Blue Star Ferries and Superfast Ferries passengers and marine employees to use water responsibly in accommodation, sanitary and catering areas. The water consumption indicators for Blue Star Ferries and Superfast Ferries, as well as for Hellenic Seaways, reached 0.0347 and 0.025 m³/passenger respectively in 2018.

· Train employees to use water more efficiently.

· Proactively check and immediately respond to potential damages in our office water supply system.

· Ensure that water leakages (such as in pipes, shower heads and flushers) or any other leakages are immediately managed, as well as perform all necessary maintenance activities on vessel systems. Within 2018, there were no significant leakages of any material (e.g. oil or chemical substances spills) or marine pollution incidents.

Water

	2016	2017	2018*
Water consumption (m³)	215,967	237,255	205,690
Vessels	214,125	235,331	203,733
Offices	1,842	1,924	1,957
Water sources (%)			
Public water supply networks	64.7 (139,792 m³)	59.2 (140,365 m³)	72.4 (148,985 m³)
Seawater (76,175 m³)	35.3 (76,175 m³)	40.8 (96,890 m³)	27.6 (56,705 m³)

* Data refer to Blue Star Ferries and Superfast Ferries.

We reduced water consumption from Blue Star Ferries and Superfast Ferries by 13.3%

Drinking Water Quality Assurance ✓

We have established a procedure to supply, manage safely and sample drinking water, in order to ensure the quality of water used and consumed onboard our vessels, according to which we:

· Use separate water hose to supply water, which is solely intended for this purpose and is kept away from any potential sources of contamination.

· Ensure water hose runs for a few minutes prior to connect it to the drinking water supply tank, in order not to introduce stagnant water or external materials to the supply tank, which could potentially pose health risks.

· Regularly clean and sanitize drinking water tanks, exceeding legislative requirements, and ensure continuous chlorination of drinking water.

· Sanitize shower heads, sprinklers in bars and filters in washbasins located in cabins, public areas, bars and kitchen twice a month.

· Collaborate with an external partner to collect drinking water samples.

· Analyze water samples in accredited laboratories, which issue a respective report with results and suggest corrective actions, in case there are any problems. No such incidents occurred within 2018.

Response to Pollution Incident ✓

We have equipped all our vessels with 'Shipboard Oil Pollution Emergency Plan' (SOPEP) to effectively respond to any pollution incident or risk of pollution, which may arise during the vessel's fuel supply or due to an accident (e.g. collision, grounding). According to SOPEP, we describe in detail and have specifically defined the employees responsible for immediate actions to reduce the impacts from a potential pollution incident.

We manage liquid waste

Being aware that uncontrolled liquid waste disposal at seas can significantly affect the marine environment, we:

· Do not dispose processed sewage water from sewage systems within ports, exceeding the respective legislation.

· Regularly monitor operation of wastewater treatment systems.

· Comply with relevant regulations regarding bilge and ballast water management.

· Deliver all liquid waste from our vessels (lubricants and fuel waste) to licensed contractors within ports.

Liquid Waste*

Year		
2018	4,218	
	45	
	1,376	
2017	4,343	
	46	
	1,755	
2016	4,598	
	139	
	724	

■ Liquid waste (m³)
■ Sewage water (tn)**
■ Bilge water (m³)***
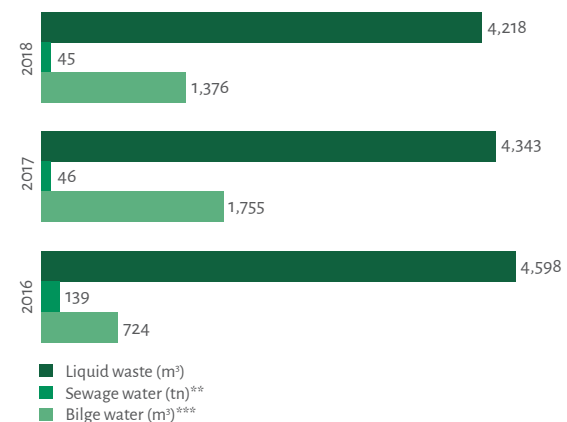
* Data refer to Blue Star Ferries and Superfast Ferries.
** Quantities of sewage water refer to cases where vessels are docked or during maintenance/cleaning activities to the sewage network.
*** Quantities of bilge water refer to quantities delivered to appropriate reception facilities of licensed contractors within ports.

We assess our impact on biodiversity

Biodiversity   ?

As water covers 71% of our planet, preserving the balance of marine ecosystems and biodiversity are crucial for humankind. The intense growth of human activities and the associated environmental pollution have significantly degraded the natural environment within a very short period of time. Consequently, many organisms fail to adapt to these new conditions, with their survival being threatened. According to the United Nations' 'Millennium Ecosystem Assessment' report, the extinction of species due to human intervention occurs 1,000 times faster than it would naturally and 1/4 of the planet's mammals face extinction in the coming years. The situation is even more critical for the marine environment, as it is estimated that 60% of coral reefs will extinct by 2030, due to illegal fishing and pollution.

Marine Biodiversity: We recognize the importance of marine biodiversity and our obligation to reduce the risk of disrupting it. Therefore, we:

- Abide to the relevant legislation concerning the abstraction and use of seawater as ballast water in our vessels, in order to avoid transfer of marine organisms into other non-native ecosystems.
- Do not use the toxic substance tributyltin (TBT) in anti-fouling paints for our vessels.
- Use exclusively environmentally friendlier cleaning agents during cleaning activities of garages, decks and exterior surfaces in general.
- Promote beach cleaning by producing and distributing beach ashtrays for free through our central agencies and vessels. Since 2007, we have distributed over 1.3 million ashtrays to passengers and citizens.

Vessel Rippling   ✓

Vessel navigation while approaching or exiting ports inevitably creates rippling, which may affect:
- Commercial activities in coastal areas, such as business activities in shores (e.g. bars/cafés, sun beds on beaches).
- Bathers' safety due to sudden appearance of waves.

For this reason, we comply with legislation and adhere to the cruising speed limits defined by the relevant provisions, in order to minimize the respective impact. Within 2018 ,there was a lawsuit regarding damage to another vessel due to rippling impact, which is expected to be discussed within 2019.

Land Biodiversity: We recognize the importance of biodiversity for the ecosystems' balance and we do not conduct any activities within protected areas, as our offices are located in an urban environment, without any adjacent protected areas or areas of high biodiversity value (even outside protected areas).

4. Achievements 2018 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility issues related to Environment by 34% (by 2020).	25%	To improve our performance on Corporate Responsibility issues related to Environment by 34%.	2020
To apply a process to monitor risks due to climate change and identify potential areas to implement energy conservation initiatives.	100%		
To include environmental protection aspects as specifications in our products' and services' design phase (e.g. vessels) (by 2019).	75%	To include environmental protection aspects as specifications in our products' and services' design phase (e.g. vessels).	2019
To upgrade our BMS system's software (by 2019).	0%	To upgrade our BMS system's software.	2019
To train our office employees on recycling issues (by 2019).	50%	To train our office employees on environmental protection issues (e.g. recycling, renewable energy sources and technologies).	2019
To further upgrade the photovoltaic panel unit onboard Blue Star Delos (by 2020).	0%	To further upgrade the photovoltaic panel unit onboard Blue Star Delos.	2020
To reduce consumption of refrigerants by 2% (by 2019).	100%		
To create an Eurail/Interrail Greek Islands Pass for 5 destinations in Greece (by 2019).	50%	To create an Eurail/Interrail Greek Islands Pass for 5 destinations in Greece.	2019

IX. SUMMARY

1. About this Report

This is the 10th Corporate Responsibility Report published by Attica Group.
Here in, we present the practices followed and the results achieved, through focusing on topics our Stakeholders are interested in and committing in the long-term towards responsible business operations.

The Principles we follow: The Report follows:
- For structure and content, the guidelines 'Sustainability Reporting Standards' (version 2016) of the Global Reporting Initiative (GRI).
- For principles, the UN's Global Compact.
- For presentation of quantitative data, the EFQM's RADAR Card.

The scope we refer to: The annual Corporate Responsibility Report:
- Refers to the period 1/1/2018-31/12/2018 (unless indicated otherwise in certain points).
- Addresses all activities of ATTICA HOLDINGS S.A. (Attica Group), namely the provision of maritime transportation services for passengers, private vehicles and freight units in the Eastern Mediterranean Sea, with references to the Group's activities in the Morocco – Spain route in Chapter III (Attica Group), which are not included in the scope of this Report.
- Includes, as a norm, quantitative data for the period 2016-2018 for all quantitative indicators.
- Includes data from direct measurement, while cases of data estimations or restatements of data provided in our previous 2017 Corporate Responsibility Report, are clearly indicated.
- Includes data for the entire Group, while cases of data that refer only to Blue Star Ferries and Superfast Ferries (i.e. excluding Hellenic Seaways) or only Africa Morocco Links (AML) are clearly indicated.
- Data presented have been collected internally, in order to be published in this Report.

The limitations we recognize: We recognize limitations in the Report, which we intend to handle in future publications, such as presentation of more quantitative data and objectives.

The in accordance option of our Report: This Report has been prepared in accordance with the GRI Standards: Core option.

Your feedback: We welcome your thoughts, comments or proposals through the feedback form at the end of this Report or at the following address:

Corporate Responsibility Team
Attica Group
1-7 Lysikratous & Evripidou Street, 17674 Athens
E-mail: csr@attica-group.com

The symbols we use: For convenient reading of this Report, please pay attention to the following main symbols, which are widely used:

✓ **Good Practice**
Indicates examples of good practices implemented.

{ } **Policy**
Indicates sections from formal corporate Policies.

i **Did you Know**
Indicates information of particular interest.

? **Issue of Consideration**
Indicates issues of public interest and consideration.

Q **Your Opinion**
Indicates results from surveys conducted.

Development of Report: The Report has been developed by the Group's Corporate Responsibility Team in cooperation with STREAM Management:
(www.stream-eu.com)

stream ▶
HELPING YOU IMPROVE

Yiota Krassakopoulou
General Counsel Director Legal & Corporate Affairs

Christina Grigora
Brand Marketing Manager Domestic lines

Georgia Kokaliari
Recruiting & Training Manager

Nikolaos Merkouris
Internal Auditor of Management Systems

Dimitrios Roggas
Team Member Accounts Payable

2. Summary Data

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
MANAGEMENT						
We commit to adopt responsible policies and practices in our operations and to harmoniously cooperate with our Stakeholders, in order to create mutual long-term value.				To improve our overall performance on Corporate Responsibility issues by 24% (by 2020).	**25%**	To improve our overall performance on Corporate Responsibility issues by 24% (by 2020).
				To improve our performance on Corporate Responsibility issues related to Owners by 10% (by 2020).	**75%**	To improve our performance on Corporate Responsibility issues related to Owners by 10% (by 2020).
				To improve our performance related to Management of Corporate Responsibility issues by 25% (by 2020).	**25%**	To improve our performance related to Management of Corporate Responsibility issues by 25% (by 2020).
Objectives in the Report (number)	33	55	42	To develop a Corporate Responsibility Strategy and Action Plan 2018-2020, based on quantitative assessment and target setting.	**100%**	
				To integrate the Corporate Responsibility Strategy 2018-2020's target assessment score within the overall Group Strategy.	**50%**	To integrate the Corporate Responsibility Strategy 2018-2020's target assessment score within the overall Group Strategy (by 2020).
				To include the Corporate Responsibility Strategy 2018-2020's quantitative assessment score as target in the formal appraisal process for Top Management members and at least one Board of Directors member (by 2019).	**0%**	To include the Corporate Responsibility Strategy 2018-2020's quantitative assessment score as target in the formal appraisal process for Top Management members and at least one Board of Directors member.

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
MANAGEMENT						
				To develop a process to identify, prioritize and include Corporate Responsibility issues in local and international investment agreements.	0%	To develop a process to identify, prioritize and include Corporate Responsibility issues in local and international investment agreements.
				To conduct a Stakeholder Engagement process on issues related to Corporate Responsibility (by 2019).	25%	To conduct a Stakeholder Engagement process on issues related to Corporate Responsibility.
				To include Corporate Responsibility Team's responsibilities within its members' formal job descriptions.	100%	
GRI disclosures in the Report (number, full + partial coverage)	58 + 14	56 + 18	66 + 18			
Quantitative indicators in the Report (number)	200	210	225		We increased by 7% the number of quantitative indicators we make reference to within the Report.	
				To include our Corporate Responsibility Report's quantitative indicators in our SAP ERP.	0%	To include our Corporate Responsibility Report's quantitative indicators in our SAP ERP (by 2021).
				To include perception measurement questions regarding our Corporate Responsibility performance (e.g. responsible promotion of products and services, personal data protection, society support) in our market surveys.	100%	
Violation cases concerning our main principles and rules of professional behavior (number)	0	0	0		No violation cases concerning our main principles and rules of professional behavior occurred.	

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
MANAGEMENT						
				To conduct trainings or briefings related to the Regulation of Professional Conduct & Business Ethics.	We have communicated Regulation of Professional Behavior to 100% of our employees. **100%**	
Office employees informed on anti-corruption procedures (%)	100	NR	100	To develop an Anti-Corruption Code.	We informed 100% of office employees about our anti-corruption policies and procedures. **100%**	
Corruption incidents (number)	0	0	0		No corruption incidents occurred.	
					No bribery incidents related to our employees occurred.	
Non-compliance incidents recoded during external Management Systems' audits (number)	0	0	0*		We were subjected to 82 external audits regarding Management Systems used by Blue Star Ferries and Superfast Ferries, with no recorded non-compliance incident.	
					No non-compliance incident was recorded during audits of our contractors' Management Systems.	
				To establish a comprehensive Business Continuity Plan to ensure continuation of our operations following unexpected events (by 2020).	**0%**	To establish a comprehensive Business Continuity Plan to ensure continuation of our operations following unexpected events (by 2020).
SOCIETY						
We commit to combine our business success with our country's and partners' development, as well as support local communities affected by our operations, in order to contribute to improving the quality of life and prosperity of our society in general.				To improve our performance on Corporate Responsibility issues related to Community by 10% (by 2020).	**75%**	To improve our performance on Corporate Responsibility issues related to Community by 10% (by 2020).

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
SOCIETY						
				To improve our performance on Corporate Responsibility issues related to Suppliers by 180% (by 2020).	0%	To improve our performance on Corporate Responsibility issues related to Suppliers by 180% (by 2020).
Turnover (total sales with VAT) (million €)	268.61	271.54	365.4		We distributed over €569 million in economic value: over €91.6 million to employees (for salaries, benefits and insurance payments), €71.3 million for taxes (including VAT and port taxes), €59.3 million to providers of capital (for interest and return payments), €20.6 million to agents (for commissions), €196.6 million to suppliers (for purchases of goods and services), €2.2 million to society (for discount tickets, implemented programs, sponsorships and donations) and €128 million for investments.	
Profits after taxes (million €)	20.25	1.25	17.27			
Cost of employees (including salaries, benefits and insurance payments) (million €)	60.59	61.61	91.6			
Payments to suppliers (million €)	145.1	130.75	196.6			
Investments (million €)	4.06	7.18	128			
Training of sales network employees (hours)	1,584	248	1,920	To increase sales network employees' training hours by 5%.	We increased the number of Blue Star Ferries and Superfast Ferries sales network employees trained by 16.6% and the number of total training hours by over four times. 100%	
Social contribution (€)	1,398,436	1,599,360	2,224,319		We increased the total value of societal support activities through Blue Star Ferries and Superfast Ferries by 14.7%.	
				To support the activities of charitable organizations and NGOs.	100%	To support the activities of charitable organizations and NGOs.

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
SOCIETY						
				To apply a process to identify and define needs of local communities in products, services or donations, as well as support the activities of organizations with a charitable purpose.	We allocated 47% of sponsorships and donations to local communities. **100%**	
				To design and implement 5 programs / activities to address local communities needs in the areas of sports, culture, education or health.	We implemented or supported societal support activities in 100% of the islands we serve. **100%**	To design and implement 2 programs / activities to address local communities needs in the areas of sports, culture, education or health (by 2020).
Discount tickets (number)	44,747	48,052	75,322		We increased the total number of discount tickets offered through Blue Star Ferries and Superfast Ferries by 11.8%.	
Employee volunteers (number)	121	165	170	To implement at least 2 volunteer activities with the participation of our employees.	**100%**	To implement at least 2 volunteer activities with the participation of our employees.
Blood units from voluntary blood donation programs (number)	68	70	113		We collected 251 blood units through our voluntary blood donation programs in the last three years.	
Visiting school and university students (number)	866	739	1,290		We welcomed 1,290 young people from schools and universities visiting our vessels.	
					We supported the development of 83 students in Merchant Navy's Officer academies.	
Suppliers (number)	1,202	1,110	1,451	To consolidate/review the various procurement processes per Department and establish a single Procurement Process.	**75%**	To consolidate/review the various procurement processes per Department and establish a single Procurement Process.
				To develop a Policy for our Contractors' Suppliers (by 2019).	**75%**	To develop a Policy for our Contractors' Suppliers.
				To develop a Code of Conduct for Suppliers, including selection criteria to become a supplier.	**75%**	To develop a Code of Conduct for Suppliers, including selection criteria to become a supplier.
				To integrate contractual clauses for Corporate Responsibility issues into contracts with significant suppliers (by 2019).	**0%**	

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
SOCIETY						
				To integrate Corporate Responsibility issues in selection criteria to become a supplier (by 2019).	75%	To integrate Corporate Responsibility issues in selection criteria to become a supplier.
Procurement expenditure to local suppliers (%)	90.4	92.9	90.7		We maintained the percentage of procurement expenditure to local suppliers over 90%.	
Procurement expenditure to SME suppliers (%)	NR	89.2	28.7		We allocated 28.7% of total procurement expenditure to small and medium-sized enterprises (up to 250 employees).	
EMPLOYEES						
We commit to cultivate a workplace focused on respect, equality, safety and merit, as well as offer training opportunities to our employees, in order to facilitate their personal and professional development.				To improve our performance on Corporate Responsibility issues related to Employees by 6% (by 2020).	75%	To improve our performance on Corporate Responsibility issues related to Employees by 6% (by 2020).
Employees (number, offices + vessels)	191 + 1,151	201 + 1,004	286 + 1,537		We employ 100% of our employees with full time employment contracts.	
				To conduct an Employee Satisfaction Survey (by 2019).	0%	
					No grievances regarding our marine employees' living conditions were filed.	
Women in overall workforce (%)	11.5	13.3	15.5			
Women in Director positions (%)	4.7	4.9	4.2			

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
EMPLOYEES						103
Greek employees in Director positions (%)	100	100	100		100% of employees in Director positions are Greek.	
				To define Managers formally responsible to manage Corporate Responsibility issues within their formal job description.	100%	
Discrimination incidents (number)	0	0	0			
Employees with entry level wage equal or higher than the legal minimum wage or collective agreement (%)	100	100	100			
Training hours (hours)	5,964	5,221	7,057*		We increased the number of employees trained and training hours in Blue Star Ferries and Superfast Ferries by 124.6% and 35.1% respectively.	
				To train all Managers on Corporate Responsibility.	75%	
				To conduct a Corporate Responsibility e-learning course for our office employees.	100%	To conduct a Corporate Responsibility e-learning course for our new office employees.
				To integrate Corporate Responsibility issues into the other categories of in-house training courses (by 2019).	0%	To integrate Corporate Responsibility issues into the other categories of in-house training courses.
				To conduct the Skills Development Program to 20 employees in all hierarchical levels (by 2019).	0%	To update our employees' job descriptions according to our new organizational structure.
Employees receiving their annual leave, as planned (%)	82.8	100	100		100% of our employees received their annual leave, as planned.	

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
EMPLOYEES						
Marine employees participating in internal drills on Health and Safety issues (%)	100	100	100		We conducted internal drills on Health and Safety issues (such as response to emergency situations) to 100% of marine employees.	
Fatal accidents (number, employees)	0	0	0			
Accidents (number)	19	14	32			
				To apply a process to monitor health and safety incidents (e.g. injuries, diseases, absences, fatal accidents) of subcontractors' employees working in our offices (by 2019).	0%	To apply a process to monitor health and safety incidents (e.g. injuries, diseases, absences, fatal accidents) of subcontractors' employees working in our offices.
Accidents with absence >3 days (number)	19	12	27			
Injury rate (rate)	1.07	0.78	1.47*			
Employees participating in performance appraisal (%, offices / vessels)	0 / 100	0 / 100	0 / 100	To conduct performance appraisal for 100% of office employees with a new Performance Appraisal System (by 2019).	0%	To conduct performance appraisal for 100% of office employees with a new Performance Appraisal System.
				To include specific Corporate Responsibility objectives in formal appraisal process for employees, Managers and at least one Board of Directors member (by 2019).	0%	To include specific Corporate Responsibility objectives in formal appraisal process for employees, Managers and at least one Board of Directors member.
				To include specific Corporate Responsibility objectives in Top Management members' formal appraisal process (by 2020).	0%	To include specific Corporate Responsibility objectives in Top Management members' formal appraisal process (by 2020).

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
CUSTOMERS						
We commit to safeguard the health and safety of our passengers and offer them the best possible travel experience, in order to meet their needs and expectations during their journey.				To improve our performance on Corporate Responsibility issues related to Customers by 17% (by 2020).	75%	To improve our performance on Corporate Responsibility issues related to Customers by 17% (by 2020).
Marine employees participating in internal drills on passenger safety procedures (%)	100	100	100		We conducted internal drills and trainings on passenger safety procedures to 100% of marine employees.	
Vessels' evaluation within the context of 'Mystery Passenger' (%, Domestic lines / Adriatic Sea lines)	81 / 79	-	-			
				To systematically inform and train our customers on Corporate Responsibility issues.	75%	To systematically inform and train our customers on Corporate Responsibility issues.
Inspections from local authorities for food hygiene and safety (number)	59	45	49		We were subjected to 49 inspections from local authorities for food hygiene and safety, with no recorded non-compliance incidents.	
Items lost/found or damaged (number)	4,642	5,027	5,078			
Compensations for vehicle damages (€)	45,080	45,461	57,800			
Complaints regarding responsible communication (number)	0	0	0	To formalize our Responsible Communication Policy.	100%	
				To apply a Responsible Marketing and Communication Code in our business activities.	75%	To apply a Responsible Marketing and Communication Code in our business activities.
Recalls of products and services due to health and safety impacts (number)	0	0	0	To apply a process to monitor potential recalls of products or services from subcontractors due to possible health and safety issues (by 2019).	0%	To apply a process to monitor potential recalls of products or services from subcontractors due to possible health and safety issues.

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
CUSTOMERS						
Complaints regarding customer privacy (number)	0	0	0			
Delays in routes (number)	15	9	59	To achieve an 'as scheduled' routes rate in Crete, Dodecanese and Ancona routes of over 90%.	We kept Blue Star Ferries and Superfast Ferries vessels' departure time in 61.8% and Hellenic Seaways vessels' departure time in 89.5% of our scheduled journeys. **50%**	To achieve an 'as scheduled' routes rate in Crete, Dodecanese and Ancona routes of over 90%.
Formal response letters to comments, complaints and requests (number)	726	619	1,987			
Formal thank-you letters (number)	190	179	143			
Questionnaires in vessels (number)	945	878	982		The average score of evaluations registered through dedicated devices onboard Blue Star Ferries and Superfast Ferries vessels reached 3.82 on a 5 point scale.	
Total calls to customer service telephone lines (number)	NR	548,977	824,757			
				To further reduce unanswered calls from our Call Center by 50%.	**100%**	
				To establish a Customer Relationship Management system (CRM) (by 2020).	**0%**	To establish a Customer Relationship Management system (CRM) (by 2020).
				To categorize complaints per category (e.g. delays, price of tickets, price discrepancies) (by 2020).	**0%**	To categorize complaints per category (e.g. delays, price of tickets, price discrepancies) (by 2020).
					We maintain 5 corporate websites, with over 4.9 million unique visitors annually and handle 3 mobile applications with over 130,000 downloads.	
SMS messages sent to customers (number)	68,954	91,482	259,472	To increase communication with our customers through SMS by 5%.	**100%**	To increase communication for early arrival at the port of Piraeus and changes or cancellations of scheduled journeys through SMS by 5%.

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
CUSTOMERS						
					We dispatched 851 notifications to serve passengers with reduced mobility to our vessels.	
					We dispatched 2,411 notifications to serve passengers to Blue Star Ferries and Superfast Ferries vessels, out of which 17 concerning passengers with sensitivity to allergens.	
Members in loyalty and reward program (number)	199,673	242,483	262,444		We increased our seasmiles loyalty and reward program members by 8.2%.	To install Infokiosks about the seasmiles program on 8 Hellenic Seaways vessels.
						To extend the infotainment platform @ sea to Hellenic Seaways vessels.
ENVIRONMENT						
We commit to integrate sustainable development in our operations and apply environmentally friendlier business practices, in order to reduce, where feasible, our environmental impacts.				To improve our performance on Corporate Responsibility issues related to Environment by 34% (by 2020).	25%	To improve our performance on Corporate Responsibility issues related to Environment by 34% (by 2020).
Environmental protection investments (million €)	2.1	1.9	2.1*		We conducted internal drills on environmental protection issues to 100% of marine employees.	
				To train our office employees on recycling issues (by 2019).	We informed 70% of our office employees on environmental protection issues. 50%	To train our office employees on environmental protection issues (e.g. recycling, renewable energy sources and technologies).
				To create an Eurail/ Interrail Greek Islands Pass for 5 destinations in Greece (by 2019).	50%	To create an Eurail/ Interrail Greek Islands Pass for 5 destinations in Greece.

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
ENVIRMENT						
				To apply a process to monitor risks due to climate change and identify potential areas to implement energy conservation initiatives.	**100%**	
					We informed over 1.2 million customers on Corporate Responsibility issues, such as environmental protection.	
Energy consumption (GJ)	9,533,156	9,827,535	13,791,276	To include environmental protection aspects as specifications in our products' and services' design phase (e.g. vessels) (by 2019).	**75%**	To include environmental protection aspects as specifications in our products' and services' design phase (e.g. vessels).
				To upgrade our BMS system's software (by 2019).	**0%**	To upgrade our BMS system's software.
Electricity consumption (KWh)	1,549,711	1,331,453	1,252,448*		80% of monitors and 40% of personal and laptop computers we use have energy-saving specifications.	
Electricity produced from renewable energy sources (KWh)	4,380	4,380	4,380	To further upgrade the photovoltaic panel unit onboard Blue Star Delos (by 2020).	**0%**	To further upgrade the photovoltaic panel unit onboard Blue Star Delos (by 2020).
Prevention of CO_2 due to energy use from renewable energy sources (kgr)	2,844	2,935	2,935			
Total eCO_2 emissions (tn)	738,104	760,920	1,064,890			
Use of refrigerants (kgr)	3,124.5	3,278	2,309*	To reduce consumption of refrigerants by 2% (by 2019).	We reduced the total quantity of refrigerant materials used from Blue Star Ferries and Superfast Ferries by 29.6%. **100%**	
Total ODP of refrigerants (number, R-11 equivalent)	0	0	0		We use refrigerants that do not affect the ozone layer (such as R134a, R404a, R407a) in 100% of refrigerators and freezers onboard our vessels.	

Section	2016	2017	2018	Objectives 2018	Achievements 2018	Future Objectives
ENVIRONMENT						
Paper used for all purposes (tn)	80.8	100.8	118.9		We reduced the paper used for all purposes from Blue Star Ferries and Superfast Ferries by 12.5%.	
					We used 28.1% recycled paper for all purposes from Blue Star Ferries and Superfast Ferries.	
Paper used for commercial purposes (tn)	66.4	83.2	93.5		We reduced the paper used for commercial purposes from Blue Star Ferries and Superfast Ferries by 15.2%.	
					We reduced consumption of plastic bags in our offices by 13.3%.	
Recycled toners/ink cartridges for printers/ faxes/photocopying machines (units)	249	79	752*		We used 69.8% recycled toners/ink cartridges.	
Materials from recycling activities, transported for recycling (tn)	78	79	153		We transported from Islands free-of-charge over 153 tonnes of materials for recycling.	
Solid waste (m³)	28,836	36,071	49,821			
Solid waste indicator (m³ per million passengers)	7,150	9,000	7,209			
Water consumption (m³)	215,967	237,255	205,690*		We reduced water consumption from Blue Star Ferries and Superfast Ferries by 13.3%.	
Liquid waste (m³)	4,598	4,343	4,218*			

*   Data refer to Blue Star Ferries and Superfast Ferries.
NR = Not Reported

3. Global Compact, Sustainable Development Goals, ISO26000 and GRI Tables

The correspondence between the content of this Report and the Global Compact Principles, the Sustainable Development Goals, the ISO26000 International Guidelines, as well as the Global Reporting Initiative's (GRI Standards 2016) General Disclosures, Management Approach and Topic-Specific Disclosures, is presented in the following tables.

· Coverage of Global Compact Principles, ISO26000 Aspects and GRI Disclosures is characterized as Full (F), Partial (P) or Not Applicable (NA).

· General Disclosures of GRI required for 'Core' option are indicated in grey background.

· Management Approach, Topic Specific Disclosures and Boundaries for Material Topics (both for GRI related Topics and other Topics) are indicated on the Table, based on the Materiality Analysis conducted.

· No external assurance has been conducted for the Material Topics.

United Nations' Global Compact Table

Issue	Principle	Report Section	Coverage
Human Rights			
1.	Support and respect protection of internationally proclaimed human rights	V-3, VI-3	F
2.	Ensure not to be complicit in human rights abuses	V-3, VI-3	F
Labour Standards			
3.	Recognize freedom of association and right to collective bargaining	V-3, VI-3	F
4.	Eliminate all forms of forced and compulsory labour	V-3, VI-3	F
5.	Abolish effectively child labour	V-3, VI-3	F
6.	Eliminate discrimination in respect to employment and occupation	V-3, VI-3	F
Environment			
7.	Support a precautionary approach to environmental challenges	V-3, VIII-1-3	F
8.	Promote greater environmental responsibility	VIII-1-3	F
9.	Encourage development and diffusion of environmentally friendly technologies	VIII-1	F
Corruption			
10.	Work against all forms of corruption, including extortion and bribery	IV-1,2	F

United Nations' Sustainable Development Goals Table

Goal	Principle	Report Section
1.	End poverty in all its forms everywhere	V-1,2
2.	End hunger, achieve food security and improved nutrition and promote sustainable agriculture	VII-3
3.	Ensure healthy lives and promote well-being for all at all ages	V-2, VI-2, VII-1
4.	Ensure inclusive and quality education for all and promote lifelong learning	V-2, VI-4
5.	Achieve gender equality and empower all women and girls	VI-3
6.	Ensure access to water and sanitation for all	VIII-3
7.	Ensure access to affordable, reliable, sustainable and modern energy for all	VIII-1
8.	Promote inclusive and sustainable economic growth, employment and decent work for all	V-1,2, VI-1-3
9.	Build resilient infrastructure, promote sustainable industrialization and foster innovation	-
10.	Reduce inequality within and among countries	VI-3
11.	Make cities inclusive, safe, resilient and sustainable	-
12.	Ensure sustainable consumption and production patterns	VII-3, VIII-2,3
13.	Take urgent action to combat climate change and its impacts	VIII-1
14.	Conserve and sustainably use the oceans, seas and marine resources	VIII-2,3
15.	Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss	VIII-3
16.	Promote just, peaceful and inclusive societies	V-2
17.	Revitalize the global partnership for sustainable development	IV-VIII

ISO26000 Table

Aspect	Report Section	Coverage
1. Scope	IX-1	F
2. Definitions	IX-4	F
3. Understanding Social Responsibility	IV-1,2	F
4. Principles of Social Responsibility	IV-2,3	F
5. Recognizing Social Responsibility & Engaging Stakeholders	IV-3	F
6. Guidance on Social Responsibility Core Subjects		
a. Organizational Governance	IV-1	F
b. Human Rights	VI-3	F
c. Labor practices	VI-3	F
d. Environment	V-3, VIII-1-3	F
e. Fair operating practices	IV-1	F
f. Consumer issues	VII-1-3	F
g. Community involvement and development	V-2	F
7. Guidance on Integrating SR throughout the Organization		
a. Enhancing Credibility	IV-VIII	F
b. Communication	IV-2,3, VI-1	F

GRI Content Index

GRI Standard	Report Section	Coverage	Boundary of Disclosure
General Disclosures			
GRI 102: General Disclosures 2016			
Organizational Profile			Yes (Group)
102-1	IX-1	F	
102-2	III-2, VII-2	F	
102-3	III-2, IX-1	F	
102-4	III-2	F	
102-5	III-2	F	
102-6	III-2	F	
102-7	III-2, V-1, VI-1	F	
102-8	VI-1	F	
102-9	III-2, V-3	F	
102-10	III-2	F	
102-11	V-3, VIII-1	F	
102-12	IV-2, VI-3, VII-1, VIII-1	F	
102-13	IV-2	F	
Strategy			Yes (Group)
102-14	I	F	
102-15	I, IV-1	P	
Ethics and Integrity			Yes (Group)
102-16	III-2, IV-1,2, VI-3, VII-2, VIII-1	F	
102-17	IV-1	P	
Governance			Yes (Group)
102-18	IV-1	F	
102-19	IV-2	P	
102-20	IV-2	F	
102-21	IV-1	F	
102-22	IV-1	F	

GRI Standard	Report Section	Coverage	Boundary of Disclosure
102-23	IV-1	F	
102-24	IV-1	P	
102-25	IV-1	F	
102-26	IV-2	P	
102-27	IV-1,2	P	
102-28	IV-1	P	
102-30	IV-1	P	
102-32	IV-3	F	
102-34	IV-1	F	
102-35	IV-1	P	
102-36	IV-1	P	
102-38	VI-3	F	
102-39	VI-3	F	
Stakeholder Engagement			**Yes (Group)**
102-40	IV-3	F	
102-41	VI-3	F	
102-42	IV-3	F	
102-43	IV-3	F	
102-44	IV-3	F	
Reporting Practice			**Yes (Group)**
102-45	V-1, IX-1	F	
102-46	IV-3, IX-3	F	
102-47	IV-3, IX-3	F	
102-48	V-1,2, IX-1	F	
102-49	IX-1	F	
102-50	IX-1	F	
102-51	IX-1	F	
102-52	IX-1	F	
102-53	IX-1	F	
102-54	IX-1	F	
102-55	IX-3	F	
102-56	IX-1,3	F	
Economic Topics			
GRI 103: Management Approach 2016			
103-1	IV-1,3, V-1-3, VI-1,3, IX-3	F	
103-2	IV-1, V-1-3, VI-1,3	F	
103-3	IV-1,3, V-1-3, VI-1,3	F	
GRI 201: Economic Performance 2016			**Yes (Group)**
201-1	V-1	F	
201-4	V-1	F	
GRI 202: Market Presence 2016			**Yes (Group)**
202-1	VI-3	P	
202-2	VI-1	F	
GRI 203: Indirect Economic Impacts 2016			**Yes (Group)**
203-1	V-2	P	
203-2	V-2	F	
GRI 204: Procurement Practices 2016			**Yes (Group)**
204-1	V-3	F	
GRI 205: Anti-corruption 2016			**Yes (Group)**
205-2	IV-1	P	
205-3	IV-1	F	
GRI 206: Anti-competitive Behavior 2016			**Yes (Group)**
206-1	IV-1	F	

GRI Standard	Report Section	Coverage	Boundary of Disclosure
Environment Topics			
GRI 103: Management Approach 2016			
103-1	IV-3, VIII-1-3, IX-3	F	
103-2	VIII-1-3	F	
103-3	IV-1,3, VIII-1-3	F	
GRI 301: Materials 2016			**Yes (Group)**
301-1	VIII-2	F	
301-2	VIII-2	F	
GRI 302: Energy 2016			**Yes (Group)**
302-1	VIII-1	F	
302-2	VIII-1	P	
302-3	VIII-1	P	
302-4	VIII-1	P	
GRI 303: Water 2016			**Yes (Group)**
303-1	VIII-3	F	
303-2	VIII-3	F	
GRI 304: Biodiversity 2016			**Yes (Group)**
304-1	VIII-3	F	
304-2	VIII-3	F	
GRI 305: Emissions 2016			**Yes (Group)**
305-1	VIII-1	F	
305-2	VIII-1	P	
305-5	VIII-1	P	
305-6	VIII-1	F	
305-7	VIII-1	P	
GRI 306: Effluents and Waste 2016			**Yes (Group)**
306-2	VIII-2,3	P	
306-3	VIII-3	F	
306-4	VIII-2	P	
GRI 307: Environmental Compliance 2016			**Yes (Group)**
307-1	IV-1, VIII-1	F	
GRI 308: Supplier Environmental Assessment 2016			**Yes (Group)**
308-2	V-3	F	
Social Topics			
GRI 103: Management Approach 2016			
103-1	IV-3, V-2,3, VI-1-4, VII-1,2, VIII-3, IX-3	F	
103-2	V-2,3, VI-1-4, VII-1,2, VIII-3	F	
103-3	IV-1,3, V-2,3, VI-1-4, VII-1,2	F	
GRI 401: Employment 2016			**Yes (Group)**
401-1	VI-1	F	
401-2	VI-3	F	
401-3	VI-1	P	
GRI 402: Labor/Management Relations 2016			**Yes (Group)**
402-1	VI-3	F	
GRI 403: Occupational Health and Safety 2016			**Yes (Group)**
403-1	VI-2	F	
403-2	VI-2	F	
403-3	VI-2	F	
403-4	VI-2	F	
GRI 404: Training and Education 2016			**Yes (Group)**
404-1	VI-4	F	
404-2	VI-4	P	
404-3	VI-4	F	

GRI Standard	Report Section	Coverage	Boundary of Disclosure
GRI 405: Diversity and Equal Opportunity 2016			**Yes (Group)**
405-1	VI-1,3	F	
405-2	VI-3	F	
GRI 406: Non-discrimination 2016			**Yes (Group)**
406-1	IV-1	F	
GRI 407: Freedom of Association and Collective Bargaining 2016			
407-1	VI-3	P	
GRI 408: Child Labor 2016			
408-1	VI-3	P	
GRI 409: Forced or Compulsory Labor 2016			
409-1	VI-3	P	
GRI 410: Security Practices 2016			
410-1	V-2	F	
GRI 411: Rights of Indigenous People 2016			
411-1	-	NA	
GRI 412: Human Rights Assessment 2016			**Yes (Group)**
412-1	VI-3	P	
412-2	VI-4	F	
412-3	VI-3	F	
GRI 413: Local Communities 2016			**Yes (Group)**
413-2	V-2	F	
GRI 414: Supplier Social Assessment 2016			**Yes (Group)**
414-2	V-3	F	
GRI 415: Public Policy 2016			**Yes (Group)**
415-1	IV-1	F	
GRI 416: Customer Health and Safety 2016			**Yes (Group)**
416-1	VII-1	P	
416-2	IV-1, VII-1	F	
GRI 417: Marketing and Labelling 2016			**Yes (Group)**
417-1	VII-2	F	
417-2	IV-1	F	
417-3	IV-1	F	
GRI 418: Customer Privacy 2016			**Yes (Group)**
418-1	IV-1	F	
GRI 419: Socioeconomic Compliance 2016			
419-1	IV-1	F	
Other Topics (non GRI)			
GRI 103: Management Approach 2016			
103-1	IV-1,3, V-2,3, VI-1, VII-1-3, VIII-1-3, IX-3	F	
103-2	IV-1, V-2,3, VI-1, VII-1-3, VIII-1-3	F	
103-3	IV-1,3, V-2,3, VI-1, VII-1-3, VIII-1-3	F	
Products and Services			**Yes (Group)**
Customers informed on Corporate Responsibility issues	VII-1,2, VIII-1-3	F	
Audits and inspections for products and services quality (by number, outcome)	VII-1	F	
Customer satisfaction surveys and practices (results)	IV-3, VII-3	F	
Reductions in products and services prices	VII-3	F	
Lost/found or damaged passengers' personal items (number, compensations)	VII-1	F	
Business Continuity			**Yes (Group)**
Proactive approaches to ensure our uninterrupted operation	IV-1	F	

GRI Standard	Report Section	Coverage	Boundary of Disclosure
Vessel Operations and Impacts			Yes (Group)
Proactive approaches on vessel safety standards and respective compliance	VII-1	F	
Accidents within vessels (by number, type, reason, results)	V-2, VII-1	F	
Non-compliance with regulations regarding exceeding vessel capacity (by number, outcomes)	IV-1, VII-1	F	
Non-compliance with regulations regarding rippling impacts to coastal areas (by number, outcomes)	IV-1, VIII-3	F	
Responsible Buying			Yes (Group)
Average supplier payment time	V-3	F	
Suppliers evaluation (by percentage, frequency)	V-3	F	
Discontinuation of collaboration with suppliers (by number, reason)	V-3	F	
Environment			Yes (Group)
Value of environmental protection investments	VIII-1	F	
Employee training on environmental protection issues (by number, duration)	VIII-1	F	
Marine pollution incidents (by number, type, reason, results)	VIII-3	F	
Non-compliance with regulations regarding acoustic impact (by number, outcomes)	IV-1	F	
Work Conditions			Yes (Group)
Percentage of employees informed regarding Corporate Responsibility issues	VI-1	F	
Employees with overtime work (by percentage, average)	VI-1	F	
Non-compliance with regulations regarding labour practices (by number, outcomes)	IV-1	F	
Non-compliance with regulations regarding accommodation conditions for marine employees (by number, outcomes)	IV-1	F	
Society			Yes (Group)
Participation in volunteering activities	V-2	F	
Number of visiting school and university students	V-2	F	

4. Glossary

Please pay attention to the following, frequently used terms:

Term	Refers to
'Bilge water'	The mixture of water, lubricants and fuel produced during engine washing, as well as by accidental leaks.
'Biodiversity'	The various living organisms in an ecosystem (land, marine and aquatic), as well as the extent of their genetic composition.
'Carbon dioxide', 'CO_2'	The gaseous chemical compound derived from the combustion of fossil fuels (oil, gasoline, natural gas, etc.) and organic compounds (wood, plastic, etc.), which contributes to the greenhouse effect.
'Classification societies'	The maritime technical organizations who establish safety regulations for shipbuilding, as well as for the vessels' equipment.
'Corporate Responsibility', 'Corporate Social Responsibility', 'Sustainable Development'	The voluntary commitment of companies to include in their corporate practices economical, social and environmental criteria and activities, which are beyond the legislative requirements and are related to their impact on Stakeholders. The terms refer to the current economic growth that does not compromise the ability of future generations to satisfy their own needs.
'Environmental footprint'	The total greenhouse gas emissions that arise directly (e.g. burning of fossil fuels for heating) or indirectly (e.g. by the use of products) from a company.
'equivalent CO_2', 'eCO_2'	The measurement unit of all greenhouse gases that contribute to global warming (carbon dioxide-CO_2, methane-CH_4, nitrous oxide-N_2O, fluorinated hydrocarbons-HFCS, perfluorocarbons-PFC's, sulfur hexafluoride-SF_6), expressed as equivalent carbon dioxide.
'Global Compact'	The United Nations Global Compact, an initiative to encourage companies to align their business operation with 10 universally accepted principles in the areas of human rights, labor, environment and anti-corruption.
'Group', 'we', 'Attica Group'	The legal entity ATTICA HOLDINGS S.A. (which this Report addresses).
'IMO'	The International Maritime Organisation, which is a specialized organization to establish measures in order to improve safety of international shipping and prevent environmental pollution from vessels, and is also responsible for legal issues related to liability and indemnify cases of maritime accidents, as well as facilitate international maritime traffic.
'MARPOL'	The Convention of the International Maritime Organization to adopt concrete measures, in order to control and prevent pollution from vessels.
'Passengers'	The people transported with our vessels.
'Report'	The Corporate Responsibility Report 2018.
'VI-3' etc.	The Chapter and section of this Report (e.g. used in the GRI, Global Compact and Stakeholder Tables). For example, the term 'VI-3' makes reference to Chapter VI (Employees), section 3 (Equality and Fairness).
'Universal Declaration of Human Rights'	The declaration adopted by the United Nations General Assembly in 1948 with the fundamental rights to which all human beings are inherently entitled.

5. Feedback Form

1. To which Stakeholder group do you belong?

☐ Employees ☐ Shareholders ☐ Customers ☐ Sales Network ☐ Suppliers

☐ State ☐ Associations and Unions ☐ Local Communities ☐ Citizens ☐ NGOs

☐ Media

Other:

2. What is your impression, about the following Chapters of this Report?

Chapter:	Excellent	Good	Neutral	Mediocre	Bad
IV. Management	☐	☐	☐	☐	☐
V. Society	☐	☐	☐	☐	☐
VI. Employees	☐	☐	☐	☐	☐
VII. Customers	☐	☐	☐	☐	☐
VIII. Environment	☐	☐	☐	☐	☐

3. What is your impression, about the following elements of this Report?

Element:	Excellent	Good	Neutral	Mediocre	Bad
Sections have the right **balance**	☐	☐	☐	☐	☐
Important topics are **covered**	☐	☐	☐	☐	☐
Structure supports easy **reading**	☐	☐	☐	☐	☐
Texts are comprehensive	☐	☐	☐	☐	☐
Quantitative elements are complete	☐	☐	☐	☐	☐
Graphs included are comprehensive	☐	☐	☐	☐	☐
Layout is attractive/pleasant	☐	☐	☐	☐	☐

4. Are there any topics, which are not answered (or not adequately covered) in this Report or do you have questions you would like to be answered in our next Report?

....

....

5. Are there any other comments/proposals you might have?

....

....

Personal Data (optionally):

Name: .... Organization: ....

Address:.. Tel/Fax: ....

E-mail: ....

Please fill out the form and send it to:

Attica Group, Corporate Responsibility Team, 1-7 Lysikratous & Evripidou Street, 17674, Athens, e-mail: csr@attica-group.com

All information on this form will be used only for evaluating this Report, through statistical analysis. Personal data are protected, as defined by the respective law regarding private information.

Attica Group

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ATTICA GROUP
1-7 Lysikratous & Evripidou
176 74 Athens

www.attica-group.com