



CORPORATE
RESPONSIBILITY
REPORT
2019

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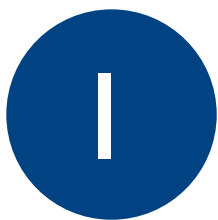
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“ For all of us at Attica Group,
Corporate Responsibility is
an essential and practical commitment,
which defines the way we think,
our daily operations, as well as
our vision for the future. **”**



MESSAGE FROM THE CEO

Dear Readers,

The year 2019 was a milestone for Attica Group, as we successfully completed Hellenic Seaways' operational integration and further strengthened our competitive position against major European companies in our industry, within the scope of ensuring long-term sustainability, facilitated by favorable conditions such as increased tourist volume and Greece's overall economic recovery.

However, the COVID-19 pandemic in early 2020 halted these positive prospects and negatively impacted the global economy, while the health measures taken affected both our Group's business activity and our daily operations. Acting responsibly towards our employees, customers, suppliers and shareholders, we implemented all necessary organizational and operational changes, to ensure the health of our office and marine employees, customers and suppliers, as well as adopted operational and financial measures to ensure the business continuity of our Group.

Furthermore, other challenges in 2019 for the passenger shipping industry were issues, such as the increase in marine fuel prices, the mandatory compliance with new international environmental legislation to reduce sulfur dioxide emissions, which affect the industry's operational profitability, as well as the inadequate port infrastructure, which contributed to journey delays.

Under these circumstances, Corporate Responsibility has been the guiding compass for our activities, as we continued our commitments to:

- Incorporate Responsibility into our daily management practices.
- Support prosperity of Society.
- Establish positive Employment Conditions.
- Ensure Our Passenger Safety.
- Reduce our Environmental Impact.

Attica Group's 11th Corporate Responsibility Report, addressing the year 2019, follows the Global Reporting Initiative's Sustainability Reporting Standards and continues our effort to assess our performance based on internationally recognized indicators and set challenging new objectives with transparency and accountability, as we were the first passenger shipping company worldwide with a Corporate Responsibility Report in accordance with the GRI Standards.

The Report reflects our efforts to maintain a bilateral communication to respond to our Stakeholders' expectations, by presenting our progress in key areas of our operations, as well as our initiatives and actions which ensure our responsible operation. Indicatively, within 2019, 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 €470 million in economic value to our Stakeholders and implemented or supported societal support activities in 100% of the islands we operate, such as 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 45 food hygiene and safety vessel inspections from local authorities, with no recorded non-compliance incidents.
- Reduced our total energy consumption and total carbon dioxide emissions by 5.7% and 5.6% respectively and informed potentially over 2 million customers on Corporate Responsibility issues, such as environmental protection.

For all of us at Attica Group, Corporate Responsibility is an essential and practical commitment, which defines the way we think, our daily operations, as well as our vision for the future, which is to operate oriented on continuous growth orientation for our country, customers, employees, partners and suppliers. Within this context, I would like to thank our employees, our partners and all others who contributed to our successful operation for yet another year.

Have a pleasant reading,

Spyridon Paschalis
Chief Executive Officer Attica Group



COVID-19 BRIEFING

Beginning of the Pandemic

In March 2020, the World Health Organization (WHO) declared the COVID-19 coronavirus as pandemic and its rapid spread has affected business and economic activity around the globe, as well as ceased or slowed down activities of core economic sectors, including passenger shipping.

To constrain the pandemic's spread, European Union countries implemented various restrictive measures, including restrictions on passenger and vehicle transportation, which have a direct impact on our Group's activities. The Greek state also implemented a series of measures, with restrictions on the unconfined citizen transportation of, including:

- Prohibition of passenger and private vehicle transportation (except truck drivers) in Adriatic Sea lines from March 15, 2020 to June 30, 2020.
- Restriction on passenger transportation (except for permanent island residents for emergency reasons) in Aegean lines from March 21, 2020 to May 17, 2020 for Crete and May 24, 2020 for the other islands.
- Restriction on collection of post-dated checks for COVID-19 affected companies imposed by a legislative decree.

Risks from the Pandemic

The pandemic resulted in significant risks for the Group, mainly in the following areas:

Transportation volume: Obviously since mid-March 2020, transportation volume and consequently turnover of the lines we operate have significantly decreased, which continued until May. There is further uncertainty regarding transportation volume for the remaining months in 2020, which will depend on the pandemic's spread, as well as decisions taken by Authorities.

Loss of revenues during summer period: The industry has intense passenger and private vehicle seasonality (July – September is the period with the highest volume), which significantly determines the annual financial results. The Group's revenues will obviously be affected by repeated restrictive measures in citizen transportation or change of their transportation habits during their summer vacations or obstacles that disrupt the tourism chain and consequently the country's tourism or even a more severe pandemic recovery.

Fuel prices: The Group is significantly affected by fuel prices fluctuations, as the cost of marine fuels and lubricants is by far the Group's highest operating cost. There has been a sharp decrease in fuel prices since February 2020, with extreme fluctuations caused by reduced demand mainly due to the pandemic, as well as the failure of major oil-producing countries to agree and reduce production.

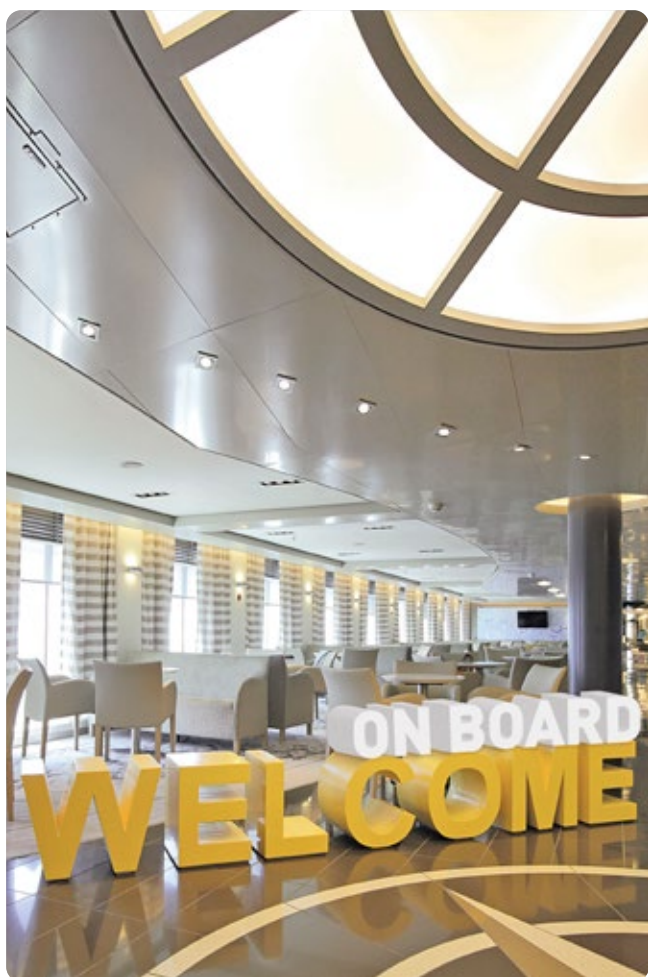
Measures to address the Pandemic

In order to deal with the emergency situation caused by the pandemic, we established a plan based on three main areas:

Health and Safety: As our main concern is our employees', passengers' and partners' health, we promptly implemented a number of precautionary measures, such as:

- Provided detailed instructions on what each employee should do in case of disease symptoms.
- Implemented remote work for over 80% of office employees since the beginning and kept the minimum security personnel.
- Suspended all business trips and physical meetings, which are now conducted via teleconference or video conference.
- Perform regular disinfections in office buildings from certified external collaborators.
- Provided marine employees with the Authorities' specific instructions, regarding the necessary precautionary measures against COVID-19 and actions to address any suspicious case, while at sea, in cooperation with competent Authorities.
- Equipped all our vessels with the appropriate personal protection equipment (such as masks, gloves and special kit) and antiseptics in clearly marked spots for passengers' and crews' personal hygiene, while we designated dedicated cabins on each vessel to address and constrain any potential incident.
- Intensified cleaning of vessels' air conditions, cabins and public areas and perform regular disinfections by certified external collaborators.
- Display informative messages on vessel screens and inform passengers with printed material, regular announcements and recommendations to apply and comply with preventive measures and maintain necessary distance between passengers during their stay, as well as avoid overcrowding during their disembarkation.
- Provide our customers the option of online ticket booking and boarding pass issuance.
- Comply with Authorities' instructions and use relevant signage on our vessel seats, with clear signs for permitted passenger seats in vessel lounges and appropriate configuration for seats on external decks.
- Allow cabin use by two persons, except for up to 4-member families or persons with disabilities and their escort, and mandate completion of the 'Pre-Boarding' form prior to vessel boarding.

- Installed protective plexiglass at our vessels' Reception desks, in order to keep the necessary safety distances.
- Mandate operation of bars and self-service restaurants in accordance with the respective health protocols and fully comply with food hygiene and safety provisions. Therefore, dishes and cutlery are washed in special washing machines at temperatures above 70°C to ensure destruction of all pathogens, with individual packaging for cutlery and no food or packaged products available at passengers' self-service areas.
- Have inspected and certified all our routed vessels for compliance with the 'SAFEGUARD' label requirements by Bureau Veritas (BV) regarding full implementation of the required hygiene procedures and measures to address biological risks posed by COVID-19, aiming to protect public health.



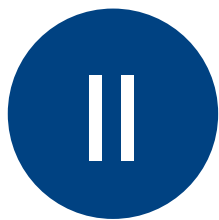
Business Continuity: We immediately formed a COVID-19 Task Force to ensure continuous information regarding appropriate measures to protect our passengers and employees, in cooperation with the National Public Health Organization (NPHO) and competent Authorities, and developed a business continuity plan, to ensure all our services' continuous operation.

Operating Costs & Financial Position: The pandemic's rapid spread caused significant damage to the transportation industry and especially the passenger shipping industry, with severely decreased passenger and vehicle transportation, as a result of canceling pre-issued tickets and suspending ticket booking for the summer period.

For this reason, we immediately decided to reduce operating costs and strengthen our financial position, as among other we:

- Largely financed our business activities with own funds, due to restrictions imposed on collection of customer checks and minimization of passenger revenues.
- Reduced the number of vessel journeys and redeployed our fleet.
- Reduced all operating expenses.
- Temporarily postponed our business development projects, until the scale of the pandemic effect becomes clear.
- Utilized all State support measures for affected companies.
- Implemented rotation work for all office employees, with 1 week off work every 4 calendar weeks. Moreover, we withhold an additional 25% of the Management members' gross salaries (including Board of Directors executive members) for future payment, when and if allowed by future conditions and the Group's financial results.

We remain fully committed to apply all necessary measures to reduce the pandemic's impact and remain fully dedicated to our indisputable obligation to ensure all our employees', passengers' and partners' health and safety.



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
- 24 years of continuous presence in our Seas
- We operate 30 modern vessels in the Eastern Mediterranean Sea (and 2 more on the Morocco – Spain route)
- We handled 4.7 million reservations for journeys in the Eastern Mediterranean Sea (and 143.5 thousand 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 116 external audits regarding our Management Systems, with no recorded non-compliance incident
- No non-compliance incident was recorded during audits of our contractors' Management Systems
- We increased by 4.4% the number of quantitative indicators we make reference to within the Report

Society

- We distributed over €470 million in economic value: over €94.2 million to employees (for salaries, benefits and insurance payments), €81.9 million for taxes (including VAT and port taxes), €29.9 million to providers of capital (for interest and return payments), €21.9 million to agents (for commissions), €205.6 million to suppliers (for purchases of goods and services), €2.8 million to society (for discount tickets, implemented programs, sponsorships and donations) and €34.5 million for investments
- We implemented or supported societal support activities in 100% of the islands we serve
- We increased the total number of discount tickets offered by 85.5%
- We increased the total value of societal support activities by 24.8%
- We allocated 55% of sponsorships and donations to local communities
- We increased the number of employees participating in volunteer activities and employee volunteering hours by 13.5% and 49.3% respectively
- We collected 282 blood units through our voluntary blood donation programs in the last three years
- We welcomed 1,047 young people from schools and universities visiting our offices and vessels
- We supported the development of 86 students in Merchant Navy's Officer academies
- We spent 77.2% of total procurement expenditure to local suppliers
- We spent 15.4% of total procurement expenditure to small and medium-sized enterprises (up to 50 employees)
- We have defined 10% of suppliers' selection criteria to be related to their responsible operation



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 trained at least once over 61% of our office employees

Customers

- We conducted internal drills and trainings on passenger safety procedures to 100% of marine employees
- The overall performance of our vessels in Domestic and Adriatic Sea lines from 'Mystery Passenger' survey for Blue Star Ferries, Superfast Ferries and Hellenic Seaways reached 86%, 83% and 84% respectively
- We were subjected to 45 inspections from local authorities for food hygiene and safety, with no recorded non-compliance incidents
- We maintain 5 corporate websites, with over 4.5 million unique visitors annually and handle 2 mobile applications with over 22,600 downloads
- We trained 80% of Marketing Department employees on responsible communication and marketing issues, for a total duration of 48 hours
- We informed 456,214 passengers through information SMS for early arrival at the Piraeus port or changes or cancellations of scheduled journeys in Domestic and Adriatic Sea lines (77% of passengers on these routes who have registered their mobile number)
- We send 2,813 notifications to serve passengers to our vessels, out of which 596 concerning passengers with reduced mobility and 12 concerning passengers with sensitivity to allergens
- The average score of evaluations registered through dedicated devices onboard Blue Star Ferries and Superfast Ferries vessels reached 4 and 4.11 for Hellenic Seaways on a 5 point scale
- We kept our vessels' departure time at 84% and arrival time at 56% of schedules
- We increased our seasmiles loyalty and reward program members by 34.7%

Environment

- We conducted internal drills on environmental protection issues to 100% of marine employees
- We informed 100% of our employees on environmental protection issues
- We reduced our total energy consumption by 5.7% (equal to over 786,000 GJ)
- We reduced our total carbon dioxide emissions by 5.6% (equal to over 59,000 tonnes of CO₂)
- 80% of monitors and 60% 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 informed potentially over 2 million customers on Corporate Responsibility issues, such as environmental protection
- We used 22.3% recycled paper for all purposes and 62.4% recycled toners/ink cartridges
- We transported from Islands free-of-charge over 82 tonnes of materials for recycling



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

30

modern vessels in the Eastern Mediterranean Sea and

2

more in the Morocco - Spain route

24

years of presence in our seas

1.02

million private vehicles annually in the Eastern Mediterranean Sea

6.99

million passengers annually in the Eastern Mediterranean Sea

391.6

thousand freight units annually in the Eastern Mediterranean Sea

1,779

employees

2

million nautical miles annually (49.7 times around the Earth)

We offer

We serve 60 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.



1. The Passenger Shipping Industry

! Did you Know

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.

About the Industry

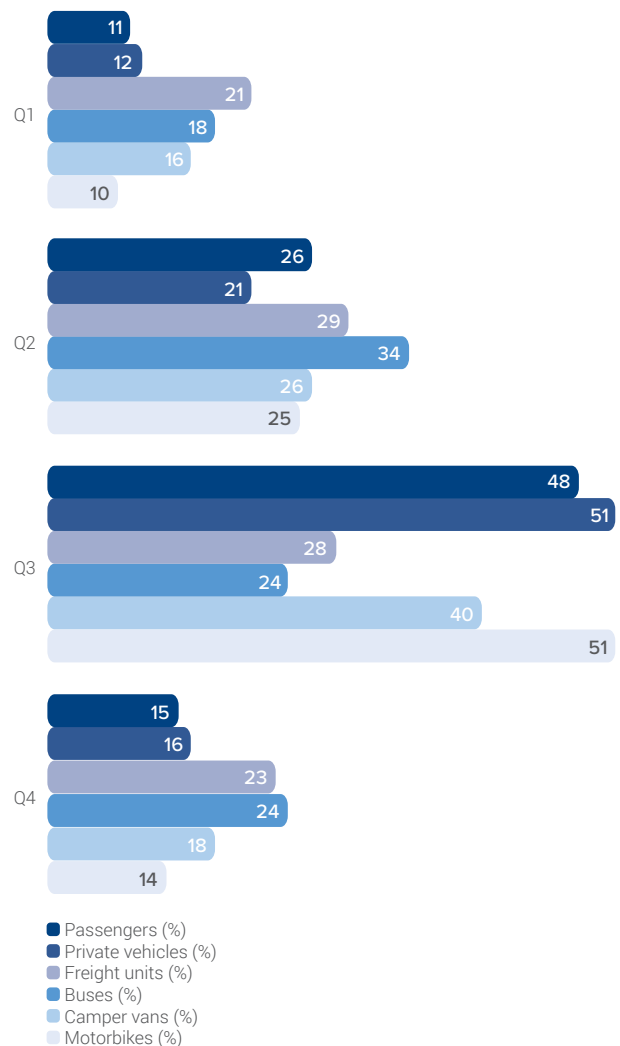
Passenger shipping is one of the most important industries in the Greek economy, as the use of passenger and car-passenger vessels is required to connect islands with the mainland, as well as to connect Greece with Italy. Based on a 2016 study conducted by the Foundation for Economic and Industrial Research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

- Greece has the highest number of ports for maritime passenger transport and the Piraeus port 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 (9.7% of nationwide total job positions), without including short domestic routes and cruise lines.

The Greek Passenger Shipping Industry contributes 9.2% to the Greek GDP and 9.7% to the total job positions in Greece

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.

Seasonality of Passengers and Vehicles Transportation*



* Passenger and vehicle transportation data refer to 2018.
Source: Hellenic Statistical Authority

? Issue of Consideration

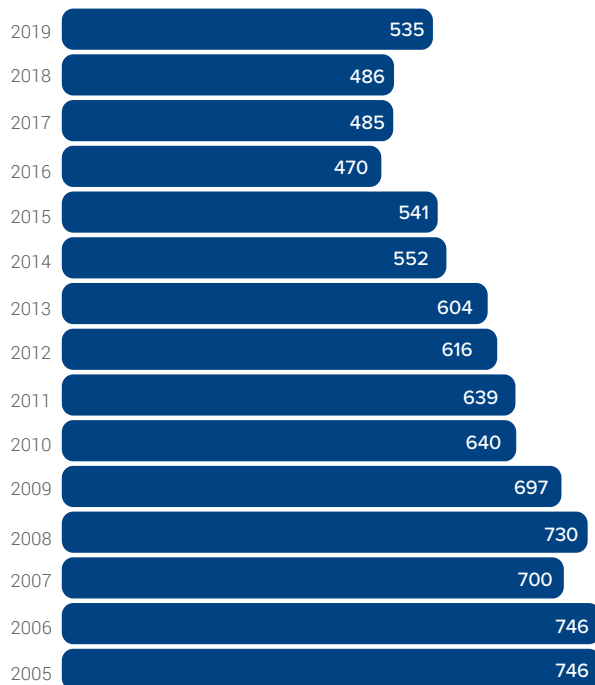
Arrivals and Spending

Based on Bank of Greece's data, the number of 2019 non-resident arrivals in Greece reached approximately 34 million, 2.8% more than 2018, while travel revenues and average spending per trip also increased by 13% and 9.9% respectively compared to 2018, reaching €18.2 billion and €535 respectively.

However, the average length of stay per trip has decreased to 7 days in 2019, compared to 9.6 days in 2008 and 8.1 days in 2013 (27% 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



■ Average spending per trip (€)

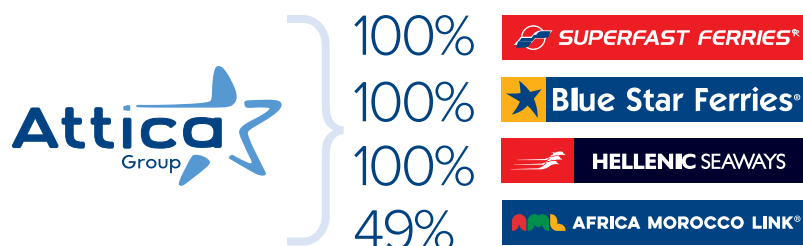
Source: Bank of Greece



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.

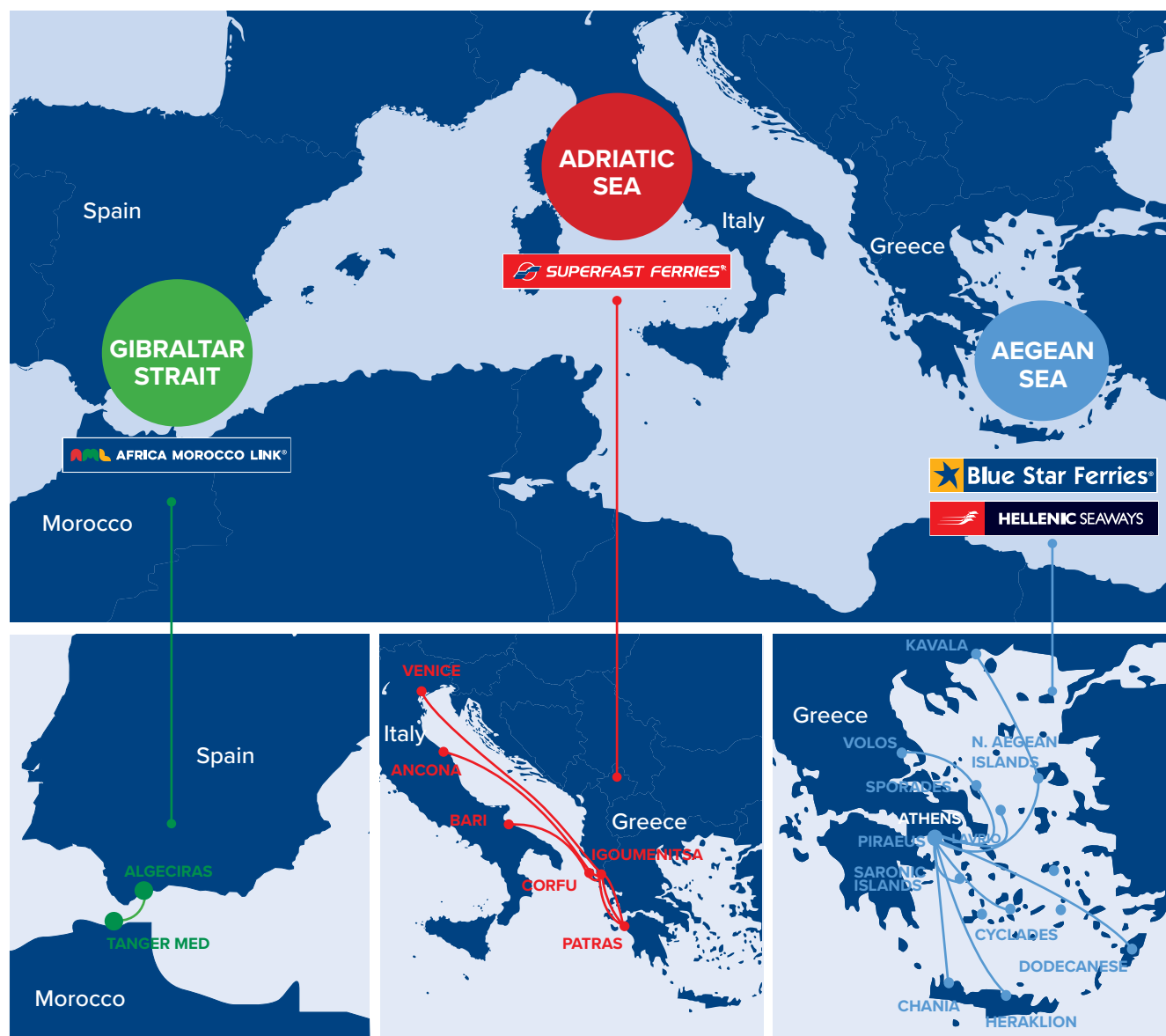


Shareholder Structure

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

* Data refer to 31/12/2019.

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

Innovation

We encourage and promote communicating and developing new ideas, suggestions and solutions, in order to continuously improve the quality of our product and the efficiency of the Group's operations.

Integrity

We behave with integrity and honesty in all aspects of our business according to our ethical standards.

Quality

We work to provide high quality services, while ensuring customer satisfaction, sustainability and future of our employees.

Transparency

We create open and on-going communication frameworks at all levels of the Group, making our incentives and choices clear. We provide complete and accurate information to our associates and Stakeholders.

Corporate Responsibility

We operate responsibly and facilitate harmonious collaborations with our Stakeholders to ensure generating mutual long-term value.

Reliability

We build long-term relationships of confidence with our passengers and employees, consistently delivering high quality services.

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 'Srintzis Lines Shipping S.A.' and rebranded to Blue Star Ferries

2001

Launch of operations 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

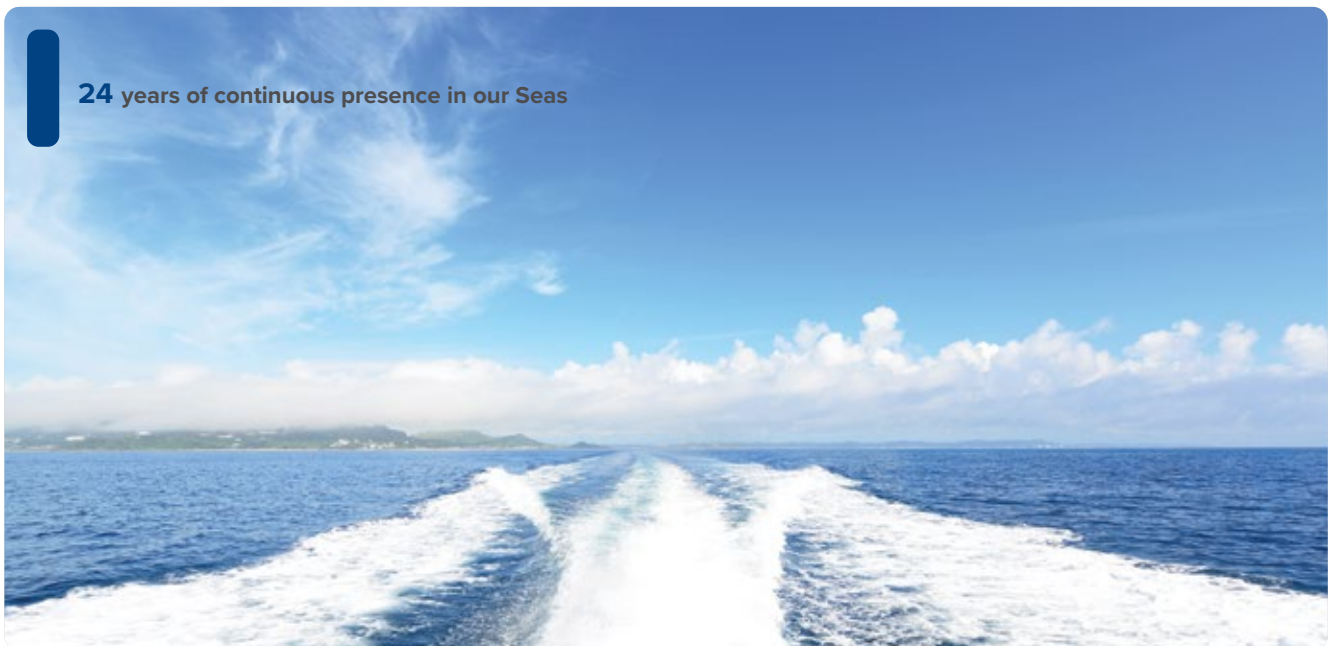
- Attica Group celebrated 100 years since its first Shareholders General Assembly
- Completion of acquisition for 98.83% of Hellenic Seaways' share capital

2019

- Acquisition of the remaining 1.17% of Hellenic Seaways' share capital
- Successful operational integration of Hellenic Seaways and adjustment of Group organizational structure

During 2019, we acquired the remaining 1.17% of Hellenic Seaways' share capital and completed its functional integration, while in parallel adjusted the Group's organizational structure. At the same time, we agreed with DFDS to acquire a cargo vessel, which was renamed to Blue Carrier 1 and launched on domestic routes, to increase our transportation capacity of freight units towards islands, adding additional route options to our existing network.

24 years of continuous presence in our Seas



Our fleet

We operate 30 modern vessels in the Eastern Mediterranean Sea (and 2 more on the Morocco – Spain route)

Our fleet consists of 20 car-passenger (ro-pax) vessels, 2 high-speed car-passenger vessels, 7 high-speed passenger vessels and 1 cargo (ro-ro) vessel in the Eastern Mediterranean Sea, out of which 29 are privately-owned and 1 is on long-term contract.

Furthermore, we managed 3 vessels of the related company AML in the Morocco – Spain route in 2019.

It must be noted that:

- 14 of our 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.
- 30 vessels are registered in the Greek ship registry.
- The average age of our vessels in the Eastern Mediterranean Sea is 21.9 years, while the average age of our vessels is 23 years.
- Out of all our vessels, 5 are jointly operated 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	10	17	2	32
Passengers (number)	3,697	15,847	16,770	1,936	38,250
Beds (number)	1,452	3,276	1,587	0	6,315
Garage lane length (meters)	6,927	11,361	8,074	1,510	27,872

Transportation Volume

	2017	2018*	2019
Passengers (million)	4.13	6.70	6.99
Private vehicles (million)	0.64	0.95	1.02
Freight units (thousand)	300.61	362.00	391.60

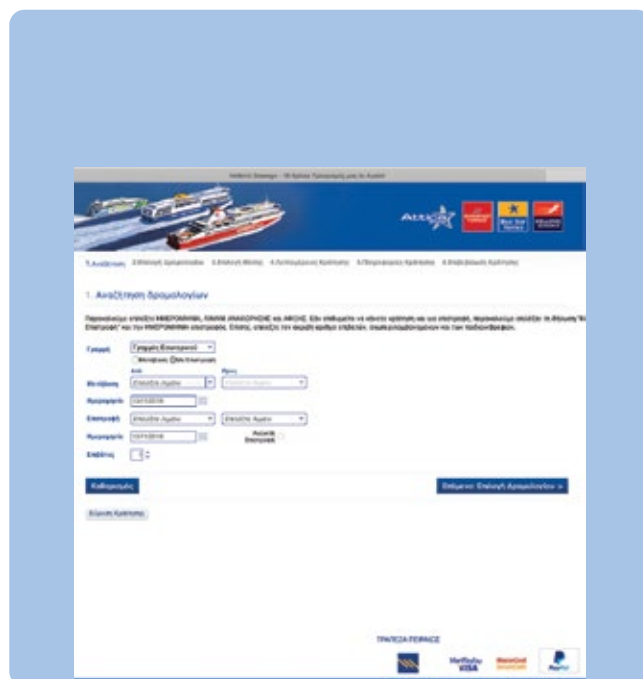
* Data refer to Eastern Mediterranean Sea routes during the period 01/01/2018-31/12/2018 for Blue Star Ferries and Superfast Ferries and 01/06/2018-31/12/2018 for Hellenic Seaways.

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.hsw.gr and www.aml.ma, as well as mobile applications.
- 30 Premium Sales Agents and 82 Port agents for Blue Star Ferries, Superfast Ferries and Hellenic Seaways, as well as 14 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 4.7 million reservations for journeys in the Eastern Mediterranean Sea (and 143.5 thousand more on the Morocco – Spain route), through our central reservation systems

Our Sales Network



In order to provide our services in the Eastern Mediterranean Sea in 2019, we utilised:

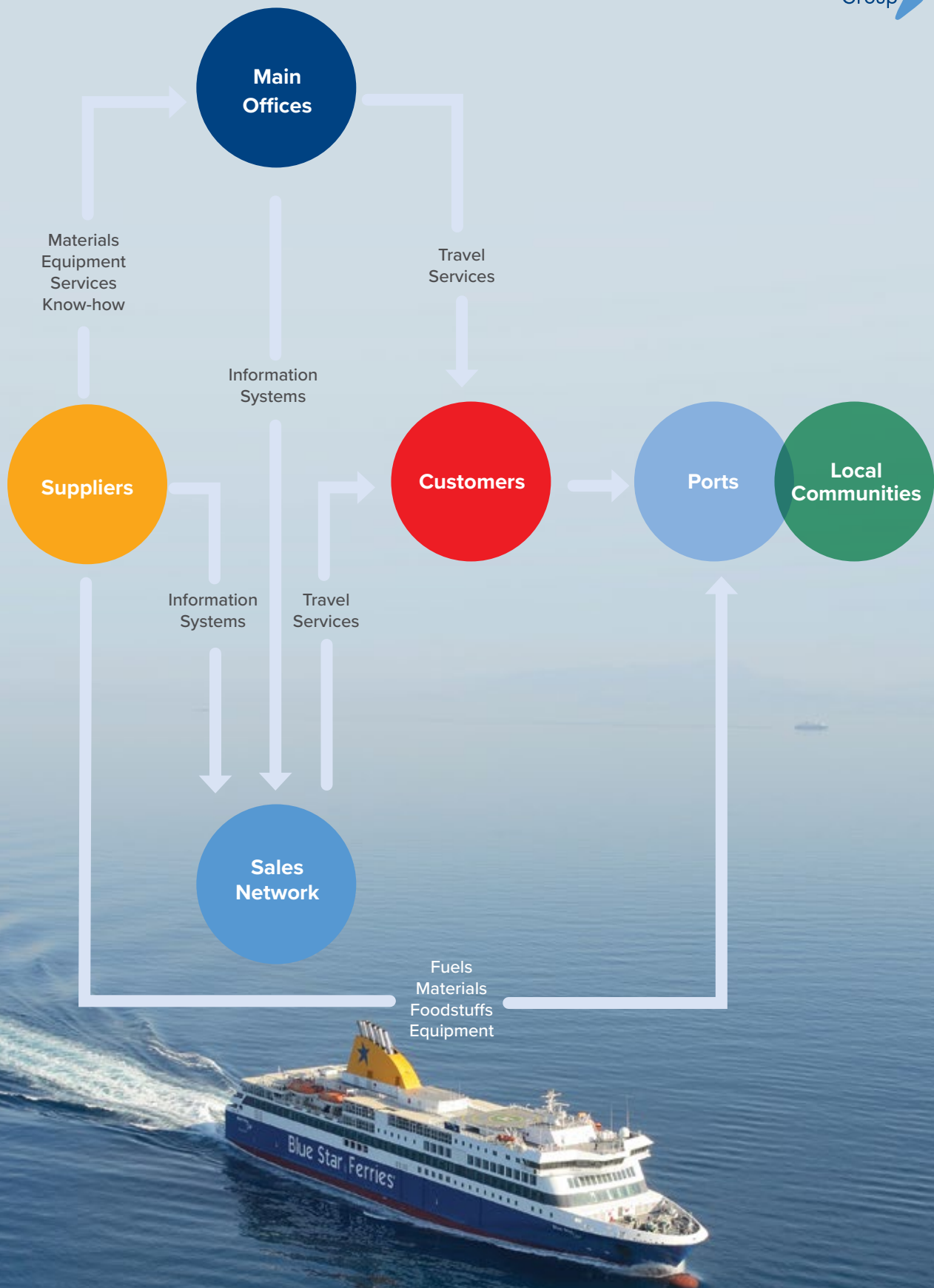
- 25 vessels for Domestic lines to connect:

- Piraeus and Lavrio with Cyclades.
- Piraeus with Cyclades, Dodecanese, Crete (Chania and Heraklion), Saronic and N.E. Aegean islands.
- Piraeus, Lavrio and Kavala with N.E. Aegean islands.
- Volos with Sporades.

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

Furthermore, we managed 3 vessels in the Morocco – Spain route in 2019, out of which 1 privately-owned, 1 with long-term contract and 1 chartered during the summer months.

Our Value Chain



IV



Incorporate Responsibility
into our daily management
practices

MANAGEMENT

We are

5

pillars of Corporate
Responsibility

‘Core’

in accordance option of Report
with the GRI Standards

11

Stakeholder groups

38

future objectives
in the Report

85

GRI disclosures
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.

We follow

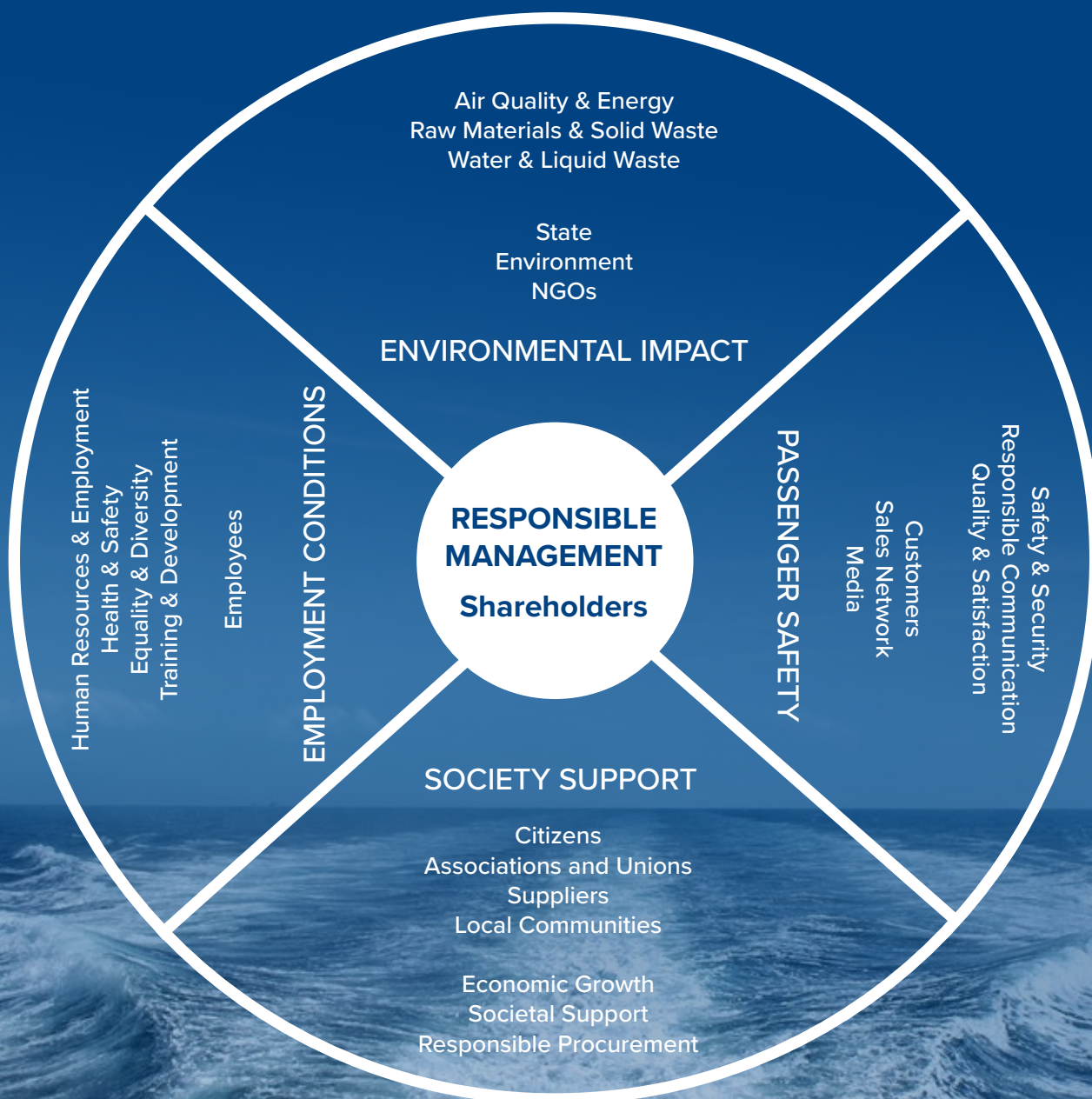
Principles of the United Nations’ Global Compact

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 116 external audits regarding our Management Systems, with no recorded non-compliance incident.
- No non-compliance incident was recorded during audits of our contractors’ Management Systems.
- We increased by 4.4% the number of quantitative indicators we make reference to within the Report.

We focus



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. 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.

Board of Directors

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

* Data refer to 31/12/2019.

- The Board of Directors consists between three to nine members (individuals or legal persons), who are elected by the Shareholders General Assembly for a three-year term.
- BoD members elect the Chairman, Vice-Chairman and Chief Executive Officer, as well as the Authorized Director, if deemed necessary.
- There is a separation of responsibilities between the Chairman of the Board of Directors and the Chief Executive Officer.
- 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 2019.
- The Chairman of the BoD is responsible for the Chief Executive Officer's performance evaluation.
- 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.

Policy

Remuneration Policy

During 2019, we developed and published a Remuneration Policy for the Group's BoD members, which aims to attract, motivate and retain highly skilled executives. Within this context:

- Remuneration for executive members is linked with factors, such as their duties, tasks and responsibilities, their contribution to improve our effectiveness and long-term financial performance, as well as their ability to effectively manage human resources in their area of responsibility.
- Remuneration for non-executive members is approved by the annual Shareholders General Assembly and is associated with their employment time and responsibilities, without however being directly linked with business performance, in order to encourage freedom of opinion regarding excessive business risks. Non-executive members do not participate in pension and benefits programs or other long-term incentives and are not granted additional fees or other performance-related compensation.

The Board of Directors is supported by the **Audit Committee** and the **Remuneration Committee**, which are elected from the Shareholders General Assembly.

Board Committees

Committee	Members	Responsibilities
Audit Committee (meets at least quarterly)	Two independent non-executive members and one non-executive member	<ul style="list-style-type: none">• 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.
Remuneration Committee	Three non-executive members	<ul style="list-style-type: none">• Assists BoD to perform its duties related to remuneration issues, incentives and other benefits, including the approved Remuneration Policy.• Monitors the Remuneration Policy's implementation.• Ensures periodic review of the Remuneration Policy.

Policy

Dependency Relationships for Group BoD Members

According to our Corporate Governance Code, a BoD member cannot be considered as independent in case the member holds over 0.5% of the Group's share capital or has a dependency relationship, with dependency relationships being the following:

- Maintains business or other professional relationship with the Group or an affiliated company (according to article 42e par. 5 of Codified Law 2190/1920), which affects its business activity, especially in cases of being a major supplier or Group customer, with significance being described within the Group's Internal Operation Regulations.
- Is BoD Chairman 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.
- Has been appointed in accordance with article 18 par. 3 of Codified Law 2190/1920.

Good Practice

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. Moreover, the Corporate Governance Department informs and briefs BoD members and executives on issues related to conflicts of interests, as required by applicable stock market legislation, corporate law and Internal Operation Regulations, in order to ensure their comprehensive knowledge and understanding of obligations.

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, which is uploaded on the corporate Intranet OneAttica. 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 2019.

- 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, as we posted the Regulation of Professional Conduct & Business Ethics in the corporate Intranet to inform all office employees in 2019, combined with a briefing of all new hired employees on our Anti-corruption Regulation, who signed for their acceptance.

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

:) Good Practice

Reporting Violations

Any office employee who becomes aware of any violation of the Regulation of Professional Conduct & Business Ethics (such as fraud, theft or any other illegal activity), should report the incident to his/her supervisor who informs the Human Resources Department or the Internal Audit Department, in cases of fraud or incident that can lead to financial damage.

At the same time, marine employees can report potential violations concerning the Employee Guidebook through the established procedure for submitting complaints and additionally can contact the competent authorities directly for any violations. All reports have to be submitted by name, while marine employees can anonymously submit any complaint through the personal interviews conducted during the Maritime Labour Convention's (MLC) external inspections.

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

We apply internal control and risk management systems

Internal Control: We apply an internal control system with the policies and processes 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 Operation Regulations' implementation and enforcement.
- The Internal Operation Regulations, which among other defines:
 - Departments' structure, their responsibilities and the relationship with the Group's Management.
 - Main principles of BoD's operation and the responsibilities of executive and non-executive members.
 - Recruitment and performance evaluation processes for Managers.
 - Monitoring process of transactions from BoD members, Managers and other persons with access to privileged information.
 - Public disclosure process of significant transactions from persons exercising managerial duties.
 - Monitoring process of significant transactions related to key customers, suppliers and partners.
 - Rules governing transactions between affiliated parties.
- The integrated Enterprise Resource Planning (ERP) system we use to automate and computerize our operations.

Policy

Stock Trading Monitoring Procedure

According to the relevant legislation, we adhere to the respective procedures and we maintain, among other:

- A List of Liable Persons to monitor and disclose transactions from persons exercising managerial duties and persons closely connected with them.
- A List of Persons with access to privileged information to monitor their personal transactions.

We inform each person in the lists for its obligations, as well as potential sanctions in case of legislation violation and information misuse.

Risk Management: Within the context of our risk management system, a Risk Registry is maintained and updated annually in cooperation with Directors and Group's Management, where risks that can affect the Group's business plan are recorded, assessed and prioritized. Based on the Registry's latest update, overall 38 risks have been identified, with the following high and medium significance risks which may affect the Group's operation and efficiency.

Risk Registry

	Description of High and Medium significance risks
1	Increase of marine fuel prices
2	Reduced transportation volume due to financial recession
3	Lack of vessel Officers (mainly engine and deck vessel Officers)
4	Difficulties in financing investment goals and strategic plans
5	Competition in domestic and international shipping lines
6	Risk from unsafe vessel approach to ports
7	Data security
8	Changes in vessel operating regulations
9	Functional integration of Hellenic Seaways within the Group

) Good Practice

Ensuring Business Continuity and Cybersecurity

In order to ensure our business continuity and 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.
- Have been certified for our Information Security Management System in accordance with the international standard ISO 27001:2013, which defines requirements for implementation, maintenance and continuous improvement of information security management systems.
- Have been certified in accordance with the international standard PCI DSS for our practices to ensure data security from electronic transactions via credit and debit cards (see Section VII-1).
- Implement the appropriate safety measures and/or seek to improve the efficiency of existing safety measures through systematic risk assessment process.

Furthermore, in order to ensure the confidentiality, integrity and availability of information, we have defined our actions to protect office and vessel information systems from risks, such as:

- Computer viruses and malware.
- Internal and External attacks (such as hacking and phishing).
- Important data destruction due to employee negligence.

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 uploaded our anti-corruption policies and procedures on our corporate Intranet for all office employees.
- Train our employees on our anti-corruption policies and procedures, with respective trainings conducted to 2 office employees in 2019.
- 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



:) Good Practice

Anti-corruption Regulation

Showcasing our commitment to work with integrity and transparency throughout our business operations, we have developed our Anti-corruption Regulation, which is mandatory for all employees and communicates 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 action 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 2019.

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, without however any relevant trainings taking place within 2019.

Regarding a previous legal case, one appeal was filed within 2019 against the Court of Appeal's decision which dismissed a complaint for anti-competitive behavior in 2015 and is expected to be discussed in 2020.

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 2019:

- There were no 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.
 - Anti-competitive behavior or anti-trust practices.
 - Overbooking.
 - Environmental legislation violation or environmental impacts.
 - 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.



2. Corporate Responsibility

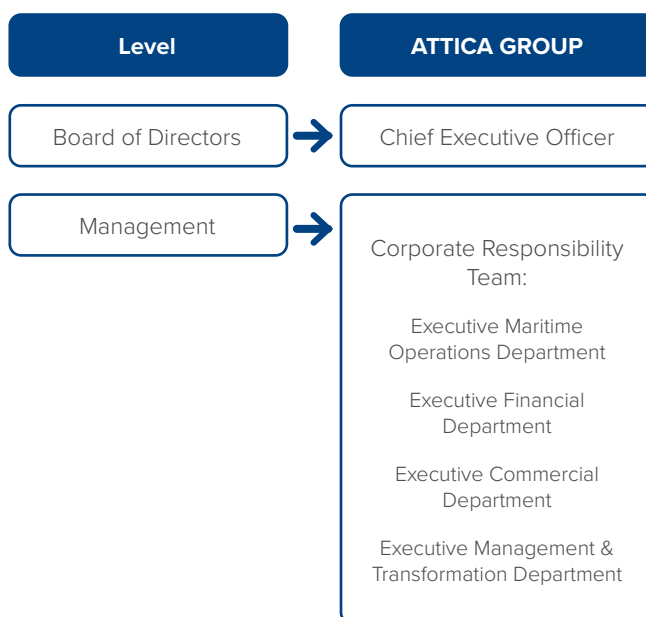
Corporate Responsibility

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.

Managing Corporate Responsibility



- 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.
- Total amount of fines paid related to our operation was €23,337.
- 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.
 - Environmental issues.
 - Rippling impact of our vessels.

- At Board level, the Chief Executive Officer has the overall responsibility for Corporate Responsibility issues, including principles, policies and objectives.
- At Management level, the six-member Corporate Responsibility Team is responsible to coordinate our overall Corporate Responsibility strategy. The Team consists of representatives from the Executive Maritime Operations Department, Executive Financial Department, Executive Commercial Department and Executive Management & Transformation Department and cooperates with other Departments, in order to diffuse practices related to responsible operation. It must be noted that responsibilities of Corporate Responsibility Team's members have been included within the Group's formal organizational structure and members' formal job descriptions.

:) Good Practice

Global Compact Principles and Corporate Responsibility

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. At the same time, we have completed the development of a process to identify, prioritize and integrate Corporate Responsibility issues into local and international investment agreements, for which the final approval is currently pending.

:) Good Practice

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.

:) Good Practice

'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.

:) Good Practice

Training on Corporate Responsibility

In order to further manage Corporate Responsibility, during 2019 we organized a half-day Corporate Responsibility training seminar to approximately 110 Management executives, including the Chief Executive Officer, Top Management members, Directors and Managers from all departments, as well as 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 have invited all office employees (including all new hired employees) during 2018-2019 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 27% of all participants achieved a score of over 80%.



:) Good Practice

Corporate Responsibility Strategy & Action Plan

In 2017 we developed our Corporate Responsibility Strategy 2018-2020 to improve our performance. To achieve this, we utilized an online tool to quantitatively assess our Corporate Responsibility level, through over 1,000 questions based on criteria from internationally recognized systems (such as GRI, AA1000, ISO26000 and EFQM), as well as good practices from leading organizations worldwide.

Results were presented during a half-day workshop, where the anticipated Corporate Responsibility performance by 2020 was defined (24% improvement compared to 2017), specific quantitative objectives in 7 Corporate Responsibility Areas were set and Areas, Sub-Areas and Dimensions we need to focus on were identified, in order to achieve the 2018-2020 Corporate Responsibility Strategy.

60 Top Management Members, Directors and Managers from all departments participated in the development of our Corporate Responsibility Strategy 2018-2020

Following the Workshop, future Actions and responsible employees for each action in the 7 Areas within the context of our Corporate Responsibility Action Plan 2018-2020 were defined, with Actions being incorporated into our Group's objectives and monthly monitored for implementation.

104 Actions were defined in our Corporate Responsibility Action Plan 2018-2020

During our annual Corporate Responsibility meeting, we evaluate our Corporate Responsibility performance and the implementation of defined Actions. The respective assessment for 2019 shows improved performance across all Corporate Responsibility Areas compared to 2017, a performance close to the anticipated performance for 2020.

We improved our performance on Corporate Responsibility issues by 18% since 2017

It must be noted that:

- We have included the Corporate Responsibility Strategy 2018-2020's quantitative assessment score as a target in the formal performance appraisal of our Chief Executive Officer.
- The development of our Corporate Responsibility Strategy 2018-2020 was presented during 2 webinars organized by the European Foundation for Quality Management (EFQM).

Over 200 participants from across the World were informed during 2 respective EFQM webinars on our methodology to develop our Corporate Responsibility Strategy & Action Plan



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 116 external audits regarding our Management Systems, with no recorded non-compliance incident

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

:) Good Practice

Digital Transformation

Investing in the Digital Transformation of our activities, we implemented a Fleet Management System in cooperation with an expert foreign company, in order to ensure reliable and high quality operations on all our vessels. The System:

- Provides a comprehensive overview and ensures central control of all vessels' data, in order to:
 - Improve workflow and better scheduling of vessel maintenance.
 - Reduce tank time and repair expenses.
- Contributes to the digitization of our vessels' Safety Management System.

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-Chairman of BoD and the Chief Executive Officer are Chairman of BoD and Vice-Chairman of International Routes in the BoD of SEEN.
- Hellenic Chamber of Shipping (HCS). The Vice-Chairman 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 2019, we were proud to receive:

- The Gold Award in Ethos Media's **Greek Hospitality Awards 2019** in the category 'Best Greek Domestic Passenger Shipping Company', among the Greek hotels and tourism companies with innovative practices, robust management and willingness to offer top-level tourist services to visitors according to international standards.
- Five awards in Boussias Communications' **Tourism Awards 2019**:
 - The Gold Award in the category 'Innovative Concept' for our Eurail & Interrail Greek Islands Pass for 5 domestic destinations (see Section VIII-1).
 - The Gold Award in the category 'On Line Strategy' for our targeted Performance Marketing strategy and the online bookings' increase in the Adriatic routes during 2018.
 - The Silver Award in the category 'Loyalty Programs' for our loyalty and reward program seasmiles (see Section VII-3).
 - The Silver Award in the category 'Storytelling Experience' for our activity 'The Unseen Beauty of the Aegean' to showcase the cultural heritage of the Aegean islands.
 - The Silver Award in the category 'Social Media Presence' for our dynamic presence on social media channels.
- The Gold Award in Boussias Communications' **Loyalty Awards 2019** in the category 'Best in Loyalty & Engagement (Travel)', for our loyalty and reward program seasmiles (see Section VII-3).

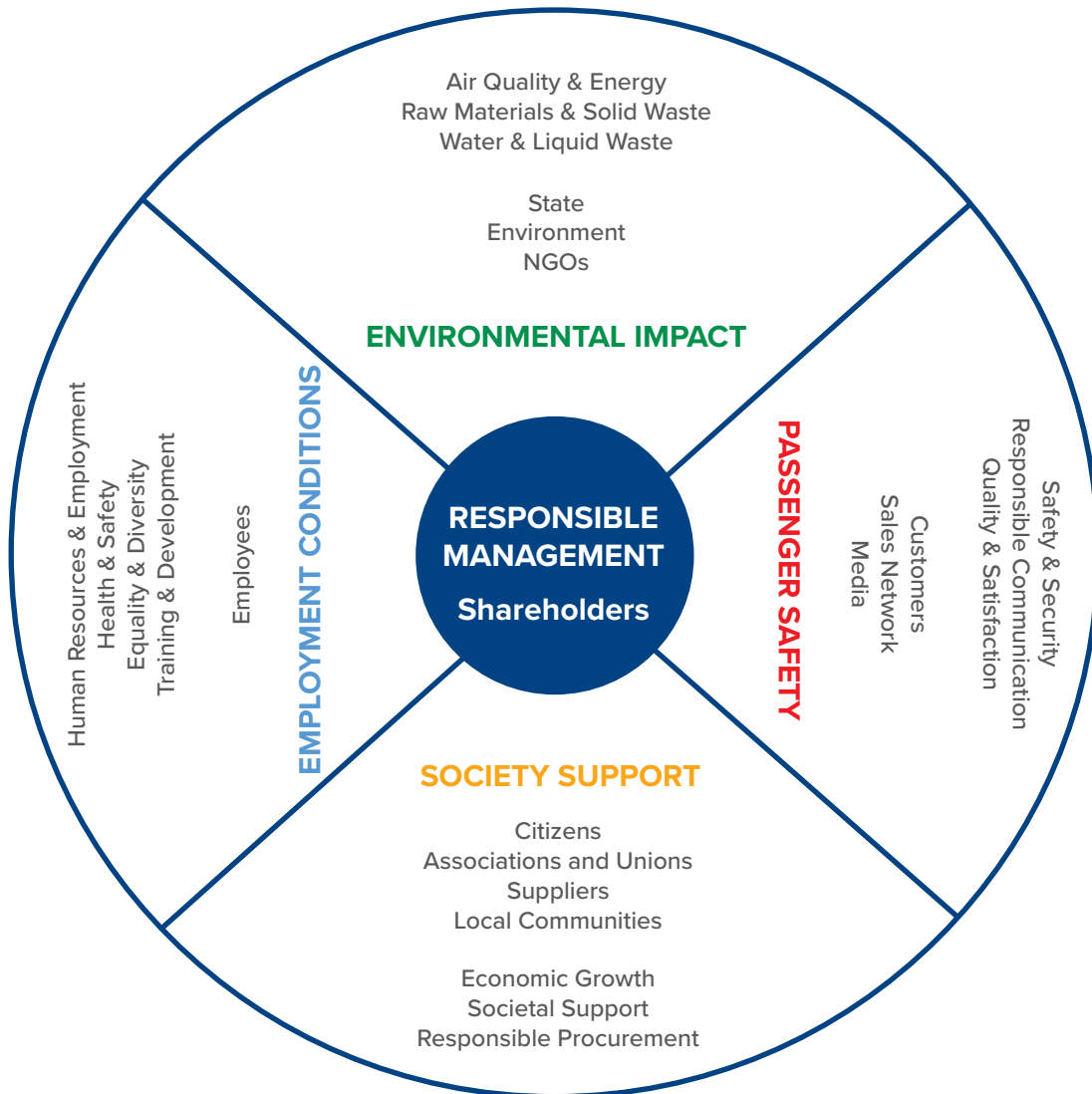


3. Materiality and Stakeholders

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



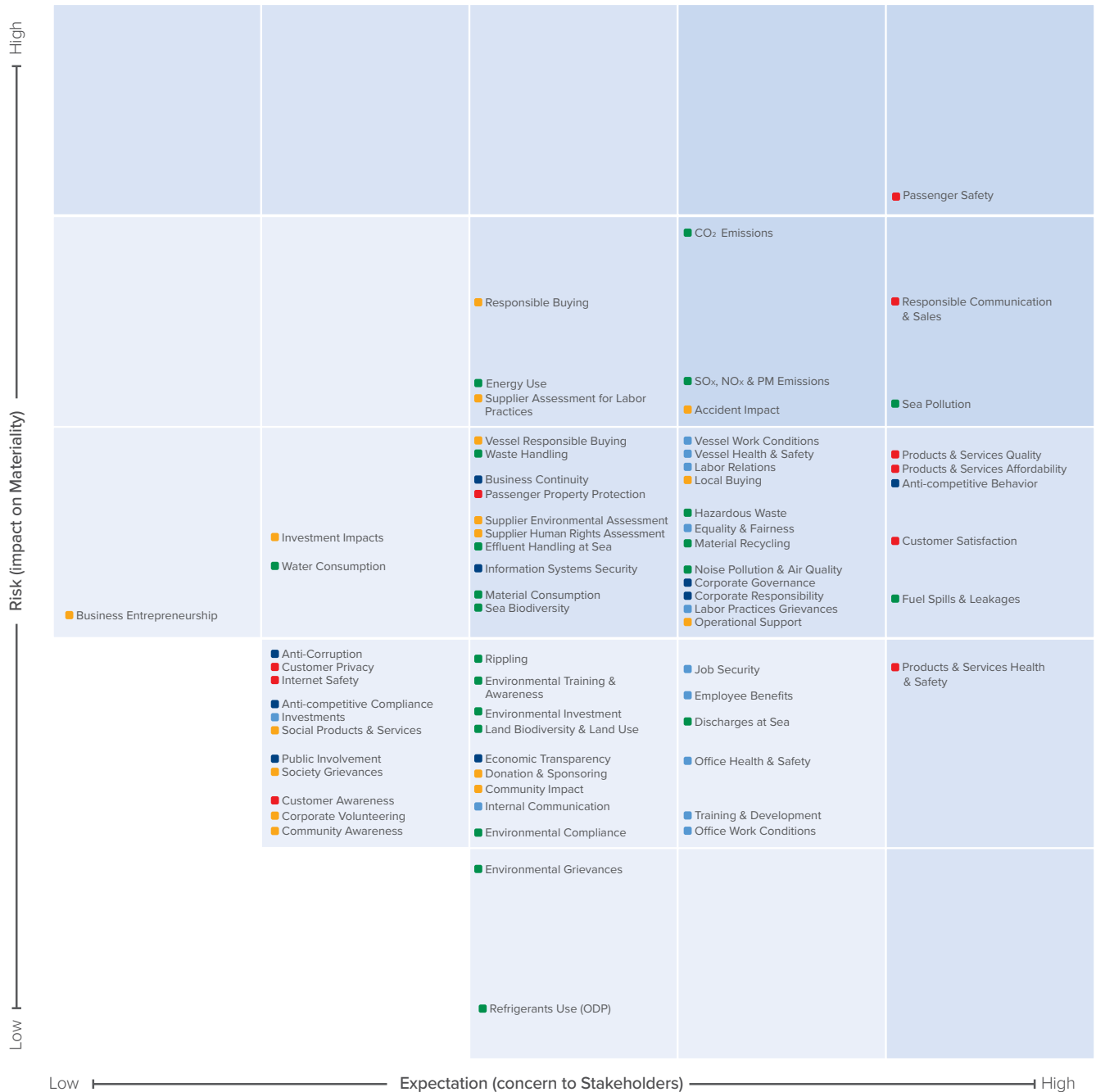
In each one of the areas of Corporate Responsibility, we focus on Material Topics, identified through a respective Materiality Analysis, during which:

- 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 (see Section IV-2), as well as a workshop conducted to over 110 Management executives, including the Chief Executive Officer, Top Management members, Directors and Managers from all departments, who analyzed the risk and our Stakeholders' expectations on each topic, in order to develop our Materiality Analysis.

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 2019 (all Topics that were not deemed Material are not referenced in detail):

Corporate Responsibility Materiality Analysis



- 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

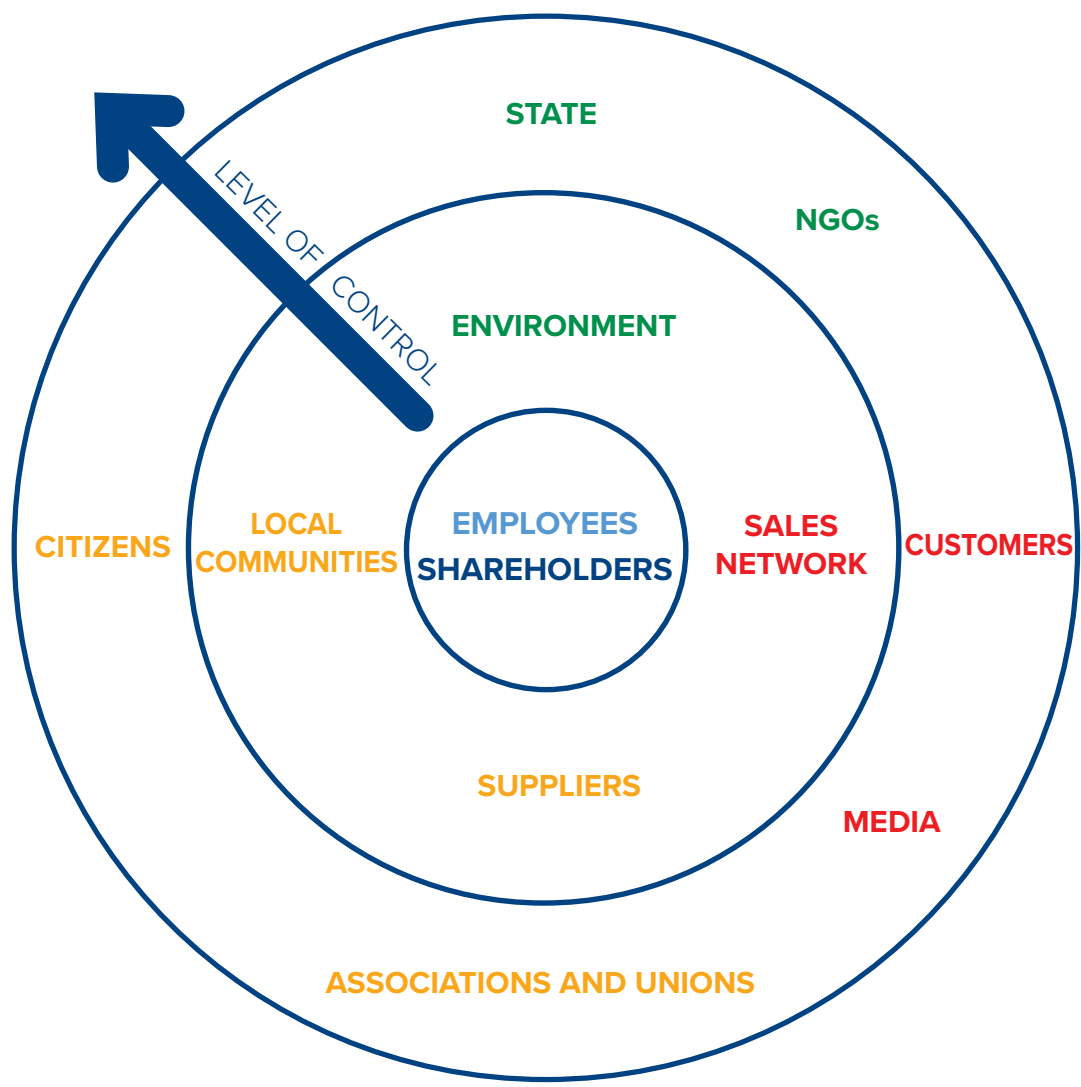
The way we operate, as well as our decisions, affect a wide range of people, groups and organizations, who comprise our Stakeholders. The following table describes our Stakeholder groups, which influence or are influenced by our operations, the methods we apply to continuously communicate and interact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

Stakeholder Engagement

Stakeholder	Methods of interaction through continuous activities (unless indicated otherwise)	Main issues of interest (reference in Report)
DIRECT		
Employees	<ul style="list-style-type: none"> • Events / Meetings • Training • Negotiations with Employee Unions (through Greek Shipowners Association for Passenger Ships – SEEN) • Corporate Intranet 	<ul style="list-style-type: none"> • 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) • Internal Communication (VI-1)
Shareholders	<ul style="list-style-type: none"> • Shareholders General Assembly (annually/extraordinary) • Websites • Meetings 	<ul style="list-style-type: none"> • Passenger Safety (VII-1) • 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	<ul style="list-style-type: none"> • Qualitative Greek Domestic Lines Survey (every 2-3 years) • Quantitative Greek Domestic Lines Survey (every 2-3 years) • Customer Services Division • Websites • Satisfaction / Complaints Questionnaires • Social media • Information leaflets 	<ul style="list-style-type: none"> • 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) • Customer Privacy (VII-1) • Internet Safety (VII-1) • Customer Awareness (V-2, VIII-1-3)
Sales Network	<ul style="list-style-type: none"> • Events / Meetings • Information systems • Travel agents' online portal • Websites 	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Supplier evaluation • Meetings • Contracts 	<ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • Discussion with representatives at local and national level • Meetings / Presentations • Participation in organizations and associations • Vessel inspections • Formal communication 	<ul style="list-style-type: none"> • 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)
Associations and Unions (e.g. Industry Associations, Hoteliers' Associations)	<ul style="list-style-type: none"> • Participation in associations • Meetings / Presentations • Discussion with representatives at local and national level • Formal communication 	<ul style="list-style-type: none"> • Passenger Safety (VII-1) • Products & Services Quality (VII-1, 3) • Products & Services Affordability (VII-3)

Stakeholder	Methods of interaction through continuous activities (unless indicated otherwise)	Main issues of interest (reference in Report)
INDIRECT		
Local Communities (e.g. islands)	<ul style="list-style-type: none"> Qualitative Greek Domestic Lines Survey (every 2-3 years) Quantitative Greek Domestic Lines Survey (every 2-3 years) Meetings / Presentations Local events and programs 	<ul style="list-style-type: none"> Community Impact (V-2) Sea Pollution (VIII-2, 3) Fuel Spills & Leakages (VIII-3) CO₂ Emissions (VIII-1) Effluent Handling (VIII-3) Waste Handling (VIII-2) Hazardous Waste (VIII-2) SO_x, NO_x & PM Emissions (VIII-1) Noise Pollution & Air Quality (VIII-1) Environmental Grievances (IV-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)
Citizens	<ul style="list-style-type: none"> Qualitative Greek Domestic Lines Survey (every 2-3 years) Quantitative Greek Domestic Lines Survey (every 2-3 years) Websites Social media 	<ul style="list-style-type: none"> Passenger Safety (VII-1) Products & Services Quality (VII-1, 3) Energy Use (VIII-1) Sea Pollution (VIII-2, 3) Fuel Spills & Leakages (VIII-3) CO₂ Emissions (VIII-1) Environmental Training & Awareness (VIII-1) Material Consumption (VIII-2) Material Recycling (VIII-2) Responsible Communication & Sales (VII-2) Accident Impact (V-2, VIII-1) Social Products & Services (V-2)
Non-Governmental Organizations (NGOs)	<ul style="list-style-type: none"> Collaborations Meetings / Presentations 	<ul style="list-style-type: none"> 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) 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	<ul style="list-style-type: none"> Press releases Press conferences Websites 	<ul style="list-style-type: none"> Passenger Safety (VII-1) Products & Services Quality (VII-1, 3) Community Impact (V-2) Sea Pollution (VIII-2, 3) Fuel Spills & Leakages (VIII-3) Accident Impact (V-2, VIII-1) Donation & Sponsoring (V-2) Environmental Investment (VIII-1) Anti-competitive Compliance (IV-1)

Stakeholders and Level of Control

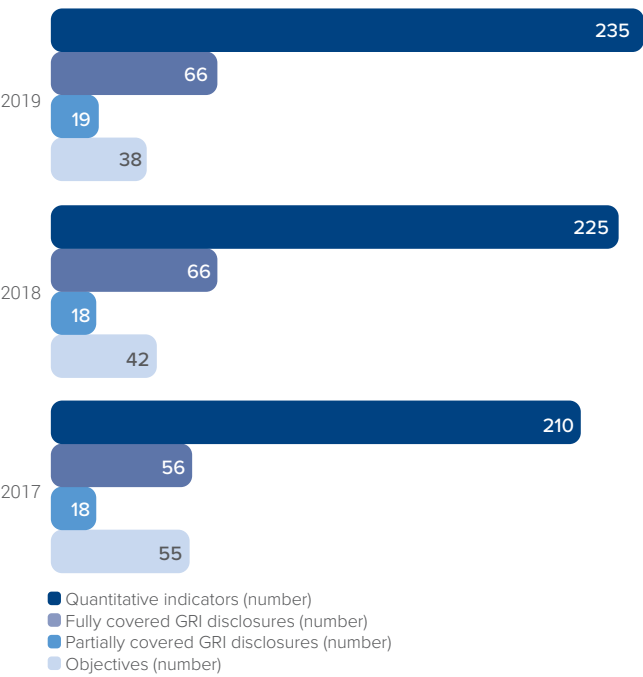


We focus on quantitative data and results

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. To systematically report on our performance, we have identified our Corporate Responsibility Report's quantitative indicators and defined the respective requirements to configure our Enterprise Resource Planning (ERP) system.

We increased by **4.4%** the number of quantitative indicators we make reference to within the Report

Quantitative Data within the Corporate Responsibility Report



4. Achievements 2019 and Future Objectives

We committed	Progress	We aim	By
To improve our overall performance on Corporate Responsibility issues by 24% (by 2020).	75%	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).	100%	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).	75%	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.	25%	To conduct a Stakeholder Engagement process on issues related to Corporate Responsibility.	2020
To include our Corporate Responsibility Report's quantitative indicators in our SAP ERP (by 2021).	50%	To include our Corporate Responsibility Report's quantitative indicators in our SAP ERP.	2021
To integrate the Corporate Responsibility Strategy 2018-2020's target assessment score within the overall Group Strategy (by 2020).	100%		
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.	50%	To include the Corporate Responsibility Strategy 2020 score as a target within the formal appraisal process for Top Management members.	2020
To develop a process to identify, prioritize and include Corporate Responsibility issues in local and international investment agreements.	75%	To apply a process to identify, prioritize and include Corporate Responsibility issues in local and international investment agreements.	2020
To establish a comprehensive Business Continuity Plan to ensure continuation of our operations following unexpected events (by 2020).	25%	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.	0%	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.	2020
		To complete the implementation of our Fleet Management System for all our vessels.	2020



We support prosperity
of Society

SOCIETY

We are

€405.4

million turnover

€470.8

million economic value
distributed

139,703

discount tickets

99

blood units from volunteer
blood donors

€2.8

million social contribution

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.

We follow

Principles of the United Nations' Global Compact

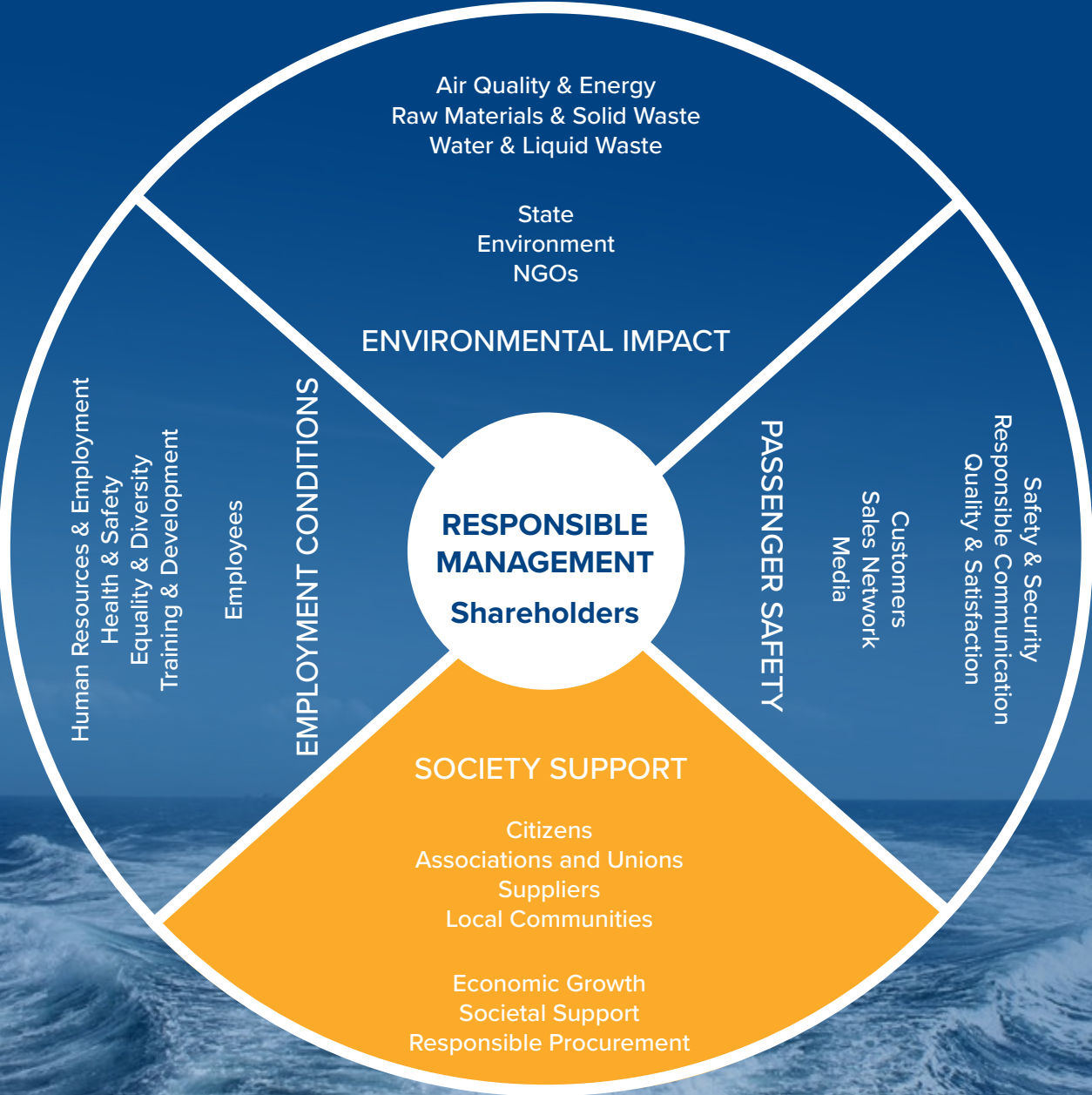
- 1 Support and respect protection of internationally proclaimed human rights
- 2 Ensure not to be complicit in human rights abuses
- 4 Eliminate all forms of forced and compulsory labour
- 5 Abolish effectively child labour
- 8 Promote greater environmental responsibility

We achieved

- We distributed over €470 million in economic value: over €94.2 million to employees (for salaries, benefits and insurance payments), €81.9 million for taxes (including VAT and port taxes), €29.9 million to providers of capital (for interest and return payments), €21.9 million to agents (for commissions), €205.6 million to suppliers (for purchases of goods and services), €2.8 million to society (for discount tickets, implemented programs, sponsorships and donations) and €34.5 million for investments.

- We implemented or supported societal support activities in 100% of the islands we serve.
- We increased the total number of discount tickets offered by 85.5%.
- We increased the total value of societal support activities by 24.8%.
- We allocated 55% of sponsorships and donations to local communities.
- We increased the number of employees participating in volunteer activities and employee volunteering hours by 13.5% and 49.3% respectively.
- We collected 282 blood units through our voluntary blood donation programs in the last three years.
- We welcomed 1,047 young people from schools and universities visiting our offices and vessels.
- We supported the development of 86 students in Merchant Navy's Officer academies.
- We spent 77.2% of total procurement expenditure to local suppliers.
- We spent 15.4% of total procurement expenditure to small and medium-sized enterprises (up to 50 employees).
- We have defined 10% of suppliers' selection criteria to be related to their responsible operation.

We focus



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 2017-2019 (additional financial information can be found in our Annual Financial Reports at www.attica-group.com).

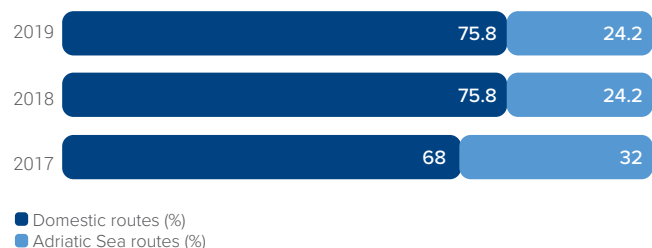
Financial Results

	2017	2018*	2019
Turnover (total sales with VAT) (million €)	271.54	365.4	405.4
Operating costs (million €)	211.52	290.8	316.2
Earnings before interest, taxes, depreciation and amortization (EBITDA) (million €)	59.55	57	78
Profits after taxes (million €)	1.25	17.27	20.8
Corporate taxes (thousand €)	307	264.4	197
Total taxes (including corporate taxes, VAT and port taxes) (million €)	49.43	71.3	81.9
Payments to providers of capital (million €)	34.7	59.3	29.9
Payments to suppliers (million €)	130.75	196.6	205.6
Cost of employees (including salaries, benefits and insurance payments) (million €)	61.61	91.6	94.2
Commissions to agents (million €)	15.27	20.6	21.9
Investments (million €)	7.18	128	34.5

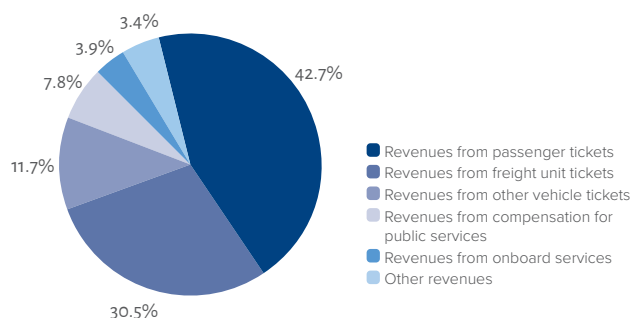
* Data refer to the period 01/01/2018-31/12/2018 for Blue Star Ferries and Superfast Ferries and 01/06/2018-31/12/2018 for Hellenic Seaways.

It must be noted that during 2019, the total financial compensation received from the Greek State and grants from the European Union amounted to €31.44 million, compared to €23.87 million in 2018, 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.

Turnover per Market



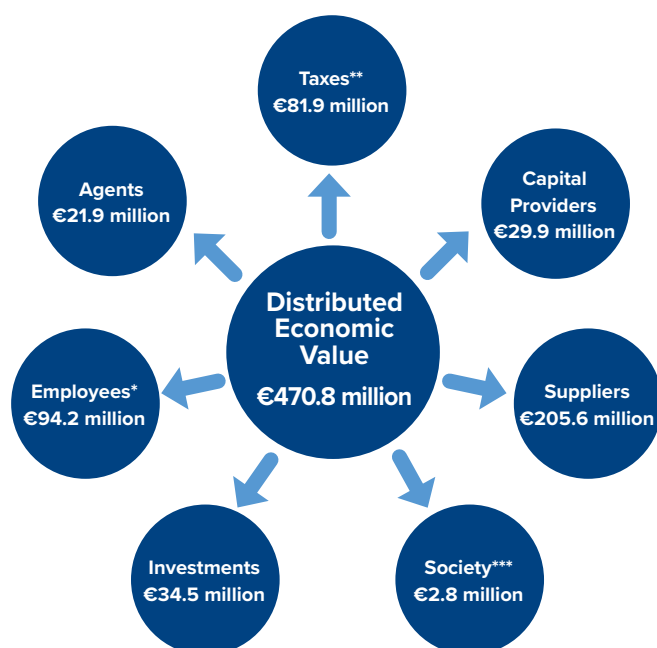
Revenue Structure



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



* 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 distributed over **€470** million in economic value: over **€94.2** million to employees (for salaries, benefits and insurance payments), **€81.9** million for taxes (including VAT and port taxes), **€29.9** million to providers of capital (for interest and return payments), **€21.9** million to agents (for commissions), **€205.6** million to suppliers (for purchases of goods and services), **€2.8** million to society (for discount tickets, implemented programs, sponsorships and donations) and **€34.5** million for investments

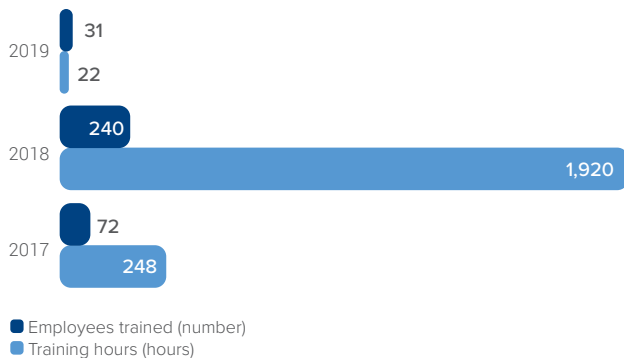
We help our sales network develop

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.

Besides trainings conducted to the Blue Star Ferries, Superfast Ferries and Hellenic Seaways sales network, we trained 2 employees of AML's sales network in 2019, for a total duration of 56 training hours.

Sales Network Training



2. Society Support

We support society

;) Good Practice

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 170 societal support activities in 2019, compared to 130 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

We offered over €198,000 to various social groups, organizations and sport associations during 2019, out of which over €43,000 to NGOs, without any infrastructure investments to local communities, with the following indicative examples:

- The Holy Diocese of Chios-Psara-Oinousses.
- The 1st Local Health Unit of Kos.
- The Sport Association Kolossos Rhodes.
- The Sport Association Foinikas Syrou.
- The Heraklion Sailing Club.
- The Port Authority of Astypalaia.
- The non-profit organization FAROS.

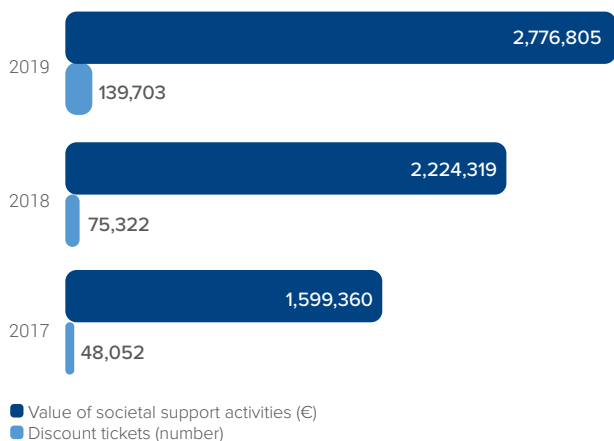
- The amateur sports and cultural association AMES Nireas.
- The Ecumenical Confederation of Constantinople.
- The 'Agoni Grammi Gonimi' program.
- The Safe Water Sports initiative.
- The Olympic sailing team P. Mantis - P. Kagialis.

Social Contribution

	2017	2018	2019
Value of discount tickets (€)	1,436,386	1,982,089	2,578,597
Value of donations from passengers to charitable organizations through collection boxes in vessels (€)	2,605	3,433	4,413
Value of implemented social programs (€)	4,730	42,995	54,138
Value of sponsorships and donations (€)	155,639	195,802	139,657

Furthermore, we donate surplus equipment to schools and charitable organizations, with an indicative value of €1,900 for electronic equipment donated in 2019, which included 3 personal computers, 3 computer monitors, 3 keyboards, 3 computer mice and 2 multi-function printers.

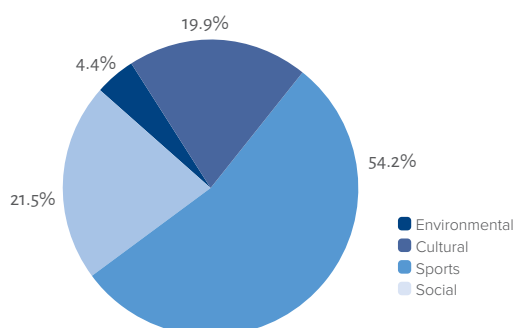
Society Support



We increased the total number of discount tickets offered by 85.5%

We increased the total value of societal support activities by 24.8%

Sponsorships and Donations



Good Practice

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 Lesbos, 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 in Cyclades, Dodecanese, North Aegean islands, Sporades, Saronic islands and Crete (Heraklion and Chania).
- 50% discount for substitute teaching faculty appointed to islands.
- 30%-100% discount for 217 residents in Cyclades, Dodecanese, Saronic islands, Sporades and North Aegean islands, as well as 144 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 Hydra, Spetses and Ag. Eustratios to specific routes.
- 100% discount to 1,600 passenger tickets for 107 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 to support:

- Archaeological programs and excavations in Keros, Paros and Lesbos, the Infinite Liquid Project to highlight the diversity and beauty of Greek underwater caves, as well as the archeological exhibition 'From the world of Homer. Tinos and Cyclades in the Mycenaean era'.
- Activities and conferences to provide information for environmental and biodiversity protection, such as activities of the Hellenic Society for the Study and Protection of the Monk Seal, the scientific conference 'Designing the protection of natural heritage for sustainable development' of the Hellenic Society for the Environment and Cultural Heritage, the cleaning of sea shores in Paros by the Marine Environment Protection Organization and the transportation of tree saplings for a reforestation activity in Tinos.

Overall, it is estimated that during 2019, we offered 139,703 discount tickets for sport, cultural and educational activities and additionally benefitted thousands of citizens who participated or attended those events and activities.

Good Practice

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 2019 we:

- Implemented for the 2nd consecutive year the initiative 'Greek Communities of Italy – A voyage to culture', during which school students and adults in Reggio (Calabria) and Messina (Sicily) attended Greek language and culture lessons, participated in experiential/art workshops, learnt traditional Greek dishes, danced, sang and read Greek literature. At the same time, we supported the publication of a book about our National Poet Dionysios Solomos, which was sent to 90 libraries in Greece and Greek associations, Greek schools, universities and school/community/regional libraries in Italy, while we offered an interactive board to the Greek Culture Association of Bova Marina for their educational and cultural activities.
- Continued our collaboration with the Greek Gastronomy Guide for 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 are displayed in the website www.greekgastronomyguide.gr.
- Continued our collaboration with the 'pculiar' platform Reflex Photographers for the cultural activity 'The unseen Aegean beauty' and created an online photo album of culture and customs photos from Aegean islands available at www.bluestarferries.com, to highlight cultural richness and enhance knowledge about each island's culture and customs.
- Hosted events of the Association of Carpathians, Association of Marpissa & Archilochites of Paros and the Federation of Lesbian Associations of Attica, as well as 2 Greek National Tourism Organization's events in Ancona and Bari on our vessels.

Good Practice

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 2019:

- Smile of the Child.
- Amnesty International.
- Lions Club Rhodes.

Good Practice

First Aid Training Courses

We continued our 'First Aid' training program for the 6th year, in cooperation with the Volunteer Crisis Rescue Team (VCRT), during which First Aid training courses have been conducted in Tilos, Amorgos, Santorini, Paros and Naxos, while relevant courses were conducted in Leros and Symi during 2019, with over 670 participants (out of whom 169 within 2019), which mark substantial contribution to disseminate valuable First Aid knowledge and cultivate volunteering and solidarity for our fellow citizens.

As a result of the 'First Aid' training program that started in 2014, the VCRT of Amorgos was created in 2015, to which we are the main sponsor, and has since provided significant rescue assistance in emergency situations, with additional First Aid training courses conducted to 150 children and adults in Lesser Cyclades.

Furthermore, First Aid training courses were conducted for 74 office employees in 2019.

Good Practice

'Agoni Grammi Gonimi'

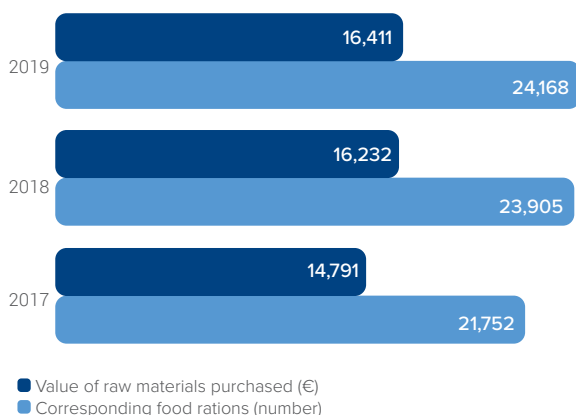
To ensure participation of small island residents in educational and cultural events, we supported the 'Agoni Grammi Gonimi' program for the 13th consecutive year, which is the largest educational and cultural program of remote Aegean islands. Within 2019, the program featured cultural activities in Astypalaia, Donoussa, Naxos, Thirasia, Karystos and Kythira with 9 creative workshops in different thematic areas (Technology, Sports, Arts, Dance, Theater and Music), with the participation of 195 children and 10 adults, compared to 167 children and 20 adults in 2018.

;) Good Practice

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



Furthermore, since 2019 we have offered 3,990 food rations with a total value of €5,985 in cooperation with the non-profit organization FAROS ELPIDAS, offering cooked meals from our Blue Horizon and Blue Galaxy vessels to vulnerable groups in the Municipality of Moschato-Tavros.

We allocated 55% of sponsorships and donations to local communities

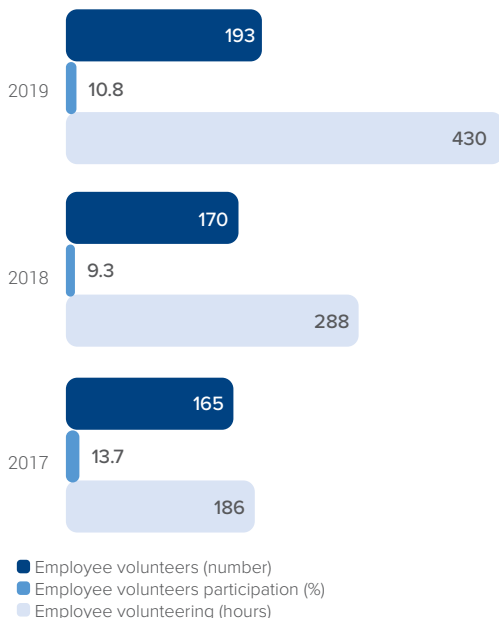
At the same time, we participated in efforts by the Greek government and non-governmental organizations to assist refugees, as in 2019 we:

- Transported free-of-charge 1,521 unaccompanied minors and NGO 'Metadrasí' volunteer escorts, which specializes in interpreting and protecting unaccompanied minors, with 4,203 people transported during 2016-2019.
- Provided free tickets to organizations and associations for 66 humanitarian aid shipments, during which we transported approximately 1,300 packages, boxes, parcels and pallets, as well as 12 vehicles with additional materials to support refugees.

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 3rd charity race 'No Finish Line' with a team of 95 volunteer runners, who covered a total distance of 1,560 km and offered €780 to support the association 'Together for Children'. Based on the total kilometers run, our team ranked 1st among 18 companies with 60-119 runners and 18th in the overall ranking among 100 participating companies.

Employee Participation in Societal Support Activities



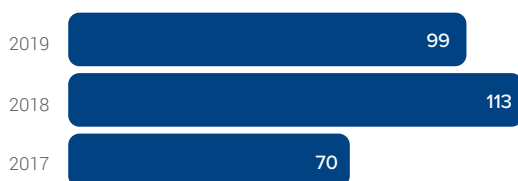
We increased the number of employees participating in volunteer activities and employee volunteering hours by **13.5%** and **49.3%** respectively

;) Good Practice

'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 2019, we continued the program for the 11th consecutive year with 2 employee voluntary blood donations, in cooperation with the 'G. Gennimatas' General Hospital and gathered in total 99 blood units, out of which 38 units were utilized for our employees' and their families' needs and 3 units from local community members.

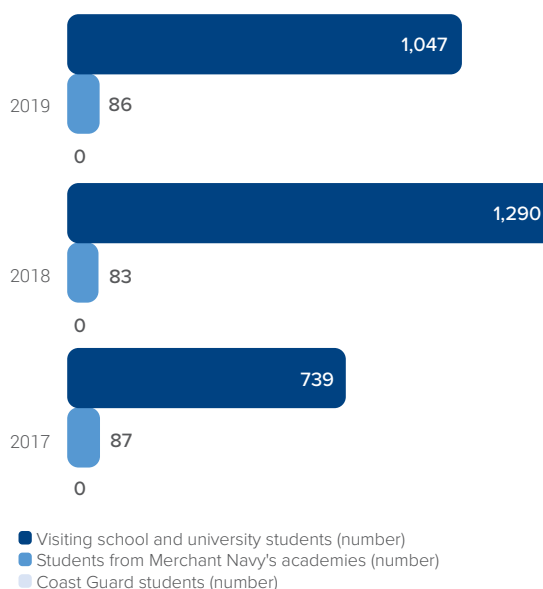
Voluntary Blood Donation



■ Blood units (number)

We collected **282** blood units through our voluntary blood donation programs in the last three years

Supporting Professional Growth



We welcomed **1,047** young people from schools and universities visiting our offices and vessels

We supported the development of **86** students in Merchant Navy's Officer academies

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. Within this context, we have implemented relevant programs for 24 school and university students during 2018-2019, out of which 25% have been hired.

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 18.2% of office security personnel on our human rights policies and procedures, which accounted for 13.1% 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 2019, the following significant incidents occurred on our vessels:

- A minor collision of Blue Star Naxos in the shallows occurred during maneuvering at the Schinoussa port, due to sudden adverse weather conditions, without any injuries among passengers and crew members. The vessel sailed by itself to the Naxos port and was inspected by the competent authorities. In parallel, we arranged for passengers to be forwarded to their destinations and repaired the minor damages to the vessel's reefs.
- A fire onboard Flying Dolphin XVIII occurred, while an external crew was cutting the vessel's hull in the Perama Shipbuilding Repair Zone, which caused the complete vessel destruction (besides the 2 engines). The fire was extinguished by the Fire Service, tugboats and own means, without any injury or marine pollution occurring.
- Three mooring ropes of our Superfast II vessel smashed at the Igoumenitsa port, due to a sudden change in weather conditions, when the vessel's ramp was lifted by a mooring rope of another vessel's siding very close. The incident caused damages, without any injuries.
- A minor collision on the left side of high-speed FLYING CAT 3 with a sea taxi, which did not follow collision avoidance rules, during its journey to the Hydra port. The collision caused small plate abrasions, without any injuries among passengers or crew members or marine pollution.

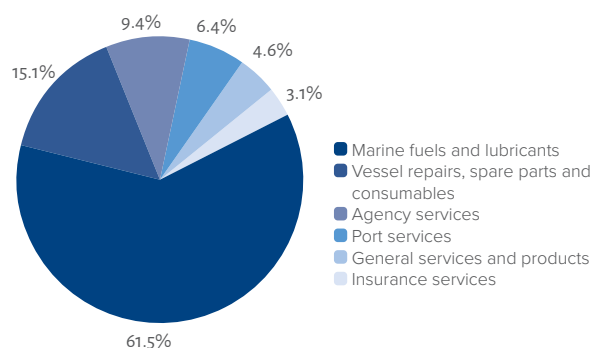
3. Responsible Procurement

We give priority to local suppliers

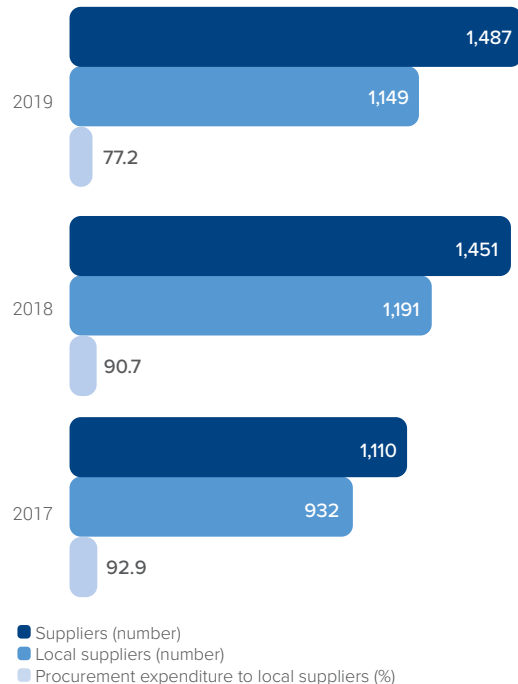
Our suppliers are 1,487 throughout Greece and abroad, with 77.2% of them being local suppliers. Based on their turnover, we consider 143 of them as major suppliers, out of which 100 are local suppliers. For 2019:

- The average supplier payment time was 104 days, compared to 114 days in 2018.
- 100% of payments for undertaken contractual obligations were made according to the terms in our contract agreements, as in 2018.

Supplier Categories



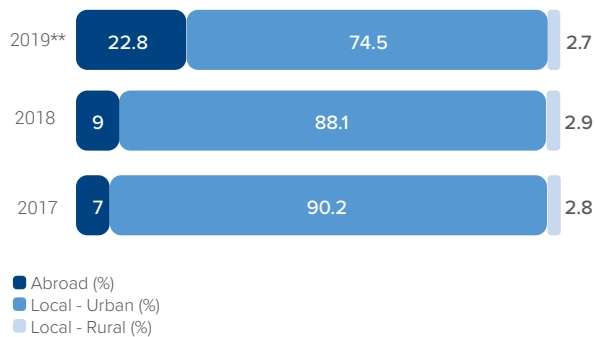
Suppliers and Procurement Expenditure



We spent **77.2%** of total procurement expenditure to local suppliers

We spent **15.4%** of total procurement expenditure to small and medium-sized enterprises (up to 50 employees)

Allocation of Purchases per Region*



* Percentages refer to the procurement expenditure of all suppliers.

** The 2019 change in purchases is attributed to purchasing the cargo vessel Blue Carrier 1 and ordering air pollutants monitoring systems (scrubbers) from foreign 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. Within this context, we have incorporated contractual clauses for Corporate Responsibility issues in contracts with significant suppliers, which include protection of human rights, environment and working conditions and tackle corruption, as well as acceptance and compliance with our Code of Conduct for Suppliers/Partners (including their subcontractors). 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.



Policy

Responsibility in our Supply Chain

To implement Corporate Responsibility principles throughout our supply chain, we have developed a Code of Conduct for Suppliers/Partners (which also addresses our Contractors' Suppliers), as well as a single Procurement Process, which defines responsibilities of our suppliers and partners, and establishes supplier selection criteria for products and services. Within this context, we:

- Have defined our principles and specific commitments for suppliers/partners and involved contractors/subcontractors on the following issues:
 - Compliance with national and European law.
 - Freedom of participation in trade unions and collective bargaining.
 - Prohibition of child labor.
 - Prohibition of forced labor.
 - Compliance with working hours.
 - Fair and reasonable remuneration.
 - Fair treatment, diversity.
 - Health and safety.
 - Fight against bribery, corruption and money laundering.
 - Sponsorships.
 - Prohibition of donations to political parties.
 - Environmental protection.
 - Minimize greenhouse gas emissions for climate change.
 - Efficient use of natural resources and waste management.
 - Data security and protection.
 - Respect of free and fair competition.
 - Quality assurance of products and services.
- Consider any violation of the Code of Conduct for Suppliers/Partners as a violation of the agreement with the Supplier/Partner and reserve the right to intervene with corrective actions schedules or other legal actions.
- Prohibit any relationship of interest from employees involved in the procurement process with our suppliers or accept gifts or any other benefit from suppliers.
- Have defined the maximum supplier payment time to 120 days.
- Keep and continuously update our Authorized Suppliers List and require from new suppliers to sign that they accept our Code of Conduct for Suppliers/Partners prior to be included in the List.
- Have defined specific criteria and weighting to evaluate offers for supplier selection, which include responsible operation criteria for suppliers with less than 50 employees and suppliers based outside Attica.
- Require at least three offers for each tender over €3,000, except for direct selection cases, either because they exactly match our technical specifications or only one unique supplier exists.

We have defined 10% of suppliers' selection criteria to be related to their responsible operation

Furthermore, since March 2016 we evaluate our suppliers' performance with an annual spending of over €10,000 and we utilize specific criteria in five areas of the performance evaluation process, based on which we approve our suppliers:

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

Within 2019, we evaluated 94 suppliers (out of which 1 new supplier), which correspond to a spending of over €10,000 and are at the same time important suppliers for our operations, in the following categories:

- Fuel and lubricants
- Engine and deck spare parts and consumables
- Hotel operation
- Office

It must be noted that:

- We assess the performance of potential suppliers prior to our collaboration, according to available and applicable criteria. Within 2019, we initiated collaboration with 311 new suppliers.
- 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 any relevant suppliers within 2019.
- 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 2019, 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, in case we cannot determine whether product specifications match the ones agreed with the supplier, in order to analyze and verify their specifications.

Good Practice

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 2019 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility issues related to Community by 10% (by 2020).	100%	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).	50%	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.	100%		
To develop a Policy for our Contractors' Suppliers.	100%		
To develop a Code of Conduct for Suppliers, including selection criteria to become a supplier.	100%		
To integrate Corporate Responsibility issues in selection criteria to become a supplier.	100%		
To support the activities of charitable organizations and NGOs.	100%	To support the activities of charitable organizations and NGOs.	2020
To implement at least 2 volunteer activities with the participation of our employees.	100%	To implement at least 1 volunteer activity with the participation of our employees.	2020
To design and implement 2 programs / activities to address local communities needs in the areas of sports, culture, education or health (by 2020).	100%	To design and implement 2 programs / activities to address local communities needs in the areas of sports, culture, education or health.	2020



VI

We establish positive
Employment Conditions

EMPLOYEES

We are

99.3%

of employees covered
by voluntary benefits

1,779
employees

14%
women

100%

of employees with full time
employment contracts

100%

of employees informed regarding
Corporate Responsibility issues

We commit to

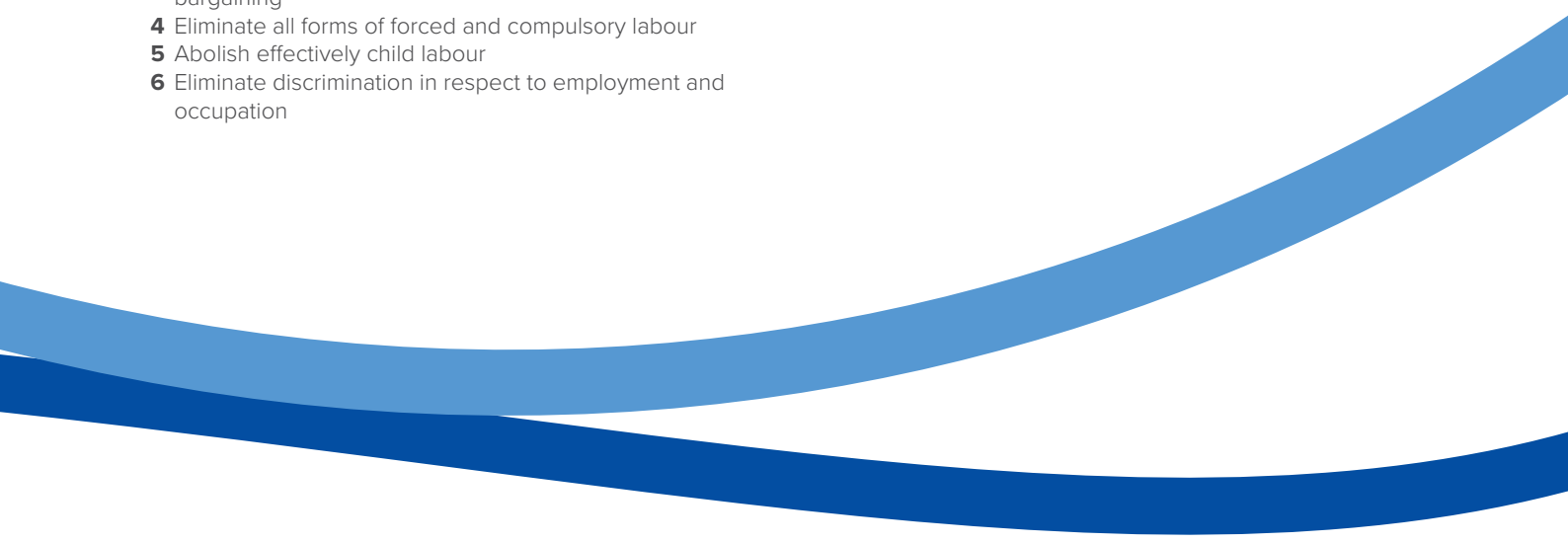
Cultivate a workplace focused on respect, equality, safety and merit, as well as offer training opportunities to our employees, in order to facilitate their personal and professional development.

We follow

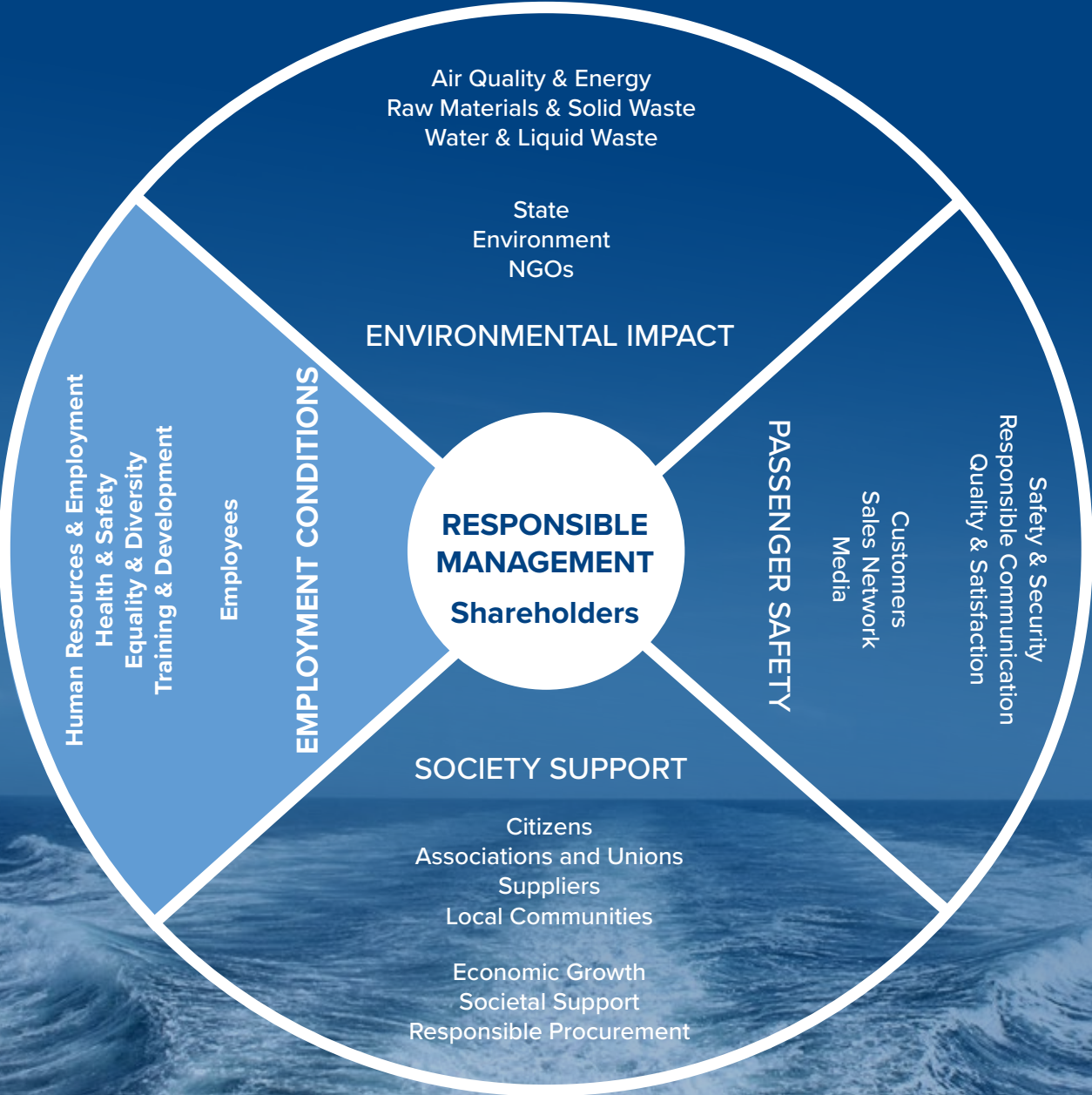
Principles of the United Nations' Global Compact

- 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 trained at least once over 61% of our office employees.
- 

We focus

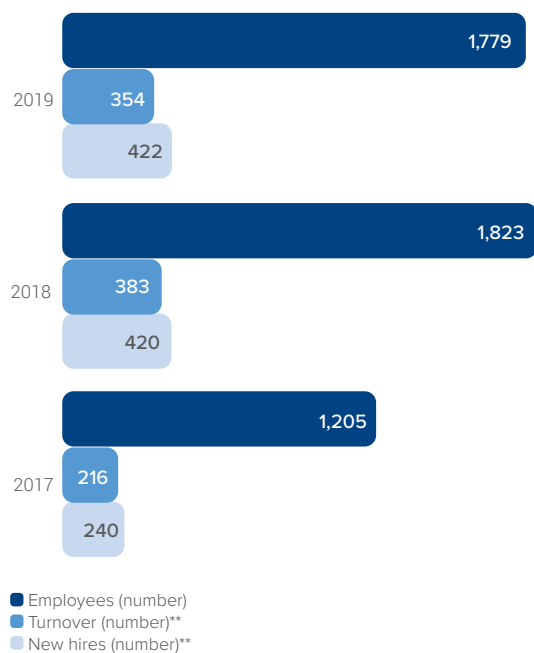


1. Human Resources and Employment

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 36.7% compared to the autumn and winter months (1,728 employees compared to 1,264).

Human Resources*



* Data refer to 31/12/2019 for office employees and to the average of 01/03/2019 and 01/07/2019 for marine employees.

** New hires and turnover for the period 2017-2019 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)	1,582	197 (11.1%) (15 women in total) (182 marine employees)	1,779	0	
Gender	Female	Male			
Employees (number)	250	1,529			
Age	<30	30-50	>50		
Employees (number)	267	1,231	281		
Categories	Nationalities	Disabilities	Foreigners		
Number	5	0	7		
Education Level	Public School - High School	Post High School / Higher / Highest Education	Postgraduate Education		
Employees (number)	1,335	402	42		
Employment Tenure	<5 years	5-10 years	>10 years		
Employees (%)	37.2	12.8	50		
New Hires**	Female	Male	<30	30-50	>50
Employees (number)	34	388	177	206	39
Turnover**	Female	Male	<30	30-50	>50
Employees (number)	33	321	101	169	84
Turnover**	Resignations	Redundancies	Other		
Turnover reason (%)	38.7	61.3	0		
Working Place	Offices	Vessels			
Employees (number)	283	1,496			
Hierarchy	Top Management***	Directors***	Employees	Total	
Employees (number)	37	74	1,668	1,779	

* Data refer to 31/12/2019 for office employees and to the average of 01/03/2019 and 01/07/2019 for marine employees.

** New hires and turnover for 2019 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.

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

It must be noted that:

- The average age of office and marine employees is 44.3 and 39.3 years respectively.
- The average employment tenure for office and marine employees is 14.5 and 10.9 years respectively.
- The turnover rate of office employees was 4.2% (out of which 2.8% redundancies and 1.4% resignations) and 22.9% for marine employees (out of which 14% redundancies and 8.9% resignations).
- There were 2 office employees who left before completing 12 months of employment, while the respective turnover rate of marine employees was 10.6% (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 47.2% compared to male office employees, while the turnover rate of male marine employees is lower by 73.1% compared to female marine employees.
- The majority of our employees are from the prefecture of Attica, while there were no workers under freelance arrangement working within the Group during 2019.

100% of employees in Director positions are Greek

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:

- Crew cabins are located above the main deck.
- We set temperature, ventilation and lighting conditions in accommodation areas according to relevant regulations.
- We provide individual cabins to vessel Masters and Officers.
- We equipped entertainment halls with various recreation means (library, TVs, film projectors, board games) in all vessels, accessible by all marine employees.
- We systematically clean and sanitize accommodation areas.

No grievances regarding our marine employees' living conditions were filed



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 2019:

- 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 marine employees was 1.06 hours.
- All 2 women who received their maternity leave, returned and continued their work within our Group.
- 3 women employees were granted reduced working hours due to raising a child.

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

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 17 internal communication activities regarding Corporate Responsibility issues to all our employees in 2019.

Good Practice

One Group/One Crew

To strengthen our employees' commitment, we organise an annual corporate half-day event called One Group/One Crew for the last 3 years, with the participation of all office employees, during which:

- The Chief Executive Officer refers to important events of the previous year, announces financial results and focuses on specific issues such as our Vision, Values and the Group's Strategy for the next five years.
- We held 4 presentations by renowned external speakers from the sectors of sports, academic community, corporate responsibility and brand strategy, which all focused on our culture and Values, in order to strengthen teamwork and our employees' ability to achieve their goals.
- Each Department reviews its objectives, while the Chief Executive Officer and the Executive Directors announce the current year objectives.
- We organize a cocktail party to strengthen our employees' interpersonal relationships.

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:

- There is a 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 in emergency incidents and notifies the Group regarding its findings.
- We 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.
- We 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.
- We continuously train our marine employees on Health, Hygiene and Safety issues (such as response to emergency situations), during which 3 employees were trained on maritime safety and vessel and port infrastructure safety for a total duration of 72 training hours within 2019, while overall 96 vessel Officers have been trained on prevention of serious diseases.
- We provide the necessary personal protective equipment and relevant training to all marine employees.
- We ensure proper employment conditions, such as temperature, ventilation, lighting and sanitation.
- We 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 2019.
- We record and monitor accidents and Health and Safety incidents, in order to take corrective actions and eliminate respective risks.
- We 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 and Law 3580/2010 regarding employee Health and Safety.
- Have created a six-member Health, Safety and Environment Team, which designs and proposes our overall strategy on employee health and safety issues related to their workplace, as well as protection of our assets, passenger safety and marine environment.
- Have developed a comprehensive Security Measures Plan.
- Have created a Health, Safety and Environment Division to properly implement preventive systems and protection measures for employees and buildings.
- 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 posts on the corporate Intranet instructions for emergency situations to all office employees, 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 76 employees (26.8% of office 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 137 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 2019.

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 within 2019, while there were no occupational diseases among our employees.
- There were only minor accidents with minor injuries involving our employees within 2019, without any accidents to office employees.
- The total absenteeism rate for female office employees compared to male office employees is higher by 41%.
- There were two lawsuits for marine employees' injuries filed in 2019, which are expected to be discussed within 2020.
- There were no relevant fines or other sanctions imposed by the respective authorities.
- Two previous lawsuits for marine employees' injuries were discussed within 2019 and the cases are still pending.





3. Equality and Diversity

Policy

Equal Treatment and Human Rights

According to our Regulation of Professional Conduct & Business Ethics, we:

- Apply equal treatment regarding our recruitment practices and appraise our employees fairly and objectively.
- Commit not to tolerate any retaliation towards employees who report any human rights violations.

Health and Safety

	2017	2018	2019
Employees' fatal accidents (number)	0	0	0
Collaborators' fatal accidents (number)	0	0	0
Accidents (number)	14	32	10
Men	14	29	9
Women	0	3	1
Accidents with absence >1 day (number)	12	31	8
Accidents with absence <3 days (number)	2	5	2
Accidents with absence >3 days (number)	12	27	8
Absence from work due to accidents (hours)	0	0	0
Average days of absence per injury (days)	23.5	46.5	43.3
Medical treatment cases (number)	68	114	128
Injury Rate (rate)**	0.78	1.47*	0.36
Men	0.88	1.49*	0.37
Women	0	1.33*	0.32
Occupational Disease Rate (rate)***	0	0	0
Men	0	0	0
Women	0	0	0
Lost Days Rate due to injuries or occupational diseases (rate)****	18.44	70.43*	15.72
Men	20.66	71.39*	15.96
Women	0	63.58*	13.87
Absenteeism Rate due to injuries and occupational diseases (rate)*****	157.9	408.52*	140.4
Men	177.72	419.58*	143.44
Women	0	337.35*	117.94

* Data refer to Blue Star Ferries and Superfast Ferries.

** 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.

We commit to meritocracy

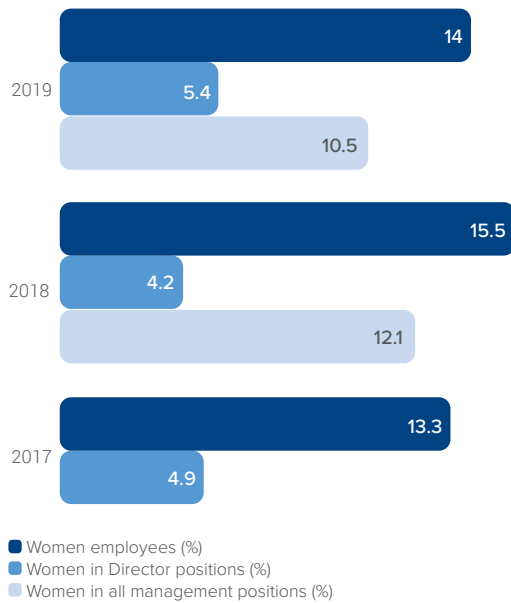
Our commitment towards meritocracy follows the principle to treat all our employees equally, which enables their professional development to depend solely on their performance and skills. We do not allow any kind of discrimination due to gender, religion, age, ethnic group, social or national origin, 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 54.8% and 6.4% respectively.
- The overall percentage of women in all management positions (including supervisors) in offices and vessels is 36.3% and 4.3% respectively.
- The percentage of female office and marine employees in Director positions is 14.3% and 1.9% 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 94.2% respectively.
- The total training hours of female office employees compared to male office employees are lower by 32.8%, without any female marine employees participating in training programs in 2019 (not including internal drills conducted onboard vessels).

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

Percentage of Women



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 2019:

- 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, 2 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 marine employees' work was interrupted during the 4 strikes or lock-outs organized by the Panhellenic Seamen's Federation (PNO) within 2019, due to their opposition to the tax and insurance revisions by the Greek government, with the time lost due to strikes being 1,000 mandays, which corresponds to approximately 0.2% of marine employees' total working time. No office employees participated in any strike or lock-out within 2019.



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 Health, Safety and Environment 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 2019:

- The minimum salary is equal to the lowest salary defined in the industry labor agreement in force.
- The average salary for male office employees and Managers compared to female office employees and Managers is higher by 2.8% and 38% respectively, due to factors such as professional experience, qualifications and expertise.
- The average salary for male office Directors compared to female office Directors is lower by 45%.
- 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 office and marine employees (excluding the highest-paid individual) is 9.36:1 and 4.49:1 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 office employees (excluding the highest-paid individual) is 0.4:1.
- 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 marine employees (excluding the highest-paid individual) is 1.89:1.
- There were 18 lawsuits filed by marine employees for labor disputes (with claims over €30,000), which are expected to be discussed within 2020.
- Regarding 10 previous lawsuits filed by marine employees for labor disputes (with claims over €30,000), these cases were discussed within 2019, with 6 first instance and 4 appeal decisions pending respectively.

We offer additional benefits

We offer a number of voluntary benefits, which cover all our office and marine employees. It must be noted that 99.3% of our office and marine employees (employees with permanent employment contracts and with fixed term employment contract of over 6 months) are covered by a sickness insurance program and all subcontractors' employees working on our behalf in our offices are covered by public insurance, while office Top Management members and Directors are covered by an additional retirement program, for which approximately €320,000 were spend in 2019, compared to €310,000 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 10% within 2019, compared to 7.5% in 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 2019, we updated our office employees' job descriptions, a process completed for 85% of office employees, while a detailed job description is available for 100% of marine 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:

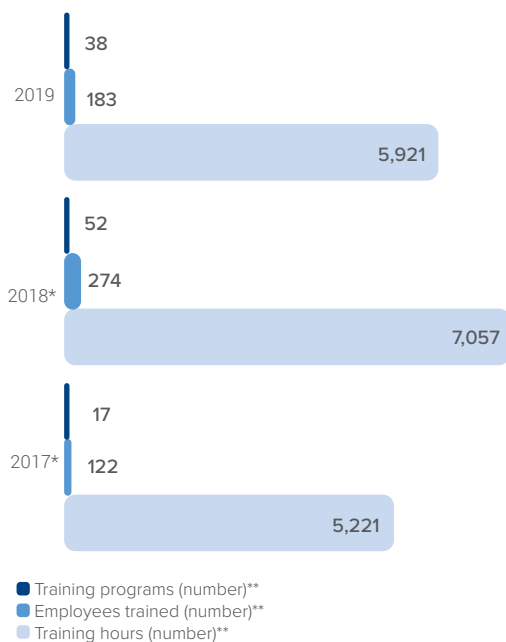
- Marine employees:
 - Corporate Responsibility (e.g. responsible procurement).
 - Foreign languages.
 - Safety and security issues.
 - Response to pollution incidents.
 - Fire fighting.
 - Cleaning processes.
- Office employees:
 - Shipping.
 - Finance / Taxation (e.g. International Financial Reporting Standards).
 - Management issues (e.g. Strategy, Corporate Governance, Protection of Personal Information, Human Resources, Internal Audit, Legal).
 - Information Technology.
 - Marketing.
 - Foreign languages.
 - Safety.
 - Corporate Responsibility (e.g. environmental protection).
 - First Aid.
 - Digitization.
 - Cybersecurity.



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 2019:

- We conducted trainings on our human rights policies and processes to 2 office employees, with a total duration of 80 training hours, without any relevant trainings to marine employees.
- We conducted training programs on Corporate Responsibility issues to our office employees, with the participation of 13% of employees, 92% of Managers and 96% of Directors and Top Management members, as well as to marine employees, with the participation of 1% of vessel Officers and 6% of Master and Senior Officers.
- We included Corporate Responsibility issues in 3 in-house training programs related to environmental management, responsible procurement and responsible communication issues.
- We trained 10 marine employees on safety and Corporate Responsibility issues.
- We conducted training programs on digitization with a total duration of 230 training hours.
- Total cost of training programs exceeded €40,700, compared to over €54,200 in 2018.

Employee Training



* 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.

We trained at least once over 61% of our office employees

Employee Training

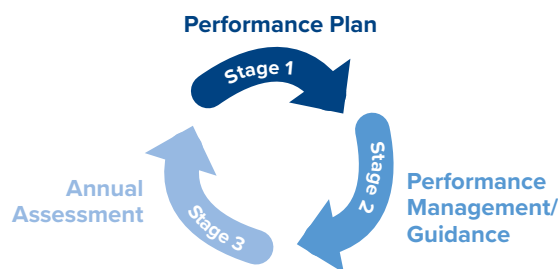
Averages	2017*	2018*	2019
Office employees			
Training per employee (hours)	24.8	30.1	20.6
Training per male employee (hours)	19.4	23	27.5
Training per female employee (hours)	29.5	36.6	14.8
Training per employee in Top Management positions (hours)	50.1	30	9.8
Training per employee in management positions (hours)	34.5	39.3	14.7
Training per employee in administrative positions (hours)	29.6	53.3	57.8
Marine employees**			
Training per employee (hours)	0.2	1.1	0.1
Training per male employee (hours)	0.2	1.1	0.1
Training per female employee (hours)	0.1	1.1	0
Training per employee in Top Management positions (hours)	4	2.6	1.8
Training per employee in management positions (hours)	0.3	3.2	0.3
Training per employee in administrative positions (hours)	0.5	1.2	0.1

* 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:

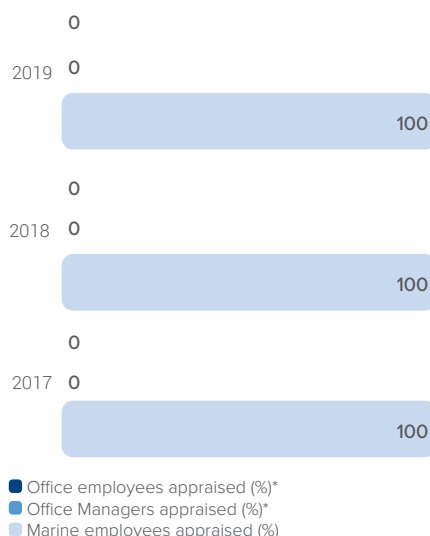


The Performance Appraisal System for office employees consists of 5 main areas:

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.

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 Appraisal



* No performance appraisal for office employees took place for the period 2017-2019, as the Performance Appraisal System was under review.

5. Achievements 2019 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility issues related to Employees by 6% (by 2020).	100%	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.	0%	To conduct performance appraisal for 100% of office employees with a new Performance Appraisal System.	2020
To include specific Corporate Responsibility objectives in formal appraisal process for employees, Managers and at least one Board of Directors member.	0%	To include specific Corporate Responsibility objectives in formal appraisal process for employees, Managers and at least one Board of Directors member.	2020
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 update our employees' job descriptions according to our new organizational structure.	75%	To complete the update of our employees' job descriptions according to our new organizational structure.	2020
To integrate Corporate Responsibility issues into the other categories of in-house training courses.	50%	To integrate Corporate Responsibility issues into the other categories of in-house training courses.	2020
To conduct a Corporate Responsibility e-learning course for our new office employees.	25%	To conduct a Corporate Responsibility e-learning course for 150 marine employees.	2021
To apply a process to monitor health and safety incidents (e.g. injuries, diseases, absences, fatal accidents) of subcontractors' employees working in our offices.	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.	2020





We ensure our Passenger
Safety

CUSTOMERS

We are

14,896

journeys annually

323,309

calls to corporate customer service
phone lines

1,200

questionnaires in vessels

45

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

353,417

members in the Loyalty &
Reward program seasmiles

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.

We follow

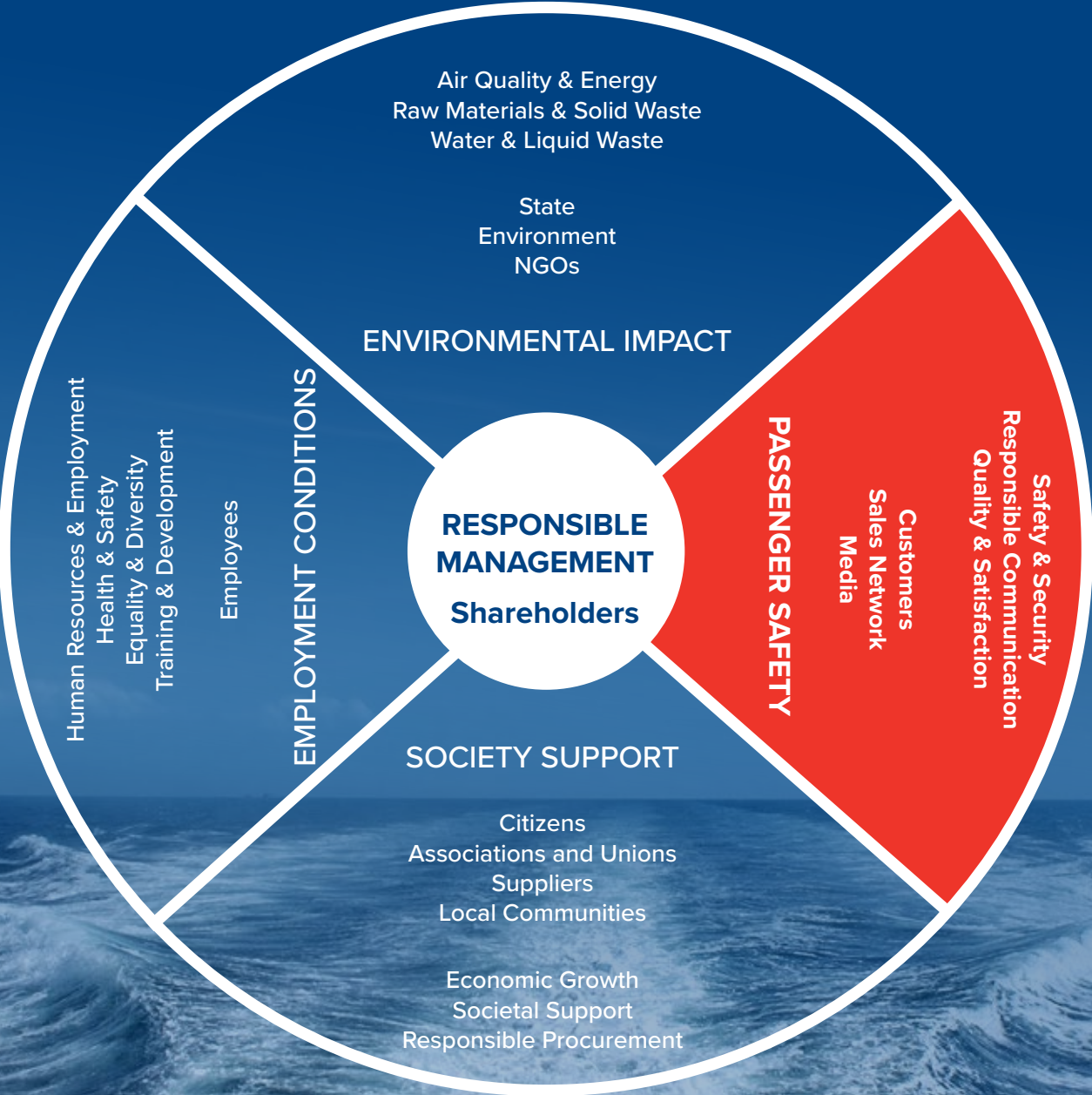
Principles of the United Nations' Global Compact

- 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.
- The overall performance of our vessels in Domestic and Adriatic Sea lines from 'Mystery Passenger' survey for Blue Star Ferries, Superfast Ferries and Hellenic Seaways reached 86%, 83% and 84% respectively.
- We were subjected to 45 inspections from local authorities for food hygiene and safety, with no recorded non-compliance incidents.
- We maintain 5 corporate websites, with over 4.5 million unique visitors annually and handle 2 mobile applications with over 22,600 downloads.
- We trained 80% of Marketing Department employees on responsible communication and marketing issues, for a total duration of 48 hours.
- We informed 456,214 passengers through information SMS for early arrival at the Piraeus port or changes or cancellations of scheduled journeys in Domestic and Adriatic Sea lines (77% of passengers on these routes who have registered their mobile number).
- We send 2,813 notifications to serve passengers to our vessels, out of which 596 concerning passengers with reduced mobility and 12 concerning passengers with sensitivity to allergens.
- The average score of evaluations registered through dedicated devices onboard Blue Star Ferries and Superfast Ferries vessels reached 4 and 4.11 for Hellenic Seaways on a 5 point scale.
- We kept our vessels' departure time at 84% and arrival time at 56% of schedules.
- We increased our seasmiles loyalty and reward program members by 34.7%.

We focus



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 2019.
- Have established Safety Committee in each vessel, in order to examine and assess health and safety issues.
- Train our employees on passenger safety procedures.
- Have launched a safety program based on our Master and Senior Officers' behavior evaluation, to enhance prevention and reduce risks associated with vessel safety.
- 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 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.

Within 2019:

- Four lawsuits for passenger injuries onboard vessels in 2014, 2017 and 2018, as well as a lawsuit for fatal passenger injury onboard a vessel in 2017 were filed, which are expected to be discussed within 2020.
- A lawsuit for non-pecuniary damage related to the Blue Star Patmos grounding at los in 2017 was filed, which is expected to be discussed within 2020.
- Regarding previous legal cases:
 - A lawsuit for passenger injury onboard vessel in 2017 was rejected.
 - Appeals were filed against court decisions which rejected two lawsuits for alleged passenger injuries onboard vessels in 2013 and 2016.
 - An appeal was filed against a court decision regarding a professional driver injury by a truck driver, during a vehicle onboarding in 2016.



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

;) Good Practice

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 2019, the Emergency Response Team's members met, regarding a fire incident on the Flying Dolphin XVIII (see Section V-2).

:) Good Practice

Addressing Infectious / Transmittable Diseases

According to an established procedure and the internal drills conducted as required onboard all 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 2019.



:) Good Practice

Missing Onboard Person Search

Each 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 arrival port, port authorities thoroughly check all passengers and search all vehicles during passenger disembarkation. Within 2019:

- No missing person incident was reported.
- An exemption decision was issued, regarding a missing person incident onboard Blue Horizon in 2015, with the compensation lawsuit for his death filed by relatives expected to be discussed.

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.
- Have communicated to our contractors our notification process and information required (e.g. product details, reason for recall, immediate corrective actions) in cases of products or services being recalled from shops, restaurants and other vessel catering areas due to potential health and safety issues and we collaborate with contractors to ensure removal of product or discontinuation of service.
- 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 to upgrade our services, to ensure efficient operation, provision of quality services and prompt response to customer needs. The 'Mystery Passenger' survey was conducted in 2 phases with 3 visits to each vessel in Domestic and Adriatic Sea lines in 2019, during which at least 17 passenger service categories were evaluated, with no procedures and practices revised or improved as a result of these surveys.

The overall performance of our vessels in Domestic and Adriatic Sea lines from 'Mystery Passenger' survey for Blue Star Ferries, Superfast Ferries and Hellenic Seaways reached **86%, **83%** and **84%** respectively**



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 2019, as in 2018.
- Our contractor carried out 94 inspections during 2019 in areas of interest, such as kitchens and bars, with no findings registered or corrective actions being required, as was the case also in 2018.

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.

;) Good Practice

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 45 inspections from local authorities for food hygiene and safety, with no recorded non-compliance incidents

;) Good Practice

'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

	2017	2018	2019
Lost/found or damaged items (number)	5,027	5,078	5,741
Adriatic Sea lines (number)	291	382	447
Domestic lines (number)	4,736	4,696	5,294
Compensations paid for luggage and other damages (€)	52,438	32,937	34,552
Compensations paid for vehicle damages (€)	45,461	57,800	56,825

Within 2019:

- Two lawsuits for loss of car keys and loss of luggage in 2019 were discussed, with the cases still pending.
- A passenger lawsuit for damages caused to a camper van in 2017 was filed.
- Regarding previous legal cases:
 - Two lawsuits for damages to a truck during vessel loading in 2017 and to a private vehicle in 2018 were discussed and the cases are still pending.
 - Two lawsuits for loss of unaccompanied parcel in 2015 and damages to a motorcycle during vessel loading/unloading in 2017 were closed following out of court settlement.
 - A lawsuit for alleged damages to an unaccompanied vehicle in 2018 was discussed and the case is still pending.
 - A lawsuit for delivery delay of a transported private vehicle in 2012 was rejected.

Good Practice

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, without however any relevant equipment collected and forwarded for recycling within 2019.

We ensure protection of personal data

Policy

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:

- Have created a Data Protection Team, to properly and effectively respond to the protection of individuals regarding personal data processing and monitor the proper implementation and compliance with the European Union's new General Data Protection Regulation (GDPR). We also established a Security Breach Handling Team to investigate and manage security breach incidents, as well as the adequacy of our policies, processes, technological means and security measures.
- Have conducted a relevant training program and sent a GDPR informative guide via e-mail to all office employees and posted a relevant informative leaflet on all our vessels' bulletin boards to inform marine employees.
- Have developed policies and processes to comply with 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.
- Have defined a dedicated phone number and email address to report suspected or confirmed data security violations to the Information Technology and Telecommunications Division.
- Have developed an Electronic Incident Response Plan to restrict data security violations.
- Have signed a contract with a specialized law firm to provide advisory services related to GDPR compliance issues.
- Have signed an insurance policy contract against cyber attacks.
- Have distributed a Greek and English GDPR informative leaflet to our vessels.
- Have sent an additional personal data processing act to our partners, in order to ensure their compliance with the GDPR Regulation.
- 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.
- Have been 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.

During 2019, there were 2 complaints regarding confidentiality or personal data security from our customers, without however these complaints addressing critical impact or loss of personal information for individuals involved. The complaints concerned:

- Appearance of a wrong reservation to a customer, who entered incorrectly reservation and access codes to our website. Despite the fact that it was an isolated incident, we immediately proceeded with necessary technical corrections and informed the customer about the relevant clarifications via e-mail.
- An automated message from the seasmiles program, which was sent to an incorrectly submitted e-mail address of a user who registered as a new member. As part of the investigation, we informed the involved customers and implemented a safer registration mechanism, with an e-mail address confirmation being required before activating an account.



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, in order to be incorporated into our contracts related to communication and advertising issues. The Code was included in 50% of relevant contracts signed in 2019.
- 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.

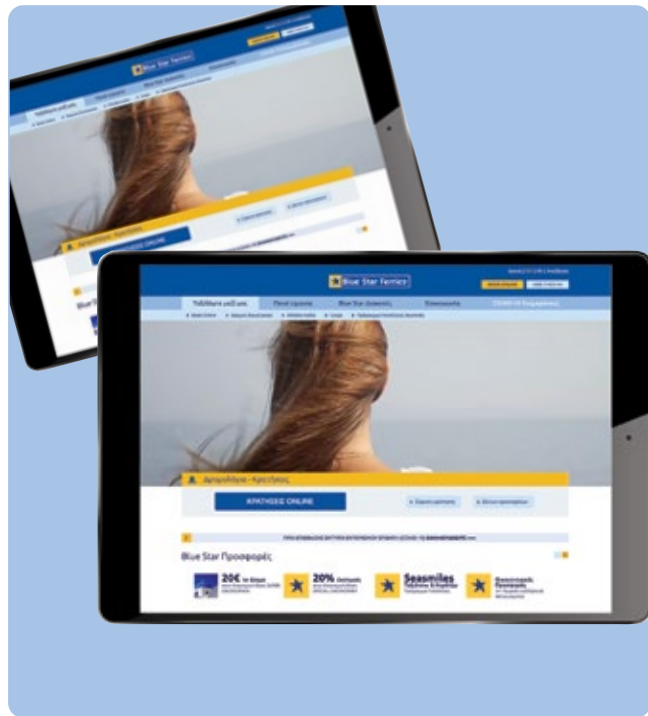
Good Practice

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 4.5 million unique visitors annually and handle 2 mobile applications with over 22,600 downloads

At the same time, we maintain one corporate website and manage a mobile application for AML, with over 81,000 unique visitors and 2,900 downloads.

Good Practice

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).

We trained 80% of Marketing Department employees on responsible communication and marketing issues, for a total duration of 48 hours



In 2019, there were:

- Informative messages with social, environmental and cultural content communicated on all vessels with relevant information screens, which indicatively include:
 - Water sports safety.
 - Fire prevention.
 - Ultraviolet radiation protection.
 - The 'Agoni Grammi Gonimi' program.
 - The Hellenic Marine Environment Protection Association's (HELMEPA) initiative for clean shores.
 - Our initiative to distribute beach ashtrays (see Section VIII-3).
 - Various cultural and sports events, such as the Aegean Film Festival and Animasyros animation film festival and the Panhellenic Aquathlon Swimming Championship of the Syros Nautical Club.
- A dedicated Greek and English poster to inform passengers onboard Blue Star Ferries and Superfast Ferries who travel with a pet regarding responsible attitude towards the vessel and other passengers.
- A dedicated poster to inform Blue Star Ferries and Hellenic Seaways passengers about the Transportation Equivalent, which refers to the harmonization of sea transport and transportation cost with the land transportation cost for island residents and companies.

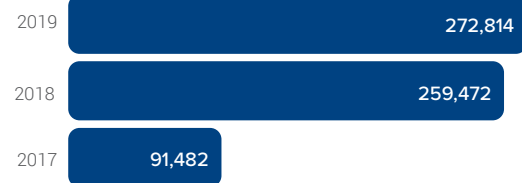
We ensure prompt communication

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.hsw.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



■ Informative SMS messages sent (number)

We informed 456,214 passengers through information SMS for early arrival at the Piraeus port or changes or cancellations of scheduled journeys in Domestic and Adriatic Sea lines (77% of passengers on these routes who have registered their mobile number)



3. Quality and Satisfaction

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.

;) Good Practice

Supporting Tourism in Islands

For the fourth consecutive year within 2019, we supported the effort to reverse the negative tourism trend and strengthen the transportation volume in Lesbos, Chios, Leros and Kos, caused by the refugee crisis. For this reason, we offered a 30% discount to 13,187 passenger and 3,402 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

Policy

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.

We send **2,813** notifications to serve passengers to our vessels, out of which **596** concerning passengers with reduced mobility and **12** concerning passengers with sensitivity to allergens

We ensure our customers' travel experience

;) Good Practice

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.



;) Good Practice

'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.

;) Good Practice

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 installed Seasmiles Kiosks on 19 Blue Star Ferries, Superfast Ferries and Hellenic Seaways vessels for faster passenger service and provision of information regarding our seasmiles Loyalty and Reward program.
- Have designed pet accommodation areas onboard Blue Star Delos and Blue Star Patmos, which feature easy access, a pet sanitation area and air conditioning.
- Have installed vinyl flooring in all 67 cabins designated for pet accommodation, to facilitate area cleaning and disinfection.
- Have specifically tailor-designed Blue Star Delos and Blue Star Patmos to address the needs of their 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.

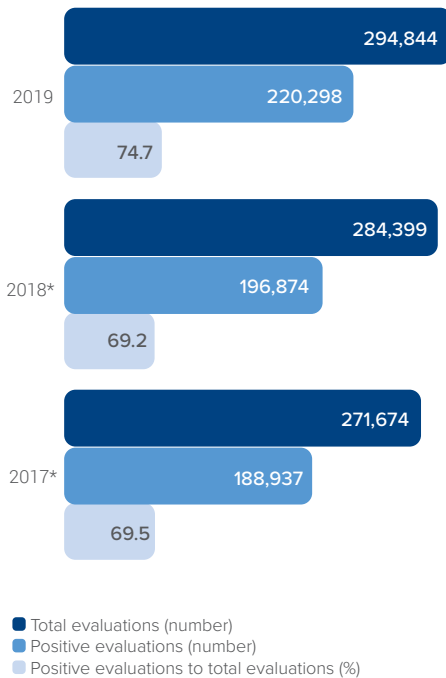


We listen to our customers

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 vessels to evaluate the services provided.

Evaluations Onboard Vessels



* Data for 2017 and 2018 refer to Blue Star Ferries and Superfast Ferries.

The average score of evaluations registered through dedicated devices onboard Blue Star Ferries and Superfast Ferries vessels reached **4** and **4.11** for Hellenic Seaways on a **5** point scale

Good Practice

@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:

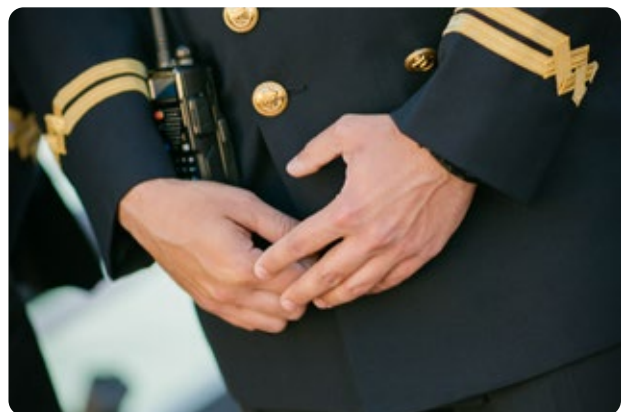
- Weather conditions.
- Vessel location in real-time.
- Restaurant and bar menus.
- Ports and destination information.
- Loyalty and Reward program seasmiles.



Good Practice

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.



We monitor our customers' satisfaction

We recognize the importance and our responsibility to offer reliable and responsible customer services, in order to ensure our business success. Within 2019, we:

- Received over 345,800 calls in all our corporate customer service telephone lines (including unanswered calls), responding to 86.3% of incoming calls. However, the above data do not include unregistered calls during 06/08/2019-31/12/2019 due to a technical problem in the call center database.
- Sent 1,496 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

	2017	2018	2019
Formal response letters to comments, complaints and requests (number)	619	1,987	1,496
Adriatic Sea lines	120	176	120
Domestic lines	499	1,811	1,376
Formal thank-you letters (number)	179	143	192
Adriatic Sea lines	27	47	41
Domestic lines	152	96	151
Questionnaires in vessels (number)	878	982	1,200
Total calls to customer service telephone lines (number)	548,977	824,757	323,309**
Calls to Customer Services Division (number)	66,318	66,846*	36,007
Calls to Call Center Division (number)	162,813	232,583*	32,122
Calls to Help Desk Division (number)	12,315	15,162*	15,645
Calls to Loyalty Division (number)	49,728	59,382*	70,025
Calls to Capacity Domestic / Adriatic Division (number)	194,999	141,156*	95,688
Calls to Cargo Domestic / Adriatic Division (number)	62,804	64,405*	39,973
Calls to Heraklion office (number)	NR	NR	33,849

* Data refer to calls from Blue Star Ferries and Superfast Ferries customers.

** Data are not representative of the number of calls, as unregistered calls during 06/08/2019-31/12/2019 due to a technical problem in the call center database are not included. Additional 437,322 calls were handled by an external partner without being forwarded to corporate customer service telephone lines.

NR: Not reported

Policy

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 2019:

- There were 124 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 418 occasions of passenger compensations.
- Two passenger lawsuits with compensation claims due to a journey delay in 2018 were rejected.
- A passenger lawsuit with compensation claim due to a journey delay in 2018 was discussed and the case is still pending.

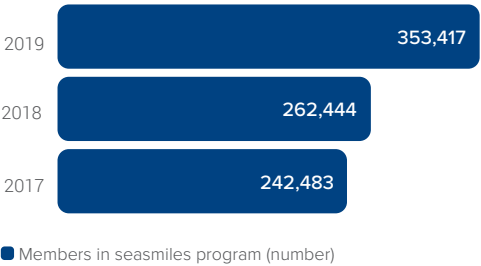
We kept our vessels' departure time at 84% and arrival time at 56% of schedules

: Good Practice

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. 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. At the same time, we have installed Seasmiles Kiosks on 19 vessels for faster passenger service regarding electronic data entry and automated seasmiles card issuance onboard vessels, while registered members of all ranks (Blue, Silver, Gold) can be informed about collected points.

Seasmiles Loyalty & Reward Program



We increased our seasmiles loyalty and reward program members by 34.7%



4. Achievements 2019 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility issues related to Customers by 17% (by 2020).	100%	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.	100%	To systematically inform and train our customers on Corporate Responsibility issues.	2020
To achieve an 'as scheduled' routes rate in Crete, Dodecanese and Ancona routes of over 90%.	75%	To achieve an 'as scheduled' routes rate in Crete, Dodecanese and Ancona routes of over 85%.	2020
To increase communication for early arrival at the Piraeus port and changes or cancellations of scheduled journeys through SMS by 5%.	100%		
To apply a Responsible Marketing and Communication Code in our business activities.	50%	To apply a Responsible Marketing and Communication Code in our business activities.	2020
To apply a process to monitor potential recalls of products or services from subcontractors due to possible health and safety issues.	100%		
To extend the infotainment platform @sea to Hellenic Seaways vessels.	0%	To extend the infotainment platform @sea to Hellenic Seaways vessels.	2021
To install Infokiosks about the seasmiles program on 8 Hellenic Seaways vessels.	75%		



We reduce our
Environmental Impact

ENVIRONMENT

We are

4,380

KWh energy produced from
renewable energy sources

€3.6

million environmental
investment

119,785

kgr paper consumption

13,005

TJ energy consumption

1.005

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.

We follow

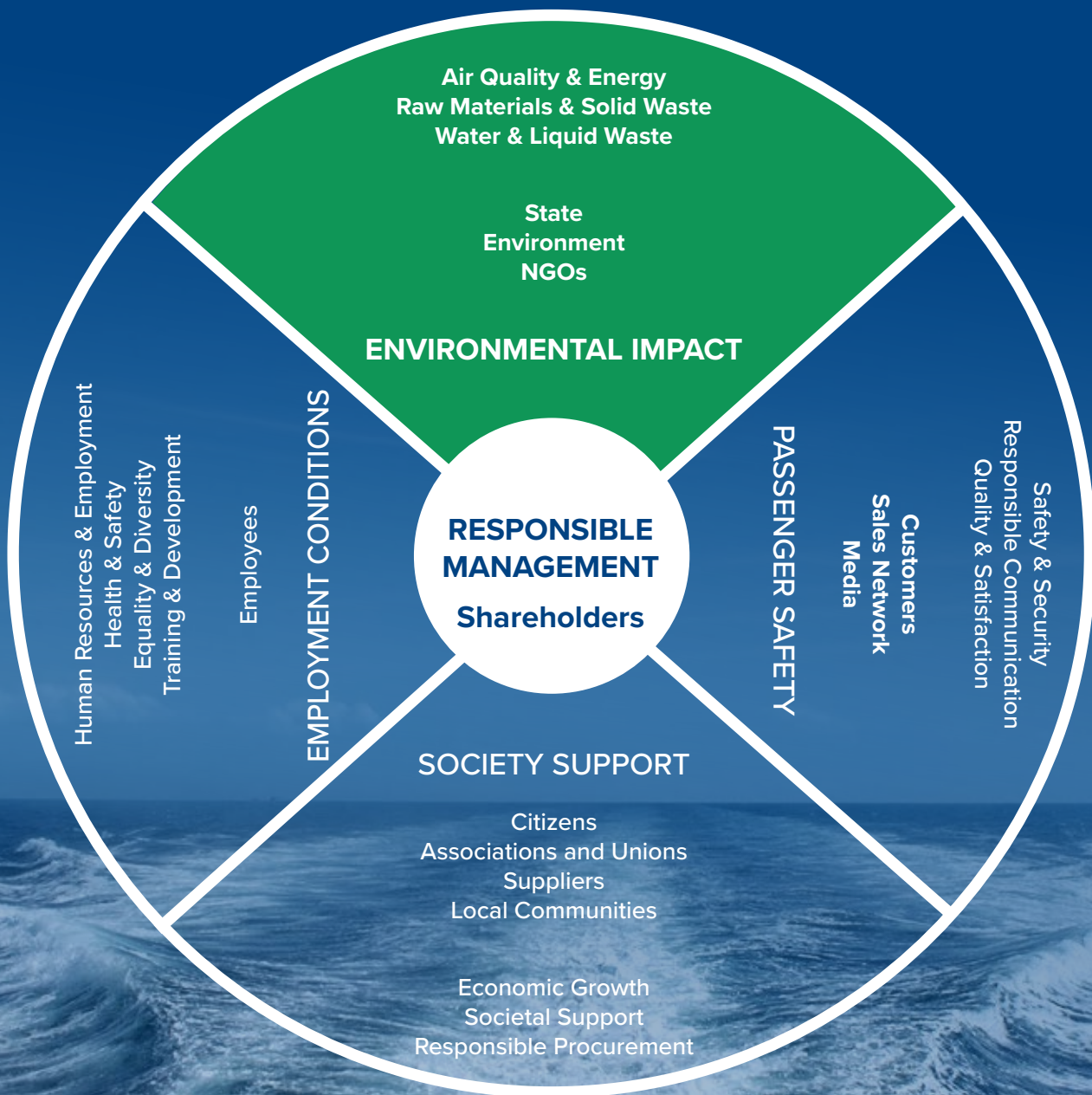
Principles of the United Nations' Global Compact

- 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 100% of our employees on environmental protection issues.
- We reduced our total energy consumption by 5.7% (equal to over 786,000 GJ).
- We reduced our total carbon dioxide emissions by 5.6% (equal to over 59,000 tonnes of CO₂).
- 80% of monitors and 60% 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 informed potentially over 2 million customers on Corporate Responsibility issues, such as environmental protection.
- We used 22.3% recycled paper for all purposes and 62.4% recycled toners/ink cartridges.
- We transported from Islands free-of-charge over 82 tonnes of materials for recycling.

We focus



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 70% of our vessels (all Blue Star Ferries and Superfast Ferries vessels and 7 Hellenic Seaways 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.
- Were the first passenger shipping group in Greece to implement necessary actions for our vessels' timely compliance with the European Union Ship Recycling Regulation (EU SRR).
- Discuss environmental protection issues during respective meetings of each 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 2019, we trained 130 office employees on environmental protection issues, for a total duration of 209 hours, while we conducted relevant external trainings to 13 office employees, for a total duration of 69 hours, compared to 3 office employees and 28 hours in 2018.
- 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 informed all office employees on materials recycling through letters and relevant posts on corporate Intranet.
- 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 100% of our employees on environmental protection issues

In 2019:

- Total value of investment agreements that addressed Corporate Responsibility issues exceeded €15.5 million (44% of total investment agreements) with the purchase of Blue Carrier 1 (see Section III-2), which is also equipped with all required environmental certifications, as well as the supply of air pollutants monitoring systems (scrubbers) for our vessels.
- We invested approximately €3.6 million for environmental protection programs (solid and liquid waste disposal investments, materials and equipment to remediate pollution incidents, internal and external inspections and environmental performance certificates).
- Apologetic statements were filed for two cases of vessel fumigation in 2019.
- Regarding previous legal cases:
 - An appeal against fines with a total amount of €62,151 imposed by the Central Port Authority of Piraeus and the Central Port Authority of Los due to limited pollution incident caused by Blue Star Patmos in 2017 is expected to be discussed within 2020.
 - An exemption decision was issued to legal proceedings regarding a limited pollution incident caused by the vessel Artemis in 2016. Furthermore, an appeal against an imposed fine of €27,200 is expected to be discussed, and favorably be accepted due to the court's binding exemption decision.

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 2018*	Energy Consumption 2018 (GJ)	Environmental Footprint 2018 (tn eCO ₂)	Consumption 2019*	Energy Consumption 2019 (GJ)	Environmental Footprint 2019 (tn eCO ₂)
Scope 1						
Oil (vessels)	340,610 tn	13,783,552	1,064,011	321,601 tn	12,998,217	1,004,036
MGO	36,396 tn	1,554,109	116,686	27,943 tn	1,193,166	89,585
LSHFO	263,457 tn	10,590,971	820,405	260,944 tn	10,489,948	812,580
HFO	40,758 tn	1,638,472	126,920	32,714 tn	1,315,103	101,871
Heating oil (offices)	9,500 lt	3,013	25	2,400 lt	761	6.5
Diesel (offices)	0	0	0	200 lt	7	0.5
Gasoline (corporate vehicles)	6,121 lt	202	14	7,419 lt	245	17
Scope 2						
Electricity (offices)	1,252,448 KWh	4,509	839	1,552,885 KWh	5,590	1,040
TOTAL		13,791,276	1,064,890		13,004,820	1,005,100

* Vessel data refer to all vessels we operated within the year without including chartered vessels 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 - CO₂ Emissions from Fuel Combustion 2016 edition 1 (Electricity)

We reduced our total energy consumption by 5.7% (equal to over 786,000 GJ)

We reduced our total carbon dioxide emissions by 5.6% (equal to over 59,000 tonnes of CO₂)

In order to achieve efficient fuel and energy consumption and better manage our environmental footprint, which reached 0.16 tn, 6.5 GJ and 0.5 tn CO₂ per nautical mile travelled respectively, we:

- Have installed sunscreen films in our offices' ground floor and mezzanine.
- Have installed solar absorption systems in selected areas of our offices to improve energy efficiency.
- Have introduced automations into our offices' BMS for efficient cooling / heating and have implemented various interventions to increase energy management efficiency, such as installation of specialized control sensors and definition, schedule and communication of critical alarms, scheduled timetables to reduce energy costs, as well as additional configurations to power generators.
- Have installed energy saving light bulbs (LED) in our Blue Star Ferries and Superfast Ferries offices and initiated replacement of conventional light bulbs on our vessels with new LED bulbs.
- 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, Flying Cat 6, Superfast I, Superfast II and Superfast XI 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.
- Have initiated the process to replace our corporate fleet with new vehicles, which reached 72,586 km total distance travelled by vehicles and 10.2 lt/100 km average fuel consumption in 2019, compared to 78,360 km and 6.2 lt/100 km respectively in 2018.



80% of monitors and 60% of personal and laptop computers we use have energy-saving specifications

;) Good Practice

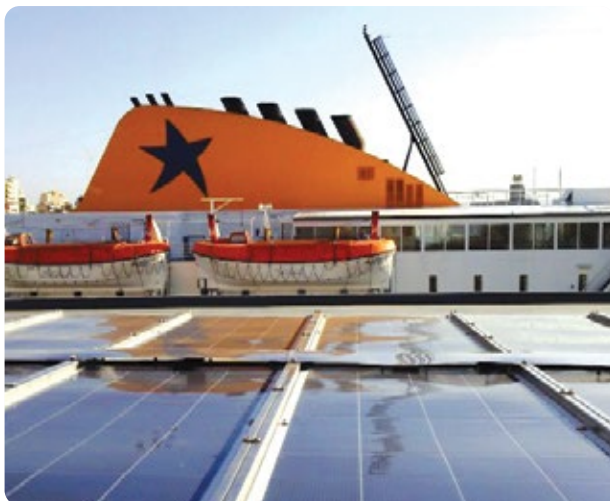
Installing Photovoltaic Panels

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 2019, 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



■ Electricity produced (KWh)



;) Good Practice

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 SO₂ emissions and can achieve 95%-100% lower particulate matter emissions (PM), 85% lower NO_x emissions and 25% lower CO₂ 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 CO₂, 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.

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

Refrigerants and CO₂

Liquids	2017		2018		2019	
	Stored (kg)	Used (kg)	Stored (kg)	Used (kg)	Stored (kg)	Used (kg)
Carbon dioxide (CO ₂)*	49,678	0	86,884	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)	9,394**	3,278**	9,394**	2,309**	13,883	3,624
TOTAL	59,072	3,278	96,278	2,309	100,767	3,624

* Stored quantities include CO₂ in fire extinguishing systems and CO₂ 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 placed orders for exhaust monitoring systems (scrubbers) for 4 vessels, in order to further reduce sulfur oxide emissions (SO_x).
- Proceed with corrective measures, if deemed necessary.

SO_x Emissions*

Source	2019
MGO (tn)	50.2
LSHFO (tn)	4,697
HFO (tn)	2,224.5
TOTAL	6,971.7

* Data refer to all vessels we operated within the year, without including chartered vessels and are estimated SO_x emissions based on average sulfur content values per type of fuel.

Source of conversion factors: BIMCO Shipping KPI System

:) Good Practice

Reduce Air Pollutants

Indicating our commitment to reduce air pollutants, we were the first 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.

:) Good Practice

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, we have distributed double-sided cards to all 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.

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.hsw.gr and www.superfast.com.
 - Corporate magazines 'On Blue', 'Route' and 'Thalasea'.
 - Companies' social media.
 - Relevant press releases.
- 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.
- 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 & Eurail 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, which is currently in the Top 10 preferences of railway passengers in Europe.
- Display on all vessels with relevant informative screens information on how to prevent forest fires, in cooperation with the General Secretariat for Civil Protection (GSCP), an agency within Ministry of Interior.

We informed potentially over 2 million customers on Corporate Responsibility issues, such as environmental protection



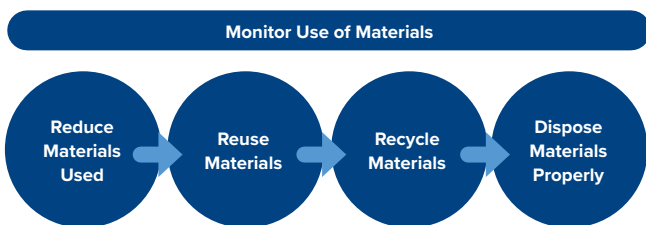
2. Raw Materials and Solid Waste

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



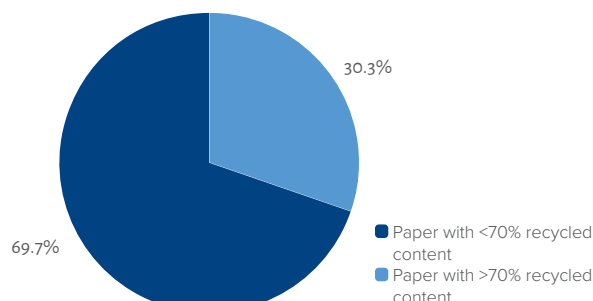
We reduce materials used

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

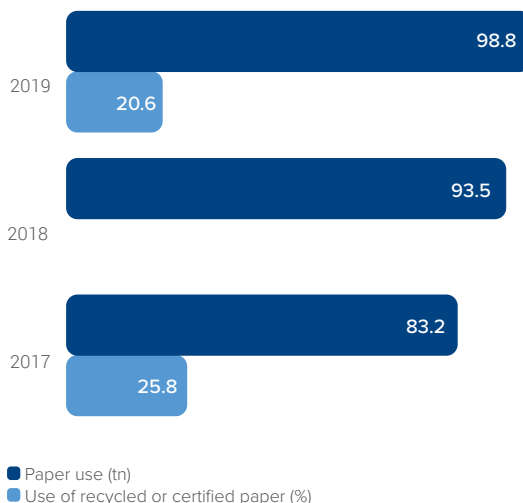
- Entirely use multifunction printers and photocopiers at our offices, whose 93% of mechanisms, spare parts and consumables are recycled and refurbished. Furthermore:
 - We have initiated development of a process to increase use of materials from recycled input raw materials, in order to examine the possibility of purchasing materials/items from recycled raw materials during new purchases and replacement of materials already used with others that originate from recycled raw materials, and at the same time have started a relevant process for purchasing of electronic equipment and printing paper.
 - The percentage of recycled or certified paper and recycled toners/ink cartridges we used was 22.3% and 62.4% respectively, compared to 28.1% and 72.9% respectively in 2018.
 - Besides using recycled paper and recycled toners/ink cartridges, we do not use any other recycled materials.
- Purchase refurbished electronic equipment, with a total of 323 devices and peripherals purchased for our offices and vessels in 2019, such as laptops, computer monitors, servers, telephone devices, power supplies and memory modules for laptops and desktops.
- 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 **22.3%** recycled paper for all purposes and **62.4%** recycled toners/ink cartridges

Paper Use for Printing



Paper Use for Commercial Purposes



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 towels in the engine room, with over 48,000 sheets, pillowcases, duvet cases and towels reused within 2019, which corresponds to 100% of the respective damaged materials.

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	2018		2019	
	Consumption	Recycling	Consumption	Recycling
Paper	118,896 kgr	3,970 kgr*	119,785 kgr	42,786 kgr from offices
Toners/ink cartridges for printers/faxes/photocopying machines	1,819 units (1,270 were recycled)	752 units*	1,764 units (1,101 were recycled)	1.4 m ³ from vessels 144 units from offices
Domestic batteries	289.2 kgr	54 kgr*	352 kgr	264 kgr
Vessel batteries	13,523 kgr*	9,723 kgr*	13,700 kgr	9,247 kgr
UPS batteries	3,663.6 kgr (in use) 490.3 kgr (consumption)	490.3 kgr	3,663.6 kgr (in use) 206.7 kgr (consumption)	206.7 kgr
Accumulators	NR	NR	14,052.2 kgr	9,410 kgr
IT equipment (computers, printers etc.) / electrical equipment and light bulbs	782 units 18,781 light bulbs	21.1 m ³ IT equipment (152 units) 12.2 m ³ light bulbs	739 units 39,288 light bulbs 330 LED luminaires	2,800 kgr electrical/IT equipment from warehouse 2.2 m ³ IT equipment from vessels 9 units IT equipment from offices** 10 m ³ light bulbs
Cooking oils	75,565 lt	37.7 m ³ from vessels	69,400 lt	24.5 m ³ from vessels
Lubricants	2,397,160 lt	493.3 m ³	2,579,454 lt	434.5 m ³
Medicines and pharmaceuticals	6,603 units	743 units from vessels	10,242 units	5.1 m ³ from vessels
Chemical substances	204,891 lt	NR	194,965 lt	NR

* Data refer to Blue Star Ferries and Superfast Ferries.

** Additional quantities of IT equipment from offices have been collected and are pending to be forwarded for recycling. Data do not include cables and IT equipment peripherals (e.g. memory modules, hard drives).

NR: Not reported

Hazardous waste: The total quantity of 10,551 m³ liquid and solid hazardous waste collected in 2019 (such as waste which contain oil or mercury, lubricants, biodegradable waste from kitchen and accommodation areas, light bulbs, IT equipment and toners), was forwarded to specialized hazardous waste management companies, which comply with strict standards regarding environmental protection and apply proper treatment methods, out of which 4.8% was recycled, while no hazardous waste was reused or transported abroad to be treated.

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 and UPS / laptop / mobile phones batteries, as well as paper, metal and plastic recycling bins in 1 Hellenic Seaways vessel, in order to promote recycling throughout daily activities of employees and passengers.
- Collect and forward for recycling used cooking oils from vessels.

! Did you Know

Paper Recycling

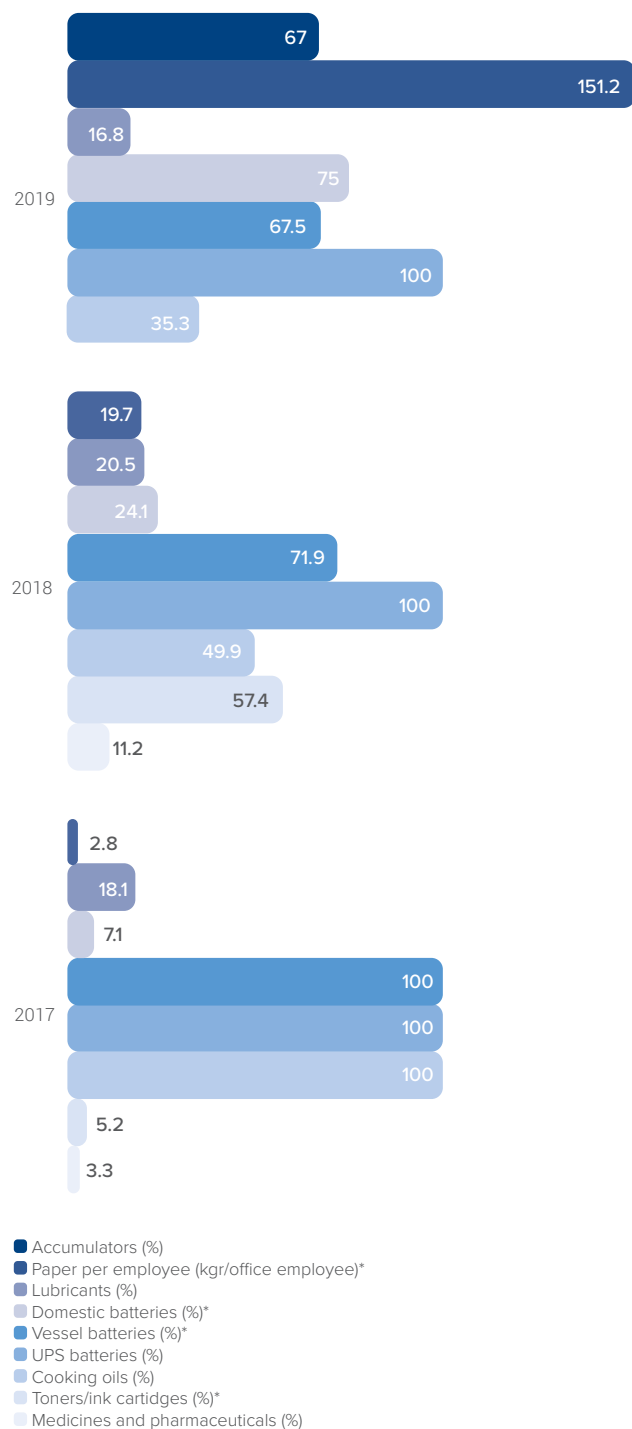
Paper recycling can significantly contribute to reduce consumption of raw materials and energy, as the use of one tonne of recycled paper instead of one tonne of non-recycled paper:

- 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



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

Good Practice

Sponsoring Recycling Activities

Within the context of our social contribution, we are the main sponsor of the Municipality of Patmos in Dodecanese and all South Aegean Region islands, in order to transport recyclable materials from islands to the Hellenic Recovery Recycling Corporation (HE.R.R.Co) in Attica. The total quantity of free-of-charge transported materials (such as paper, plastic and aluminum) for recycling on behalf of the Municipality of Patmos through our vessels within 2019 was 82.5 tonnes.

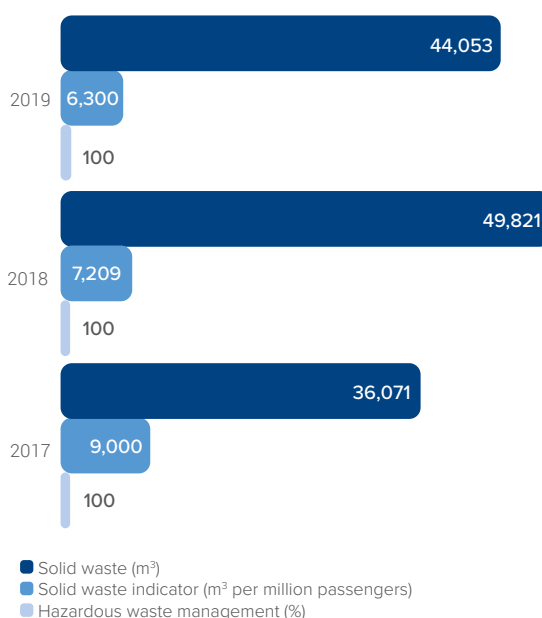
We transported from Islands free-of-charge over 82 tonnes of materials for recycling

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.
- 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 vessels to appropriate reception facilities of licensed contractors within ports after each journey, while no solid waste was transported abroad.

Solid and Hazardous Waste



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 all Blue Star Ferries and Superfast Ferries vessels and 1 Hellenic Seaways vessel 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 7 vessels (Superfast I, Superfast II, Blue Star 1, Blue Star 2, Blue Star Paros, Blue Star Naxos and Blue Star Delos).
- 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, with the water consumption indicator reaching 0.0343 m³/passenger in 2019.
- 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 2019, there were no significant leakages of any material (e.g. oil or chemical substances spills) or marine pollution incidents.

Water

	2017*	2018*	2019
Water consumption (m ³)	237,255	205,690	303,872
Vessels	235,331	203,733	300,899
Offices	1,924	1,957	2,973
Water sources (%)			
Public water supply networks	59.2 (140,365 m ³)	72.4 (148,985 m ³)	80.4 (244,313 m ³)
Seawater	40.8 (96,890 m ³)	27.6 (56,705 m ³)	19.6 (59,559 m ³)

* Data refer to Blue Star Ferries and Superfast Ferries.

:) Good Practice

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 2019.



:) Good Practice

Response to Pollution Incident

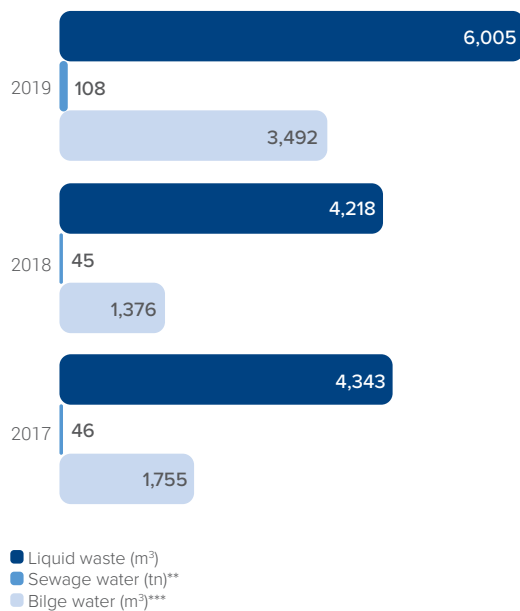
We have equipped all our vessels with 'Shipboard Oil Pollution Emergency Plan' (SOPEP) to effectively respond to any pollution incident or risk of pollution, which may arise during the vessel's fuel supply or due to an accident (e.g. collision, grounding). According to SOPEP, we describe in detail and 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*



* Data for 2017 and 2018 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

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).

? Issue of Consideration

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 1,450,000 ashtrays to passengers and citizens.

: Good Practice

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/café, 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 2019:

- There were 2 lawsuits and 2 indictments for damages to vessels caused by rippling, which are expected to be discussed.
- A previous lawsuit regarding damage to another vessel due to rippling in 2018 was discussed and the case is still pending.

4. Achievements 2019 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility issues related to Environment by 34% (by 2020).	50%	To improve our performance on Corporate Responsibility issues related to Environment by 34%.	2020
To include environmental protection aspects as specifications in our products' and services' design phase (e.g. vessels).	25%	To install air pollutants monitoring equipment (scrubbers) on 5 vessels.	2021
To upgrade our BMS system's software.	25%	To upgrade our BMS system's software.	2021
		To reduce electricity consumption in offices per employee by 5%.	2020
To further upgrade the photovoltaic panel unit onboard Blue Star Delos (by 2020).	0%	To reduce electricity consumption per square meter in offices by 5%.	2020
To create an Eurail/Interrail Greek Islands Pass for 5 destinations in Greece.	100%	To reduce noise level in office workplaces by 10%.	2020
		To reduce water consumption per employee in offices by 5%.	2020
To train our office employees on environmental protection issues (e.g. recycling, renewable energy sources and technologies).	100%	To train 100% of corporate vehicle drivers on safe and economical driving.	2021



SUMMARY

1. About this Report

This is the 11th 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 1/1/2019-31/12/2019 (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 2017-2019 for all quantitative indicators.
- Includes data from direct measurement, while cases of data estimations or restatements of data provided in our previous 2018 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.

Did you Know

Indicates information of particular interest.

Issue of Consideration

Indicates issues of public interest and consideration.

Development of Report: The Report has been developed by the Group's Corporate Responsibility Team in cooperation with STREAM Management:

Panagiotis Papadodimas
Chief Administration & Transformation Officer

Christina Grigora
Marketing Manager

Georgia Kokaliari
Training & Development Manager

Nikolaos Merkouris
Safety, Security, Quality & Environmental Supervisor

Dimitrios Roggas
Accounting Supervisor of AML Athens Office

Antonis Strintzis
ISO & Quality Assurance Head



www.stream-eu.com

2. Summary Data

✓	completion (100%)
←	under completion (75%)
<	progress (50%)
—	off plan (25%)
x	not achieved (0%)

Section	2017	2018	2019	Objectives 2019	Achievements 2019	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).	←	To improve our overall performance on Corporate Responsibility issues by 24%.
				To improve our performance on Corporate Responsibility issues related to Owners by 10% (by 2020).	✓	To improve our performance on Corporate Responsibility issues related to Owners by 10%.
				To improve our performance related to Management of Corporate Responsibility issues by 25% (by 2020).	←	To improve our performance related to Management of Corporate Responsibility issues by 25%.
Objectives in the Report (number)	55	42	38			
				To conduct a Stakeholder Engagement process on issues related to Corporate Responsibility.	—	To conduct a Stakeholder Engagement process on issues related to Corporate Responsibility.
				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.	<	To include the Corporate Responsibility Strategy 2020 score as a target within the formal appraisal process for Top Management members.
				To develop a process to identify, prioritize and include Corporate Responsibility issues in local and international investment agreements.	←	To apply a process to identify, prioritize and include Corporate Responsibility issues in local and international investment agreements.
GRI disclosures in the Report (number, full + partial coverage)	56 + 18	66 + 18	66 + 19			
Quantitative indicators in the Report (number)	210	225	235		We increased by 4.4% the number of quantitative indicators we make reference to within the Report.	

Section	2017	2018	2019	Objectives 2019	Achievements 2019	Future Objectives
MANAGEMENT						
				To include our Corporate Responsibility Report's quantitative indicators in our SAP ERP (by 2021).	<	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.	X	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.
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.	
					We have communicated Regulation of Professional Behavior to 100% of our employees.	
Office employees informed on anti-corruption procedures (%)	NR	100	100		We informed 100% of office employees about our anti-corruption policies and procedures.	
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 116 external audits regarding our Management Systems, with no recorded non-compliance incident.	
					No non-compliance incident was recorded during audits of our contractors' Management Systems.	

Section	2017	2018	2019	Objectives 2019	Achievements 2019	Future Objectives
MANAGEMENT						
				To establish a comprehensive Business Continuity Plan to ensure continuation of our operations following unexpected events (by 2020).	—	To establish a comprehensive Business Continuity Plan to ensure continuation of our operations following unexpected events.
						To complete the implementation of our Fleet Management System for all our vessels.
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).	✓	To improve our performance on Corporate Responsibility issues related to Community by 10%.
				To improve our performance on Corporate Responsibility issues related to Suppliers by 180% (by 2020).	<	To improve our performance on Corporate Responsibility issues related to Suppliers by 180%.
Turnover (total sales with VAT) (million €)	271.54	365.4	405.4		We distributed over €470 million in economic value: over €94.2 million to employees (for salaries, benefits and insurance payments), €81.9 million for taxes (including VAT and port taxes), €29.9 million to providers of capital (for interest and return payments), €21.9 million to agents (for commissions), €205.6 million to suppliers (for purchases of goods and services), €2.8 million to society (for discount tickets, implemented programs, sponsorships and donations) and €34.5 million for investments.	
Profits after taxes (million €)	1.25	17.27	20.8			
Cost of employees (including salaries, benefits and insurance payments) (million €)	61.61	91.6	94.2			
Payments to suppliers (million €)	130.75	196.6	205.6			

Section	2017	2018	2019	Objectives 2019	Achievements 2019	Future Objectives
SOCIETY						
Investments (million €)	7.18	128	34.5			
Training of sales network employees (hours)	248	1,920	22			
Social contribution (€)	1,599,360	2,224,319	2,776,805		We increased the total value of societal support activities by 24.8%.	
					We allocated 55% of sponsorships and donations to local communities.	
				To support the activities of charitable organizations and NGOs.	✓	To support the activities of charitable organizations and NGOs.
				To design and implement 2 programs / activities to address local communities needs in the areas of sports, culture, education or health (by 2020).	✓	To design and implement 2 programs / activities to address local communities needs in the areas of sports, culture, education or health.
Discount tickets (number)	48,052	75,322	139,703		We increased the total number of discount tickets offered by 85.5%.	
Employee volunteers (number)	165	170	193	To implement at least 2 volunteer activities with the participation of our employees.	We increased the number of employees participating in volunteer activities and employee volunteering hours by 13.5% and 49.3% respectively. ✓	To implement at least 1 volunteer activity with the participation of our employees.
Blood units from voluntary blood donation programs (number)	70	113	99		We collected 282 blood units through our voluntary blood donation programs in the last three years.	
Visiting school and university students (number)	739	1,290	1,047		We welcomed 1,047 young people from schools and universities visiting our offices and vessels.	
					We supported the development of 86 students in Merchant Navy's Officer academies.	

Section	2017	2018	2019	Objectives 2019	Achievements 2019	Future Objectives
SOCIETY						
Suppliers (number)	1,110	1,451	1,487	To consolidate/review the various procurement processes per Department and establish a single Procurement Process.	✓	
				To develop a Policy for our Contractors' Suppliers.	✓	
				To develop a Code of Conduct for Suppliers, including selection criteria to become a supplier.	✓	
				To integrate Corporate Responsibility issues in selection criteria to become a supplier.	We have defined 10% of suppliers' selection criteria to be related to their responsible operation. ✓	
Procurement expenditure to local suppliers (%)	92.9	90.7	77.2		We spent 77.2% of total procurement expenditure to local suppliers.	
Procurement expenditure to SME suppliers (%)	89.2	28.7	15.4		We spent 15.4% of total procurement expenditure to small and medium-sized enterprises (up to 50 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).	✓	To improve our performance on Corporate Responsibility issues related to Employees by 6%.
Employees (number, offices + vessels)	201 + 1,004	286 + 1,537	283 + 1,496		We employ 100% of our employees with full time employment contracts.	
					No grievances regarding our marine employees' living conditions were filed.	
Women in overall workforce (%)	13.3	15.5	14			
Women in Director positions (%)	4.9	4.2	5.4			

Section	2017	2018	2019	Objectives 2019	Achievements 2019	Future Objectives
EMPLOYEES						
Greek employees in Director positions (%)	100	100	100		100% of employees in Director positions are Greek.	
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)	5,221	7,057*	5,921		We trained at least once over 61% of our office employees.	
				To integrate Corporate Responsibility issues into the other categories of in-house training courses.	<	To integrate Corporate Responsibility issues into the other categories of in-house training courses.
				To conduct a Corporate Responsibility e-learning course for our new office employees.	—	To conduct a Corporate Responsibility e-learning course for 150 marine employees (by 2021).
				To update our employees' job descriptions according to our new organizational structure.	←	To complete the update of our employees' job descriptions according to our new organizational structure.
Employees receiving their annual leave, as planned (%)	100	100	100		100% of our employees received their annual leave, as planned.	
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)	14	32	10			
				To apply a process to monitor health and safety incidents (e.g. injuries, diseases, absences, fatal accidents) of subcontractors' employees working in our offices.	X	To apply a process to monitor health and safety incidents (e.g. injuries, diseases, absences, fatal accidents) of subcontractors' employees working in our offices.

Section	2017	2018	2019	Objectives 2019	Achievements 2019	Future Objectives
EMPLOYEES						
Accidents with absence >3 days (number)	12	27	8			
Injury rate (rate)	0.78	1.47*	0.36			
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.	X	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.	X	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).	X	To include specific Corporate Responsibility objectives in Top Management members' formal appraisal process.
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).	V	To improve our performance on Corporate Responsibility issues related to Customers by 17%.
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' (% Blue Star Ferries / Superfast Ferries / Hellenic Seaways)	-	-	86 / 83 / 84		The overall performance of our vessels in Domestic and Adriatic Sea lines from 'Mystery Passenger' survey for Blue Star Ferries, Superfast Ferries and Hellenic Seaways reached 86%, 83% and 84% respectively.	
Inspections from local authorities for food hygiene and safety (number)	45	49	45		We were subjected to 45 inspections from local authorities for food hygiene and safety, with no recorded non-compliance incidents.	
Items lost/found or damaged (number)	5,027	5,078	5,741			
Compensations for vehicle damages (€)	45,461	57,800	56,825			

Section	2017	2018	2019	Objectives 2019	Achievements 2019	Future Objectives
CUSTOMERS						
Complaints regarding responsible communication (number)	0	0	0	To apply a Responsible Marketing and Communication Code in our business activities.	We trained 80% of Marketing Department employees on responsible communication and marketing issues, for a total duration of 48 hours. ◀	To apply a Responsible Marketing and Communication Code in our business activities.
				To systematically inform and train our customers on Corporate Responsibility issues.	✓	To systematically inform and train our customers on Corporate Responsibility issues.
					We maintain 5 corporate websites, with over 4.5 million unique visitors annually and handle 2 mobile applications with over 22,600 downloads.	
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.	✓	
Complaints regarding customer privacy (number)	0	0	2			
Delays in routes (number)	9	59	124	To achieve an 'as scheduled' routes rate in Crete, Dodecanese and Ancona routes of over 90%.	We kept our vessels' departure time at 84% and arrival time at 56% of schedules. ←	To achieve an 'as scheduled' routes rate in Crete, Dodecanese and Ancona routes of over 85%.
Formal response letters to comments, complaints and requests (number)	619	1,987	1,496			
				To establish a Customer Relationship Management system (CRM) (by 2020).	✗	To establish a Customer Relationship Management system (CRM).
				To categorize complaints per category (e.g. delays, price of tickets, price discrepancies) (by 2020).	✗	To categorize complaints per category (e.g. delays, price of tickets, price discrepancies).
Formal thank-you letters (number)	179	143	192			

Section	2017	2018	2019	Objectives 2019	Achievements 2019	Future Objectives
CUSTOMERS						
Questionnaires in vessels (number)	878	982	1,200		The average score of evaluations registered through dedicated devices onboard Blue Star Ferries and Superfast Ferries vessels reached 4 and 4.11 for Hellenic Seaways on a 5 point scale.	
SMS messages sent to customers (number)	91,482	259,472	272,814	To increase communication for early arrival at the Piraeus port and changes or cancellations of scheduled journeys through SMS by 5%.	We informed 456,214 passengers through information SMS for early arrival at the Piraeus port or changes or cancellations of scheduled journeys in Domestic and Adriatic Sea lines (77% of passengers on these routes who have registered their mobile number). ✓	
					We send 2,813 notifications to serve passengers to our vessels, out of which 596 concerning passengers with reduced mobility and 12 concerning passengers with sensitivity to allergens.	
Members in loyalty and reward program (number)	242,483	262,444	353,417	To install Infokiosks about the seasmiles program on 8 Hellenic Seaways vessels.	We increased our seasmiles loyalty and reward program members by 34.7%. ←	
				To extend the infotainment platform @sea to Hellenic Seaways vessels.	X	To extend the infotainment platform @sea to Hellenic Seaways vessels (by 2021).
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).	<	To improve our performance on Corporate Responsibility issues related to Environment by 34%.
Environmental protection investments (million €)	1.9	21*	3.6		We conducted internal drills on environmental protection issues to 100% of marine employees.	
						To reduce noise level in office workplaces by 10%.

Section	2017	2018	2019	Objectives 2019	Achievements 2019	Future Objectives
ENVIRONMENT						
				To train our office employees on environmental protection issues (e.g. recycling, renewable energy sources and technologies).	We informed 100% of our employees on environmental protection issues. ✓	To train 100% of corporate vehicle drivers on safe and economical driving (by 2021).
					We informed potentially over 2 million customers on Corporate Responsibility issues, such as environmental protection.	
				To create an Eurail/Interrail Greek Islands Pass for 5 destinations in Greece.	✓	
Energy consumption (GJ)	9,827,535	13,791,276	13,004,820		We reduced our total energy consumption by 5.7% (equal to over 786,000 GJ).	
				To upgrade our BMS system's software.	—	To upgrade our BMS system's software (by 2021).
Electricity consumption (KWh)	1,331,453	1,252,448*	1,552,885		80% of monitors and 60% of personal and laptop computers we use have energy-saving specifications.	
						To reduce electricity consumption in offices per employee by 5%.
						To reduce electricity consumption per square meter in offices by 5%.
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).	✗	
Prevention of CO ₂ due to energy use from renewable energy sources (kg)	2,935	2,935	2,935			
Total eCO ₂ emissions (tn)	760,920	1,064,890	1,005,100		We reduced our total carbon dioxide emissions by 5.6% (equal to over 59,000 tonnes of CO ₂).	

Section	2017	2018	2019	Objectives 2019	Achievements 2019	Future Objectives
ENVIRONMENT						
				To include environmental protection aspects as specifications in our products' and services' design phase (e.g. vessels).	—	To install air pollutants monitoring equipment (scrubbers) on 5 vessels (by 2021).
Use of refrigerants (kgr)	3,278	2,309*	3,624			
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.	
Paper used for all purposes (tn)	100.8	118.9	119.8		We used 22.3% recycled paper for all purposes and 62.4% recycled toners/ink cartridges.	
Paper used for commercial purposes (tn)	83.2	93.5	98.8			
Materials from recycling activities, transported for recycling (tn)	79	153	82		We transported from Islands free-of-charge over 82 tonnes of materials for recycling.	
Solid waste (m³)	36,071	49,821	44,053			
Solid waste indicator (m³ per million passengers)	9,000	7,209	6,300			
Water consumption (m³)	237,255	205,690*	303,872			To reduce water consumption per employee in offices by 5%.
Liquid waste (m³)	4,343	4,218*	6,005			

* 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	-
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	P	
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	

GRI Standard	Report Section	Coverage	Boundary of Disclosure
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	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	
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	

GRI Standard	Report Section	Coverage	Boundary of Disclosure
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	
305-4	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 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 Standard	Report Section	Coverage	Boundary of Disclosure
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, VII-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 uninterrupted operation	IV-1	F	
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	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	

GRI Standard	Report Section	Coverage	Boundary of Disclosure
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 (by number, percentage)	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 economic, 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 ₂ O, 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 2019.
'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?

- | | | | |
|---------------------------------------|--|--|--------------------------------|
| <input type="checkbox"/> Employees | <input type="checkbox"/> Sales Network | <input type="checkbox"/> Associations and Unions | <input type="checkbox"/> NGOs |
| <input type="checkbox"/> Shareholders | <input type="checkbox"/> Suppliers | <input type="checkbox"/> Local Communities | <input type="checkbox"/> Media |
| <input type="checkbox"/> Customers | <input type="checkbox"/> State | <input type="checkbox"/> Citizens | Other: _____ |

2. What is your impression, about the following Chapters of this Report?

Chapter:	Excellent	Good	Neutral	Mediocre	Bad
IV. Management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
V. Society	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VI. Employees	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VII. Customers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VIII. Environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. What is your impression, about the following elements of this Report?

Element:	Excellent	Good	Neutral	Mediocre	Bad
Sections have the right balance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Important topics are covered	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Structure supports easy reading	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Texts are comprehensive	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Quantitative elements are complete	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Graphs included are comprehensive	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Layout is attractive/pleasant	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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: _____

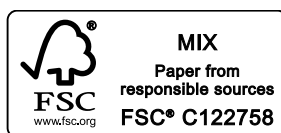
Phone: _____

Email: _____

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.
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