



RESPONSIBILITY AND SUSTAINABILITY
REPORT **2021**





CONTENTS

Attica Group	4	Environmental Section	90
1. Message from the CEO	4	8. Environment	92
2. ESG Highlights	6	1. Air Quality and Climate Change	94
3. Attica Group	8	2. Raw Materials and Solid Waste	102
1. The Passenger Shipping Industry	9	3. Water and Liquid Waste	105
2. About Attica Group	11	4. Biodiversity and Vessel Rippling	106
		5. Achievements 2021 and Future Objectives	108
Governance Section	18	Summary	109
4. Management	20	9. Summary	109
1. Corporate Governance	22	1. About this Report	109
2. Corporate Responsibility & Sustainability	32	2. Summary Data	110
3. Materiality and Stakeholders	36	3. Tables – Reporting Frameworks	123
4. Achievements 2021 and Future Objectives	41	4. Glossary	129
		5. Independent Limited Assurance Report	130
		6. Feedback Form	132
Social Section	42		
5. Society	44		
1. Economic Growth	46		
2. Society Support	48		
3. Responsible Procurement	54		
4. Achievements 2021 and Future Objectives	57		
6. Employees	58		
1. Human Resources and Employment	60		
2. Health and Safety	63		
3. Equality and Diversity	67		
4. Training and Development	70		
5. Achievements 2021 and Future Objectives	73		
7. Customers	74		
1. Safety and Security	76		
2. Responsible Communication	81		
3. Quality and Satisfaction	83		
4. Achievements 2021 and Future Objectives	89		



[Our commitment is to continue our efforts to operate responsibly and work harmoniously with our Stakeholders to ensure creating mutual long-term value.]



[1] Message from the CEO

Dear Readers,

During the last years, passenger shipping companies managed to preserve their viability and quality of services provided, despite facing major and critical challenges, such as significant increases in fuel prices, rising operating costs due to new regulatory requirements and the impact of COVID-19 pandemic.

As we pursue both our industry's and domestic economy's growth, we consistently continued to achieve our long-term business objectives, while focusing on Corporate Responsibility and Sustainability. It has been imperative to implement safety measures to protect our passengers' and employees' health, as well as measures to support our business operations, since the pandemic reminded us that well-prepared companies are able to swiftly plan and implement necessary changes, to face challenges in difficult times.

The present Responsibility and Sustainability Report addresses the year 2021 and presents our main results and progress regarding issues related to our responsible operation, as well as our initiatives and efforts to contribute to our country's growth and development of local communities. The Report follows the revised Global Reporting Initiative's (GRI) Sustainability Reporting Standards 2021, continuing our tradition for transparency and accountability, as we were the first passenger shipping company worldwide with a Report in accordance with the GRI Standards.

At the same time, we follow and make relevant references to the NASDAQ Stock Exchange ESG Guidelines, the revised Athens Stock Exchange ESG Reporting Guide 2022, for the first time the Recommendations of Task Force on Climate-related Financial Disclosures (TCFD), and of course the UN Global Compact's 10 Principles, which we support. A milestone within 2021 was the approval of our new Corporate Responsibility and Sustainability Strategy & Action Plan 2021-2023, where we have set the demanding and realistic target to improve our overall performance by 13%, following a 28% improvement in the 2018-2020 cycle.

Obviously, our commitment is to continue our efforts to operate responsibly and work harmoniously with our Stakeholders to ensure creating mutual long-term value, based on our Vision, Mission and Values, but above all our employees' ethos. By following our strong corporate culture, which is guided by the concept of 'One Group, One Crew', we can overcome our market's difficult conditions and remain optimistic about the future, despite the new geopolitical and environmental challenges ahead of us and corresponding consequences we will have to face.

Have a pleasant reading,

Spyridon Paschalis

Chief Executive Officer, Attica Group

[2] ESG Highlights

> Governance Section

Governance

- 106 Top Management Members, Directors and Managers from all departments participated in the development of our Strategy 2021-2023
- We defined 123 actions in our Corporate Responsibility and Sustainability Action Plan 2021-2023
- We increased by 5.9% the number of quantitative indicators we make reference to within the Report
- We have communicated our Regulation of Professional Conduct & Business Ethics to 100% of our office employees
- We have communicated our Anti-corruption Regulation to 100% of our office employees
- We have trained 93% of office employees on our Regulation of Professional Conduct & Business Ethics
- We trained 12.7% of office employees on anti-corruption
- No violation cases concerning our main principles and rules of professional behavior occurred
- No corruption incidents occurred
- No bribery incidents related to our employees occurred
- We were subject to 39 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
- 24 internal audits were conducted
- We did not make any donations to political parties

> Social Section

Society

- We distributed approximately €426 million in economic value: €87.3 million to employees (for salaries, benefits and insurance payments), €56.8 million for taxes (including VAT and port taxes), €19.2 million to providers of capital (for interest and return payments), €19.2 million to agents (for commissions), €194 million to suppliers (for purchases of goods and services), €1.6 million to society (for discount tickets, implemented programs, sponsorships and donations) and €47.9 million for investments
- We increased the total value of implemented or supported social support programs by 16.6%
- We implemented or supported 130 society support programs, as well as in 100% of the islands we serve
- We increased the total number of discount tickets offered by 10%
- We tripled the number of employees participating in volunteer activities and increased twentyfold employee volunteering hours
- We spent 87.3% of total procurement expenditure to local suppliers
- We spent 18.6% of total procurement expenditure to small and medium-sized enterprises (up to 50 employees)
- 10% of supplier selection criteria is related to their responsible operation
- We communicated our Supplier Code of Conduct to 100% of our suppliers, with 66% already signing its acceptance
- Approximately 500 customers participated in our society support programs and activities

Employees

- Responsibility is 1 out of 6 appraisal criteria for all office employees
- We trained (at least once) 70.8% and 12% of our office and marine employees respectively
- We increased the number of training programs by 21%
- 31% of work was conducted remotely, while 10,903 online meetings were conducted
- We employ 100% of our employees with full time employment contracts
- We collected 169 blood units through our voluntary blood donation programs in the last three years
- 100% of employees in Director and Top Management positions are Greek
- No grievances regarding our marine employee 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 covered 15.4% of permanent job openings in offices by internal candidates

> Environmental Section

Environment

- We produced approximately 4,380 KWh electricity from renewable energy sources
- We informed 100% of our employees on environmental protection issues
- 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 reduced the consumption of plastic bags in our offices by 18.7%
- We informed potentially over 1.2 million customers on Corporate Responsibility and Sustainability issues, such as environmental protection
- We used 70% recycled paper for all purposes and 68% recycled toners/ink cartridges
- We increased use of recycled or certified paper for commercial use to 78%
- We transported from Islands free-of-charge over 98 tonnes of materials for recycling
- We conducted internal drills on environmental protection issues to 100% of marine employees

Customers

- We informed 97% of passengers deemed necessary (over 818,000 passengers) through information SMS for early arrival at port or changes or cancellations of scheduled journeys in Domestic and Adriatic Sea lines
- We sent over 387,000 information SMS to our passengers
- 97.4% of our premises and vessels have access for people with disabilities
- We kept 83% of our vessels' departure times and 61% of arrival times as scheduled
- The average score registered through service evaluation devices onboard our vessels reached 4.2 on a 5 point scale
- We conducted internal drills and trainings on passenger safety to 100% of marine employees
- We were subject to 173 vessel inspections for protection measures against the pandemic, 52 for food hygiene and safety and 66 for Anti-Smoking Law's implementation, with no non-compliance incident
- We maintain 5 corporate websites, with over 2.3 million visitors annually and 2 mobile applications with over 7,600 downloads in 2021
- We sent overall 2,892 notifications to serve our passengers (1,375 concerning passengers with reduced mobility, 2 concerning passengers with sensitivity to allergens)
- We increased our seasmiles Loyalty and Reward program members by 16.8%

> Attica Group



- We are the largest passenger shipping group in Greece, the third in the Mediterranean Sea and among the 10 largest in Europe
- We operate 30 modern vessels in the Eastern Mediterranean Sea (and 2 more on the Morocco – Spain route)
- We have invested in total over €1.8 billion in new vessels
- We are the 3rd largest passenger shipping operator of conventional ro-pax vessels worldwide in terms of passenger capacity, 6th largest in terms of freight lane length in vessels and 7th largest in terms of vessels' gross-tonnage (according to Shippax data)
- 26 years of continuous presence in our Seas
- We handled 3.4 million reservations for journeys in the Eastern Mediterranean Sea (and 110 thousand more on the Morocco – Spain route), through our central reservation systems



[3] 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

Our Oceans



97%

of Earth's water is contained in its Oceans, which cover

71%

of Earth's surface

We are



26

years of presence in our seas



1,688

employees



30

modern vessels in the Eastern Mediterranean Sea and



2

more in the Morocco-Spain route



1.74

million nautical miles annually (80 times around the Earth)



4.4

million passengers annually in the Eastern Mediterranean Sea



870

thousand private vehicles annually in the Eastern Mediterranean Sea



373

thousand freight units annually in the Eastern Mediterranean Sea

We offer

We serve

62

unique destinations and reach

72

ports in Greece and Italy, through our brands



which are known for their high level of service, as well as

2

ports in the Morocco – Spain route, through our brand



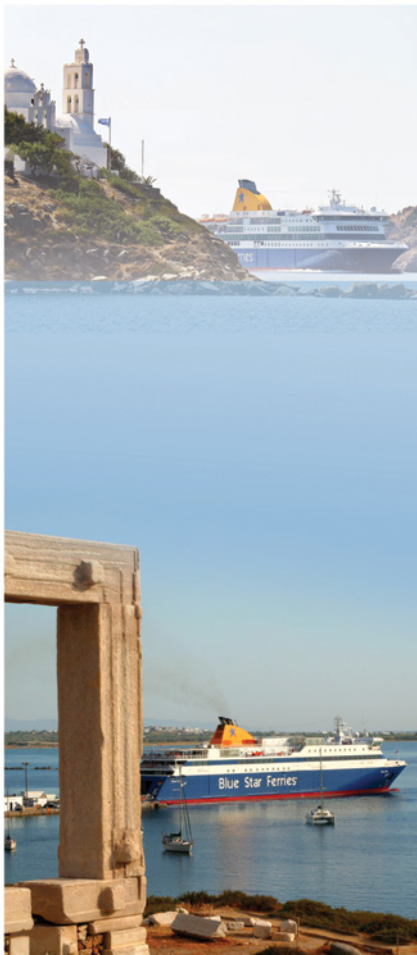
1. The Passenger Shipping Industry

[Did you Know]

Coastline and Greek Islands

Greece has the 11th largest coastline worldwide (13,676 km), due to its unique geographical relief and morphology with approximately 6,000 islands and islets, out of which 227 are inhabited. Greek islands:

- Have over 1,500,000 registered inhabitants (approximately 12.3% of the country's population).
- Contribute 11.7% to the Greek Gross Domestic Product (GDP).
- Support over 13.8% of total job positions.
- 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 based on a 2019 study conducted by the Foundation for Economic and Industrial Research (IOBE) published in January 2021:

- Greece has the highest number of maritime passenger transportation ports, while Piraeus port has the highest passenger transportation volume among the 28 European Union countries.
- The number of transported passengers and vehicles in domestic lines during 2019 reached approximately 19 million and 3 million respectively, while 2019 passenger transportation volume was lower by 1.1% compared to 2009.
- The number of transported passengers and vehicles in Adriatic Sea lines reached approximately 1.5 million and 690,000 respectively, decreased by 33% and 19.7% respectively compared to 2009.
- The passenger shipping industry contributes approximately €13.6 billion to the Greek economy (7.4% of the country's GDP) and supports approximately 332,000 job positions (8.5% of nationwide total job positions), without including short domestic routes and cruise lines.

The Greek Passenger Shipping Industry contributes **7.4%** to the Greek GDP and **8.5%** to the total job positions in Greece

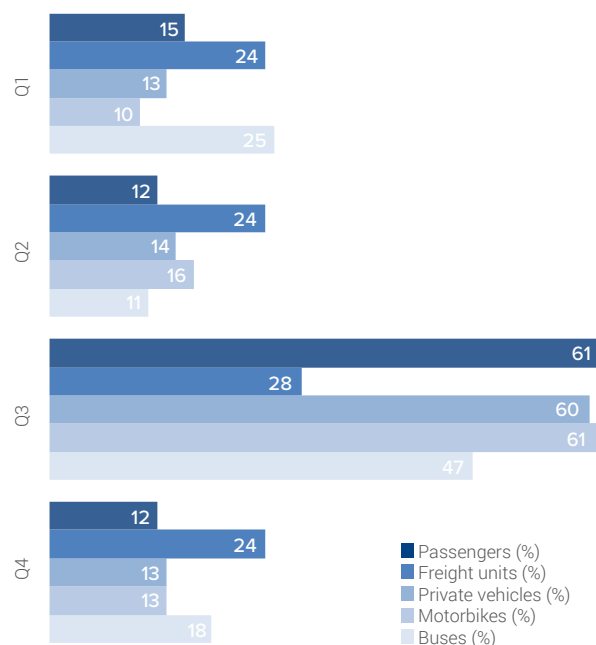
Ferries

According to Oxford Economics' report 'The Economic Impact of Global Passenger Shipping' in collaboration with INTERFERRY regarding the global ferry sector:

- Ferry lines operate over 15,400 vessels (out of which over 12,000 in Asia and 1,600 in Europe) and transported over 4.2 billion passengers and 373 million vehicles in 2019.
- Total direct and indirect contribution (i.e. through their value chain) to global GDP exceeds \$60 billion, while directly employing 218,000 employees and indirectly support 883,000 job positions.
- Direct and indirect contribution to the European GDP alone reaches \$11 billion and \$22.4 billion respectively, while creating 109,000 direct job positions and indirectly support 314,000 job positions.

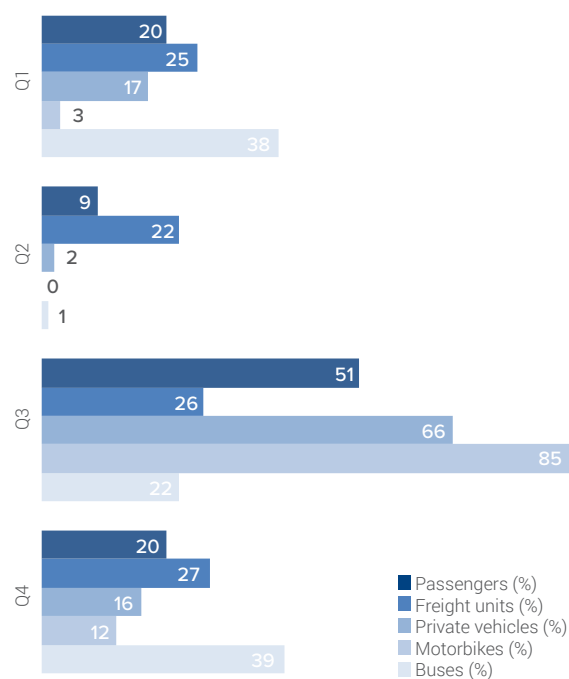
Passenger and vehicle (private vehicles and freight units) transportation volume in domestic lines increased by 16.4% and 26.9% respectively in 2021 compared to 2020, while passenger and vehicle transportation volume in Adriatic Sea lines increased by 48.9% and 32.1% respectively compared to 2020 (according to Hellenic Statistical Authority data and official figures from Port Authorities). At the same time, 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 November to February. 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 - Domestic Lines (2020)



Source: Hellenic Statistical Authority (until Report publication, Hellenic Statistical Authority had not yet published the complete 2021 data)

Seasonality of Passengers and Vehicles Transportation - Adriatic Sea Lines (2020)



Source: Hellenic Statistical Authority (until Report publication, Hellenic Statistical Authority had not yet published the complete 2021 data)

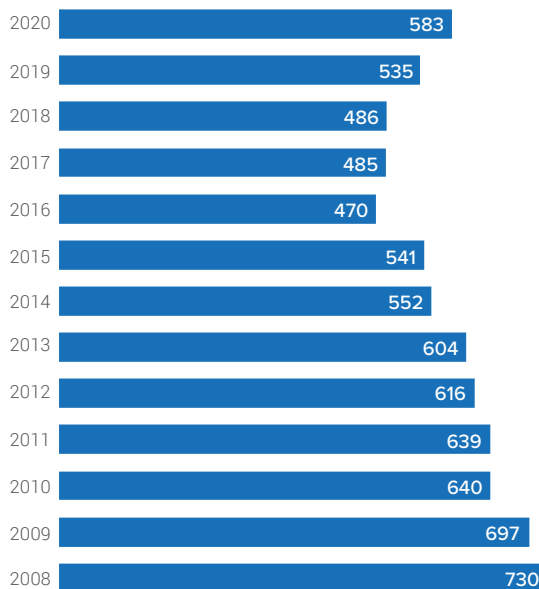
[Issue of Consideration]

Arrivals and Spending

Based on Bank of Greece's data for 2020, the number of non-resident arrivals in Greece reached approximately 7.4 million, reduced by 78.2% compared to 2019 due to the COVID-19 pandemic, while travel revenues decreased by 76.2% compared to 2019, despite the increase in average spending per trip by 9.1% compared to 2019, which reached €4.3 billion and €583 respectively (until Report publication, Bank of Greece had not yet published the complete 2021 data).

The decrease can be 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 increase local GDP and job positions in islands.

Average Spending from Abroad Visitors



■ Average spending per trip (€)

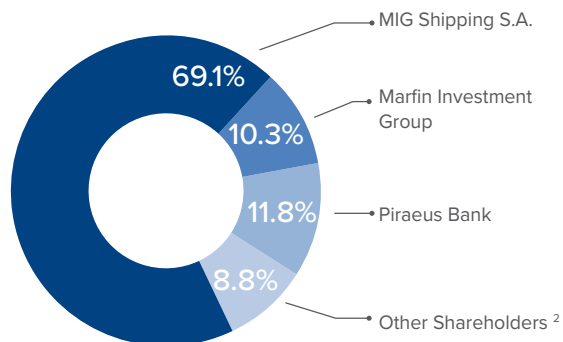
Source: Bank of Greece (until Report publication, Bank of Greece had not yet published the complete 2021 data)

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 LINK' (AML), which connects Morocco with Spain. 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.

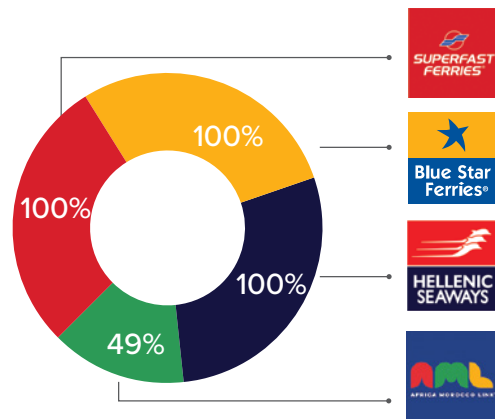
Shareholder Structure ¹



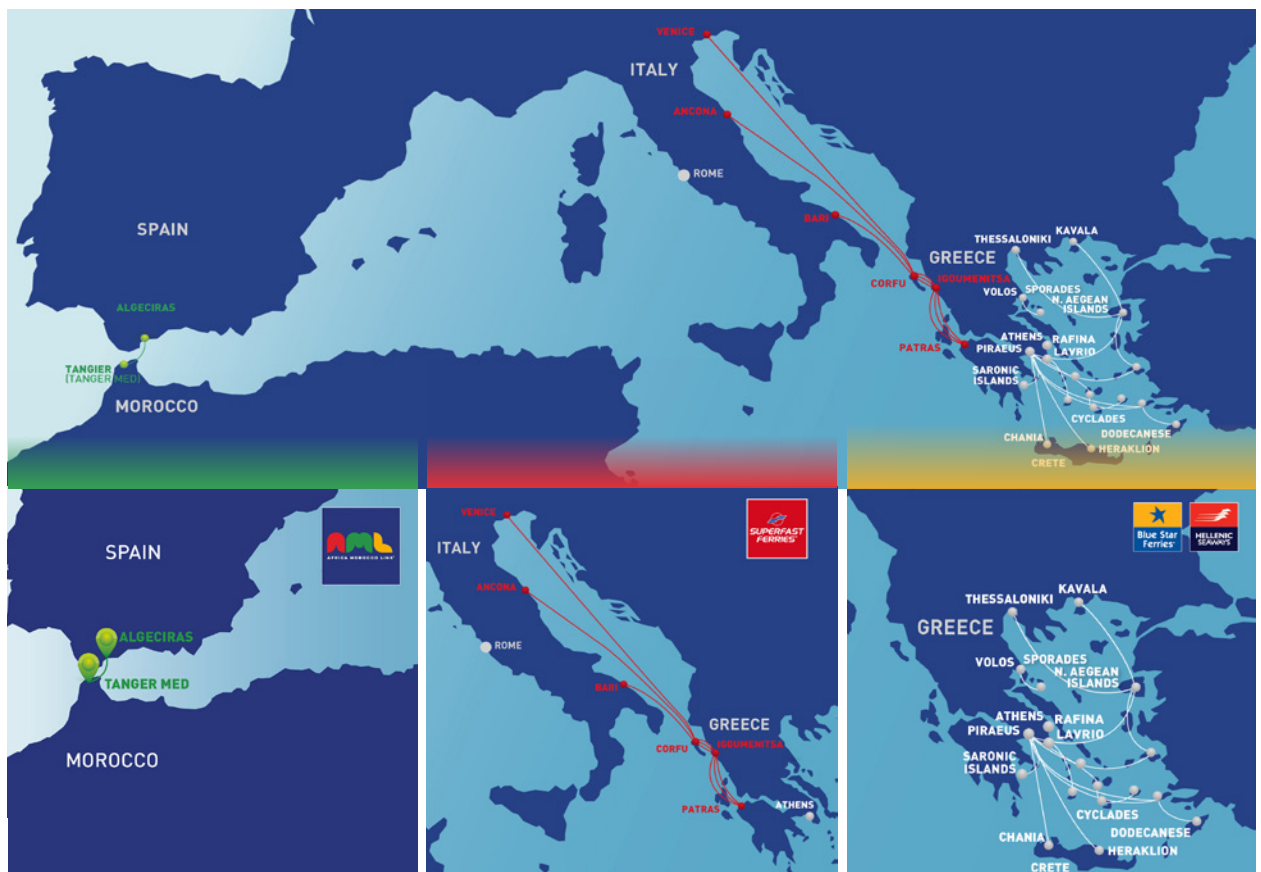
¹ Data refer to 31/12/2021.

² There are no governmental organizations in the Group's shareholder structure.

Attica Group Passenger Shipping Companies



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



Our fleet

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

We have invested in total over **€1.8** billion in new vessels

Our fleet, under the commercial brands Superfast Ferries, Blue Star Ferries and Hellenic Seaways consists of 30 vessels*, including 20 conventional car-passenger (ro-pax), 9 high-speed and 1 cargo vessel (ro-ro), while 28 are privately-owned and 1 is on long-term bareboat charter.

Furthermore, we managed 2 conventional ro-pax vessels of the related company AML in the Morocco – Spain route on long-term charter in 2021.

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, according to the highest shipbuilding standards.
- 29 vessels are registered in the Greek ship registry.
- The average age of our vessels in the Eastern Mediterranean Sea is 23.9 years, while the average age of our vessels is 25 years.
- Out of all our vessels, 5 are jointly operated with ANEK LINES's vessels, within the context of the 'ANEK - SUPERFAST 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 ¹

	2019	2020	2021
Passengers (million)	6.99	3.30	4.42
Private vehicles (million)	1.02	0.63	0.87
Freight units (thousand)	391.60	334.62	373.45

¹ Data refer to Eastern Mediterranean Sea routes.

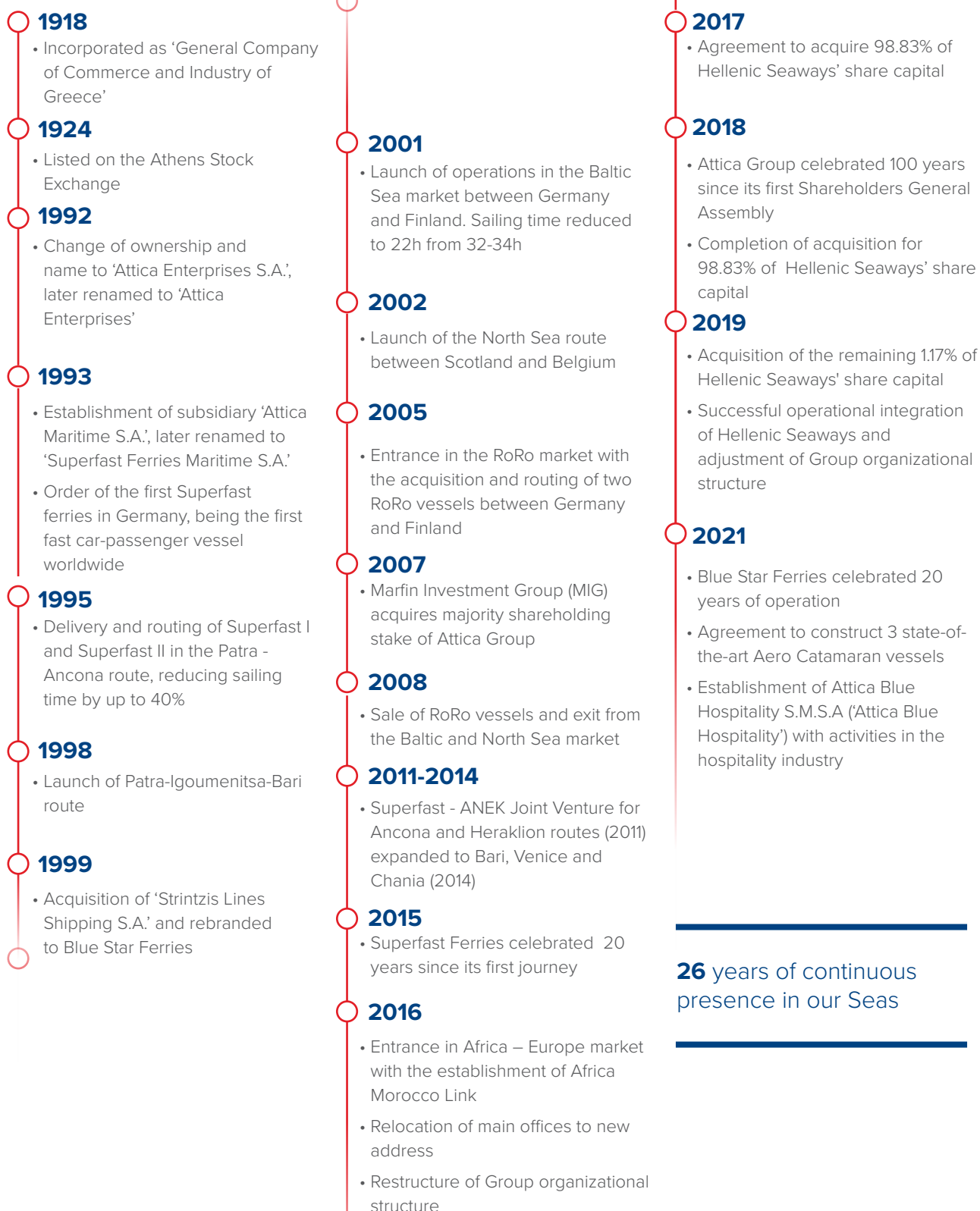
We are the **3rd** largest passenger shipping operator of conventional ro-pax vessels worldwide in terms of passenger capacity, **6th** largest in terms of freight lane length in vessels and **7th** largest in terms of vessels' gross-tonnage (according to Shippax data)



Regarding changes in the global passenger shipping industry during 2021, the European Commission approved the set of revised legislation 'Fit for 55' (see Section 8.1). Also, during 2021, we established the 100% subsidiary company Attica Blue Hospitality S.M.S.A ('Attica Blue Hospitality'), which acquired the owning company of Naxos Resort Beach Hotel located in the island of Naxos, as part of our strategic growth plan to further invest in Greek tourism and the hospitality industry.

* On 14/12/2021, we completed the sale of the car-passenger vessel EXPRESS PEGASUS for recycling (see Section 8.1).

Our history



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.



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.

Quality

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

Reliability

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

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.

Integrity

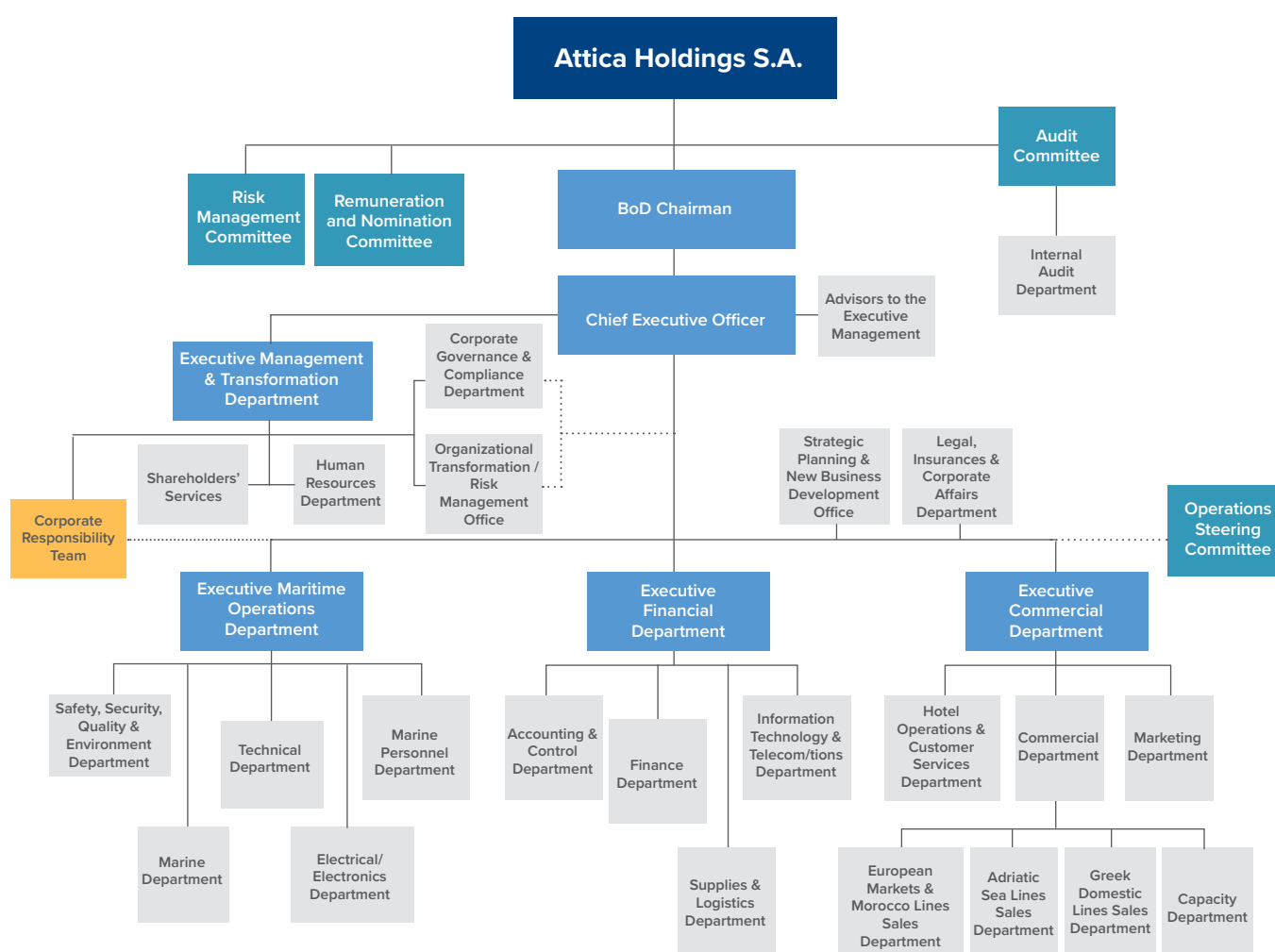
We behave with integrity and honesty in all aspects of our business according to our ethical standards.

Responsibility

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

Our organizational structure

Our organizational structure is schematically depicted below.



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 85 Port agents for Blue Star Ferries, Superfast Ferries and Hellenic Seaways, as well as 11 Premium Sales Agents and 2 Port agents for AML.
- Two central reservation systems for Blue Star Ferries, Superfast Ferries and Hellenic Seaways, as well as one more for AML, 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 **3.4** million reservations for journeys in the Eastern Mediterranean Sea (and **110** thousand more on the Morocco - Spain route), through our central reservation systems

Our Sales Network

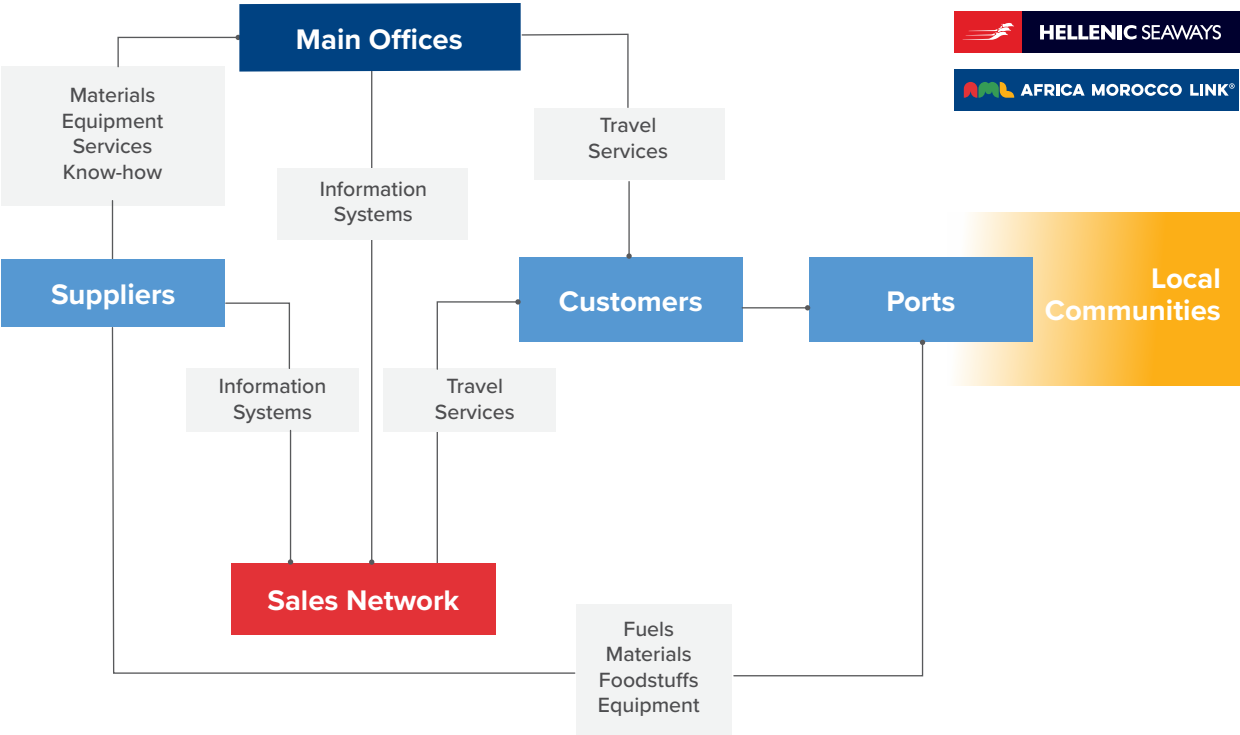


In order to provide our services in the Eastern Mediterranean Sea in 2021, we utilised:

- 25 vessels for Domestic lines to connect:
 - Piraeus, Rafina and Lavrio with Cyclades.
 - Piraeus with Dodecanese, N.E. Aegean islands, Crete (Chania and Heraklion) and Saronic.
 - Thessaloniki with N.E. Aegean islands and Cyclades.
 - Kavala with Cyclades and N.E. Aegean islands.
 - Volos with Sporades.
 - Crete (Sitia) with Dodecanese.

- 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 2 vessels in the Morocco – Spain route in 2021, both of which were on long-term charter.



[ESG Highlight]

Corporate Responsibility and Sustainability Strategy & Action Plan 2021-2023

For the first time in 2017, we developed our Corporate Responsibility and Sustainability Strategy 2018-2020 to systematically and quantitatively improve our performance.

Initially, we utilized an online tool to quantitatively assess our Corporate Responsibility and Sustainability maturity level, through over 1,000 questions based on criteria from global systems, standards and guidelines (such as GRI, AA1000, ISO26000, EFQM), as well as good practices from leading organizations worldwide.

The next steps were to define the anticipated performance, set specific quantitative objectives in 7 Areas of responsible operation and identify the Areas, Sub-Areas and Dimensions we need to focus, in order to achieve our Strategy. Based on the results of our Strategy 2018-2020, we improved our maturity level on Corporate Responsibility and Sustainability issues by 28% in 2020, compared to 2017.

Corporate Responsibility and Sustainability Maturity Level

Area	Improvement 2017-2020 ¹
Total	+28%
1. Management	+31%
2. Owners	+28%
3. Employees	+6%
4. Suppliers	+190%
5. Customers	+31%
6. Community	+31%
7. Environment	+16%

¹ Compared to the 2017 quantitative maturity level assessment defined as baseline.

We already initiated within 2020 a similar process to develop our Corporate Responsibility and Sustainability Strategy 2021-2023. However in this cycle, we designed a more extensive involvement from both our Corporate Responsibility Team and our Top Management Members. In addition, we defined in our Group's overall Responsibility program 'SAILING TOGETHER' one main program (flagship program) in each of the 7 Areas of responsible operation, to create additional value for our Stakeholders.

The results of the 2020 quantitative evaluation were presented during 4 online meetings with the Corporate Responsibility Team and the Group's Management Team (i.e. BoD Chairman, Chief Executive Officer, Executive Directors), who defined the objective to improve our performance on Corporate Responsibility and Sustainability issues by 13%.

Anticipated Corporate Responsibility and Sustainability Maturity Level

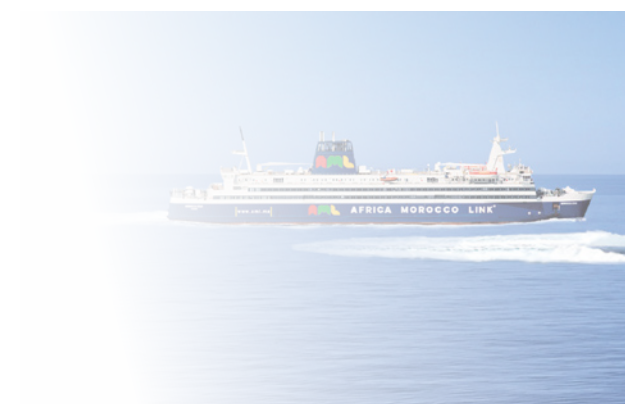
Area	Improvement 2020-2023 ¹
Total	+13%
1. Management	+11%
2. Owners	+10%
3. Employees	+7%
4. Suppliers	+31%
5. Customers	+9%
6. Community	+22%
7. Environment	+8%

¹ Compared to the 2020 quantitative maturity level assessment defined as baseline.

106 Top Management Members, Directors and Managers from all departments participated in the development of our Strategy 2021-2023



Sailing together



Despite the challenges due to the COVID-19 pandemic, during 2021 we organized our 6th Annual Responsibility Event through online meetings, which included:

- Introduction meeting to review the achievement of objectives included in the Strategy 2018-2020 and directions to develop our Strategy 2021-2023 by the Chief Executive Officer and the Chief Administrative & Transformation Officer, as well as review the Group's Corporate Responsibility Report 2020.
- 9 meetings in 6 theme Areas (Owners, Employees, Suppliers, Customers, Community and Environment), during which Top Management Members, Directors and Managers from all departments defined specific Actions and responsible employees for each one in the 7 Areas within the context of our Corporate Responsibility and Sustainability Plan 2021-2023.
- Presentation meeting of results in each one of the Areas.

We defined **123** actions in our Corporate Responsibility and Sustainability Action Plan 2021-2023

We have incorporated these Actions in our business strategy and business plans, policies and procedures (e.g. risk management, regulations of responsible business behavior), as well as in our Group's objectives. At the same time, we monthly monitor their implementation and evaluate our performance and implementation of planned Actions during our annual Responsibility meetings.

It must be noted that:

- We included the quantitative target for the overall 2023 Corporate Responsibility and Sustainability maturity level as a target in the formal Performance Appraisal of our Group Chief Executive Officer ^c (with a 7.5% weighting in his total variable remuneration) and Top Management Members.
- The development of our Corporate Responsibility & Sustainability Strategy and Action Plan 2018-2020 was presented during 2 webinars organized by the European Foundation for Quality Management (EFQM), where over 200 participants from across the World were informed on the methodology followed.



[4] Management

Incorporate Corporate Responsibility and Sustainability into our Management practices

Our Oceans



214 meters

is the deepest world record freediving (no limit), achieved off the coast of Spetses, Greece, in 2007

We are



5

pillars of Corporate Responsibility and Sustainability



11

Stakeholder groups



93

GRI disclosures in the Report



270

quantitative indicators in the Report



55

future objectives in the Report

We focus



Responsible 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.

We follow

Principles of the United Nations' Global Compact

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

We contribute

United Nations' Sustainable Development Goals

- 17 Revitalize the global partnership for sustainable development





We achieved

- 106 Top Management Members, Directors and Managers from all departments participated in the development of our Strategy 2021-2023.
- We defined 123 actions in our Corporate Responsibility and Sustainability Action Plan 2021-2023.
- We increased by 5.9% the number of quantitative indicators we make reference to within the Report.
- We have communicated our Regulation of Professional Conduct & Business Ethics to 100% of our office employees.
- We have communicated our Anti-corruption Regulation to 100% of our office employees.
- We have trained 93% of office employees on our Regulation of Professional Conduct & Business Ethics.
- We trained 12.7% of office employees on anti-corruption.
- No violation cases concerning our main principles and rules of professional behavior occurred.
- No corruption incidents occurred.
- No bribery incidents related to our employees occurred.
- We were subject to 39 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.
- 24 internal audits were conducted.
- We did not make any donations to political parties.

1. Corporate Governance

[Your Opinion]

Corruption

According to a survey conducted to office employees in 2021, **79.9%** agrees that we are a Group which does not tolerate corruption. Furthermore, according to a survey conducted to 1,400 citizens in 2021, our 3 brands and 2 competitors were positioned in the following ranking order to the question **'Does not tolerate corruption'**:



We operate based on best Corporate Governance practices

Attica Group has adopted the Hellenic Corporate Governance Council's Hellenic Corporate Governance Code. 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 ^{1,2}

Name	Position
Kyriakos Mageiras	Chairman / Executive Member
Michael Sakellis	Vice-Chairman / Non-Executive Member
Spyridon Paschalis	Chief Executive Officer (CEO) and Deputy BoD Chairman / Executive Member
George Efstratiadis	Non-Executive Member
Loukas Papazoglou	Independent Non-Executive Member
Efstratios Chatzigiannis	Independent Non-Executive Member
Maria G. Sarri	Independent Non-Executive Member

¹ Data refer to 31/12/2021.

² For further information, please visit <https://www.attica-group.com/en/attica-group/board-of-directors.html>.

- The Board of Directors consists between 3 to 11 members (individuals or legal persons), who are elected by the Shareholders General Assembly for a three-year term and is overall responsible to manage relationships with the Group's Stakeholders, which are considered and taken into account during decision making.
- BoD members elect the Chairman, Vice-Chairman and Chief Executive Officer. There is a separation of responsibilities between the Chairman of the Board of Directors and the Chief Executive Officer, although this is not restricted in our Articles of Association.
- BoD is overall responsible to approve Regulations and Policies related to responsible operation in accordance with the relevant legislative and regulatory framework, as well as for reviewing and implementing them when necessary, in collaboration with the Corporate Governance and Compliance Department.
- At the moment, there are no consultation processes between Stakeholders and the BoD on issues related to responsible operation. However, it must be noted that there were no critical concerns communicated to the BoD within 2021.
- We have developed a BoD Members Suitability Policy, which describes principles and criteria to select, replace and renew BoD members' tenure. Their suitability is constantly reviewed and re-evaluated whenever necessary, according to individual suitability criteria (e.g. knowledge, skills and experience, conflict of interests, independent judgment) and collective suitability criteria (e.g. knowledge of shipping industry, management and strategic planning experience).
- BoD's collective evaluation was established in 2021 and will be repeated annually, with the first cycle occurring in 2022. Among other things, the evaluation will include Corporate Responsibility and Sustainability issues and will be facilitated by an external consultant. There were no significant changes in BoD composition during 2021, except for a non-executive member resigned and replaced by an independent non-executive member.
- Initial briefing of the Shareholders General Assembly regarding candidate BoD members includes the BoD's justification for the member's candidacy, a detailed Curriculum Vitae emphasizing on professional and management experience, as well as ascertainment of suitability criteria according to the BoD Members Suitability Policy. Furthermore, candidate independent non-executive members submit a statement of fulfilling the defined Independence Criteria to the Remuneration and Nomination Committee. The Committee itself conducts a relevant evaluation, which is submitted to the Board of Directors.
- BoD conducts the BoD Chairman's and Chief Executive Officer's performance evaluation, in accordance with the Hellenic Corporate Governance Code 2021.

- The Chief Executive Officer cooperates with the BoD Chairman to evaluate Executive Directors' performance on an annual basis, considering quantitative and qualitative evaluation criteria, based on our strategic priorities, Vision and Values, who in turn evaluate Directors' performance.
- BoD Chairman maintains executive duties in all Group-related issues (e.g. Group viability, enhancing financial value, strategy formulation, BoD operation), as such function has been considered beneficial for the Group.

Diversity of BoD members

According to our BoD Members Suitability Policy, we ensure adequate gender representation, as defined by the relevant legislative provisions. The Remuneration and Nomination Committee considers this criterion prior to submitting its proposals for Board members' appointment and we additionally do not allow any discrimination that excludes candidate BoD members (e.g. due to race, nationality religion, disability, age or sexual orientation).

[Policy]

BoD Remuneration

According to our Group BoD Members Remuneration Policy, variable remuneration for executive members is 50% linked with:

- performance on objectives in each executive member's area of responsibility, and
- contribution to our Group's overall success and growth, as well as strengthening shareholders' long-term interests.

The achievement of executive BoD members' operational objectives (including objectives related to responsible operation) is part of the variable remuneration's determination methodology, which is included in the present Policy.

Fixed remuneration for executive members is defined in their employment contracts, without being subject to our Remuneration Policy. Remuneration for non-executive and independent non-executive members is approved by the annual Shareholders General Assembly and is associated with their employment time and responsibilities, without being directly linked with business performance, in order to formulate independent judgment and encourage freedom of opinion in cases of taking excessive business risks.

Non-executive and independent non-executive members receive minimum standard annual remuneration for participating in the BoD, as well as may receive an additional remuneration for additional responsibilities (e.g. chairing and participation in Committees), which is approved by the Shareholders General Assembly.

Non-executive members may participate in shares option program following the respective Shareholders General Assembly's decision. However, independent non-executive members do not participate in pension and benefit programs or other long-term incentives and are not granted additional remuneration (bonus) or other performance-related compensation.

BoD members' Remuneration Report regarding the previous financial year is submitted and discussed during the Shareholders General Assembly, while shareholders' vote is advisory and the Board explains how the voting results were taken into account in the next Remuneration Report.

We have not cooperated with consultants to determine BoD members' and Top Management Members' remuneration, while despite the fact that currently there is no approved dedicated Remuneration Policy for Top Management Members, the present Policy extends to the Group subsidiaries' Board of Directors with the participation of the Group's Top Management Members (i.e. Executive Directors).

The Board of Directors is supported by the **Audit Committee**, the **Remuneration and Nomination Committee** and the **Risk Management Committee**, without at the moment any women among their members.

Board Committees

Committee	Members	Responsibilities
Audit Committee (meets at least quarterly)	2 independent non-executive members 1 non-executive member	<ul style="list-style-type: none"> • Evaluate the effectiveness of internal control and risk management systems, emphasizing on risks associated with financial information. • Monitor, review and evaluate the process of compiling financial information. • Ensure transparency of corporate operations. • Oversee compliance with legislation and regulatory requirements.
Remuneration and Nomination Committee (meets at least once annually)	2 independent non-executive members 1 non-executive member	<ul style="list-style-type: none"> • Ensures effective and transparent nomination process for candidate BoD members. • Identifies and proposes suitable BoD members to the Board. • Assists BoD to ensure that its composition and structure correspond to the Group's size, business characteristics, nature, as well as its activities' scope and complexity. • Recommends the Remuneration Policy for BoD members to the Board. • Implements the Remuneration Policy, including recommendations related to setting and allocating variable remuneration to BoD executive members.
Risk Management Committee (meets at least quarterly)	2 independent non-executive members 2 executive members 1 non-executive member	<ul style="list-style-type: none"> • Submits proposals to the BoD regarding the Risk Management Policy and Procedure. • Evaluates the Risk Management Framework's operation and suggests corrective measures in case of deviations. • Reviews the Risk Management Framework's adequacy and effectiveness. • Examines the Group's response to recognized risks.

We prevent conflicts of interest

We comply with the relevant legislations and responsible internal operation principles regarding conflicts of interest and therefore:

- We have appointed a non-executive BoD Vice Chairman, as well as Board Committees consisting of independent non-executive members and non-executive members.
- We have established a Conflicts of Interest Management Framework and describe our policy, processes and control mechanisms to prevent, detect and manage current and potential conflicts of interest for BoD members. No cases of conflicts of interest occurred within 2021.
- 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.
- Current and candidate BoD members disclose any professional commitments to other companies and non-profit entities, participation in governance bodies of other legal entities-institutions regardless of their nature and scope (e.g. boards of directors), as well as any other relationship and/or activity which could potentially conflict with the Group's interests. There was no impact on BoD members' time availability or independence and no conflicts of interest occurred due to these participations during 2021. All CVs of BoD members are available on the Group's website, without however including any confidential information, such as positions in other Boards.

- The Shareholders General Assembly is responsible to approve any action of BoD members and executives on their behalf or on behalf of third parties which are related to the Group's purposes or participate as equal partners in companies which pursue objectives similar to those pursued by our Group.
- We inform and brief BoD members and executives on the Conflicts of Interest Management Framework, as required by applicable stock market legislation, corporate legislation and our Operation Regulations, in order to ensure their comprehensive knowledge and understanding of obligations.
- We require annually from Top Management Members to confirm in written that no conflicts of interests have occurred.
- We disclose conflicts of interest within BoD's Annual Report during the Shareholders General Assembly, as stipulated in the approved Conflicts of Interest Management Framework.

[Policy]

Dependency Relationships for Group BoD Members

According to current legislation (Law 4706/2020), a non-executive BoD member is considered independent if he/she does not hold over 0.5% of ATTICA HOLDINGS S.A.'s share capital and is exempted from financial, business, family or other dependency relationships when appointed and during his/her term of service, which may influence the member's decisions and independent and objective judgment.

Specifically according to current legislation, indicative dependency relationships are the following:

- The member receives any significant remuneration (according to the Company's Remuneration Policy) or benefit from the Company or its affiliated companies or participates in stock option or any other remuneration or benefit performance-related program, excluding fees for participation in the BoD or its Committees and receiving fixed benefits as part of a retirement program.
- The member or any other person closely connected with the member maintains or has maintained during the last 3 financial years prior to the member's appointment any business relationship with the Company or an affiliated person or shareholder who directly or indirectly holds equal to or over 10% of the Company's share capital or its affiliated companies, which affects business activities, especially in cases of being a major Company supplier or customer.

- The member or any other person closely connected with the member has been a member in the Company's or its affiliated companies' Board of Directors for over 9 financial years cumulatively at the time of his/her election or has been an executive or maintained employment or project or service relationship or paid relationship with the Company or its affiliated companies during the last 3 financial years prior to the member's appointment.
- The member or any other person closely connected with the member has up to second-degree relationship or is a spouse or partner of a BoD member or a Top Management Member or a shareholder who holds equal to or over 10% of the Company's or its affiliated companies' share capital.

According to our Procedure for Notification of Dependency Relations of the Independent Non-Executive Members of the Board of Directors, the Board reviews at least annually the fulfillment of the defined Independence Criteria from independent non-executive members (and in any case before the annual financial report's publication). The respective evaluation will be completed for the first time in 2022, before the publication of the Annual Financial Report 2021.

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, whose operation is defined in the Audit Committee's Operating Regulation we have developed.
- The Internal Audit Department, which reports functionally to the Audit Committee and to the Board of Directors through the Committee.
- The Operation Regulations, which among other defines:
 - Main principles of BoD's operation and the responsibilities of executive and non-executive members.
 - The main features and processes of our Corporate Governance Framework and Internal Audit Framework (e.g. periodic assessment).
 - Recruitment and performance evaluation processes for Managers.
 - Monitoring process of transactions from BoD members, Managers and other persons with access to privileged information.

- The disclosure process of important transactions from persons exercising managerial duties, as defined in our Transaction Disclosure Framework from Persons Exercising Managerial Duties and Persons Closely Connected with Them. According to our Framework, all relevant persons are obliged to notify the Hellenic Capital Market Commission and the Group of any transaction after completing overall transactions of €5,000 within a calendar year related to the Group's shares or other financial instruments. At the same time, we prohibit all transactions 30 calendar days before publishing our interim or annual financial report (except in cases of justified written requests approved by the Board of Directors). We include all liable persons in a dedicated List of Liable Persons to monitor and disclose transactions and we inform each person for its obligations (with respective briefing sent to all 4 new Liable Persons included in the List of Liable Persons within 2021), while we publish all relevant transactions in our Group's corporate website and sent them for publication to the Athens Stock Exchange.
- The integrated Enterprise Resource Planning (ERP) system we use to automate and computerize our operations.

24 internal audits were conducted

Risk Management

Within the context of our risk management system, we maintain and update annually a Risk Registry in cooperation between the Chief Executive Officer and Executive Directors, where we record, assess and prioritize risks that can affect our business plan. Based on the Registry's latest update, which is submitted to the Risk Management Committee for review and approval by the Board of Directors, we have identified in total 56 risks.

Regarding the Group's risk management process:

- We identify inherent risks within the context of our daily operations, as well as responding to customer complaints, incidents or financial losses.
- We use historical data to assess risk (e.g. risk severity), as well as to understand risk interdependencies.
- The Group's Management conducts individual meetings with the Risk Management Division and workshop with involved persons to assess the potential impact on business objectives (as part of the Group's strategy) and designs measures to reduce potential impact.
- At the same time, we recognize potential implementation limitations from various factors (e.g. implementation costs, technological limitations).

- We implement measures (e.g. related to risk acceptance, avoidance or reduction) based on their effectiveness and impact on our business objectives. Through these measures, we reduce inherent risk levels, which result to the residual risk for the Group.
- The Group's Management discusses and the BoD's Risk Management Committee discusses and evaluates issues and risks included in our Risk Registry for the next 12 months during the annual evaluation process.
- Issues analyzed in our Risk Registry include aspects related to responsible operation (e.g. safety/security, climate change), with respective details presented in the relevant Report sections.

Part of Risk Registry 2021 - Issues related to Responsible Operation

	Risk	Potential Impact	Residual Risk Level ¹	Reference in Report Section
1	Changes in environmental protection regulation	Implementation of strategy and activities (e.g. increases in fuel costs, need for additional investments).	Medium	8.1
2	Climate change and impact on weather conditions	Risk of severe weather incidents, emergencies and weather variability. Disruption of proper vessel operation, effect on passenger and freight traffic.	Medium	4.1, 8.1
3	Crew safety and hygiene	Potential injury, physical damage, illness, loss of life, human error. Poor quality of work, damage/loss of assets, claims and sanctions.	Low	6.2, 7.1
4	Office occupational safety and hygiene	Potential injury, physical damage, illness, loss of life, human error. Reduction of productivity and quality of services, legal actions and sanctions.	Low	6.2
5	External Fraud and Corruption	Financial results, reputation, interests and achieving the Group's objectives.	Low	4.1, 5.1, 5.3
6	Internal Fraud and Corruption	Financial losses, loss of trust and reputation of Group, legal actions and sanctions.	Low	4.1, 6.4
7	Insufficient Corporate Governance framework	Reducing reliability and efficiency of decision-making and control mechanisms, non-adherence to corporate processes and policies, adverse effect on achievement of objectives and the Group's value and viability.	Low	4.1
8	Passenger accidents	Negative publicity, impact on the Group's reputation and credibility, legal actions and other sanctions.	Low	7.1
9	Causing negative effects on local communities from vessel operation	Negative publicity, impact on the Group's reputation, disputes with local organizations and community members, claims and legal actions.	Low	5.2, 8.4

¹ Refers to the risk level after considering the adequacy and effectiveness of existing risk management measures, which reduce the estimated Inherent risk.

We ensure our business continuity

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

- Have established and annually re-evaluate a comprehensive Business Continuity Plan to ensure our operations in case of unexpected events. According to this Plan, we invest to further reduce negative impacts and ensure faster recovery of operations in case of unforeseen events.
- Operate an Alternative Information Systems and Telecommunications Center.
- Implement a specific backup policy.
- Implement certified Information Security Management System at our Data Center in accordance with the international standard ISO 27001:2013, which defines requirements for implementation, maintenance and continuous improvement of information security management systems. At the same time, we implemented a test scenario for the uninterrupted operation of Group's systems through our Alternative Data Center during 2021, which we will repeat annually.
- Have been certified for the 4th consecutive year 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 7.1).
- Implement the appropriate safety measures and/or seek to improve the efficiency of existing safety measures through systematic risk assessment process.

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 outlines principles and rules that govern our business activities. The Regulation is uploaded on the corporate Intranet OneAttica, in our corporate website and is also part of the introductory material provided to all new hired employees, while all office employees have signed for its receipt and acceptance.

Employee Guidebook

At the same time, we have communicated the 'Improving the Best' information guidebook to all marine employees (which is also included in the introductory material provided to all new hired 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.

We have communicated our Regulation of Professional Conduct & Business Ethics to 100% of our office employees

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 contact the Human Resources Department for advice or guidance, as well as to inform in written the Corporate Governance and Compliance Department in case they doubt about any action or in cases of actual or potential conflicts of interest. No such cases have been reported within 2021.
- 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 informed our employees about our revised Regulation of Professional Conduct & Business Ethics and Employee Guidebook during 2021, which were also posted on the Group's portal.

Reporting Violations

Any office employee must report any violation of the Regulation of Professional Conduct & Business Ethics (such as fraud, theft or any other illegal activity), as also highlighted during the interactive e-learning course on our Regulation of Professional Conduct & Business Ethics, with 64.4% of office employees participating during 2020-2021 achieving a score over 70%.

Marine employees can report violations concerning the Employee Guidebook through the established Maritime Labour Convention's (MLC) procedure for submitting complaints or directly to the competent authorities for any violations and they also can anonymously submit any complaint through the personal interviews conducted during the MLC's external inspections.

Furthermore, we developed a Procedure for Submission and Investigation of Complaints during 2021, following relevant discussions among the Group's Transparency

Committee members (without any other Stakeholders involved in the respective mechanism's design, review or operation). Any Stakeholder can report a potential violation of corporate policies, procedures or legislation, either by name or anonymously, via mail, dedicated e-mail address or using the electronic reporting form (<https://www.attica-group.com/en/corporate-responsibility/complaints-of-offensive-behaviors.html>).

The Group's Transparency Committee receives and exclusively manages all complaints with confidentiality and fully respects personal privacy during collection and processing of any personal data, while the Committee informs annually the BoD regarding the number, nature and management of complaints received.

There were no complaints or reports submitted within 2021 regarding violations or offensive behavior, as defined by the provisions within the Group's Procedure for Submission and Investigation of Complaints.

We have trained **93%** of office employees on our Regulation of Professional Conduct & Business Ethics

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

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 uploaded our anti-corruption policies and procedures on our corporate Intranet for all office employees.
- Assess our operations for risks related to corruption, as we assessed 16 Group Divisions during 2021 (48% of total Divisions), all of which implement measures to limit the respective risk.

- Train our employees on our anti-corruption policies and procedures, with 37 office employees trained in 2021, without at the moment conducting respective training to BoD members and marine employees.
- 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. Indicatively, during 2021 we:
 - Participated in the event 'Greek Tourism: Towards a new model utilizing Sustainable Development' organized by the Hellenic Network for Corporate Social Responsibility (CSR Hellas), where we highlighted the importance of risk management and infrastructure issues, legislation and regulations for the shipping industry's growth.
 - Participated in the 3rd Ferry Shipping Summit in Amsterdam, where we analyzed strategies in the passenger shipping industry for the next 3 years and the most significant challenges for our Group, crisis management through social media, as well as their dynamics in building a brand.

Anti-corruption Regulation

We have developed our Anti-corruption Regulation, which is available in our corporate website and is mandatory for all employees. The Regulation communicates our zero tolerance towards corruption, without at the moment actively communicating the Regulation to our business partners (e.g. suppliers, sales network).

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 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.

At the same time, all employees can report actual or potential corruption incidents via mail, dedicated e-mail address or the electronic reporting form to the Group's Transparency Committee, whose members are:

- The Chairman of the BoD's Audit Committee.
- The Internal Audit Director.
- The Legal, Insurance & Corporate Affairs Director.

In all cases, the Transparency Committee protects all employees who submit such reports from any action against them, since any form of retaliation is considered a violation of our Regulation of Professional Conduct & Business Ethics.

During 2020-2021, we conducted an interactive e-learning course on our Anti-corruption Regulation and trained overall 91.6% of office employees, with 67.4% of office employees achieving a score of over 70%.

We have communicated our Anti-corruption Regulation to **100%** of our office employees

We trained **12.7%** of office employees on anti-corruption 

No corruption incidents occurred 

No bribery incidents related to our employees occurred

We **did not** make any donations to political parties

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 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 and trainings on legislative competition issues, without however any relevant trainings in 2021.

Regarding a previous legal case, one appeal filed in 2019 against the Court of Appeal's decision which dismissed a complaint for anti-competitive behavior in 2015 is expected to be discussed within 2022. Furthermore, a fine of €29,972 imposed by the Hellenic Competition Commission in 2020 and accepted by us, for non-compliance with the Commission's approval decision regarding acquiring exclusive control of Hellenic Seaways (the issue concerned a minor deviation in implementing the Group's voluntary commitment due to misinterpretation of a relevant provision, with almost no effect on competition and market operation) will be paid in 2022.

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 2021:

- There were no grievances regarding:
 - Impacts on society related to our operation.
 - Employee health and safety.
 - Labor practices.
 - Human rights violation.
 - Marine employee living conditions onboard our vessels.
 - Privacy issues or personal data security on behalf of our employees.
 - Anti-competitive behavior or anti-trust practices.
 - Environmental legislation violation or environmental impacts.
 - Vessels' acoustic impact.
 - Vessels' rippling impact.
- There were no incidents or cases of:
 - Non-compliance with regulations regarding our corporate governance practices.
 - Corruption.
 - Bribery related to our employees.
 - Anti-competitive behavior or anti-trust practices.
 - Unfair pricing practices.
 - Disputes with local communities.
 - Non-compliance with regulations regarding impacts on society related to our operation.
 - Employee discrimination.
 - Non-compliance with regulations regarding our labor practices.
 - Human rights violation.
 - Non-compliance of products and services during the external audits conducted by the relevant health and market authorities.
 - Non-compliance with regulations and voluntary codes concerning marketing, advertising, promotion, product and service information and labeling.
 - Non-compliance with regulations and voluntary codes regarding product and service use or their health and safety impacts on our customers.
 - Recalls of products and services due to quality or health and safety impacts.
 - Non-compliance with regulations and voluntary codes concerning customers' personal data security.
 - Advertising campaigns being withdrawn.
 - Environmental legislation violation.
- There were no legal cases related to:
 - Corruption.
 - Anti-competitive behavior or anti-trust practices.
 - Marketing, advertising, promotion, product and service information and labeling.
 - Product and service use.
 - Personal data security related to our customers.
 - Vehicle damages in vessel garages within the year.
 - Journey delays.
 - Damages to other vessels due to rippling impact.
- There were no written notices from competent authorities for any reason (e.g. economic activities, financial reporting, corruption, impacts on society related to our operation, employee health and safety, overbooking, marketing, advertising, promotion, product and service information and labeling, rippling impact of our vessels), except for the written notices regarding environmental issues (see Section 8.1).
- The total amount of fines imposed in 2021 was €98,400 (out of which €54,400 were related to the 'Express Samina' incident, see Section 8.4). The total amount of fines paid related to our operation during 2021 was €28,600, most of which were imposed within the year.
- There were no monetary losses as a result of business ethics violations (e.g. due to anti-competitive activities, fraud, unethical practices, corruption or bribery incidents) or monetary losses as a result of legal proceedings associated with labor law violations (e.g. refraining from paying required overtime, failing to ensure a safe workplace).
- There were no warnings from competent authorities and no significant fines (over €20,000) or other non-monetary sanctions were imposed for any reason (e.g. corruption, impacts on society related to our operation, employee health and safety, overbooking, rippling impact of our vessels), except for a fine related to the 'Express Samina' (see Section 8.4).

2. Corporate Responsibility and Sustainability

[Your Opinion]

Managing Corporate Responsibility and Sustainability

According to a survey conducted to office employees in 2021:

88.9% agrees that we are a Group which manages the issue of Corporate Responsibility and Sustainability in a systematic way.

86.4% acknowledges and understands the importance of ESG criteria (Environmental, Social and Governance) for the Group's sustainable development.

83.4% acknowledges and understands the importance of adopting good practices related to responsible operation within the Group's daily activities.

[Good Practice]

BoD Members Training

According to our Training Policy for BoD Members, we implement a training program, which consists of:

- Induction Training Program (Briefing) to brief and inform them on various issues (e.g. related to their responsibilities).
- Periodic Training Program, as required for important business issues/developments, which are indicatively related to:
 - Regulatory and legislative developments.
 - Corporate governance and internal audit issues.
 - Emerging risks and new technologies.
 - Developments, potential risks and trends on responsible operation issues.

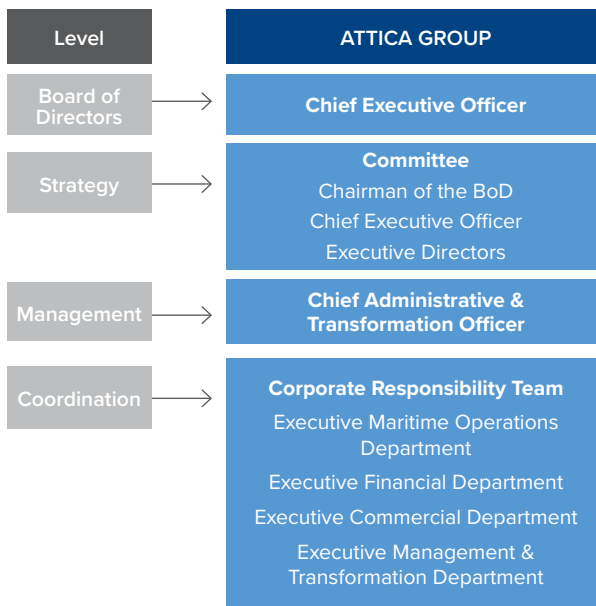
Indicatively, we conducted a 2-hour Corporate Responsibility and Sustainability training to our BoD members within 2021, which we intend to repeat every 6 months, with the following main topics:

- ESG terminology, benefits and reporting frameworks.
- International trends regarding environmental and social practices, as well as governance practices.
- Requirements of performance reporting frameworks on responsible operation issues.
- Investment practices utilizing responsible operation criteria.
- Review of Corporate Responsibility and Sustainability Strategy and Report.

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 and Sustainability



- At Board level, the Chief Executive Officer has the overall responsibility for Corporate Responsibility and Sustainability issues, including Principles, Policies, the overall quantitative Corporate Responsibility and Sustainability Target, while at the same time shapes and implements the Group's Strategy, Vision and respective Policy.
- The Chief Executive Officer communicates Corporate Responsibility and Sustainability issues when deemed necessary and at least once a year (e.g. 3-year Strategy, Risk Analysis, Due Diligence) to the Board of Directors.
- The 3 year Corporate Responsibility and Sustainability Strategy (including the respective Action Plan, as well as the related maturity performance objectives) is approved by a six-member Committee, consisting of the BoD Chairman, the Chief Executive Officer and the 4 Executive Directors.
- At Top Management level, the Chief Administrative & Transformation Officer is responsible, who among other, guides the Corporate Responsibility Team, reviews and approves the Annual Responsibility and Sustainability Report (e.g. regarding Material Topics), as assigned by the BoD and Chief Executive Officer and outlined in our Sustainable Development Policy.

- At coordination level, the six-member Corporate Responsibility Team with representatives from the Executive Departments is responsible to coordinate the implementation of our Corporate Responsibility and Sustainability Strategy, as well as cooperate with other Departments to implement our 3 year Corporate Responsibility and Sustainability Action Plan. It must be noted that we have defined the Corporate Responsibility Team's overall responsibilities within the Group's Operation Regulations and its members' individual

responsibilities in their formal job descriptions, while 5 out of 6 Team members have quantitative responsibility objectives in their formal performance appraisal.

- The Board of Directors receives the external auditor's Independent Audit Report along with the annual Responsibility and Sustainability Report, while the Chief Administrative & Transformation Officer is responsible for the independent auditor's selection and assignment of audit work.

[Good Practice]

Responsible Operation

Being committed to operate responsibly throughout our business operations and work harmoniously with our Stakeholders to create mutual long-term value, we have:

- Developed our Sustainable Development Policy with our principles regarding sustainable development and management practices for social, environmental and governance issues (ESG) in 3 main Dimensions (Governance, Social, Environmental) and 5 Sections (Management, Society, Employees, Customers, Environment), as these are also described in our Annual Responsibility and Sustainability Report. At the moment, we have not communicated the respective Policy to other Stakeholders.
- Included the acceptance of the 10 Principles of the United Nations' Global Compact within our Regulation of Professional Conduct & Business Ethics.
- Developed a Code for Responsible Investments with our relevant commitments (e.g. integrity in business relationships, due diligence on human rights, labor rights and environmental legal compliance) and invest in organizations which:
 - Comply with National and European Law (e.g. labor legislation, security and data protection, fair competition).
 - Do not apply child labor or forced and compulsory labor.
 - Respect employee diversity and do not apply discrimination practices.
 - Are not engaged in any form of bribery, fraudulent offering or payment to employees, customers, organizations, government officials or individuals.
 - Adhere to national and internationally recognized environmental standards.
 - Seek to minimize greenhouse gas emissions and reduce their environmental footprint.

- Developed a process to identify, prioritize and incorporate Corporate Responsibility and Sustainability issues into local and international investment agreements.
- Recorded the participation of Socially Responsible Investment Funds (SRI) in our Group, with the respective percentage being 0.1% for 2021 (refers to shareholders with over 10,000 shares).
- Published main Regulations and Policies related to our responsible operation on our website www.attica-group.com, which are available to all our Stakeholders in Greek and English.


At the same time, we acknowledge that responsible operation contributes to improving our performance and achieving our objectives.



We operate based on Management Systems

We use the following certified Management Systems, International Safety and Management Codes, as well as International Conventions:

- 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 22000 Food Safety Management System (contractors).
- ISO 27001 Information Security Management System.
- European Union Ship Recycling Regulation (Regulation EU No 1257/2013) (see Section 8.1).

We were subject to **39** 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 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, the Chief Executive Officer and the Chief Commercial Officer are Chairman, Vice-Chairman of International Routes and Member respectively in SEEN's BoD.
- 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.
- Hellenic Institute of Customer Service (HICS).

Sustainable Mobility

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

European Enterprise Manifesto 2020

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

- Enhance employability and social inclusion.
- Promote new sustainable production and consumption methods, as well as improve living conditions.
- Increase transparency and respect for human rights.

Our efforts are recognized

We consider the recognition of our efforts related to our responsible operation as an important moral award, which also highlights our commitment to continue our relevant practices and initiatives.

Awards and Distinctions

Event/Authority	Type of Award/Distinction	Category	Reason
Greek Hospitality Awards 2021 (Ethos Media)	Gold Award	Best Greek Coastal Shipping Company	As the leading domestic passenger shipping group in Greece
	Silver Award	Best Digital Advertising and Performance	Use of digital media to promote services
Impact Bite Awards 2021 (Boussias Communications)	Gold Award	Systems Integration	Create a single booking process for Superfast Ferries, Blue Star Ferries and Hellenic Seaways
Loyalty Awards 2021 (Boussias Communications)	Gold Award	Best Short-Term Initiative	Loyalty and Reward program seasmiles (see Section 7.3)
	Silver Award	Travel & Hospitality	
	Silver Award	Best in Omnichannel	
	Silver Award	Best Direct Marketing Campaign	
	Bronze Award	Best Use of Digital Onboarding	
	Bronze Award	Best Partnership Initiative	
Tourism Awards 2021 (Boussias Communications)	Gold Award	Travel - Loyalty Programs	Innovation of services and infrastructure related to Loyalty and Reward program seasmiles (see Section 7.3)
	Gold Award	Travel - Technology enhanced experience	Seasmiles Chatbot (see Section 7.3)
	Silver Award	Digital Tourism - Multichannel marketing strategy	Communication strategy for Blue Star Ferries
	Silver Award	Digital Tourism - User interaction / Use of user generated content / Use of influencers / Social media contest	Use of social media by Blue Star Ferries
	Bronze Award	Innovation - Innovative concept	Combined passenger transport by train and vessel 'Sail & Rail' (see Section 8.1)
	Bronze Award	Technology - Innovative use of Technology	Seasmiles Chatbot (see Section 7.3)
Health & Safety Awards 2021 (Boussias Communications)	Winner	Shipping	Overall Health and Safety management and monitoring for employees, passengers and visitors in all facilities and vessels
	Gold Award	Disability Facilitate Space	Practices in all workplaces for the safe reception of employees, customers and visitors with disabilities
	Gold Award	Premises Evacuation	Evacuation actions and processes for buildings and vessels (e.g. infrastructure, equipment), with special emphasis on disabled persons
	Bronze Award	COVID-19: Resources for the workplace	Actions to reduce SARS-CoV-2 virus exposure risk of employees in the workplace

3. Materiality and Stakeholders

[Your Opinion]

Trust

According to a survey conducted to office employees in 2021, **89.4%** agrees that we are a Group which can be trusted.

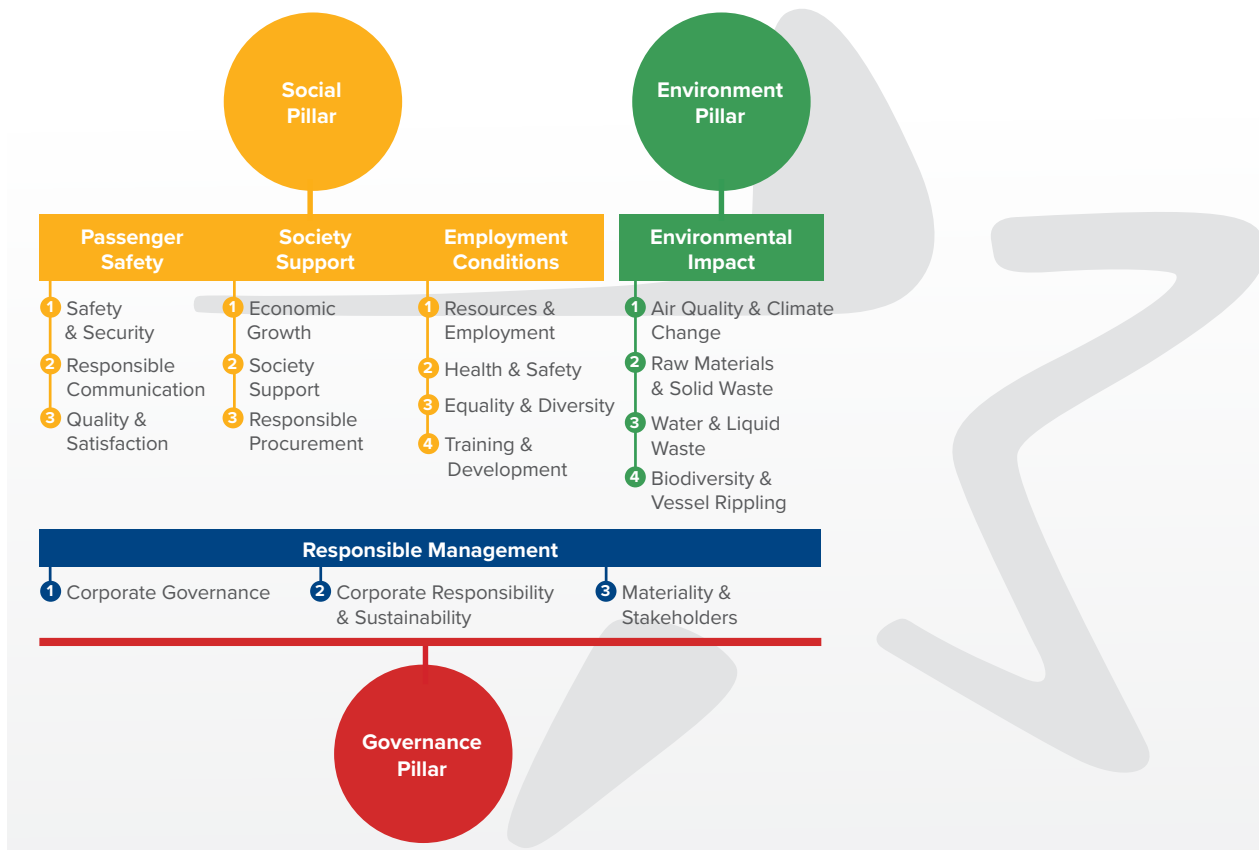
Furthermore, according to a survey conducted to 1,400 citizens in 2021, our 3 brands and 2 competitors were positioned in the following ranking order to the question 'You can trust this company':



We identify Material Topics

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

Corporate Responsibility and Sustainability Framework



We define our Report's content and identify Material Topics in each of the above Areas, which include topics related to the actual or potential impact we may have on society, environment and economy. We utilized the following indicative input and sources, without any significant changes compared to the previous reporting period (e.g. regarding Material Topics):

- Industry's regulatory framework, current global conditions and practices, as well as future trends based on respective analyses from international organizations.
- The Global Reporting Initiative's (GRI) 'Sustainability Reporting Standards'.
- The GRI study 'Sustainability Topics for Sectors'.

- The S&P Global's Sustainability Yearbook.
- Material Topics identified in passenger shipping companies' Corporate Responsibility Reports (or equivalent).
- Our Group's Corporate Responsibility and Sustainability Strategy 2021-2023 and the Areas identified that we need to focus.
- Our Risk Registry, which is annually updated.
- Our Stakeholders' expectations related to our responsible operation (where available), taking into account their input from engagement activities and various sources (e.g. relevant surveys conducted). Within 2021, we identified our Stakeholders' views and expectations mainly through the following surveys:
 - Quantitative Satisfaction Survey, with personal interviews to 1,400 people in selected areas (Athens, Patra, Crete, South Aegean and North Aegean islands), as well as telephone interviews to 200 travel agencies we cooperate with in Domestic and Adriatic Sea lines.
 - Use of service evaluation devices in our vessels (see Section 7.3).

We assessed the actual or potential impact we may have on economy, environment and society (including human rights) as a result of our activities, based on the likelihood of occurrence and severity of their impact on our Stakeholders. During the next step, we prioritized the significance of our activities' actual or potential impact. Through this Analysis, we have identified the following Material Topics for 2021 (all Topics that were not deemed Material are not referenced in detail):

Materiality Analysis

Topics		
Material Topics of high importance	Material Topics of medium importance	Material Topics of moderate importance
<ul style="list-style-type: none"> Accident Impact Passenger Safety Products & Services Health & Safety Responsible Communication & Sales CO₂ Emissions SOx, NOx and Particulate Matter (PM) Emissions 	<ul style="list-style-type: none"> Socioeconomic Compliance Anti-competitive Compliance Business Continuity Information Systems Security Responsible Buying Supplier Labor Practices Assessment Local Buying Operational Support Vessels' Responsible Buying Supplier Environmental Assessment Supplier Human Rights Assessment Vessel Work Conditions Vessel Health & Safety Labor Relations Equality & Fairness Labor Practices Grievances Products & Services Quality Products & Services Affordability Customer Satisfaction Passenger Property Protection Environmental Compliance Energy Use Sea Pollution Fuel Spills & Leakages Hazardous Waste Handling Material Recycling Acoustic Impact Waste Handling Effluent Handling Material Consumption Biodiversity & Land Rippling 	<ul style="list-style-type: none"> Corporate Governance Anti-Corruption Economic Transparency Investments Public Policy Human Rights Grievances Investment Impacts Donation & Sponsoring Community Impact Social Products & Services Society Grievances Corporate Volunteering Community Awareness Business Entrepreneurship Job Security Employee Benefits Office Health & Safety Training & Development Office Work Conditions Internal Communication Labor Association Human Rights Customer Privacy Internet & Data Safety Customer Awareness Sea Discharges Water Consumption Environmental Training & Awareness Environmental Investment Environmental Grievances Ozone Layer (ODP)

Management
Society
Employees
Customers
Environment

We interact with Stakeholders

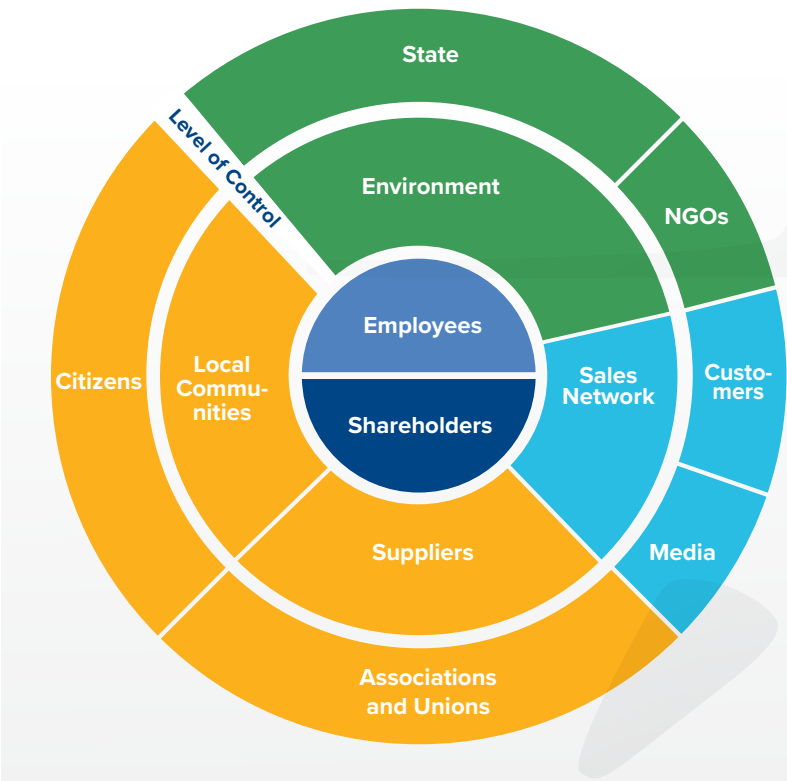
The way we operate, as well as our decisions, affect a wide range of people, groups and organizations, who comprise our Stakeholders. The following table describes our Stakeholder groups, which influence or are influenced by our operations, the methods we apply to continuously communicate and interact with them (without any distinct engagement activities specifically as part of this Report's development) in order to ensure consistent value creation for our Stakeholders, 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"> Employee opinion survey (every 1-2 years) Performance Appraisal (annually) 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 (6.1) Training & Development (6.4) Health & Safety (6.2) Work Conditions (6.1-6.4) Employee Benefits (6.3) Equality & Fairness (6.3) Labor Practices Grievances (4.1, 6.3) Labor Relations (6.3) Labor Association (6.3) Internal Communication (6.1) Human Rights Impact Reviews (6.3) Human Rights Grievances (4.1, 6.3)
Shareholders	<ul style="list-style-type: none"> Shareholders General Assembly (annually/extraordinary) Websites Meetings 	<ul style="list-style-type: none"> Passenger Safety (7.1) Accident Impact (5.2, 8.1) Corporate Governance (4.1) Business Continuity (4.1) Investments (6.3) Anti-corruption (4.1) Information Systems Security (4.1, 7.1) Economic Transparency (4.1, 5.1) Public Involvement (4.1)
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 (7.1) Products & Services Quality (7.1, 7.3) Products & Services Health & Safety (7.1) Products & Services Affordability (7.3) Responsible Communication & Sales (7.2) Customer Satisfaction (7.3) Accident Impact (5.2, 8.1) Anti-competitive Compliance (4.1) Passenger Property Protection (7.1) Customer Privacy (7.1) Internet Safety (7.1) Customer Awareness (5.2, 8.1-8.4) Socioeconomic Compliance (4.1)
Sales Network	<ul style="list-style-type: none"> Events / Meetings Information systems Travel agents' online portal Websites Network satisfaction survey (every 2-3 years) 	<ul style="list-style-type: none"> Products & Services Quality (7.1, 7.3) Responsible Communication & Sales (7.2) Customer Satisfaction (7.3) Anti-competitive Compliance (4.1)
Suppliers	<ul style="list-style-type: none"> Supplier evaluation Meetings Contracts 	<ul style="list-style-type: none"> Operational Support (5.3) Responsible Buying (5.3) Local Buying (5.3) Vessel Responsible Buying (5.3) Supplier Assessment for Labor Practices (5.3) Supplier Human Rights Assessment (5.3) Supplier Environmental Assessment (5.3)

Stakeholder	Methods of interaction through continuous activities (unless indicated otherwise)	Main issues of interest (reference in Report)
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 (7.1) • Sea Pollution (8.2-8.4) • Fuel Spills & Leakages (8.3) • Accident Impact (5.2, 8.1) • Corporate Governance (4.1) • Anti-competitive Compliance (4.1)
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 (7.1) • Products & Services Quality (7.1, 7.3) • Products & Services Affordability (7.3)
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 (5.2) • Sea Pollution (8.2-8.4) • Fuel Spills & Leakages (8.3) • CO₂ Emissions (8.1) • Effluent Handling (8.3) • Waste Handling (8.2) • Hazardous Waste Handling (8.2) • SOx, NOx & PM Emissions (8.1) • Acoustic Impact (8.1) • Environmental Grievances (4.1) • Donation & Sponsoring (5.2) • Investment Impacts (5.2) • Corporate Volunteering (5.2) • Business Entrepreneurship (5.2) • Rippling (8.4) • Society Grievances (4.1, 5.2) • Community Awareness (5.2) • Socioeconomic Compliance (4.1)
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"> • Energy Use (8.1) • Sea Pollution (8.2-8.4) • Fuel Spills & Leakages (8.3) • CO₂ Emissions (8.1) • Environmental Training & Awareness (8.1) • Material Consumption (8.2) • Material Recycling (8.2) • Responsible Communication & Sales (7.2) • Socioeconomic Compliance (4.1)
Non-Governmental Organizations (NGOs)	<ul style="list-style-type: none"> • Collaborations • Meetings / Presentations 	<ul style="list-style-type: none"> • Community Impact (5.2) • Sea Pollution (8.2-8.4) • Effluent Handling (8.3) • Waste Handling (8.2) • Discharges at Sea (8.2, 8.3) • Water Consumption (8.3) • Biodiversity & Land (8.4) • Refrigerants Use (ODP) (8.1) • Environmental Grievances (4.1) • Environmental Compliance (4.1) • Rippling (8.4) • Environmental Training & Awareness (8.1) • Socioeconomic Compliance (4.1)
Media	<ul style="list-style-type: none"> • Press releases • Press conferences • Websites 	<ul style="list-style-type: none"> • Passenger Safety (7.1) • Community Impact (5.2) • Sea Pollution (8.2-8.4) • Fuel Spills & Leakages (8.3) • Accident Impact (5.2, 8.1) • Donation & Sponsoring (5.2)

Stakeholders and Level of Control

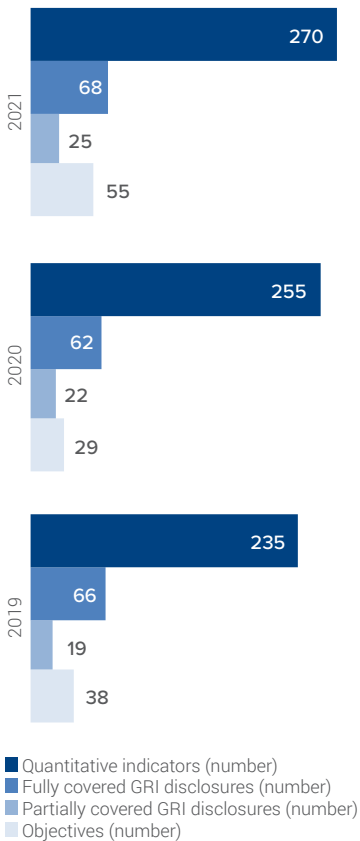


We focus on quantitative data and results

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 and defined our Responsibility and Sustainability Report's quantitative indicators.

We increased by **5.9%** the number of quantitative indicators we make reference to within the Report

Quantitative Data within the Responsibility and Sustainability Report



4. Achievements 2021 and Future Objectives

We committed	Progress	We aim	By
To improve our overall performance on Corporate Responsibility and Sustainability issues by 13% (by 2023).	25%	To improve our overall performance on Corporate Responsibility and Sustainability issues by 13%.	2023
To improve our performance on Corporate Responsibility and Sustainability issues related to Owners by 10% (by 2023).	25%	To improve our performance on Corporate Responsibility and Sustainability issues related to Owners by 10%.	2023
To improve our performance related to Management of Corporate Responsibility and Sustainability issues by 11% (by 2023).	75%	To improve our performance related to Management of Corporate Responsibility and Sustainability issues by 11%.	2023
To conduct a Stakeholder Engagement process on issues related to Corporate Responsibility and Sustainability (by 2023).	25%	To conduct a Stakeholder Engagement process on issues related to Corporate Responsibility and Sustainability.	2023
To monitor our Responsibility and Sustainability Report's quantitative indicators through our Business Intelligence Tool (by 2023).	0%	To monitor our Responsibility and Sustainability Report's quantitative indicators through our Business Intelligence Tool.	2023
To include the target for each Area of responsible operation in the Corporate Responsibility Team members' performance appraisal (by 2022).	75%	To include the target for each Area of responsible operation in the Corporate Responsibility Team members' performance appraisal.	2022
		To simplify, harmonize and consolidate our various Regulations of business operation into a single Regulation.	2022
		To train 25% of crew ratings and 100% of vessel Officers on our Regulation of Professional Conduct & Business Ethics and Anti-corruption Regulation.	2023
		To assess fraud/corruption risk in our business operation.	2022
		To design a Remuneration Policy to define remuneration in additional hierarchical levels (except BoD), which emphasizes on normalizing wages between genders.	2022
		To strengthen our business continuity through ISO 22301 certification.	2022
		To conduct benchmarking studies with other peer organizations.	2023
		To train all Group executives on risk management issues.	2022
		To conduct a long-term risk assessment (4-7 years).	2022

[ESG Highlight]

Responding to the Global Pandemic

The coronavirus SARS COV-2 pandemic forced the Group to intensify and adapt its procedures to the challenging conditions related to protecting passengers' and employees' health, in close cooperation with the competent Health Authorities.

Despite 1,899 cancellations of vessel itineraries (18% less compared to 2019) and subsequent redesign of our routes, as well as implementing a reduced passenger protocol, which resulted in reduced passenger and vehicle transportation volume by over 37% and 15% respectively compared to 2019, we nevertheless transported over 4.4 million passengers and 1.2 million vehicles, while we ensured uninterrupted transportation of goods to islands, supporting citizens for medical and social reasons. Also, we transported free-of-charge medical and personal protection supplies throughout the South Aegean and North Aegean Regions and Crete.

The pandemic impact will continue to significantly affect our Group's transportation volume and we expect to gradually return to pre-COVID-19 levels when authorities remove travel restrictions imposed both domestically and in foreign countries, which have a significant share in our passenger transportation volume during the summer months.

Since the pandemic's beginning, we implemented an action plan focusing on Health and Hygiene, as well as our Group's Business Continuity and Financial Position:

Health and Hygiene

As our main concerns are our employees', passengers' and partners' health, we implemented measures, such as:

- Provided detailed instructions on what each employee should do in case of disease symptoms and sent 7 briefings with respective protective measures to our office employees in 2021.
- Suspended all business trips and physical meetings, which are now conducted via teleconference or video conference.
- Conduct temperature measurements to all office employees upon entering our facilities.
- Perform regular disinfections in office buildings, as well as vessel air conditions, cabins and public areas from certified external collaborators.
- Agreed with medical groups for free COVID-19 molecular detection tests for office and marine employees, with approximately 2,630 detection tests conducted to office employees.
- 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 passenger and crew hygiene, while we designated dedicated cabins on each vessel to address and constrain any potential incident.
- Maintain stable temperature in vessel areas to prevent increased humidity and provide natural airflow inside vessels, without circulating air between cabins.
- Continuously display informative messages on vessel screens and inform passengers regarding prevention measures.
- Provide our customers the option of online ticket booking and web check-in for contactless purchase and ticket use.
- Schedule frequent announcements and recommendations from marine employees regarding mandatory use of protective mask in all vessel public areas (both indoors and outdoors), maintain necessary distances between passengers during their stay in vessel lounges, bars or outdoor areas and avoid crowding during passenger boarding/disembarkation.
- Placed specific signs in vessel lounges to inform passengers where they are allowed to sit and configured seating arrangement in external decks to keep necessary distances.

- Comply with the competent Authorities' instructions and mandate completion and handing over of the 'Pre-Boarding' form during passenger boarding.
- Allowed cabins to be used by two persons according to legislation, except for up to 4-member families or persons with disabilities and their escort.
- Installed protective plexiglass at vessel Reception desks.
- Wash dishes and cutlery in special washing machines at temperatures above 70°C, with individual packaging for cutlery.
- Have inspected and certified 26 vessels with the 'SAFEGUARD' label by Bureau Veritas, regarding implementation of specific measures and necessary procedures to address biological risks posed by COVID-19, aiming to protect human health.

Business Continuity

We formed a COVID-19 Task Force to ensure continuous information regarding appropriate measures to protect our employees and passengers, in cooperation with the National Public Health Organization (NPHO) and competent Authorities.

Financial Position

We immediately applied measures to manage financial implications due to decreased passenger and vehicle transportation, by reducing operating costs and strengthening our financial position, as among other we:

- Continue to implement measures to reduce operating costs, in order to further strengthen our financial position.
- Reduced fleet operation and redeployed our fleet, based on current needs.
- Postponed our business development projects.
- Utilized all State support measures for affected companies.
- 130 marine employees were suspended from work, in accordance with the respective government regulations in response to the COVID-19 pandemic, due to reduced vessel itineraries.

27 office employees and 318 marine employees were diagnosed with COVID-19 in 2021 and all cases were treated according to the Health Authorities' instructions. However, despite our efforts:

- 4 office employees were hospitalized to treat their symptoms.
- 1 marine employee was removed from the vessel as he required hospitalization, where he unfortunately passed away after a few days due to disease complications.

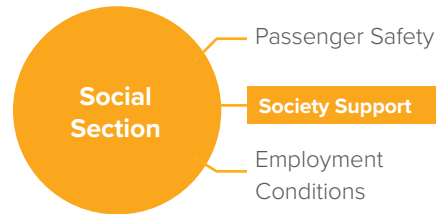
31% of work was conducted remotely, while 10,903 online meetings were conducted ¹

¹ Data refer to office employees.

[5] Society

We support prosperity of Society

We focus



Our Oceans



50%

of the oxygen we breathe is produced in Oceans

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 are



€347.9

million turnover



€426

million economic value distributed



57,040

discount tickets



€1.6

million social contribution



127

volunteer employees

We follow

Principles of the United Nations' Global Compact

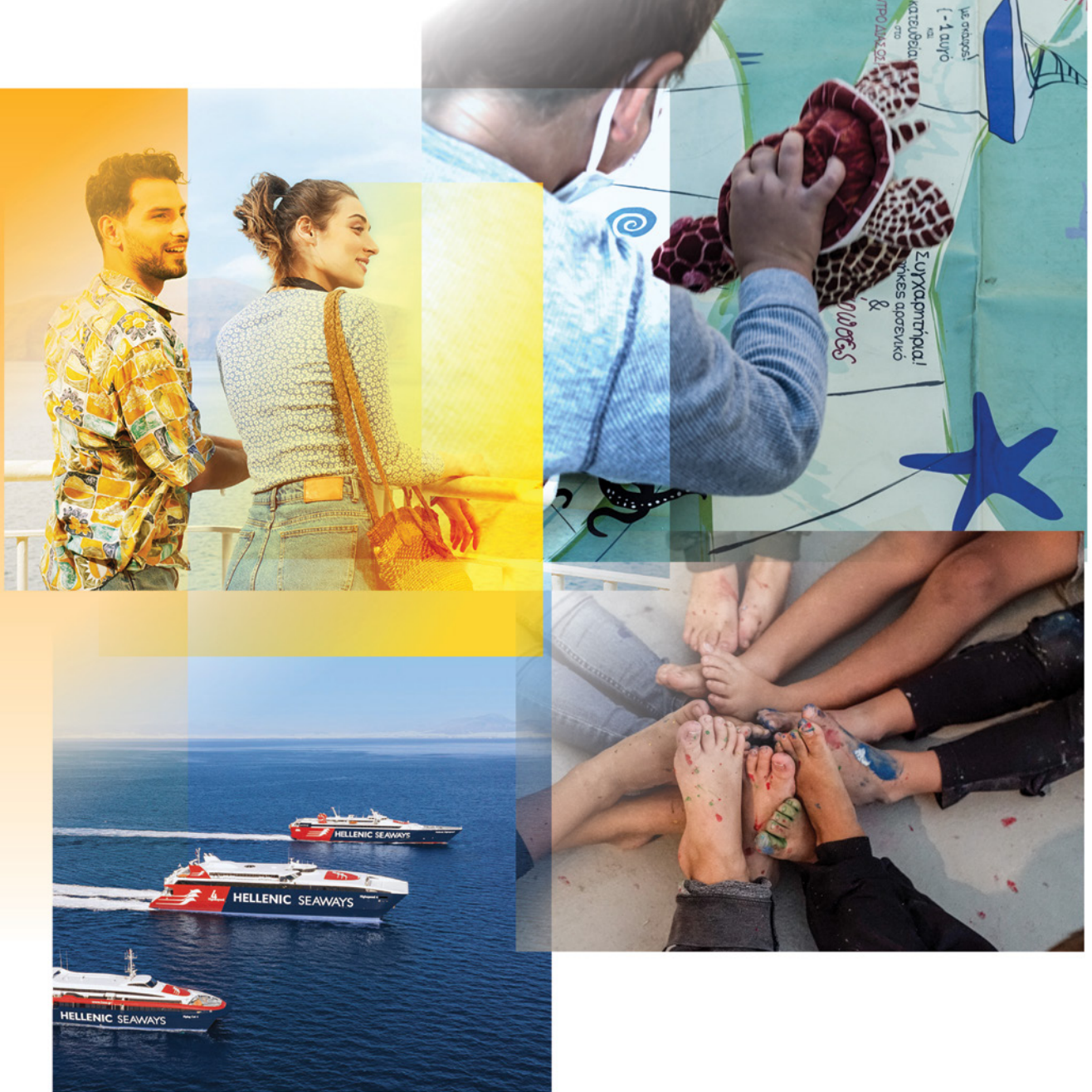
- 1 Support and respect protection of internationally proclaimed human rights
- 2 Ensure not to be complicit in human rights abuses
- 4 Eliminate all forms of forced and compulsory labour
- 5 Abolish effectively child labour
- 8 Promote greater environmental responsibility

We contribute

United Nations' Sustainable Development Goals

- 1 End poverty in all its forms everywhere
- 3 Ensure healthy lives and promote well-being for all at all ages
- 4 Ensure inclusive and quality education for all and promote lifelong learning
- 8 Promote inclusive and sustainable economic growth, employment and decent work for all
- 16 Promote just, peaceful and inclusive societies





We achieved

- We distributed approximately €426 million in economic value: €87.3 million to employees (for salaries, benefits and insurance payments), €56.8 million for taxes (including VAT and port taxes), €19.2 million to providers of capital (for interest and return payments), €19.2 million to agents (for commissions), €194 million to suppliers (for purchases of goods and services), €1.6 million to society (for discount tickets, implemented programs, sponsorships and donations) and €47.9 million for investments.
- We increased the total value of implemented or supported social support programs by 16.6%.
- We implemented or supported 130 society support programs, as well as in 100% of the islands we serve.
- We increased the total number of discount tickets offered by 10%.
- We tripled the number of employees participating in volunteer activities and increased twentyfold employee volunteering hours.
- We spent 87.3% of total procurement expenditure to local suppliers.
- We spent 18.6% of total procurement expenditure to small and medium-sized enterprises (up to 50 employees).
- 10% of supplier selection criteria is related to their responsible operation.
- We communicated our Supplier Code of Conduct to 100% of our suppliers, with 66% already signing its acceptance.
- Approximately 500 customers participated in our society support programs and activities.

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 2019-2021 (additional financial information can be found in our Annual Financial Reports at www.attica-group.com).

Financial Results

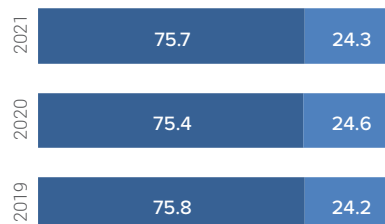
	2019	2020	2021
Capitalization (million €)	NR	205.02	227.67
Equity (million €)	NR	380.9 ¹	361.7
Debt (million €)	NR	430.5	481.8
Turnover (total sales with VAT) (million €)	405.4	290.4	347.9
Operating costs (million €)	316.2	259.3	310.5
Earnings before interest, taxes, depreciation and amortization (EBITDA) (million €)	78	40.4 ¹	42
Profits / (Losses) after taxes (million €)	20.8	(49.2) ¹	13.1
Corporate taxes (thousand €)	197	251 ¹	66
Total taxes (including corporate taxes, VAT and port taxes) (million €)	81.9	50.4	56.8
Payments to providers of capital (million €)	29.9	18.4	19.2
Payments to suppliers (million €)	205.6	155.6	194
Cost of public insurance and pension payments (million €)	NR	9.6	10
Cost of employees (including salaries, benefits and insurance payments) (million €)	94.2	79.4	87.3
Commissions to agents (million €)	21.9	13.6	19.2
Investments (million €)	34.5	39.7	47.9

¹ Data provided in our previous Report have been restated, due to changes in accounting policy.
NR: Not reported

It must be noted that during 2021, we received financial compensation from the Greek State and grants from the European Union of €32.9 million, compared to €34.3 million in 2020, 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. Furthermore, we also received €5.4 million compensation due to COVID-19, compared to €12 million in 2020, addressing operation of minimum required routes, necessary to maintain an adequate domestic shipping network.

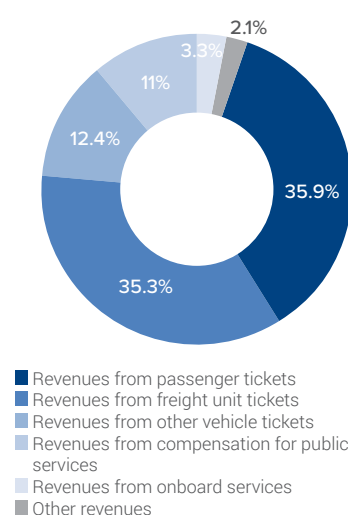


Turnover per Market



■ Domestic routes (%)
■ Adriatic Sea routes (%)

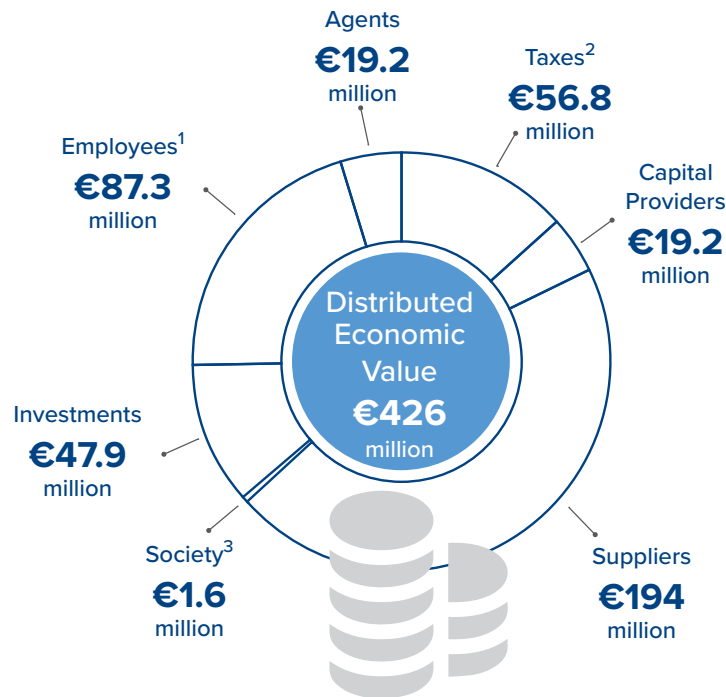
Revenue Structure



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



¹ The amount refers to gross salaries, benefits and insurance payments.

² The amount refers to total taxes, including VAT and port taxes.

³ The amount refers to value of discount tickets, implemented programs, sponsorships and donations.

We distributed approximately **€426** million in economic value:

€87.3 million to employees (for salaries, benefits and insurance payments)

€56.8 million for taxes (including VAT and port taxes)

€19.2 million to providers of capital (for interest and return payments)

€19.2 million to agents (for commissions)

€194 million to suppliers (for purchases of goods and services)

€1.6 million to society (for discount tickets, implemented programs, sponsorships and donations)

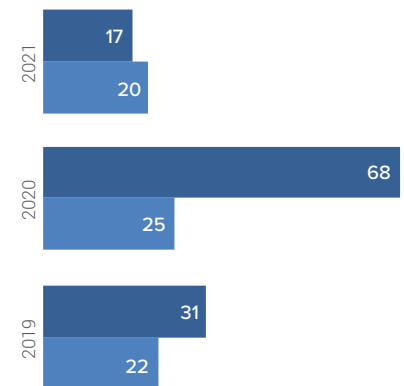
€47.9 million for investments

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.
 - Training of new users on existing reservation programs.
 - Familiarization with new features of existing reservation programs.
 - Familiarization with new reservation programs.
- Presentations-briefings for new products and services.

Sales Network Training



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

2. Society Support

[Your Opinion]

Society Support

According to a survey conducted to 1,400 citizens in 2021, our 3 brands and 2 competitors were positioned in the following ranking order to the question ‘Supports the community according to its capabilities’:



We support society needs

In order to identify and determine local community needs, we gather needs through a number of sources such as:



- 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.

Even though we operate in 6 Pillars of Society Support, implementing or supporting 130 society support programs in 2021 (out of which 62 nationwide programs  and 68 programs to local communities), compared to 118 programs in 2020, the main Pillar of our society support program is offering discount tickets, as we believe that the role of corporations is to support mainly through products and services. It is estimated that approximately 1,080 people were benefitted from our society support programs and activities during 2021.

Society Support Pillars



Society Support Value

	2019	2020	2021
Value of discount tickets (€)	2,578,597	1,179,104	1,366,596 
Value of passengers' donations (€)	4,413	1,931	1,989
Value of implemented societal programs (€)	54,138	54,173	67,009
Value of sponsorships and donations (€)	139,657	106,769	129,722
Total	2,776,805	1,341,977	1,565,316 

We increased the total value of implemented or supported social support programs by **16.6%**

We implemented or supported **130** society support programs, as well as in **100%** of the islands we serve

Approximately **500** customers participated in our society support programs and activities

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 12,783 passenger and 4,027 private vehicle and motorcycle tickets for those with at least four overnight stays in Samos, Lesbos, Chios, Leros and Kos, within the context of the program 'Hotel & Ferry', which was implemented for the sixth consecutive year, in order to reverse the negative tourism trend caused by the refugee crisis in those islands.
- 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) routes.
- 50% discount for substitute teaching faculty appointed to islands.
- 30%-100% discount for 167 residents in Cyclades, Dodecanese, Saronic islands, Sporades and North Aegean islands, as well as 127 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.

- 100% discount to 839 passenger and private vehicle tickets to support 53 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, with over 3,330 free tickets to support 277 pregnant women overall during 2018-2021.
- 100% discount to 27 scholarship students of the Association 'DODEKANISIACHI MELISSA' to travel from their residence to place of studies.
- 100% discount to the Hellenic Olympic Committee for transportation of its athletes as part of their preparation for Tokyo Olympic Games.
- Up to 50% discount to 35,832 tickets for the Manpower Employment Organization's (OAED) social tourism program beneficiaries.
- 50% discount to 40,336 tickets of vaccinated young people between 18-25 years old and 'FREEDOM PASS' digital card holders for journeys to Cyclades, Dodecanese, North Aegean Islands, Saronic, Sporades and Crete.

Furthermore, we provided discount tickets among other for:

- Health initiatives, such as the 'Health for All' program in Lesser Cyclades, the Mental Health program in Sporades, the program 'Diabetes Guide' and provision of medical examinations to remote island residents from the Olympic Village Polyclinic.

- Archaeological programs and excavations, such as the Paleolithic excavations in Lesbos by the University of Crete, the recording of monuments and small artifacts in Tinos by the Institute of Historical Research and the underwater archeological excavation in the Fournoi Korsewn complex by the Hellenic Ministry of Culture and Sports.
- Cultural activities, such as the 9th Panhellenic Festival of Culture Integration 'Deaf and Hearing In Action' in the island of Chios, the association 'Saint John the Merciful', Lions Club Rhodes, the Network 'Read for the Others' and the Panhellenic Association of Friends of Children with Special Abilities SOS KIDS LAMPISI.
- Social activities, such as the organizations 'Ark of the World', 'Smile of the Child' and 'Make a Wish', as well as the 'Archipelagos' Network to preserve our cultural heritage and promote modern culture and science.



[Good Practice]

- Environmental activities, such as the BlueCycle initiative to recycle and reuse plastic fishing and marine equipment, the activities of the non-profit organization NISYRIO to recycle plastic waste in the island of Nisyros, cleaning of sea coasts and seabeds in the islands of Poros and Santorini by AEGEAN REBREATH team, the volunteer team WE DIVE WE CLEAN, the Municipality of Paros for cleaning activities in the Parikia bay, the Municipality of Thira to clean island paths and the artistic program 'Zero waste in art', as well as the activities by the Sea Turtle Protection Society of Greece 'ARCHELON', the Institute of Marine Conservation 'Archipelagos' and the Hellenic Society for the Study and Protection of the Monk Seal.
- Civil protection activities, as we transported free-of-charge:
 - 30 Hellenic Fire Service vehicles and 116 firefighters in response to wildfires during summer months and emergency situations in the islands of Samos, Patmos, Kos, Tinos and Rhodes, as well as 57 firefighters and 19 firefighting vehicles from Germany to assist the respective firefighting efforts.
 - 3 trucks from the North Aegean Region carrying salt from Lesbos to Lemnos, in order to prepare for the upcoming snowfalls.

- Activities by the Greek government and non-governmental organizations to support refugees, as we:

- Provided free tickets to organizations and associations for 14 humanitarian aid shipments, during which we transported approximately 252 packages, boxes, parcels and pallets, as well as 6 vehicles with additional materials to support refugees and underprivileged social groups.
- Transported free-of-charge 326 unaccompanied minors and 127 NGO 'Metadrasí' volunteer escorts/interpreters, with over 5,872 people transported overall during 2016-2021.

We increased the total number of discount tickets offered by 10%

At the same time, we supported the animal welfare associations from the islands of Paros, Santorini and Lesbos, as well as the Animal Welfare Society 'Alkyoni' and the Institute of Marine Conservation 'Archipelagos', transporting free-of-charge over 577 stray animals from islands to mainland Greece for adoption or injured animals for treatment.

Overall, it is estimated that during 2021, we offered 57,040 discount tickets, compared to 51,851 tickets in 2020, with a total value of over €1.3 million for sport, cultural and educational activities and additionally benefitted thousands of citizens who participated or attended those events and activities.

Societal Programs

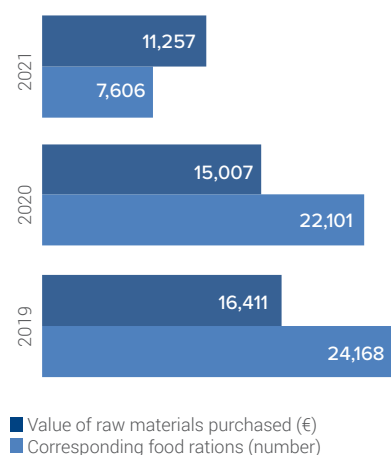
In 2021, we designed and implemented the following indicative societal programs:

- Implemented for the 4th consecutive year the initiative 'Greek Communities of Italy – A voyage to culture', during which we:
 - Organized an event featuring 4 award-winning Greek cinema films in Reggio province (Calabria).
 - Offered contemporary children's and adolescent literature books at a lending children's library in Messina (Sicily).
 - Offered an interactive board to facilitate Greek language courses.
- Supported the non-profit organization FAROS ELPIDAS, offering 12,420 cooked meals rations.
- Supported the Holy Diocese of Chios-Psara-Oinousses, by purchasing required raw materials for food rations to provide meals to underprivileged social groups.



- Implemented the 'First Aid' program with 92 participants during respective seminars in the islands of Kalymnos and Lipsi.
- Organized the 1st Nomadic Children's Aegean Festival 'Bluestarino Festival' to promote marine environmental protection.
- Implemented the 1st Environmental Initiative in the island of Naxos, in collaboration with Aegean Rebreath (see Section C).

Provision of Meals to Underprivileged Citizens



[Good Practice]

Unscheduled Journeys

We aim to serve unscheduled transportation needs and in 2021 we responded positively to 25 requests from the Municipalities of Amorgos, Ikon, Thira, Chios, Megisti and Symi, the South Aegean Administrative Region, the Secretariat General for the Aegean and Island Policy, as well as the Union Football Clubs in Cyclades, and conducted 148 unscheduled approaches or adjustments of already scheduled journeys.

[Good Practice]

Bluestarino Festival

During 2021, we organized the 1st Nomadic Children's Aegean Festival 'Bluestarino Festival' to promote marine environmental protection to students from Lesser Cyclades and Amorgos, in collaboration with the NGO 'Ta Vivlia Paizei'. The festival featured educational workshops and 15 programs for children, teenagers and adults to become acquainted with culture and science, as well as help young people develop new skills, with an overall participation of 250 children and approximately 250 parents and teachers.

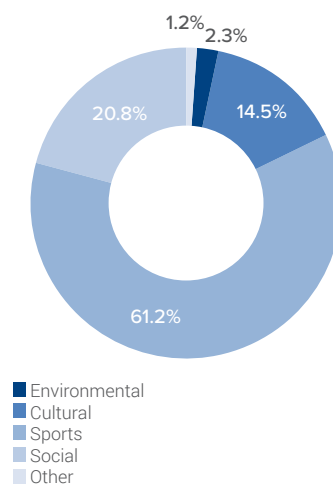
Sponsorships and Donations

We support various social groups, organizations and associations, with over €129,000 for sponsorships and donations in 2021 (out of which approximately €61,500 for sponsorships to local communities and approximately €44,800 for sponsorships to non-profit organizations, while €4,000 were related to infrastructure improvements exclusively for public benefit), focusing on 4 main Areas, namely Sports, Culture, Environment and Social, with indicative examples being:

- Supported:
 - The Volunteer Rescue Team of Kapandriti-Polydendri.
 - The Andriakos Sports Association in the island of Andros.
 - The basketball team Kolossos Rhodes.
 - The volleyball team Foinikas Syrou.
 - The sailing team Mantis-Kagialis.
 - The International Animasyros Animation Festival.
 - The Heraklion Sailing Club.
 - The Association of Naval Parents of Children with Special Needs 'ARGO'.

- Supported the ExcellenSeas Scholarship Program to assist honor students from remote islands and undertook scholarships of 2 students from the islands of Fourni and Astypalaia.
- Collaborated 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, 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.
- Donated surplus equipment to schools and charitable organizations, with 15 chairs and overall 22 electronic devices (e.g. personal computers, multifunction printers) and computer peripherals donated in 2021.

Sponsorships and Donations



Collection of Passenger donations for charitable organizations

We support various charitable organizations which are committed to support children and have limited resources. For this reason, we have placed collection boxes at the Reception desks onboard all our vessels (except for Flying Cats and Flying Dolphins) with the name of the supported organization indicated, in order to collect and deposit donations from passengers to the organizations. Within this context, we supported the following charitable organizations in 2021:

- Smile of the Child.
- SOS Children's Villages Greece.
- Amnesty International.
- Lions Club Rhodes.



We cultivate employee volunteering

[Good Practice]

Employee Volunteering

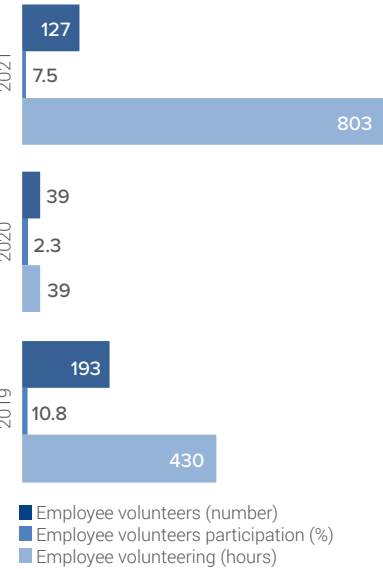
We believe that it is our responsibility to cultivate volunteering to our employees, in order to integrate the concept of responsibility in their behavior. For this reason, our Group's overall Responsibility program 'SAILING TOGETHER' includes employee voluntary contribution activities as the main program (flagship) in the area of Employees, which are mainly related to social and environmental issues. In 2021, we:

- Implemented a decontamination initiative in collaboration with Aegean Rebreath (see Section C).
- Continued our employee voluntary blood donation program (see Section 6.1).
- Participated in the 5th charity race 'No Finish Line' with a team of 70 volunteer runners, who covered a total distance of over 525 km to support the Association 'Together for Children'. Our team ranked 3rd among 6 companies with 60-119 runners and 11th in the overall ranking among 52 participating companies.

We **tripled** the number of employees participating in volunteer activities and increased **twentyfold** employee volunteering hours

- Organized the 1st football match 'One Group One Crew' with 31 office and marine employees participating to support the Association of Naval Parents of Children with Special Needs 'ARGO'. Furthermore, we placed dedicated collection boxes in 2 buildings for donations from office employees, while marine employees could deposit their donations directly to the Association's bank account, in order to further financially support the Association.
- Participated in the evaluation of projects submitted for the 6th Student Competition for Corporate Social Responsibility 'Nikos Analytis' organized by the Hellenic Network for Corporate Social Responsibility (CSR Hellas), with 10 participating teams of 33 students from 13 universities.

Employee Participation in Societal Support Activities



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, without however any visits in 2021 due to the COVID-19 pandemic.
- Participate in periodic student internship programs of the Merchant Navy's Officer academies, as well as in periodic field journey programs for Coast Guard students to familiarize themselves with their future duties.
- Implement internship programs for university students and graduates to develop skills and competencies which advance their personal and professional development. Within this context, we have implemented relevant programs for 5 school and university students in 2021, out of whom 20% have been hired.

We care for the impact of our operations

[Policy]

Community Impacts

Our Regulation of Professional Conduct & Business Ethics includes our principles and commitments regarding responsible operation towards Society. More specifically, we have committed to recognize, manage and reduce potential or actual negative impacts to local communities where we operate, due to 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 22.2% of office security personnel on our human rights policies and procedures, which accounted for 0.6% of total security personnel training hours, without however conducting relevant trainings to marine security personnel.
- 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 2021:

- A minor collision of Blue Star Mykonos occurred during mooring at the Saint Kirikos port due to adverse weather conditions, without any injuries among passengers and crew members or any marine pollution. The vessel moored safely for passenger and vehicle disembarkation and continued its journey after the respective inspection by the vessel's classification society.
- There were 18 journey cancellations due to mechanical malfunctions in vessels.
- A writ of summons was filed against a vessel Master for disturbing marine transportation safety in Kalymnos in 2017, due to anchor entanglement and collision between vessels, for which an apologetic statement has been submitted.



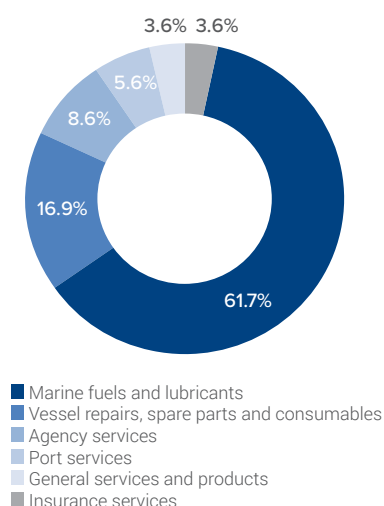
3. Responsible Procurement

We give priority to local suppliers

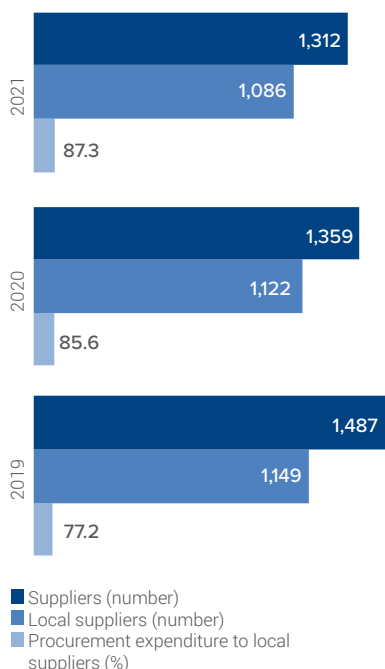
Our suppliers are 1,312 throughout Greece and abroad, with 82.8% ^c of them being local suppliers. Based on their turnover, we consider 140 of them as major suppliers, out of whom 112 are local suppliers. At the same time, we apply a process to identify small and medium-sized enterprises (with less than 50 employees) for potential cooperation. In 2021:

- The average supplier payment time was 107 days, compared to 121 days in 2020.
- 100% of payments for undertaken contractual obligations were made according to the terms in our contract agreements, as in 2020.

Supplier Categories



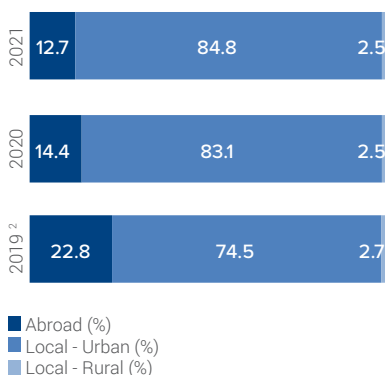
Suppliers and Procurement Expenditure



We spent **87.3%** of total procurement expenditure to local suppliers ^c

We spent **18.6%** of total procurement expenditure to small and medium-sized enterprises (up to 50 employees) ^c

Allocation of Purchases per Region ¹



¹ Percentages refer to the procurement expenditure of all suppliers.

² The 2019 change in purchases is attributed to purchasing the cargo vessel Blue Carrier 1 and ordering 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 responsible operation to our suppliers. Within this context, we will incorporate contractual clauses for issues related to responsible operation in contracts with significant local and foreign suppliers (in case they are identified as high or very high risk), which will include protection of human rights, environment and working conditions and tackling 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, human rights, freedom of association and collective bargaining impacts or impacts on society, following the results of our annual supplier risk assessment process.
- Trained or briefed our suppliers on issues related to responsible operation (e.g. environmental protection, human rights, labor practices).

Responsibility in our Supply Chain

To implement responsible operation principles throughout our supply chain, we have developed a Code of Conduct for Suppliers/Partners (available in www.attica-group.com/el/εταιρική-υπευθυνότητα/κώδικας-δεοντολογίας-προμηθευτών-συνεργατών.html, 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.
- Categorized all our suppliers into 4 categories based on risk assessment in 4 dimensions (Employee Rights, Work Conditions, Society, Economy).
- Defined actions taken to manage suppliers who have not signed the Code of Conduct.
- 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.

10% of supplier selection criteria is related to their responsible operation

We communicated our Supplier Code of Conduct to **100%** of our suppliers, with **66%** 🟡 already signing its acceptance

Furthermore, we evaluate our suppliers' performance with an annual spending of over €10,000 and we utilize specific criteria in six areas of the performance evaluation process (without at the moment utilizing ESG criteria), based on which we evaluate our suppliers.

Supplier Evaluation Areas

	Weighting
Quality	25%
Cost	20%
Availability	20%
Service – Support – Adaptability	20%
Credit Policy	10%
Acceptance of Code of Conduct for Suppliers/Partners	5%
Total	100%

Within 2021, we conducted our Supplier Risk Assessment and evaluated 386 suppliers with a procurement spending of over €20,000, according to criteria defined in our Code of Conduct for Suppliers/Partners. Furthermore, we evaluated the performance of 79 suppliers overall with 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 supplies
- Repairers and Workshops

It must be noted that:

- We assess the performance of potential suppliers prior to our collaboration, according to available and applicable criteria. Within 2021, we initiated collaboration with 244 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 2021.
- 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 2021, we did not discontinue our collaboration with any supplier or business partner as a result of actual or potential compliance issues, such as corruption, 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.

4. Achievements 2021 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility and Sustainability issues related to Community by 22% (by 2023).	50%	To improve our performance on Corporate Responsibility and Sustainability issues related to Community by 22%.	2023
To improve our performance on Corporate Responsibility and Sustainability issues related to Suppliers by 31% (by 2023).	50%	To improve our performance on Corporate Responsibility and Sustainability issues related to Suppliers by 31%.	2023
To support the activities of charitable organizations and NGOs.	100%	To support the activities of charitable organizations and NGOs.	2022
To implement at least 1 volunteer activity with the participation of our employees.	100%	To implement a volunteer program with at least 5% participating office employees.	2023
To design and implement 1 program/activity to address local communities needs in the areas of sports, culture, education or health.	100%	To design and implement 1 program/activity to address local communities needs in the areas of sports, culture, education or health.	2022
		To implement 5 non-commercial society support activities annually (i.e. exclusively for public benefit).	2023
		To implement society awareness activities on Corporate Responsibility and Sustainability issues (e.g. environmental issues, human rights).	2022
		To train security personnel (both of our Group and selected subcontractors) on human rights issues.	2022
		To train partners/agencies in Domestic lines on management issues (e.g. human resources management, financial, responsible operation) at least once annually.	2022
		To develop an audit process for major suppliers on Corporate Responsibility and Sustainability issues (e.g. human rights, environmental protection).	2023
		To develop a training process for SME suppliers by our employees on management issues (e.g. environmental issues).	2022
		To develop a process for supporting local products on our vessels.	2022
		To develop a collaboration process with suppliers on Corporate Responsibility and Sustainability issues related to their own products or services (e.g. environmental protection, responsible use).	2022

[6] Employees

We create positive Employment Conditions

We focus



Our Oceans



28

major groups of animals live in the Oceans, compared to only 11 on land

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 are



1,688
employees



100%
of employees with full time employment contracts



10,188
training hours



100%
of employees informed regarding Corporate Responsibility and Sustainability issues



100%
of employees covered by voluntary benefits

We follow

Principles of the United Nations' Global Compact

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

We contribute

United Nations' Sustainable Development Goals

- 3 Ensure healthy lives and promote well-being for all at all ages
- 4 Ensure inclusive and quality education for all and promote lifelong learning
- 5 Achieve gender equality and empower all women and girls
- 8 Promote inclusive and sustainable economic growth, employment and decent work for all
- 10 Reduce inequality within and among countries





We achieved

- Responsibility is 1 out of 6 appraisal criteria for all office employees.
- We trained (at least once) 70.8% and 12% of our office and marine employees respectively.
- We increased the number of training programs by 21%.
- 31% of work was conducted remotely, while 10,903 online meetings were conducted.
- We employ 100% of our employees with full time employment contracts.
- We collected 169 blood units through our voluntary blood donation programs in the last three years.
- 100% of employees in Director and Top Management positions are Greek.
- No grievances regarding our marine employee 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 covered 15.4% of permanent job openings in offices by internal candidates.

1. Human Resources and Employment

[Your Opinion]

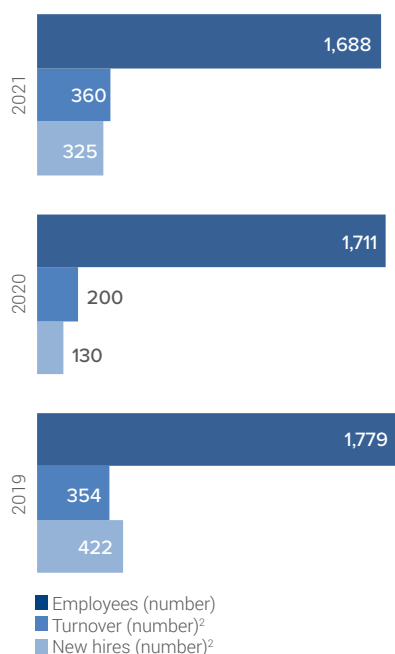
Work-Life Balance

According to a survey conducted to office employees in 2021, **59.8%** agrees that we are a Group which respects work-life balance.

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 fluctuations in employment numbers onboard our vessels, as the number of marine employees during spring and summer months was higher by 41.6% compared to autumn and winter months (1,638 employees compared to 1,157).

Human Resources ¹



¹ Employee figures refer to the headcount of 31/12/2021 for office employees and to the average of 01/03/2021 and 01/07/2021 for marine employees.

² New hires and turnover for the period 2019-2021 do not include university students and cadets in Merchant Navy's Officer and Coast Guard academies onboard our vessels (who complete their internship), 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 ¹

Employment Type	Permanent	Fixed Term ²	Full time	Part time	
Employees (number)	1,490	198 (11.7%) (13 women in total) (186 marine employees)	1,688	0	
Gender	Female	Male			
Employees (number)	233	1,455			
Age	<30	30-50	>50		
Employees (number)	208	995	485		
Categories	Nationalities	Disabilities	Foreigners		
Number	6	0	7		
Education Level	Public - High School	Post High School / Higher / Highest Education		Postgraduate Education	
Employees (number)	1,234	414		40	
Employment Tenure	<5 years	5-10 years		>10 years	
Employees (%)	44.4	14.6		41	
New Hires ³	Female	Male	<30	30-50	>50
Employees (number)	44	281	155	149	21
Turnover ³	Female	Male	<30	30-50	>50
Employees (number)	33	327	117	170	73
Turnover ³	Resignations	Redundancies		Other	
Turnover reason (%)	87.5	12.5		0	
Working Place	Offices	Vessels			
Employees (number)	291	1,397			
Hierarchy	Top Management ⁴	Directors	Employees	Total	
Employees (number)	43	81	1,564	1,688	

¹ Employee figures refer to the headcount of 31/12/2021 for office employees and to the average of 01/03/2021 and 01/07/2021 for marine employees.

² Office employees sign fixed term employment contracts upon hiring and afterwards sign permanent employment contracts (according to the Group's policy), while marine employees in Adriatic Sea lines have fixed term employment contracts (according to the sectoral agreement).

³ New hires and turnover for 2021 do not include university students and cadets in Merchant Navy's Officer and Coast Guard academies onboard our vessels (who complete their internship), as well as our marine employees' re-hiring within the same year (for whom a standardized dismissal and re-hiring process is in place).

⁴ Top Management includes the Chief Executive Officer, Executive Directors and vessel Masters. Directors include office Directors, Staff Captains and Chief Engineers.

It must be noted that:

- The average age of office and marine employees is 45.6 and 43.1 years respectively.
- The average employment tenure for office and marine employees is 15.8 and 8.5 years respectively.
- The turnover rate and new hires rate of office employees was 2.1% (all of which were resignations) and 4.1% respectively, while the respective rates for marine employees were 25.3% (out of which 3.2% redundancies and 22.1% resignations) and 22.4%.
- There were 2 office employees who left before completing 12 months of employment, while the respective turnover rate of marine employees was 7.7% (besides the cadets in Merchant Navy's Officer and Coast Guard academies onboard our vessels).
- The turnover rate of female office and marine employees compared to male office and marine employees is lower by 55.7% and higher by 62% respectively.
- 99.6% of employees (including 99.5% of all management positions) are Greeks, while majority of office employees are from the prefecture of Attica.
- There were no employees under freelance arrangements working within the Group or non-guaranteed hours employees (i.e. employees with non-guaranteed minimum or fixed number of working hours per day, week or month, e.g. casual employees, on-call employees) during 2021.

- 51 employees worked in our offices without belonging to our Group during 2021, as they are employed by a third party cleaning company (without including employees from companies for temporary activities in our offices). They are employed according to a contract and specific commitment between our Group and the company, without significant fluctuations in their number compared to previous years. There are no employees working in our vessels without belonging directly to our Group, as they have all employment contracts.
- We have defined the ratio between employees with part time and full time employment contracts in our Group's formal Hiring Procedure.

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

100% of employees in Director and Top Management positions are Greek

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

No grievances regarding our marine employee living conditions were filed

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.
- Our Anti-corruption Regulation.
- Our Operation Regulations.
- Our Corporate Governance Code.
- Our Acceptable and Safe Use of IT & Telecommunication Systems and Resources Policy.
- Our Privacy Protection Policy (GDPR).
- The Emergency Situations Response Plan for offices.
- Main work issues and procedures, such as leaves and absences, training, communication and performance appraisal.
- Corporate Responsibility and Sustainability issues (e.g. recycling activities), while at the same time receive a print copy of our annual Responsibility and Sustainability Report.

Furthermore, it must be noted that:

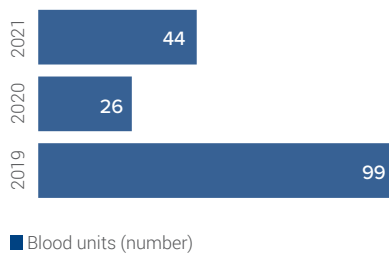
- Our employment contracts include documents which describe the way we expect employees to behave (e.g. corporate manuals).
- Prior to their employment, all employees receive their employment contracts.
- We conducted 13 internal communication activities regarding Corporate Responsibility and Sustainability issues to all our employees in 2021, compared to 8 in 2020, and informed 100% of our employees at least once regarding the respective issues.

[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 2021, we continued the program for the 13th consecutive year with one employee voluntary blood donation due to the COVID-19 pandemic, in cooperation with the 'G. Gennimatas' General Hospital and gathered in total 44 blood units. Overall, 51 blood units were utilized for our employees' and their families' needs within 2021, without any units utilized from local community members.

Voluntary Blood Donation



We collected **169** blood units through our voluntary blood donation programs in the last three years

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 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 2021:

- 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 1.1 hours, compared to 1.13 hours in 2020.
- All 5 women who received their maternity leave, returned to their work and continued to work within our Group for over 12 months after their return.
- 5 women employees were granted reduced working hours due to raising a child.

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 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.

We monitor our employees' opinion

Our goal is to establish a unified culture, inextricably related to our Vision and Values, as well as create a work environment which supports our employees and promotes open communication.

Within 2021, we conducted an online Employee Satisfaction Survey to office employees and distributed a printed questionnaire for the Crew Opinion Survey to marine employees, which were completely anonymous and confidential. With an overall participation rate of 59.5% (65.5% for office employees and 53.6% for marine employees), the Surveys captured employee views on various issues, such as:

- Relationships and communication with their supervisor.
- Overall management environment.
- Fair and meritocratic working environment.
- Duties and responsibilities.
- Collaboration with colleagues.
- Training and development.
- Health and Safety.
- Corporate Responsibility and Sustainability.

These information allow us to plan motivation initiatives for our employees, in order to contribute to accomplishing their individual goals and successfully achieve our strategic business objectives, as well as identify areas for further improvement.

2. Health and Safety

[Your Opinion]

Health and Safety

According to a survey conducted to office employees in 2021, **87.9%** agrees that we are a Group which has created workplaces that promote its employees' health and safety.

[Good Practice]

Managing Health and Safety Issues

Being committed to manage Health and Safety issues onboard our vessels in a systematic way:

- 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 record and monitor accidents and Health and Safety incidents, in order to take corrective actions and eliminate respective risks.

We ensure Health and Safety onboard our vessels

We are committed to create a safe work environment for our marine employees. Therefore, we:

- Ensure that candidates for employment hold competency certificates in training areas such as vessel safety, rescue equipment, firefighting and First Aid, prior to their employment onboard our vessels, in accordance with the respective legislative requirements, and oblige them to maintain valid certificates.
- Conduct internal drills on Health and Safety issues to all marine employees and trained 1,070 employees (76.6% of marine employees) on use of proper protective equipment in 2021.
- Train our marine employees on Health, Hygiene and Safety issues, during which we conducted respective trainings to 99 employees (71% of marine employees) for a total duration of 713 training hours in 2021, while overall 103 vessel Officers hold Medical Care certificate and are trained on response to emergencies.
- Repeated our Behavioral Based Safety Program for 71 Senior and Master vessel Officers and expanded the program to 24 Senior and Master vessel Officers and 66 vessel Officers in 2021, through behavior assessment to ensure crew members' and passenger well-being and safety, following the respective program implemented to 90 Senior and Master vessel Officers in 2020.
- Provide the necessary personal protective equipment and relevant training to all marine employees.

- Have equipped our vessels with the appropriate devices and conduct audits on alcohol consumption to all marine employees. No such non-compliance incidents occurred within 2021.
- 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:

- 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 specific instructions for emergency situations and preventive protection measures to all office employees. Within this context, we trained 20 employees (6.9% of office employees) on Health and Safety issues, out of whom 5 employees on prevention of serious diseases and 1 employee on First Aid, for a total duration of 169 training hours, without however briefing our employees on healthy lifestyle (e.g. non smoking, healthy diets, mental health) during 2021.
- 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 equal access from persons with disabilities to our offices, via parking space with ramp, wheelchair and properly designed WC.

- Have initiated the process for office employees to utilize an online platform to report work-related concerns and risks, as well as hazardous situations (HSe-service Help Desk).
- Apply a process to monitor health and safety incidents of subcontractors' employees working in our offices.
- Include insurance from a public social institution for all subcontractor employees who work on our behalf, in agreements with subcontractors, making this issue a mandatory requirement in selection and collaboration with subcontractors.
- Have developed a process to investigate work-related Health and Safety incidents (e.g. actual or potential injuries) through our Emergency Management Plan for offices, while at moment we:
 - Do not implement an occupational Health and Safety Management System.
 - Have not developed relevant processes for employees to refuse to perform an activity due to Health and Safety concerns (e.g. regarding injuries).

We monitor our Health and Safety performance


The following table summarizes our overall Health and Safety performance. It must be noted that in 2021:

- We invested over €204,000 on Health and Safety programs in our offices.
- There are no employees with high incidence or risk of disease associated with their work, while there were no occupational diseases among our employees.
- There were no accidents of office employees and there were only minor accidents with minor injuries involving our marine employees, with the exception of 2 male vessel Officers sustaining fractures due to traffic accidents during vessel stays at ports. The injuries resulted in absence time of 213 and 231 days respectively, however no corrective actions were taken, as the injuries did not occur within vessels.
- There were no accidents of subcontractor employees who work on our behalf in our offices and vessels (i.e. without being employees of our Group).
- The total absenteeism rate for male office employees compared to female office employees is lower by 15.6%.
- There was 1 lawsuit and 1 writ of summons for marine employee injuries, with the first instance decision pending for the first case and the other is expected to be discussed in 2022.




- Regarding previous lawsuits for marine employee injuries:
 - First instance decision for 1 lawsuit and appeal decision for 1 lawsuit are pending.
 - 3 lawsuits are expected to be discussed.
 - A new summon is expected to be notified to 1 writ of summons due to trial postponement as a result of weather conditions.

However, we regrettably have to report that we lost two colleagues within 2021:

- One male marine employee due to COVID-19 complications (see Section B).
- One female office employee due to illness.

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

Health and Safety

	2019	2020	2021
Work hours (hours)	NR	4,736,880	4,989,060
Offices	NR	568,000	582,000
Vessels	NR	4,168,880	4,407,060
Employees' fatal accidents (number)	0	1	0
Men	0	1	0
Women	0	0	0
Collaborators' fatal accidents (number)	0	0	0
Collaborators' accidents (number)	NR	0	0
Collaborators' high-consequence accidents (i.e. incidents with absence of over 6 months) (number)	NR	0	0
Employees' accidents (number)	10	30	33
Offices	0	0	0
Vessels (work-related)	10	11	11
Vessels (outside vessels or off duty)	NR	19	22
Men	9	29	32
Women	1	1	1
Accidents with absence >1 day (number)	8	30	33
Accidents with absence <3 days (number)	2	2	0
Accidents with absence >3 days (number)	8	28	33 
Type of accidents (number)	NR	NR	33
Sprains and strains	NR	NR	4
Fractures	NR	NR	9
Electrical injuries	NR	NR	0
Dislocations	NR	NR	1
Burns	NR	NR	0
Other (e.g. lesions/bruises, notches, minor injuries from traffic accidents)	NR	NR	19
Type of high-consequence accidents (i.e. incidents with absence of over 6 months) (number)	NR	NR	2
Fractures	NR	NR	2
Electrical injuries	NR	NR	0
Burns	NR	NR	0
Body parts entrapment injuries	NR	NR	0
Other	NR	NR	0
Absence from work due to accidents (hours)	0	12,776	12,264
Average days of absence per injury (days)	43.3	42	45.9
Medical treatment cases (number)	128	65	416
Fatality Rate (rate) ¹	NR	NR	0
Offices	NR	0	0
Vessels	NR	0.048	0
Injury Rate (rate) ²	0.36	NR	NR
Offices	NR	0	0 
Vessels	NR	1.49	1.5 

	2019	2020	2021
High-Consequence Injury Rate (rate) ³	NR	NR	NR
Offices	NR	0	0
Vessels	NR	0.048	0.09
Occupational Disease Rate (rate) ⁴	0	0	0
Offices	0	0	0
Vessels	0	0	0
Lost Days Rate due to injuries or occupational diseases (rate) ⁵	15.72	NR	NR
Offices	NR	0	0
Vessels	NR	76.61	70
Lost Time Injury Frequency Rate (rate) ⁶	NR	NR	NR
Offices	NR	0	0
Vessels	NR	7.2	14
Lost Time Injury Severity Rate (rate) ⁷	NR	NR	NR
Offices	NR	0	0
Vessels	NR	76	70
Absenteeism Rate (rate) ⁸	NR	NR	NR
Offices	NR	2,701.4	2,257
Vessels	NR	1,400	3,800

¹ Fatality Rate (FR): Number of fatal accidents x 200,000 work hours / Total work hours.

² Injury Rate (IR): Number of injuries and fatal accidents x 200,000 work hours / Total work hours.

³ High-Consequence Injury Rate (HCIR): Number of high-consequence injuries (with absence of over 6 months, excluding fatal accidents) x 200,000 work hours / Total work hours.

⁴ Occupational Disease Rate (ODR): Number of occupational diseases x 200,000 work hours / Total work hours.

⁵ Lost Days Rate due to injuries or occupational diseases (LDR): Total work days lost x 200,000 work hours / Total work hours.

⁶ Lost Time Injury Frequency Rate (LTIFR): Number of injuries related to work time x 200,000 work hours / Total work hours.

⁷ Lost Time Injury Severity Rate (LTISR): Number of work days lost due to injuries related to work time x 200,000 work hours / Total work hours.

⁸ Absenteeism Rate (AR): Total absent work days x 200,000 work hours / Total work days.

NR: Not reported



3. Equality and Diversity

[Your Opinion]

Human Rights

According to a survey conducted to office employees in 2021, **88.4%** agrees that we are a Group which has created a workplace that respects Human Rights.

[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.

We do not tolerate child, forced and compulsory labor

We respect the internationally recognized principles of human rights, as described within our Regulation of Professional Conduct & Business Ethics, 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 2021:

- 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 commit to meritocracy

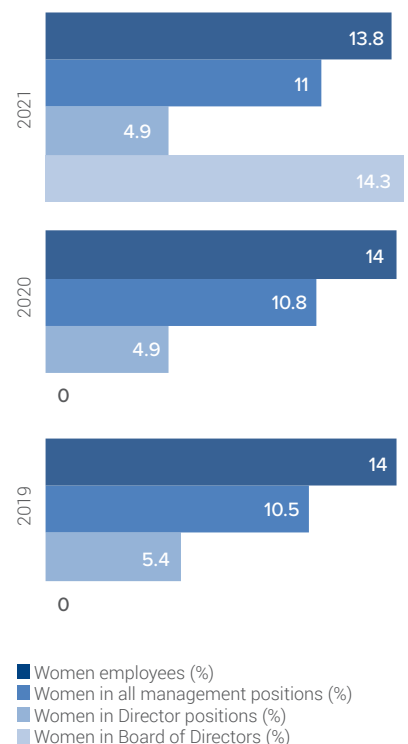
Our commitment towards meritocracy follows the principle to treat all our employees equally, which enables their professional development to depend solely on their performance and skills. We do not allow any kind of discrimination due to gender, religion, age, ethnic group, social or national origin, 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 53.3% and 5.6% respectively.
- The overall percentage of women in all management positions (including supervisors) in offices and vessels is 35.1% and 5% respectively.
- The percentage of female office and marine employees in Director positions is 12.5% and 1.8% 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 56.1% and 20% respectively.
- The total training hours of female office and marine employees compared to male office and marine employees are lower by 57.3% and 91% respectively (not including internal drills conducted onboard vessels).

Percentage of Women



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, one office employee is elected member 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 24 hours for Domestic lines and 7 days for Adriatic Sea lines. We follow, as a minimum, the relevant regulatory requirements regarding operational changes for office employees.
- 373 marine employees did not work during 4 strikes or lock-outs, organized by the Panhellenic Seamen's Federation (PNO) within 2021, due to insurance-pension issues, collective bargaining agreements and crew composition according to legal requirements. The time lost due to strikes was 2,982 mandays, which corresponds to approximately 0.07% of marine employee total working time. No office employees participated in any strike or lock-out within 2021.

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 been certified for the Group's Information Security Management System according to the international standard ISO 27001:2013, to ensure confidentiality, integrity and availability of information.
- Have developed and implement policies and processes regarding personal data processing, in accordance with the national and European legislative requirements (General Data Protection Regulation - GDPR).
- Have authorized the use of specific surveillance systems to monitor crucial access areas to our offices and vessels according to the respective legislation, 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).
- Destroy documents with personal information in an appropriate manner.

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 2021:

- The minimum salary is equal to the lowest salary defined in the industry labor agreement in force.
- The average salary for male office employees, Managers and Directors compared to female office employees, Managers and Directors is higher by 1.6%, 27.5% and 3.1%  respectively, due to factors such as professional experience, qualifications and expertise.
- The percentage of women in the 10% of highest paid job positions in offices is 3.5%, while there are no women in respective job positions onboard vessels.
- 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 percentage of variable compensation in office and marine employees' overall compensation is 6.3% and 12.3% respectively.
- The percentage of variable compensation in all management positions and Executive Directors' overall compensation is 26% and 32% respectively.

- The ratio of median annual total compensation for male office and marine employees to the median annual total compensation for female office and marine employees is 2.1:1 and 1.8:1 respectively.
- The ratio of annual total compensation for the highest-paid individual to the median annual total compensation for all office and marine employees (excluding the highest-paid individual) is 17.5:1 and 5.5:1 respectively.
- The ratio of annual total compensation for the Chief Executive Officer to the median annual total compensation for all employees (excluding the Chief Executive Officer) is 16:1.
- The ratio of percentage variation in annual total compensation for the highest-paid individual to the median percentage variation in annual total compensation for all office and marine employees (excluding the highest-paid individual) is -1.4:1 (due to the decrease in annual total compensation for the highest-paid individual and increase in annual total compensation for all employees) and 3.8:1 respectively.
- The ratio of percentage increase in annual total compensation for the Chief Executive Officer to the median percentage increase in annual total compensation for all employees (excluding the Chief Executive Officer) is 43:1.
- There were 16 lawsuits filed by marine employees for labor disputes (with claims over €30,000), out of which:
 - First instance decisions for 4 lawsuits are pending.
 - An appeal will be filed against the first instance decision in 1 lawsuit.
 - 4 lawsuits were postponed, without defining new trial dates.
 - 6 lawsuits are expected to be discussed.
 - 1 lawsuit was closed following out of court settlement.
- Regarding 41 previous lawsuits filed by marine employees for labor disputes (with claims over €30,000):
 - Decisions were issued in 4 lawsuits and awarded the adjudicated amount to the plaintiffs.
 - 9 lawsuits are expected to be discussed.
 - Appeal decisions are pending for 7 lawsuits.
 - First instance decisions are pending for 14 lawsuits.
 - 6 lawsuits will be appealed.
 - 1 lawsuit was closed following out of court settlement.

We offer additional benefits

We offer a number of voluntary benefits, which cover all our office and marine employees. It must be noted that 100% of our employees (employees with permanent employment contracts and with fixed term employment contracts 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 (10.3% of office employees) are covered by an additional retirement program, for which approximately €412,900 were spent in 2021, compared to €414,000 in 2020.

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) ¹	●	●
Discount for passenger and private vehicle tickets for first-degree relatives (upon availability) ¹	●	●
Discount for certain items from vessel shops ¹	●	●
Food arrangement ¹		●
Contingency financial allowance for heating ²		●

¹ Also offered to employees with fixed term employment contracts.

² Offered to 120 office employees during 2021 (including employees with fixed term employment contracts) to cover their heating needs, based on transparent and specific financial criteria, as defined by the respective legislation for heating allowance.

4. Training and Development

We develop our employees

Internal Advancements

According to our Operation Regulations, 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 15.4% within 2021, compared to 25% in 2020.

Job Rotation

We have established a job rotation program for office employees, in order to keep them motivated and offer the opportunity to acquire additional knowledge and experience, without however any job rotations taking place within 2021.

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 2021, we updated job descriptions for our office employees, a process completed for 99.4% of office employees, while a detailed job description is available for 100% of marine employees.

We covered **15.4%** of permanent job openings in offices by internal candidates

We train our employees

Training Program

To design our annual Training Plan, we consider:

- Identified training needs and requests related to training needs.
- Requirements for every job position.
- The annual performance appraisal results and our employees' individual development plan.
- Changes in the shipping industry (e.g. legal framework).
- Organizational changes.
- Redesign of functions and/or launch of new projects.
- Our Group's growth strategy.

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

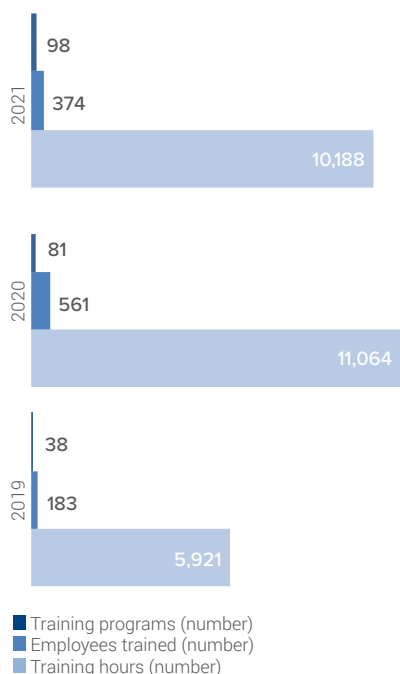
Training Programs

	Marine Employees	Office Employees
Corporate Responsibility and Sustainability	•	•
Foreign languages	•	•
Response to pollution incidents	•	•
Fire fighting	•	
Cleaning processes	•	
Health issues (compliance with COVID-19 Health Protocols)		•
Safety and security issues	•	•
First Aid	•	•
Shipping issues	•	•
Management issues (e.g. Strategy, Leadership, Governance, Transformation, Risk Management, Human Resources, Internal Audit, Legal, Information Technology, Marketing, Finance, Cybersecurity, Customer Service)		•
Postgraduate Programs		•

Within 2021:

- We conducted trainings on our human rights policies and processes to 4 office employees, with a total duration of 16 training hours, without any relevant trainings to marine employees.
- We conducted various training programs on Corporate Responsibility and Sustainability issues to our office and marine employees.
- We reviewed our Office Human Resources Training Policy and Process, and we require a dedicated section on responsible operation in all in-house training courses related to customers, suppliers, partners, employees, environment, society and governance. We included issues related to responsible operation in 2 in-house training programs related to governance issues during 2021.
- We trained 168 marine employees on management, Health and Safety, as well as Corporate Responsibility and Sustainability issues.
- Total cost of training programs was €127,855, compared to over €78,300 in 2020.

Employee Training¹



¹ 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) **70.8%** and **12%** of our office and marine employees respectively

We increased the number of training programs by **21%**

Employee Training Averages

	2019	2020	2021
Office employees			
Training per employee (hours)	20.6	32.5	29.2
Training per male employee (hours)	27.5	46.2	43.7
Training per female employee (hours)	14.8	21.3	16.4
Training per employee in Top Management positions (hours)	9.8	25.8	24.2
Training per employee in Director positions (hours)	14.7	33.1	40.2
Training per employee in Management positions (hours)	57.8	82.6	60.7
Marine employees¹			
Training per employee (hours)	0.1	1.3	1.2
Training per male employee (hours)	0.1	1.3	1.2
Training per female employee (hours)	0	1.3	1.8
Training per employee in Top Management positions (hours)	1.8	6.4	6.4
Training per employee in Director positions (hours)	0.3	6.6	6.6
Training per employee in Management positions (hours)	0.1	3.9	3.3

¹ 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.

Training on Corporate Responsibility and Sustainability Issues

	2019	2020	2021
Office employees (%)			
Employees	13	5.1	8.6
Managers	92	90	92.2
Directors	NR	100	100
Top Management Members	96 ¹	100	100
BoD members	14.3	48.9 ²	100
Marine employees (%)			
Employees	0	0	0
Vessel Officers	1	16	0
Senior vessel Officers	6	55	1.8
Vessel Masters	0	68.6	5.4

¹ Includes Directors and Top Management Members.

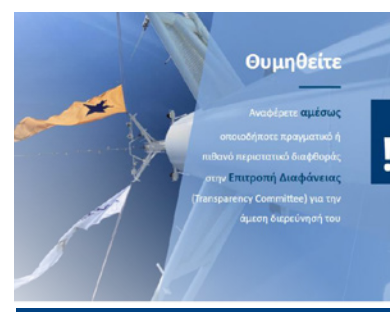
² Data provided in our previous Report has been restated.

NR: Not reported

[Good Practice]

Governance Training

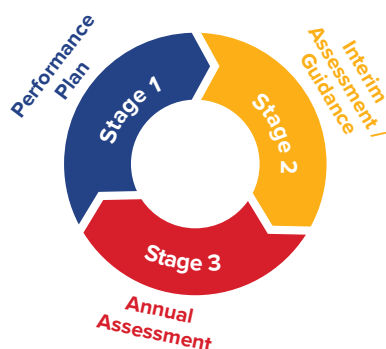
During 2020-2021, we conducted two interactive e-learning courses on our Regulation of Professional Conduct & Business Ethics and our Anti-corruption Regulation. The content was designed and presented in a simplified way to office employees (including new hired employees), with 64.4% and 67.4% of employees respectively achieving a score of over 70%.



We appraise our employees

We implement a Performance Appraisal System for our office and marine employees, in order to identify their strengths and areas for improvement and improve their overall performance.

Since 2020 we implement a Performance Appraisal System for office employees, which was designed based on our Vision and Values, our Strategic Priorities and the way we operate. The System consists of the following three main phases:



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

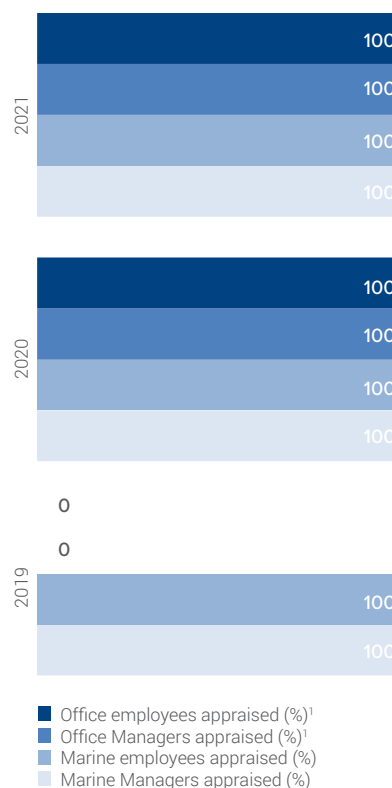
1. Quantitative Criteria – Individual Objectives (aligned with the Group's strategic objectives).
2. Qualitative Criteria – Desired Skills and Behaviors at two levels:
 - Employees.
 - Employees with team management responsibility.
3. Employee Professional Requirements.
4. Training and Development Activities.
5. Comments.

Responsibility is 1 out of 6 appraisal criteria for all office employees

It must be noted that we:

- Conducted the Performance Appraisal process for all office employees during 2021.
- Include Corporate Responsibility and Sustainability issues in all office employees', Managers', Directors', Top Management Members' and the Chief Executive Officer's formal appraisals, with weightings of 8.3%, 7.6%, 12.1%, 13.6% and 2.5% respectively.
- Include specific Corporate Responsibility and Sustainability objectives in our Chief Executive Officer's, Top Management Members' and Directors' formal appraisals, as well as in formal appraisals for 9.4% of Managers.
- 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



¹ No performance appraisal for office employees took place for 2019, as the Performance Appraisal System was under review.

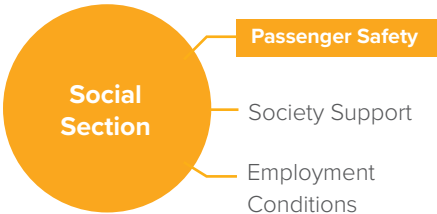
5. Achievements 2021 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility and Sustainability issues related to Employees by 7% (by 2023).	50%	To improve our performance on Corporate Responsibility and Sustainability issues related to Employees by 7%.	2023
To include specific Corporate Responsibility and Sustainability objectives in the formal appraisal process for Employees, Managers and at least one Board of Directors member (by 2022).	25%	To include specific Corporate Responsibility and Sustainability objectives in the formal appraisal process for Employees and Managers.	2022
To complete the update of our employees' job descriptions according to our new organizational structure.	100%	To include predefined and clearly announced criteria to dismiss office employees in our Labor Regulations or Regulation of Professional Conduct & Business Ethics.	2023
To integrate issues related to responsible operation into other categories of in-house training courses.	100%	To train Management executives, Executive Directors and Board of Directors members on Corporate Responsibility and Sustainability issues.	2022
To conduct a Corporate Responsibility and Sustainability e-learning course for 50 more marine employees.	0%	To train 100 employees on non-discrimination.	2023
		To implement an Occupational Health and Safety Management System for office employees.	2022
		To train 100 employees on human rights issues.	2022
		To develop a briefing process of our employees on healthcare issues (e.g. smoking, nutrition, fitness, mental health).	2022

[7] Customers

We ensure our Passenger Safety

We focus



Our Oceans



3 billion years
is the time life on Earth was
restricted to the Oceans during
evolution

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 are



291
vessel inspections
from local authorities



474
thousand members in
the Loyalty & Reward
program seasmiles



387
thousand information
SMS messages sent
to our passengers



2,829
questionnaires in vessels



181
thousand calls to corporate
customer service phone lines

We follow

Principles of the United Nations' Global Compact

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

We contribute

United Nations' Sustainable Development Goals

- 3 Ensure healthy lives and promote well-being for all at all ages
- 12 Ensure sustainable consumption and production patterns





We achieved

- We informed 97% of passengers deemed necessary (over 818,000 passengers) through information SMS for early arrival at port or changes or cancellations of scheduled journeys in Domestic and Adriatic Sea lines.
- We sent over 387,000 information SMS to our passengers.
- 97.4% of our premises and vessels have access for people with disabilities.
- We kept 83% of our vessels' departure times and 61% of arrival times as scheduled.
- The average score registered through service evaluation devices onboard our vessels reached 4.2 on a 5 point scale.
- We conducted internal drills and trainings on passenger safety to 100% of marine employees.
- We were subject to 173 vessel inspections for protection measures against the pandemic, 52 for food hygiene and safety and 66 for Anti-Smoking Law's implementation, with no non-compliance incident.
- We maintain 5 corporate websites, with over 2.3 million visitors annually and 2 mobile applications with over 7,600 downloads in 2021.
- We sent overall 2,892 notifications to serve our passengers (1,375 concerning passengers with reduced mobility, 2 concerning passengers with sensitivity to allergens).
- We increased our seasmiles Loyalty and Reward program members by 16.8%.

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 subject to extensive vessel inspections from external bodies (Merchant Vessels Inspection and classification societies) in 2021.
- Have established Safety Committee in each vessel, in order to examine and assess health and safety issues.
- 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 2021, there were no Emergency Response Team meetings regarding any incident.
- Train our employees on passenger safety procedures.
- Comply with the International Convention for the Safety of Life at Sea's (SOLAS) standards regarding use of fire extinguishing equipment, such as fire extinguishing systems in engines and all cabins, public areas and garages, and we train marine employees on the location and use of fire protection systems.
- Carry out maintenance of rescue equipment.
- Demonstrate and display informative videos regarding use of lifejackets, assembly stations and rescue equipment.
- 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.
- 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.

Addressing infectious / transmittable diseases

According to the respective procedure and internal drills conducted as required onboard all vessels, 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 passenger incidents with COVID-19 or incident of patient with infectious / transmittable disease were reported in 2021.


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. No missing person incident was reported in 2021.

Within 2021:

- There were 2 complaints for excessive passengers onboard vessels, without however any violations identified after relevant inspections by competent port authorities.
- There were 16 accidents with passenger injuries,  which mainly concerned slipping in public areas due to carelessness, without causing any serious injury. As a result, we point marine employees' attention to respond to conditions which may lead to passenger accidents and proceed with relevant announcements during vessel journeys.
- There were 4 legal cases for passenger injuries onboard during 2021, out of which decisions are expected for 2 cases, while the remaining 2 are expected to be discussed in 2022.
- In relation to previous legal cases:
 - Regarding 6 lawsuits for passenger injuries onboard from previous years which were filed in 2020, compensation was adjudicated to the passengers in 2 cases, 2 cases were rejected, while trials and respective court decisions are pending for 2 cases.

- Regarding 4 lawsuits for injuries in 2014 and 2018, 2 cases were closed in favor of the plaintiffs, while the remaining 2 are pending before the competent courts.
- Decision is expected to be issued in a lawsuit for a fatal passenger injury onboard in 2017.
- Decision is expected to be issued in a compensation lawsuit filed by relatives for a person's death reported missing onboard Blue Horizon in 2015.

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

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.
- 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.
- Are annually audited by ABS (American Bureau of Shipping) regarding ISO certificates for administration of our vessels, 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, as well as ensure efficient operation, provision of quality services and prompt response to customer needs. The 'Mystery Passenger' survey was conducted through 3 visits to each vessel in Domestic and Adriatic Sea lines in 2021, during which we evaluate at least 17 passenger service categories.

Food hygiene and safety

In order to provide high quality products, 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.
- 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 2021, as in 2020.
- Our contractor carried out 44 inspections during 2021 in areas of interest, such as kitchens and bars, with no findings registered or corrective actions being required, as was the case also in 2020.

Hotel services hygiene and safety

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

Vessel inspections from local authorities

Besides ourselves inspecting our vessels, we are subject 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. Furthermore, additional inspections were conducted within 2021 related to protective measures against COVID-19. 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 subject to **173** vessel inspections for protection measures against the pandemic, **52** for food hygiene and safety and **66** for Anti-Smoking Law's implementation, with no non-compliance incident

[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 1.8% 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

	2019	2020	2021
Lost/found or damaged items (number)	5,078	3,514	3,980 C
Adriatic Sea lines	382	193	222
Domestic lines	4,696	3,321	3,758
Compensations paid for luggage and other damages (€)	32,937	24,482	17,685
Compensations paid for vehicle damages (€)	57,800	38,665	68,000

Within 2021:

- There was a lawsuit filed for luggage theft, which is expected to be discussed in 2022.
- There was a lawsuit filed for vehicle damage in vessel garage, which is expected to be discussed in 2022.
- There were 6 lawsuits filed for vehicle damages in vessel garages in 2020, 2019 and 2017, out of which:
 - 1 case was closed following out of court settlement.
 - 3 cases are expected to be discussed.
 - Decisions are expected to be issued for 2 cases.
- In relation to 16 previous legal cases:
 - Regarding 10 lawsuits for vehicle damages in vessel garages during 2019, 5 lawsuits were closed following out of court settlement, 2 lawsuits are pending to be discussed before the competent first instance and appeal courts, 1 lawsuit is expected to be discussed and decisions are expected to be issued for 2 lawsuits.
 - A decision is expected to be issued for a lawsuit for damages to a truck during vessel loading in 2017, a lawsuit for loss of private vehicle keys in 2019, a lawsuit for damages to a private vehicle during vessel loading in 2018 and a passenger lawsuit for damages caused to a camper van in 2017.
 - A lawsuit for loss of luggage in 2019 was closed.
 - A lawsuit for alleged damages to an unaccompanied vehicle in 2018 was closed, following out of court settlement.

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 according to 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 been certified for our Group's Information Security Management System in accordance with the international standard ISO 27001:2013, in order to ensure confidentiality, integrity and availability of information.
- Have created a Data Protection Team prior to the implementation of the European Union's General Regulation 2016/679, which is responsible 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) in collaboration with the Data Protection Officer (DPO). 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.

- Conduct continuous training programs and send GDPR informative handbooks via e-mail to all office employees and have posted a relevant informative leaflet on all our vessels' bulletin boards to inform marine employees. During 2021, we trained 60 office employees on proper personal data management and privacy.
- Have developed an additional deed in all office and marine employees' employment contracts, regarding their obligations according to GDPR, which has been signed by all employees.
- Apply the Confidential Security Method at level P3 (DIN 66399) to destroy documents with personal data.
- Have conducted an impact analysis regarding our Loyalty and Reward program seasmiles to test proper technical and legal processing of our customers' personal data.
- Have developed and update policies and processes to comply with personal data protection requirements.
- 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 a Greek and English GDPR informative leaflet available through vessel Reception desks and passenger cabins.
- Sign the respective Additional Personal Data Processing Act with each new contract with our partners since the GDPR Regulation's entry into force.

- 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.
- 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.
- Updated the 'Information concerning the Processing of Personal Data' disclaimer and posted the 'Privacy Notice on the processing of personal data through a video surveillance system (CCTV)' disclaimer on corporate websites regarding purposes and processing methods of customers' and partners' personal data, as mandated by the respective GDPR Regulation's obligations.
- Updated passenger informative materials and pre-boarding forms, within the context of the COVID-19 pandemic's prevention measures.

- Have signed a collaboration agreement with an external partner to assume Data Protection Officer (DPO) responsibilities on our behalf and we proceeded with an official DPO announcement to the Hellenic Data Protection Authority.
- Inform annually our Top Management on GDPR compliance issues and the respective planned activities in our action plan, while information security issues will be discussed at BoD level within 2022.

During 2021, there was one customer complaint regarding confidentiality or personal data security, which concerned access from a customer-member of the seasmiles Loyalty and Reward program to the account and personal data of another program member. The incident was caused during an attempt to access their accounts from the electronic application at the exact same time, which caused generation of the same access confirmation token for both members. Despite the fact that it was an isolated incident, we immediately proceeded with the necessary technical corrections.



2. Responsible Communication

[Your Opinion]

Responsible Promotion

According to a survey conducted to 1,400 citizens in 2021, our 3 brands and 2 competitors were positioned in the following ranking order to the question **'Promotes products and services with Responsibility'**:



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:

- 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 100% of relevant contracts signed in 2021.
- 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.
- 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, Superfast Ferries and Hellenic Seaways websites to facilitate access by people with disabilities (including people with visual impairments).
- Do not sell or provide any products and services which are either banned or disputed in foreign markets.

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.
- Transport of railway passengers combining 'Train and Vessel'.

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 maintain 5 corporate websites, with over 2.3 million visitors annually and 2 mobile applications with over 7,600 downloads in 2021

At the same time, we maintain one corporate website and one mobile application for AML, with over 36,000 visitors and 1,000 downloads respectively in 2021.

In 2021, there were:

- Informative messages with social, environmental and cultural content communicated on all vessels with relevant information screens, which indicatively include:
 - The decontamination initiative in the island of Naxos from employee volunteers in collaboration with Aegean Rebreath (see Section C).
 - The Bluestarino Festival (see Section 5.2).
 - The activity 'Routes in Marpissa' in the island of Paros.
 - The Icaria Music festival 2021.
 - The Amorgos Tourism Film Festival.
 - The Animasyros International Animation Festival.
 - The Museum of Cycladic Art.
 - Water sports safety.
 - Fire prevention.
 - The Hellenic Marine Environment Protection Association's (HELMEPA) initiative for clean shores.
 - Doctors Without Borders' (Médecins Sans Frontières) activities.
 - COVID-19 protection measures.
 - The biodegradable Seasmiles BIO-PVC cards (see Section 8.2).
 - 8 different useful tips for environmental protection.

- 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.



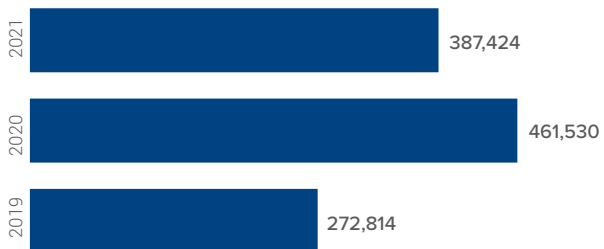
We ensure prompt communication

We strive to promptly inform our customers in case of cancellations 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 or Viber messages (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.

Information SMS Messages



■ Information SMS messages sent (number)

We sent over **387,000** information SMS to our passengers




We informed **97%** of passengers deemed necessary 🟡 (over 818,000 passengers) through information SMS for early arrival at port or changes or cancellations of scheduled journeys in Domestic and Adriatic Sea lines

3. Quality and Satisfaction

[Your Opinion]

Awareness

According to a survey conducted to 1,400 citizens in 2021, Blue Star Ferries, Hellenic Seaways and Superfast Ferries are the **No 1, No 4** and **No 5** passenger shipping companies respectively in brand awareness and have significantly improved their performance compared to the respective 2020 survey.

	Performance 2020	Performance 2021	Difference 2021-2020 (percentage points)
	52%	65%	+13
	17%	33%	+16
	14%	19%	+5









[Your Opinion]

Satisfaction

According to a survey conducted to 1,400 citizens in 2021, Superfast Ferries, Blue Star Ferries and Hellenic Seaways are the **No 2, No 3** and **No 4** passenger shipping companies respectively in the overall satisfaction of those who traveled with a shipping company and have significantly improved their performance compared to the respective 2020 survey.

Furthermore, crew politeness is the **No 1** satisfaction factor of those who traveled with Blue Star Ferries, Hellenic Seaways and Superfast Ferries, with the various satisfaction factors positioned in the following ranking order:

	Performance 2020 (on a 0-10 point scale)	Performance 2021 (on a 0-10 point scale)	Difference 2021-2020
	7.1	8.2	+15.5%
	7.8	8.1	+3.8%
	7.3	8	+9.6%

	1 st Place	2 nd Place	3 rd Place	4 th Place	5 th Place	6 th Place	7 th Place	8 th Place
	Crew politeness	Aesthetics	Safety	Routes consistency	Cleanliness	Speed	Travel comfort	Ticket price
	Crew politeness	Aesthetics	Safety	Cleanliness	Travel comfort	Routes consistency	Speed	Ticket price
	Crew politeness	Cleanliness	Travel comfort	Aesthetics	Safety	Routes consistency	Speed	Ticket price

We ensure equal treatment of customers

[Policy]

Equal Treatment

According to our Regulation of Professional Conduct & Business Ethics, we apply equal treatment policy towards 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 the cargo vessel Blue Carrier) with the necessary infrastructure to facilitate access from people with disabilities.
- Do not impose extra charges on cabins for persons with disabilities.
- Are informed about the number of passengers with mobility limitations 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.

97.4% of our premises and vessels have access for people with disabilities

We sent overall **2,892** notifications to serve our passengers (1,375 concerning passengers with reduced mobility, 2 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.

At the same time, we organized an International Animation Competition in collaboration with Animasyros International Animation Festival within 2021, during which we invited talented animators to participate with their creative proposals for a new and modern animated television spot for the Bluestarino children cartoon, with overall 8 proposals submitted from Greece and abroad.

[Good Practice]

'We do local'

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 actions and initiatives, such as:

- 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 8.1).
- Employ Greek employees and support local workforce.

We serve our customers innovatively

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

- Implement e-ticket/boarding pass application on Domestic lines to simplify boarding process on vessels.
- Have installed Seasmiles Kiosks on 18 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 introduced interactive digital assistants using Artificial Intelligence:
 - At the Loyalty and Reward program's website www.seasmiles.com (Seasmiles Chatbot), to immediately serve visitors, 24 hours a day, 365 days a year.
 - At www.bluestarferries.com, www.superfast.com, www.hsw.gr, to immediately provide information to visitors about prevention measures against COVID-19 and necessary travel guidelines, 24 hours a day, 365 days a year.
 - At our port offices' information portal (chatbot), which introduces a new online platform to inform and communicate with our partners.
- 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 106 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 routes 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 short-time journeys.

@sea portal

We have launched the interactive and multifunctional @sea portal, where all passengers in 19 Blue Star Ferries, Superfast Ferries and Hellenic Seaways vessels (without at the moment onboard Hellenic Seaways high-speed vessels) 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.

Within the context of our customer service with innovative services, we have additionally included the electronic customer satisfaction questionnaire into the @sea portal in 19 vessels, which includes questions regarding our Group's management of issues related to responsible operation.

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 for passengers and private vehicles.



- 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 passenger tickets, 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.
- Discounts for railway transport ticket-card holders.
- Discounts for OAED Social Tourism program beneficiaries.
- Discount for vaccinated young people between 18-25 years old, holders of the 'FREEDOM PASS' digital card.

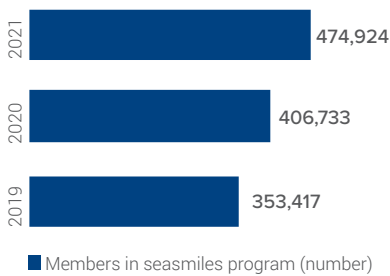
Fluctuations in Average Ticket Prices 2021-2020

	Passenger Tickets	Vehicle Tickets	Motorcycle Tickets
Cyclades routes	+10.1%	+2.1%	+0.6%
Dodecanese routes	+11.1%	+5.6%	+6%
North Aegean routes	+1.9%	+1.2%	+0.2%
Saronic routes	+4%	-	-
Sporades routes	+6%	+1%	-0.2%
Heraklion route	+9.1%	+3.2%	+2.5%
Chania route	+6.4%	+2.5%	+1.2%
Ankora route	+9.3%	-2.4%	-7.3%
Bari route	+49.6%	-1.6%	-11.7%
Venice route	+27.3%	-2.5%	-0.4%

We reward our customers

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.

Seasmiles Loyalty & Reward Program



We increased our seasmiles Loyalty and Reward program members by **16.8%**

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:

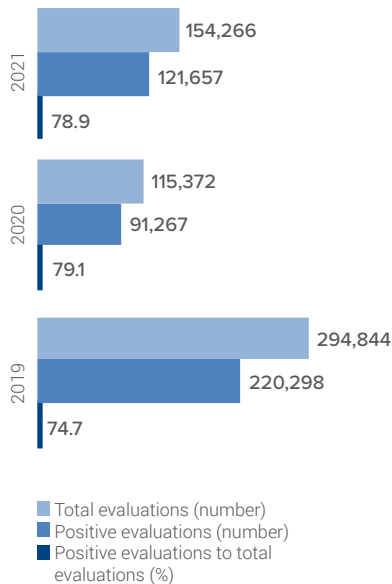
- A call center and dedicated e-mail address for customers.
- Written communication from customers.
- Private meetings with customers, which has been temporarily suspended due to the COVID-19 pandemic.

- Printed and electronic customer satisfaction questionnaires, 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. During 2021, we replaced the printed A la Carte restaurants questionnaire with an electronic questionnaire and provide a tablet to passengers when they pay their restaurant bill to evaluate the quality of experience we offer in restaurants.
- 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 service evaluation devices (Private Review) in all vessels.



In order to utilize passenger questionnaires, we have appointed a vessel Officer to collect and forward them 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.

Evaluations Onboard Vessels



The average score registered through service evaluation devices onboard our vessels reached **4.2** on a **5** point scale

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 2021, we:

- Received over 181,000 calls in all our corporate customer service telephone lines (including unanswered calls), responding to 85.5% of incoming calls. However, the above data do not include overall calls due to a technical problem related to their counting and recording.

- Sent over 2,700 formal responses to customer requests or complaints regarding product or service information (e.g. labeling, pricing) and product or service use (e.g. features), without including relevant e-mails and incoming phone calls, out of which:
 - There were no customer complaints regarding promotional activities (e.g. marketing, advertising, sales) or environmental issues.
 - 162 responses were related to concerns or complaints about prevention measures against the COVID-19 pandemic, without however any hygiene and safety non-compliance incident.



Customer Service

	2019	2020	2021
Formal response letters to comments, complaints and requests (number)	1,496	1,932	2,794 ^c
Adriatic Sea lines	120	99	115
Domestic lines	1,376	1,833	2,679
Subject of formal response letters (number)	NR	NR	2,794
Delays/cancellations/itineraries rerouting	NR	NR	411
Price of products and services onboard	NR	NR	2
Sales policy/ticket prices	NR	NR	64
Cleanliness	NR	NR	19
Lines/itineraries	NR	NR	23
External factors (e.g. weather conditions, strikes)	NR	NR	41
Pet accommodation	NR	NR	31
Temperature	NR	NR	10
Cancellation policy/ticket cancellations	NR	NR	24
Prevention measures against the COVID-19 pandemic	NR	NR	162
Loss of tickets	NR	NR	164
Responsible communication	NR	NR	0
Environmental issues	NR	NR	0
Other	NR	NR	1,843
Formal thank-you letters (number)	192	95	73
Adriatic Sea lines	41	11	4
Domestic lines	151	84	69
Questionnaires in vessels (number)	1,200	534	2,829
Total calls to customer service telephone lines (number)	323,309 ¹	93,228 ²	181,583 ³
Calls to Customer Services Division	36,007	13,142	24,532
Calls to Call Center Division	32,122	6,161	11,409
Calls to Help Desk Division	15,645	6,303	11,224
Calls to Loyalty Division	70,025	14,291	28,226
Calls to Capacity Domestic / Adriatic Division	95,688	28,388	47,453
Calls to Cargo Domestic / Adriatic Division	39,973	15,980	35,622
Calls to Heraklion office	33,849	8,963	23,117

¹ Data for the number of calls are not representative, as unregistered calls during 06/08/2019-31/12/2019 due to a technical problem are not included. Additional 437,322 calls were handled by an external partner without being forwarded to corporate customer service telephone lines.

² Data for the number of calls are not representative, as unregistered calls due to a technical problem regarding their counting and recording are not included. Additional 437,309 calls were handled by an external partner, out of which 11,698 were forwarded to corporate customer service telephone lines and the remaining 425,611 calls were not forwarded.

³ Data for the number of calls are not representative, as unregistered calls during 01/01/2021-31/03/2021 due to a technical problem are not included. Additional 501,498 calls were handled by an external partner, out of which 6,103 were forwarded to corporate customer service telephone lines, which have been included in the above data.

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.

During 2021:

- There were 2,017 journeys with delayed departure or arrival, ^c for which we compensated passengers in 92 journeys (4.6% of journeys with delays) according to the Passenger Charter of Rights and Obligations or other own benefits and acted beyond our respective obligations and offered additional benefits and compensations on 278 individual passenger occasions.
- Regarding 3 previous passenger lawsuits due to journey delays, 2 cases were rejected, while 1 lawsuit is expected to be discussed.

We kept **83%** ^c of our vessels' departure times and **61%** of arrival times as scheduled ¹ ^c

¹ Within a 20-minute arrival or departure time frame (Flying Dolphins, Flying Cats, Highspeed 4, Hellenic Highspeed and Blue Star 1 are not included).

4. Achievements 2021 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility and Sustainability issues related to Customers by 9% (by 2023).	75%	To improve our performance on Corporate Responsibility and Sustainability issues related to Customers by 9%.	2023
To systematically inform and train our customers on Corporate Responsibility and Sustainability issues.	100%	To systematically inform and train our customers on Corporate Responsibility and Sustainability issues.	2022
To achieve an 'as scheduled' routes rate in all destinations of over 75% (by 2023).	75%	To achieve an 'as scheduled' routes rate in all destinations of over 75%.	2023
To apply a Responsible Marketing and Communication Code in our business activities.	100%	To integrate Corporate Responsibility and Sustainability issues in existing communication practices.	2022
To extend the infotainment platform @sea to Hellenic Seaways vessels.	50%	To include new services in our infotainment platform @sea.	2022
		To implement initiatives to encourage passenger participation in our planned activities and other non-profit programs in local communities.	2022
		To install Seasmiles Kiosks on 2 Hellenic Seaways vessels.	2022

[ESG Highlight]

Environmental and Marine Protection

Single-use plastics have rapidly become the most critical environmental issue due to their significant repercussions on the environment. For this reason, our Group's overall Responsibility program 'SAILING TOGETHER' includes initiatives to decontaminate seabeds and protect the environment as the main program (flagship) in the area of Environment.

We implemented the program's first initiative in the island of Naxos during 2021, with 31 participating volunteer employees and 29 volunteers from the organization Aegean Rebreath and the Naxos Wildlife Protection Association, in collaboration with the Municipality of Naxos and local residents.

Volunteer divers collected and assorted 2,811 waste items from the coastal cleaning of Laguna beach and the fishing shelter's seabed at Naxos Town, out of which:

- 1,100 plastic bottles and cups.
- 5.5 sacks of plastic bags.
- 500 aluminum cans.
- 150 glass bottles.
- 50 large tires and other rubber items.
- 40 kg of nets.

The initiative also included the inauguration of a Marine Litter Collection Station (MLCS) to further raise local residents' awareness on environmental protection, which has been included in the MLCS network throughout 15 islands to efficiently manage, recycle and reuse marine litter through the Blue and Circular economy program 'Blue Cycle'.





Photo: Aegean Rebreath

[8] Environment

We reduce our Environmental Impact

Our Oceans



50

times more carbon dioxide is held in the Oceans than in the atmosphere

We are



881.9

thousand tonnes eCO₂



11,409

TJ energy consumption



4,380

KWh energy produced from renewable energy sources



98.1

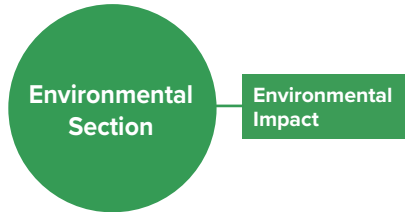
tonnes materials for recycling transported free-of-charge



110,080

kg paper consumption

We focus



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 contribute

United Nations' Sustainable Development Goals

- 6 Ensure access to water and sanitation for all
- 7 Ensure access to affordable, reliable, sustainable and modern energy for all
- 12 Ensure sustainable consumption and production patterns
- 13 Take urgent action to combat climate change and its impacts
- 14 Conserve and sustainably use the oceans, seas and marine resources
- 15 Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss





We achieved

- We produced approximately 4,380 KWh electricity from renewable energy sources.
- We informed 100% of our employees on environmental protection issues.
- 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 reduced the consumption of plastic bags in our offices by 18.7%.
- We informed potentially over 1.2 million customers on Corporate Responsibility and Sustainability issues, such as environmental protection.
- We used 70% recycled paper for all purposes and 68% recycled toners/ink cartridges.
- We increased use of recycled or certified paper for commercial use to 78%.
- We transported from Islands free-of-charge over 98 tonnes of materials for recycling.
- We conducted internal drills on environmental protection issues to 100% of marine employees.

1. Air Quality and Climate Change

[Your Opinion]

Environmental Management

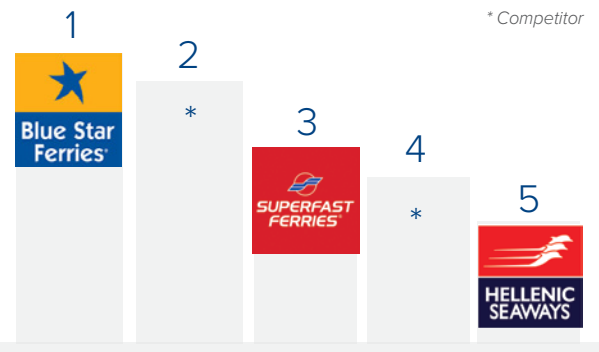
According to a survey conducted to 1,400 citizens in 2021, our 3 brands and 2 competitors were positioned in the following ranking order to the question **'Manages its environmental impacts'**:



[Your Opinion]

Informing Passengers

According to a survey conducted to 1,400 citizens in 2021, our 3 brands and 2 competitors were positioned in the following ranking order to the question **'Informs and makes its passengers more aware on Corporate Responsibility issues'**:



We operate in a systematic way

[Policy]

Environmental Policy

Our Environmental Policy clearly states our commitment to **fully comply with all international, regional and local regulations** on environmental protection.

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:

- Implement a certified Environmental Management System according to ISO 14001 and evaluate our environmental impact annually.
- 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 Energy Efficiency certificates issued for our vessels in all routes we operate.
- Demand an asbestos non-use certificate from our suppliers.
- Discuss environmental protection issues during respective meetings of each vessel's Safety Committee.
- Implement weekly drills and training plan for all marine employees, in order to prevent pollution incidents (e.g. sea pollution) and prepare them to promptly and effectively respond to such incidents. Furthermore, we trained 51 employees (45 office employees and 6 marine employees) on environmental protection issues in 2021, for a total duration of 191 hours, compared to 13 employees and 280 hours in 2020.
- Conducted 7 studies regarding return of potential investments in 2021, to reduce fuel consumption from our vessels or use renewable sources for energy production.

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

We informed **100%** of our employees on environmental protection issues

[Good Practice]

Systematic Environmental Management

As we strive to implement responsible environmental management initiatives and practices, we were the first company within the Greek passenger shipping industry to:

- Implement ISO 14001.
- Submit the Monitoring Plans regarding carbon dioxide emissions for all Blue Star Ferries and Superfast Ferries vessels.
- Certify our vessels according to the European Union Ship Recycling Regulation (EU SRR). We have also defined and implemented a procedure to monitor purchases and register hazardous materials onboard our vessels, through an inventory list with the places and quantities of hazardous materials, which refer to overall 30,216 kgr of lead batteries onboard vessels in 2021.
- Received on a voluntary basis the Statement of Compliance on the Inventory of Hazardous Materials in accordance with the relevant Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009.

In 2021:

- We completed the sale of the car-passenger (ro-pax) vessel EXPRESS PEGASUS for its safe and environmentally proper recycling, according to the respective European and Greek legislation. The vessel was sold to a company operating a vessel recycling facility in Turkey (included in the European List of Ship Recycling Facilities), which certified the vessel's recycling in accordance with the respective European Union legislation.
- Total value of estimated operating expenditure savings due to investments primarily for environmental protection (e.g. renewable energy sources) was €16.9 million.
- We invested over €20.6 million for programs directly or indirectly related to environmental protection (e.g. solid and liquid waste disposal investments, materials and equipment for pollution incidents, installation of scrubbers, environmental performance certificates).
- There were no incidents or accidents with environmental impacts.
- There were 12 written notices by competent authorities regarding environmental issues.
- Regarding fines imposed and paid due to limited pollution incident caused by Blue Star Patmos in 2017:
 - The Greek State appealed against the Piraeus Administrative Court of First Instance's decision in 2020, which reduced the fine imposed by the Central Port Authority of Piraeus from €38,200 to €30,000, which has not yet been served to the Group.
 - The Syros Administrative Court of First Instance issued its decision and reduced the fine imposed by the Central Port Authority of Ios from €26,000 to €5,000, which has not yet been served to the litigants and the Greek State is expected to appeal against the first instance decision.
- A rejection decision was issued regarding an appeal against an imposed fine of €27,200 due to a limited pollution incident caused by the vessel Artemis in 2016, and an appeal will be filed against the decision.



We manage our environmental footprint

[Did you Know]

Climate Change and Shipping

Global warming increases the frequency and intensity of extreme weather events in the EU and worldwide (e.g. heat waves, floods, devastating forest fires), while keeping global warming below 1.5°C until 2030 can potentially mitigate climate change impact.

According to data presented during the United Nations Climate Change Conference in Glasgow (COP26) in 2021:

- Shipping accounts for 2.9% of global greenhouse gas emissions.
- In 2050, emissions from shipping are likely to reach 90-130% of 2008 emissions, without taking into account emissions due to unburned methane from vessel engines (e.g. due to incomplete combustion).
- Coordinated action through upgrades to improve the vessel energy efficiency is essential to reduce emissions.
- Fully de-carbonising the global fleet by 2050 requires use of at least 5% zero-carbon fuels by 2030.

Since 2020, the European Council has agreed to reduce net greenhouse gas emissions in European Union countries by at least 55% by 2030, while the European Commission adopted the package of revised legislative proposals on climate, energy and transportation 'Fit for 55' in 2021, which includes actions to meet its climate commitments and available financial solutions related to energy and environmental issues.

At the same time, the new IMO regulations regarding reduction of carbon dioxide emissions from vessels will come into force in 2023, which sets new challenges for the global passenger shipping industry. As part of our compliance with the new regulatory framework, we have started the process to design our Group's Environmental Strategy and De-carbonisation Plan with specific actions and objectives until 2030, while we also explore new generation alternative fuels.



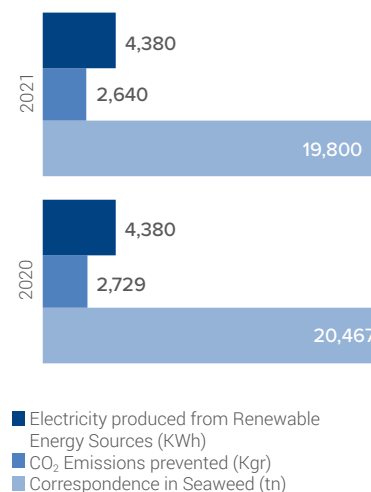
[Good Practice]

Installing Photovoltaic Panels

In 2014, we installed a 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 2021, crew members conducted periodic inspection of proper operation and maintenance. We continued its operation with positive results, as we reduced the use of vessel power generators for electricity and consequently prevented approximately 2,640 kgr of carbon dioxide emissions, which corresponds to the weight absorbed by approximately 19,800 tn of Seaweed.

Electricity from Renewable Energy Sources



We produced approximately **4,380 KWh** electricity from renewable energy sources



Climate change risk management

We have recognized that in the short-term (12 months) climate change is directly related to the risks of fuel price increases (which affect the risk of increased operating costs), as well as the more stringent regulatory and legislative requirements to reduce climate change impact (which increase capital investments required) (see Section 4.1).

Regarding Climate Change issues:

- We have established a working group, whose members include (among others) the Chief Executive Officer and 4 Executive Directors. The group will present the results of its activities, our Group's strategy on environmental and climate change issues, as well as compliance with the regulatory requirements to the BoD.



- Have appointed an employee to monitor climate change risks and identify potential areas to implement energy conservation initiatives, who submits a relevant report at least annually or when deemed necessary, without at the moment any areas where we have implemented extensive programs and activities based on these reports.

We have not further determined implications or opportunities for our financial results (e.g. turnover, operating costs) and financial position (e.g. assets, liabilities) or assessed the resilience of our strategies to climate-related risks and opportunities (e.g. potential impact on financial performance). Moreover, we do not use climate-related scenarios to determine our business strategy and financial planning.

Recording and Monitoring 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 2020 ¹	Energy Consumption 2020 (GJ)	Energy Consumption 2020 Analogy (%)	Environmental Footprint 2020 (tn eCO ₂)	Consumption 2021 ¹	Energy Consumption 2021 (GJ)	Energy Consumption 2021 Analogy (%)	Environmental Footprint 2021 (tn eCO ₂)
Scope 1		10,558,267	99.9	816,005		11,403,949	99.9	880,984
Oil (vessels)	261,493 tn	10,557,600	99.9	815,963	282,201 tn	11,403,178	99.9	880,934 
MGO	18,248 tn	779,172	7.4	58,501	23,473 tn	1,002,289	8.7	75,254
VLSFO	211,367 tn	8,496,937	80.4	658,195	158,907 tn	6,388,049	56	494,835
HSFO	31,878 tn	1,281,491	12.1	99,267	99,822 tn	4,012,840	35.2	310,845
Heating oil (offices)	4,800 lt	205	<0.1	13	7,200 lt	307	<0.1	19
Diesel (offices and corporate vehicles)	6,107 lt	235	<0.1	15	7,285 lt	280	<0.1	20
Gasoline (corporate vehicles)	6,060 lt	211	<0.1	14	4,816 lt	168	<0.1	11
Renewable Sources (vessels, energy produced)	4,380 KWh	16	<0.1	-	4,380 KWh	16	<0.1	-
Total Scope 2		5,355	<0.1	927		5,603	<0.1	939 
Electricity (offices)	1,487,562 KWh	5,355	<0.1	927	1,557,845 KWh	5,603	<0.1	939
Total (Scope 1 and Scope 2)		10,563,622	100	816,932		11,409,552	100	881,923

¹ Vessel data refer to all vessels we operated within the year without including chartered vessels and office and corporate vehicles data refer to the entire Group.
Sources of conversion factors: International Maritime Organization (MGO, VLSFO and HSFO), 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), National Inventory 2021 Report (Electricity)
Greenhouse gases included in the calculations: CO₂

In order to achieve efficient fuel and energy consumption and better manage environmental footprint from all energy sources we use (vessels and offices), which reached 0.16 tn of fuel, 6.5 GJ of energy and 506.9 kgr of carbon dioxide emissions per nautical mile travelled respectively in 2021 (out of which 506.3 kgr direct carbon dioxide emissions per nautical mile travelled), compared to 0.15 tn of fuel, 6.29 GJ of energy and 486 kgr of carbon dioxide emissions in 2020, we:

- 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. In 2021, electricity consumption in our offices was 5,534 KWh/office employee and 134.7 KWh/m², compared to 5,238 and 128.7 KWh respectively in 2020, while indirect carbon dioxide emissions were 3.2 tn/office employee.
- Have installed energy saving light bulbs (LED) in our Blue Star Ferries and Superfast Ferries offices and replaced conventional light bulbs on 12 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.

- Use exhaust gases' heat from vessel engines to heat public areas and sanitary water.
- Used specialized low resistance silicone anti-fouling paint on 10 vessels 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, replacing 2 gasoline vehicles with 2 fully electric vehicles and converting a gasoline vehicle to LPG in 2021. The total distance travelled and average fuel consumption by our 12 vehicles (with an average engine size of 1,196cc in 2021, compared to 1,399cc in 2020) reached 134,737 km and approximately 9 lt/100 km respectively in 2021, compared to 186,617 km and 6.5 lt/100 km respectively in 2020.

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

[Good Practice]

Construction of Environmentally Friendlier Vessels

We are investing €21 million to construct 3 state-of-the-art Aero Catamaran vessels, which will be launched in 2022 on the Saronic routes to replace older technology vessels. The investment will contribute to reduce environmental footprint through lower fuel consumption and reduced emissions, as a result of the lighter construction materials used (carbon fiber), as well as installing solar panels to meet lighting and electricity needs of onboard hotel services.

[Good Practice]

Participation in Programs

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 following programs:

- The European-funded program Poseidon Med II, 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. Liquefied Natural Gas is considered the cleanest fossil fuel, as it results 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 Italian Ministry of Transportation's MareBonus program, 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 initiated discussions with suppliers regarding use of LNG in our vessels and we also consider other alternative fuels, such as methanol and biofuels in general.

We reduce our atmospheric impact

[Did you Know]

IMO Regulation


The International Maritime Organization (IMO) Regulation, which came into force in 2020, defines 0.5%, as the maximum sulfur content in marine fuels except for vessels with installed scrubbers, where sulfur content may be up to 3.5%. This leads to using more expensive marine fuels, compared to 3.5% and 1% sulfur content marine fuels used so far.

Within this context, we have installed scrubbers onboard Blue Star Patmos, Blue Star Delos, Blue Star Mykonos and Superfast XI, while it must be noted that we have configured all scrubbers to SECA MODE, with the respective air emissions corresponding to 0.1% sulfur content marine fuel, although using 3.5% sulfur content marine fuel.

Our air pollutants (except carbon dioxide, which is described above) are mainly air sulphur oxides and emanate due to operation of vessel engines. To manage their impact, we:

- Use marine gas oil (MGO) with 0.1% sulphur content when vessels are expected to stay within ports for over 2 hours, as well as very low sulphur heavy fuel oil (VLSFO) with up to 0.5% sulphur content when vessels are in Greek and International waters.
- Use engine components which comply 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).
- We use VLSFO with up to 0.5% sulphur content since 2020. In 2021, air SO_x emissions to atmosphere were 0.53 kgr per nautical mile travelled by our vessels, compared to 0.66 kgr in 2020.

Air SO_x Emissions to Atmosphere ¹

Oil Type (% in sulphur content)	Emissions 2019 (tn)	Emissions 2020 (tn)	Emissions 2021 (tn)
MGO (0.1%)	50.2	18.3	23.5
LSHFO (1.0%)	4,697	-	-
VLSFO (0.5%)	-	1,056.8	794.5
HSFO (3.5%)	2,224.5	31.8	99.8
Total	6,971.7	1,106.9	917.8 

¹ Data refer to all vessels we operated within the year, without including chartered vessels and are estimated emissions based on average content values per type of fuel.

[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.

As a result, we intensively investigate silent running of our vessels during long stays in ports, utilizing power supply from land facilities or even use of batteries.



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. 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	2019		2020		2021	
	Stored (kgr)	Used (kgr)	Stored (kgr)	Used (kgr)	Stored (kgr)	Used (kgr)
Carbon dioxide (CO ₂) ¹	86,884	0	86,884	0	94,238	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)	13,883	3,624	13,793	2,735	13,883	2,200
Total	100,767	3,624	100,677	2,735	108,121	2,200

¹ Stored quantities include CO₂ in fire extinguishing systems and CO₂ stored in rescue equipment activation cylinders.

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 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 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.

We reduced the consumption of plastic bags in our offices by **18.7%**

We informed potentially over **1.2** million customers on Corporate Responsibility and Sustainability issues, such as environmental protection



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 vessel cabins to encourage passengers to turn off lights when not in use.
- We have developed an information brochure on the importance and benefits of recycling, types of materials disposed in the dedicated recycling bins and various product packaging labels, as well as useful recycling tips (e.g. recycling of electrical and electronic appliances, light bulbs, batteries), which is available on our corporate websites www.superfast.com, www.bluestarferries.com and www.hsw.gr.
- Inform our seasmiles Loyalty and Reward program members to replace their current Seasmiles plastic cards with the new biodegradable Seasmiles BIO-PVC cards through Seasmiles Kiosks onboard our vessels (see Section 8.2).
- 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 6 and 5 destinations, which offer free vessel journeys in Blue Star Ferries and Hellenic Seaways domestic routes and a free roundtrip vessel journey in Adriatic routes (valid for the 6 destinations card) to holders railway passengers.
- 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.



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.

We reduce materials used

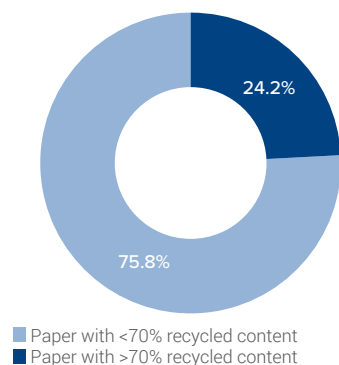
We implement initiatives to reduce use of materials, within the context of our efforts for efficient use of natural resources. Indicatively, we:

- Entirely use multifunction printers and photocopiers at our offices, whose 100% 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 electronic equipment and printing paper. We purchased 53,560 kgr of plastic garbage-food bags for our vessels in 2021, out of which 91% were bags from recycled-input raw materials.
 - Besides using recycled paper, recycled toners/ink cartridges and recycled plastic garbage-food bags, we do not use any other recycled materials.

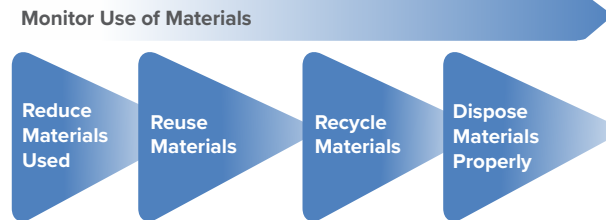
- Purchase refurbished electronic equipment, with a total of 116 devices and 42 peripherals purchased for our offices and vessels in 2021, such as personal computers and hard disks, compared to 106 devices and peripherals in 2020.
- Have installed air dryers in WCs of all our vessels, in order to reduce 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 all our vessels and train marine employees on their proper use, in order to ensure efficient use of cleaning chemicals.

We used **70%** recycled paper for all purposes and **68%** recycled toners/ink cartridges

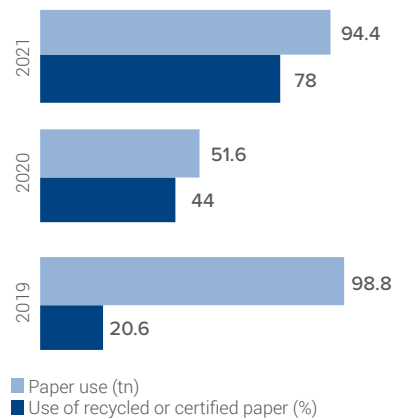
Paper Use for Printing



Reduce Impacts from Consumption of Materials



Paper Use for Commercial Purposes



We increased use of recycled or certified paper for commercial use to **78%**

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 37,000 sheets, pillowcases, duvet cases and towels reused within 2021.

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	2020		2021	
	Consumption	Recycling	Consumption	Recycling
Paper	68,491 kgr	43,622 kgr	110,080 kgr	17,929 kgr
Toners/ink cartridges for printers/faxes/photocopying machines	1,844 units (976 were recycled)	0.6 m ³	1,697 units	40 units from offices 6.3 m ³ from vessels
Domestic batteries	295 kgr	120 kgr (all from vessels)	369.8 kgr	271 kgr
Vessel batteries	7,842 kgr	4,063 kgr	30,216 kgr (in use) 6,975 kgr (purchases)	4,309 kgr
UPS batteries	3,384 kgr (in use) 1,420 kgr (consumption)	1,420 kgr	5,022 kgr (in use) 95.4 kgr (consumption)	95.4 kgr
IT equipment (computers, printers etc.) / electrical equipment and light bulbs	552 units 43,868 light bulbs	0 units IT equipment 12.2 m ³ light bulbs	865 units 35,818 light bulbs	1,274 units IT equipment 870 m ³ light bulbs
Cooking oils	53,985 lt	24.9 m ³	89,610 lt 	18.9 m ³
Lubricants	2,180,633 lt	349.2 m ³	2,176,333 lt	402.3 m ³
Medicines and pharmaceuticals	27,935 units	8.9 m ³	29,214 units	20.8 m ³
Chemical substances	91,641 lt	NR	91,741 lt	NR

NR: Not reported

Hazardous waste

The total quantity of 3,045 m³ liquid and solid hazardous waste (such as waste which contain mercury, lubricants, biodegradable waste from kitchen and accommodation areas, light bulbs, IT equipment and toners), as well as the 4.7 tn of batteries and 159 tn of solid oil residues we collected in 2021, was forwarded to specialized hazardous waste management companies, which comply with strict standards regarding environmental protection and apply proper treatment methods, out of which 42% was recycled and 58% was transported for further treatment or to landfills, while no hazardous waste was:

- Reused.
- Transported abroad to be treated.
- Imported.

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 offices and Blue Star Ferries and Superfast Ferries vessels to collect and forward for recycling paper, packaging cardboard, toners, electronic equipment, fluorescent lamps, domestic batteries and UPS / laptop / mobile phones batteries and plastic packaging recycling bins in our offices, 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.

- Were the first passenger shipping group in Greece to use biodegradable Seasmiles BIO-PVC cards for all new membership registrations in our seasmiles Loyalty and Rewards program, as well as for reissued and renewed cards, which require less energy and raw materials to produce. We collaborate with an external partner to recycle all cards collected from our vessels or returned to our offices, with over 210,000 plastic cards collected and recycled within 2021, which correspond to approximately 1,156 kgr of plastic. Furthermore, we use FSC certified paper for all printed material used to dispatch cards to Gold program members.
- Replaced plastic cutlery and straws at contractor's points of sale onboard our vessels with wooden and paper respectively in paper wrapper.

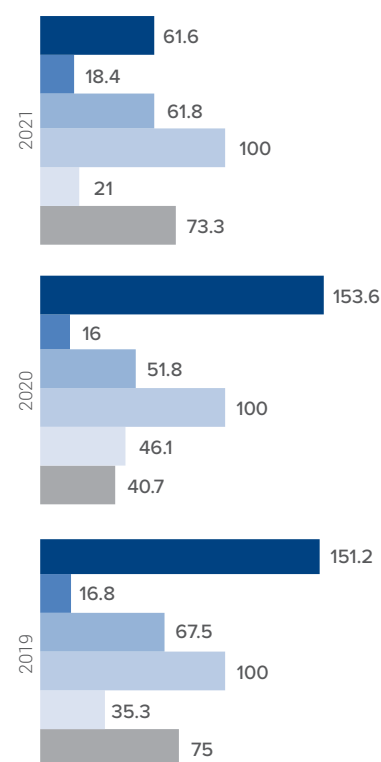
[Did you Know]

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.

Materials Recycling



- Paper per employee (kgr/office employee)
- Lubricants (%)
- Vessel batteries (%)
- UPS batteries (%)
- Cooking oils (%)
- Domestic batteries (%)

Medicines and pharmaceutical materials

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

[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 2021 was 98.1 tonnes, while we also transported free-of-charge 139 trucks with recyclable materials from the islands of Astypalaia, Ikaria, Fournoi, Leros and Lipsi.

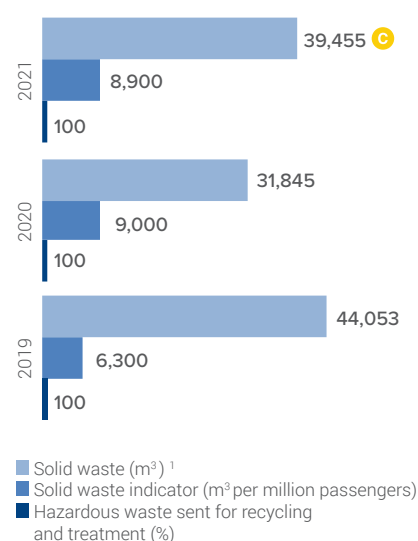
We transported from Islands free-of-charge over **98** tonnes of materials for recycling

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 annually 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, and 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



¹ Quantity of solid waste for 2021 does not include additional 163.6 tn of batteries and solid oil residues.

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 Blue Star Ferries and Superfast Ferries vessels.
- Ensure proper and regular maintenance of water production equipment and dictate immediate notification of any failures to the Technical Division.
- Have placed designated signs in all our vessels to remind passengers and marine employees to use water responsibly in accommodation, sanitary and catering areas, with the water consumption indicator reaching 0.051 m³/passenger in 2021, compared to 0.058 m³/passenger in 2020.
- Proactively check and immediately respond to potential damages in our office water supply system. In 2021, the water consumption indicator in our offices was 6.1 m³/office employee, compared to 7 m³/office employee in 2020.

- 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 office and vessel systems.
- Have not identified water storage onboard our vessels as having a significant water management impact, without storing water in any other facilities.

Drinking water quality onboard vessels

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 2021.

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. Within 2021, there were no significant leakages of any material (e.g. oil or chemical substances spills) or marine pollution incidents, C as in 2020.

Water

	2019	2020	2021
Water consumption (m³)	303,872	226,393	228,858 C
Vessels	300,899	223,993	226,730
Offices	2,973	2,400 ²	2,128
Water sources (%)			
Areas with high water stress ¹	NR	<1	<1
Public water supply networks	80.4 (244,313 m ³)	86.6 (196,126 m ³)	88.3 (201,662 m ³)
Seawater	19.6 (59,559 m ³)	13.4 (30,267 m ³)	11.7 (26,835 m ³)

¹ Crete, Cyclades and South Aegean islands

² Estimated consumption

NR: Not reported



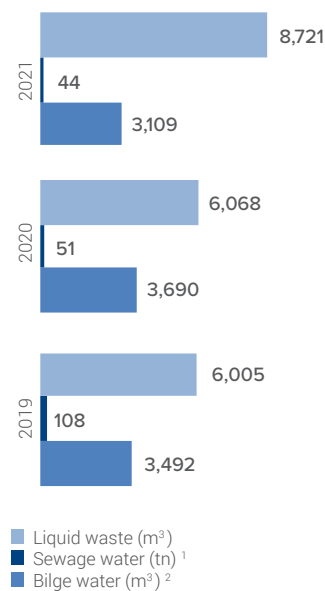
We manage liquid waste

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

- Have Prevention of Sewage Pollution Certificates issued for our vessels, in accordance with Law 1269/82 and Presidential Decree 400/96.
- 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.

- Have equipped our vessels with certified wastewater treatment systems regarding discharge parameters (coliforms and total suspended solids) and we deliver liquid waste to appropriate reception facilities of licensed contractors within ports, without any effluent discharges containing significant polluting substances (e.g. hazardous waste, nitrates, phosphate emissions) in 2021.

Liquid Waste



¹ Quantities of sewage water refer to cases where vessels are docked or during maintenance/cleaning activities to the sewage network.

² Quantities of bilge water refer to quantities delivered to appropriate reception facilities of licensed contractors within ports.

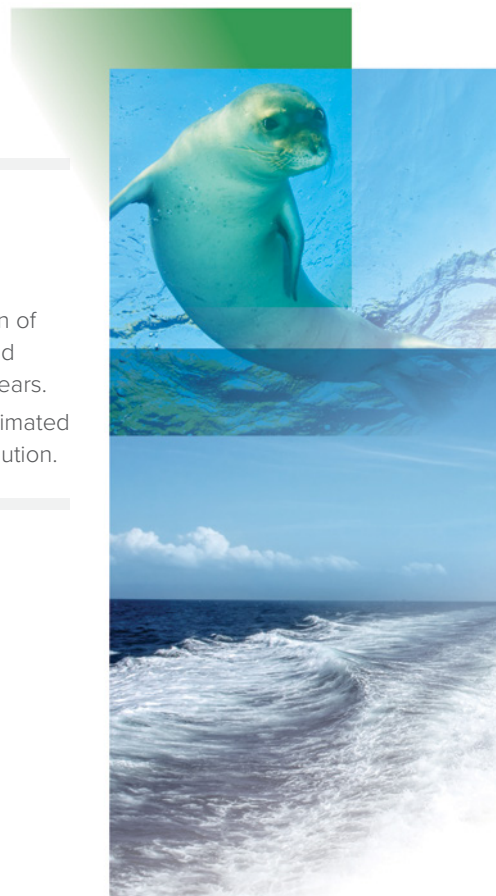
4. Biodiversity and Vessel Rippling

We assess our impact on biodiversity

[Issue of Consideration]

Biodiversity

As water covers 71% of our planet, preserving the balance of marine ecosystems and biodiversity are crucial for humankind. 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.



Old Shipwreck Cleaning

On 18/6/2020, the Port Authority of Paros informed HSW regarding marine fuel pollution spotted in the area of the ro-pax 'EXPRESS SAMINA' shipwreck, which took place 20 years ago. During that time, the vessel belonged to 'MINOAN FLYING DOLPHINS SHIPPING SOCIETE ANONYME', which was later renamed to 'HELLAS FLYING DOLPHINS SHIPPING SOCIETE ANONYME' and 'HELLENIC SEAWAYS SHIPPING SOCIETE ANONYME'. The vessel's owner company when it sank implemented all appropriate measures immediately after the shipwreck to reduce and mitigate marine pollution and remove fuels and lubricants from the shipwreck. The respective efforts were considered successful by both local authorities and Ministry of Shipping's Marine Environment Protection Directorate. Despite the fact that HSW is not anymore legally responsible for the shipwreck, in accordance with the respective shipwreck legislation, and without any legal obligation to do so, our Group voluntarily collaborated with the Port Authority of Paros to clean the marine and coastal area around the Parikia bay, proving in practice its support for local communities and continuous interest towards marine environment protection. Within this context, a specialized cleaning and pumping company was assigned to completely clean and remove any marine fuels that may have remained within the shipwreck. Within 2021, a fine with an overall amount of €54,400 was imposed, which we have challenged before the competent Administrative Courts and is under appeal process..

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.
- We use non-toxic anti-fouling paints for our vessels, which do not poison marine organisms (e.g. we do not use the toxic substance tributyltin/TBT), being a practice implemented before the respective international regulations mandated use of non-toxic substances.
- We use exclusively environmentally friendlier cleaning agents during cleaning activities of garages, decks and exterior surfaces in general.
- We 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.
- There are no IUCN Red List species and national conservation list species with habitats in areas affected by our operations or other habitats and species negatively affected by our operations.

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).

We minimize our vessel rippling impact

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's, 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. Regarding previous legal cases, in 2021:

- 2 lawsuits for damages to vessels caused by rippling within 2020 are still pending.
- A lawsuit, an nonjudicial notice and an indictment for damages to vessels caused by rippling in previous years closed in favor of our Group.
- A lawsuit for alleged diver injury from rippling impact in 2018 is still pending.

5. Achievements 2021 and Future Objectives

We committed	Progress	We aim	By
To improve our performance on Corporate Responsibility and Sustainability issues related to Environment by 8% (by 2023).	0%	To improve our performance on Corporate Responsibility and Sustainability issues related to Environment by 8%.	2023
To add scrubbers on 2 vessels.	100%		
To upgrade our BMS system's software.	0%		
To reduce electricity consumption in offices per employee by 4%.	0%	To reduce electricity consumption in offices per employee by 2%.	2022
To reduce electricity consumption per square meter in offices by 5%.	0%	To reduce electricity consumption per square meter in offices by 5%.	2022
To reduce water consumption per employee in offices by 5%, compared to 2019.	100%	To reduce water consumption per passenger in vessels by 2%, compared to 2019.	2023
		To increase water consumption from recycled water or seawater by 10%.	2023
To train 100% of corporate vehicle drivers on safe and economical driving.	0%	To train 100% of corporate vehicle drivers on safe and economical driving.	2023
		To train 100% of office employees on environmental issues.	2022
To stop using PVC plastic in seasmiles card issuance and instead use biodegradable BIO-PVC material.	100%		
		To reduce paper use per full-time equivalent (FTE) by 2%, compared to 2019.	2022
		To reduce single-use plastics in our facilities and crew accommodation areas by 20%, compared to 2019.	2023
		To recycle 80% of recyclable packaging in all our vessels.	2022
		To reduce the average fuel consumption per mile of all vehicles used for our operations by 25%.	2023
		To conduct 4 checks of noise levels on our vessels.	2022
		To integrate environmental aspects as specifications in products or services design phase.	2022

[9] Summary

1. About this Report

This is the 13th Responsibility and Sustainability Report published by Attica Group. Here in, we present the practices followed and the results achieved, through focusing on Societal, Environmental and Governance issues our Stakeholders are interested in.

The Principles we follow

The Report follows:

- For structure and content, the guidelines 'Sustainability Reporting Standards' (version 2021) of the Global Reporting Initiative (GRI), the NASDAQ & Athens Stock Exchange ESG Guidelines and the Task Force on Climate-Related Financial Disclosures (TCFD) Recommendations.
- For principles, the UN's Global Compact.
- For presentation of quantitative data, the EFQM's RADAR Card.

The scope we refer to

The annual Responsibility and Sustainability Report:

- Refers to the period 1/1/2021-31/12/2021 (unless indicated otherwise in certain points) and is published in April 2022.
- 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 through its 100% subsidiaries (which are described in detail within its Financial report), under the commercial brands Blue Star Ferries, Superfast Ferries and Hellenic Seaways.
- Makes references (without being included in the scope of this Report) to activities of Africa Morocco Link/AML which operates in the Morocco – Spain route (in which the Group owns 49% of shares) and Attica Blue Hospitality S.M.S.A which operates in hospitality industry ('Attica Blue Hospitality' is a 100% subsidiary of Attica Group). Both companies' financial results are included in the Group's published financial results.
- Includes, as a norm, quantitative data for the period 2019-2021 for all quantitative indicators.

- Includes data from direct measurement, while cases of data estimations or restatements of data provided in our previous 2020 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 Link (AML) are clearly indicated.
- Data presented have been collected internally, in order to be published in this Report.
- Where differentiations in quantitative results for 2021 compared to 2020 are probably due to the COVID-19 pandemic (e.g. number of routes), these results are presented, but not used to comment on our performance.

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.

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

Reading the Report

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.

[Your Opinion]

Indicates results from surveys conducted.

[Did you Know]

Indicates information of particular interest.

[Issue of Consideration]

Indicates issues of public interest and consideration.

[Assured]

Indicates audited and assured Quantitative Indicators by independent external party.

Development of Report

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

Panagiotis Papadodimas
Chief Administrative & Transformation Officer

Christina Grigora
Marketing Manager

Georgia Kokaliari
Training & Development Manager

Dimitrios Roggas
Accounting Supervisor of AML
Athens Office

Antonis Strintzis
ISO & Quality Assurance Head

Epameinondas Chandros
Transformation & Risk Director



www.stream-eu.com

2. Summary Data




- ✓ completion (100%)
- 🔄 under completion (75%)
- 📈 progress (50%)
- ⬇️ off plan (25%)
- ⬜ not achieved (0%)

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Governance Section						
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 and Sustainability issues by 13% (by 2023).	106 Top Management Members, Directors and Managers from all departments participated in the development of our Strategy 2021-2023.	To improve our overall performance on Corporate Responsibility and Sustainability issues by 13% (by 2023).
					📈	
				To improve our performance on Corporate Responsibility and Sustainability issues related to Owners by 10% (by 2023).	📈	To improve our performance on Corporate Responsibility and Sustainability issues related to Owners by 10% (by 2023).
				To improve our performance related to Management of Corporate Responsibility and Sustainability issues by 11% (by 2023).	We defined 123 actions in our Corporate Responsibility and Sustainability Action Plan 2021-2023.	To improve our performance related to Management of Corporate Responsibility and Sustainability issues by 11% (by 2023).
					🔄	
				To include the target for each Area of responsible operation in the Corporate Responsibility Team members' performance appraisal (by 2022).	🔄	To include the target for each Area of responsible operation in the Corporate Responsibility Team members' performance appraisal.
Objectives in the Report (number)	38	29	55	To conduct a Stakeholder Engagement process on issues related to Corporate Responsibility and Sustainability (by 2023).	✓	To conduct a Stakeholder Engagement process on issues related to Corporate Responsibility and Sustainability (by 2023).
						To design a Remuneration Policy to define remuneration in additional hierarchical levels (except BoD), which emphasizes on normalizing wages between genders.


Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Governance Section						
						To conduct benchmarking studies with other peer organizations (by 2023).
GRI disclosures in the Report (number, full + partial coverage)	66 + 19	62 + 22	68 + 25			
Quantitative indicators in the Report (number)	235	255	270		We increased by 5.9% the number of quantitative indicators we make reference to within the Report.	
				To monitor our Responsibility and Sustainability Report's quantitative indicators through our Business Intelligence Tool (by 2023).	●	To monitor our Responsibility and Sustainability Report's quantitative indicators through our Business Intelligence Tool (by 2023).
Office employees who have been informed on main principles of professional behavior (%)	100	100	100		We have communicated our Regulation of Professional Conduct & Business Ethics to 100% of our office employees.	
					We have trained 93% of office employees on our Regulation of Professional Conduct & Business Ethics.	To train 25% of crew ratings and 100% of vessel Officers on our Regulation of Professional Conduct & Business Ethics and Anti-corruption Regulation (by 2023).
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.	To simplify, harmonize and consolidate our various Regulations of business operation into a single Regulation.
Office employees who have been informed on anti-corruption Procedures (%)	100	100	100		We have communicated our Anti-corruption Regulation to 100% of our office employees.	

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Governance Section						
Office employees trained on anti-corruption issues (%)	NR	81	12.7		We trained 12.7% of office employees on anti-corruption.	
Corruption incidents (number)	0	0	0		No corruption incidents occurred.	To assess fraud/ corruption risk in our business operation.
					No bribery incidents related to our employees occurred.	
					We did not make any donations to political parties.	
Internal audits (number)	NR	27	24		24 internal audits were conducted.	To strengthen our business continuity through ISO 22301 certification.
External audits regarding Management Systems (number)	116	30	39		We were subject to 39 external audits regarding our Management Systems, with no recorded non-compliance incident.	
Non-compliance incidents recoded during external Management Systems' audits (number)	0	0	0		No non-compliance incident was recorded during audits of our contractors' Management Systems.	
						To train all Group executives on risk management issues.
						To conduct a long-term risk assessment (4-7 years).

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Social Section						
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 and Sustainability issues related to Community by 22% (by 2023).		To improve our performance on Corporate Responsibility and Sustainability issues related to Community by 22% (by 2023).
					➡	
				To improve our performance on Corporate Responsibility and Sustainability issues related to Suppliers by 31% (by 2023).		To improve our performance on Corporate Responsibility and Sustainability issues related to Suppliers by 31% (by 2023).
					➡	
Turnover (total sales with VAT) (million €)	405.4	290.4	347.9			
Profits / (Losses) after taxes (million €)	20.8	(49.2)	13.1			
Cost of employees (including salaries, benefits and insurance payments) (million €)	94.2	79.4	87.3	We distributed approximately €426 million in economic value: €87.3 million to employees (for salaries, benefits and insurance payments), €56.8 million for taxes (including VAT and port taxes), €19.2 million to providers of capital (for interest and return payments), €19.2 million to agents (for commissions), €194 million to suppliers (for purchases of goods and services), €1.6 million to society (for discount tickets, implemented programs, sponsorships and donations) and €47.9 million for investments.		
Payments to suppliers (million €)	205.6	155.6	194			
Investments (million €)	34.5	39.7	47.9			
Training of sales network employees (hours)	22	25	20	To train partners/ agencies in Domestic lines on management issues (e.g. human resources management, financial, responsible operation) at least once annually.		




Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Social Section						
Society support programs (number)	170	118	130		We implemented or supported 130 society support programs, as well as in 100% of the islands we serve.	To implement 5 non-commercial society support activities annually (i.e. exclusively for public benefit) (by 2023).
Nationwide society support programs (number)	NR	NR	62		Approximately 500 customers participated in our society support programs and activities.	To implement society awareness activities on Corporate Responsibility and Sustainability issues (e.g. environmental issues, human rights).
Social contribution (€)	2,776,805	1,341,977	1,565,316	To support the activities of charitable organizations and NGOs.	We increased the total value of implemented or supported social support programs by 16.6%. 	To support the activities of charitable organizations and NGOs.
				To design and implement 1 program/activity to address local communities needs in the areas of sports, culture, education or health.		To design and implement 1 program/activity to address local communities needs in the areas of sports, culture, education or health.
Discount tickets (number)	139,703	51,851	57,040		We increased the total number of discount tickets offered by 10%.	
Value of discount tickets (€)	2,578,597	1,179,104	1,366,596			
Employee volunteers (number)	193	39	127	To implement at least 1 volunteer activity with the participation of our employees.	We tripled the number of employees participating in volunteer activities and increased twentyfold employee volunteering hours. 	To implement a volunteer program with at least 5% participating office employees (by 2023).
Visiting school and university students (number)	1,047	307	0			
Office security personnel trained on human rights policies and procedures (%)	18.2	25	22.2			To train security personnel (both of our Group and selected subcontractors) on human rights issues.

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Social Section						
Suppliers (number)	1,487	1,359	1,312		10% of supplier selection criteria is related to their responsible operation.	To develop a collaboration process with suppliers on Corporate Responsibility and Sustainability issues related to their own products or services (e.g. environmental protection, responsible use).
Local suppliers (%)	77.3	82.6	82.8			
Suppliers already signing to accept our Supplier Code of Conduct (%)	NR	63	66		We communicated our Supplier Code of Conduct to 100% of our suppliers, with 66% already signing its acceptance.	To develop an audit process for major suppliers on Corporate Responsibility and Sustainability issues (e.g. human rights, environmental protection) (by 2023).
Procurement expenditure to local suppliers (%)	77.2	85.6	87.3		We spent 87.3% of total procurement expenditure to local suppliers.	
Procurement expenditure to SME suppliers (up to 50 employees) (%)	15.4	20.8	18.6		We spent 18.6% of total procurement expenditure to small and medium-sized enterprises (up to 50 employees).	To develop a training process for SME suppliers by our employees on management issues (e.g. environmental issues).
						To develop a process for supporting local products on our vessels.
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 and Sustainability issues related to Employees by 7% (by 2023).	»	To improve our performance on Corporate Responsibility and Sustainability issues related to Employees by 7% (by 2023).
					31% of work was conducted remotely, while 10,903 online meetings were conducted.	

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Social Section						
Employees (number, offices + vessels)	283 + 1,496	284 + 1,427	291 + 1,397		We employ 100% of our employees with full time employment contracts.	
					No grievances regarding our marine employee living conditions were filed.	
Women in overall workforce (%)	14	14	13.8			
Women in Director positions (%)	5.4	4.9	4.9			
Greek employees in Director positions (%)	100	100	100		100% of employees in Director and Top Management 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			
Difference in average salary for male office Directors compared to female office Directors (%)	NR	+10.9	+3.1			
Blood units from voluntary blood donation programs (number)	99	26	44		We collected 169 blood units through our voluntary blood donation programs in the last three years.	
Training duration (hours)	5,921	11,064	10,188	To integrate issues related to responsible operation into other categories of in-house training courses.	We trained (at least once) 70.8% and 12% of our office and marine employees respectively. 	To train Management executives, Executive Directors and Board of Directors members on Corporate Responsibility and Sustainability issues.
Total cost of training programs (€)	40,700	78,300	127,855		We increased the number of training programs by 21%.	

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Social Section						
				To conduct a Corporate Responsibility and Sustainability e-learning course for 50 more marine employees.	○	To train 100 employees on non-discrimination (by 2023).
						To train 100 employees on human rights issues.
				To complete the update of our employees' job descriptions according to our new organizational structure.	✓	To include predefined and clearly announced criteria to dismiss office employees in our Labor Regulations or Regulation of Professional Conduct & Business Ethics (by 2023).
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.	To develop a briefing process of our employees on healthcare issues (e.g. smoking, nutrition, fitness, mental health).
Total employee losses (number)	0	3	2			
Work-related employee losses (number)	0	1	0			
Accidents (number)	10	30	33			
Accidents with absence >3 days (number)	8	28	33			
Injury rate (rate, offices / vessels)	0.36 ¹	0 / 1.49	0 / 1.5			To implement an Occupational Health and Safety Management System for office employees.

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Social Section						
Employees participating in performance appraisal (% , offices / vessels)	0 / 100	100 / 100	100 / 100	To include specific Corporate Responsibility and Sustainability objectives in the formal appraisal process for Employees, Managers and at least one Board of Directors member (by 2022).	Responsibility is 1 out of 6 appraisal criteria for all office employees. 	To include specific Corporate Responsibility and Sustainability objectives in the formal appraisal process for Employees and Managers.
					We covered 15.4% of permanent job openings in offices by internal candidates.	
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 and Sustainability issues related to Customers by 9% (by 2023).		To improve our performance on Corporate Responsibility and Sustainability issues related to Customers by 9% (by 2023).
Marine employees participating in internal drills on passenger safety procedures (%)	100	100	100	We conducted internal drills and trainings on passenger safety to 100% of marine employees.		
Passenger injuries onboard vessels (number)	NR	15	16			
Inspections from local authorities (number)	45	237	291	We were subject to 173 vessel inspections for protection measures against the pandemic, 52 for food hygiene and safety and 66 for Anti-Smoking Law's implementation, with no non-compliance incident.		
Items lost/found or damaged (number)	5,741	3,514	3,980			

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Social Section						
Incidents of non-compliance regarding responsible communication (number)	0	0	0	To apply a Responsible Marketing and Communication Code in our business activities.	We maintain 5 corporate websites, with over 2.3 million visitors annually and 2 mobile applications with over 7,600 downloads in 2021. 	To integrate Corporate Responsibility and Sustainability issues in existing communication practices.
				To systematically inform and train our customers on Corporate Responsibility and Sustainability issues.		To systematically inform and train our customers on Corporate Responsibility and Sustainability issues.
Recalls of products and services due to health and safety impacts (number)	0	0	0			
Complaints regarding customer privacy (number)	2	1	1			
Delays in routes (number)	NR	1,277	2,017	To achieve an 'as scheduled' routes rate in all destinations of over 75% (by 2023).	We kept 83% of our vessels' departure times and 61% of arrival times as scheduled. 	To achieve an 'as scheduled' routes rate in all destinations of over 75% (by 2023).
Formal response letters to comments, complaints and requests (number)	1,496	1,932	2,794			
Formal thank-you letters (number)	192	95	73			
Questionnaires in vessels (number)	1,200	534	2,829		The average score registered through service evaluation devices onboard our vessels reached 4.2 on a 5 point scale.	
SMS messages sent to customers (number)	272,814	461,530	387,424		We sent over 387,000 information SMS to our passengers.	
					We informed 97% of passengers deemed necessary (over 818,000 passengers) through information SMS for early arrival at port or changes or cancellations of scheduled journeys in Domestic and Adriatic Sea lines.	

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Social Section						
Notifications sent to serve passengers (number)	2,813	2,176	2,892		We sent overall 2,892 notifications to serve our passengers (1,375 concerning passengers with reduced mobility, 2 concerning passengers with sensitivity to allergens).	
						97.4% of our premises and vessels have access for people with disabilities.
Members in loyalty and reward program (number)	353,417	406,733	474,924		We increased our seasmiles Loyalty and Reward program members by 16.8%.	To implement initiatives to encourage passenger participation in our planned activities and other non-profit programs in local communities.
				To extend the infotainment platform @sea to Hellenic Seaways vessels.	▶	To include new services in our infotainment platform @sea.
						To install Seasmiles Kiosks on 2 Hellenic Seaways vessels.
Environmental Section						
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 and Sustainability issues related to Environment by 8% (by 2023).	○	To improve our performance on Corporate Responsibility and Sustainability issues related to Environment by 8% (by 2023).
Investments for programs directly or indirectly related to environmental protection (million €)	3.6	24.9	20.6		We conducted internal drills on environmental protection issues to 100% of marine employees.	To integrate environmental aspects as specifications in products or services design phase.
					We informed 100% of our employees on environmental protection issues.	
					We informed potentially over 1.2 million customers on Corporate Responsibility and Sustainability issues, such as environmental protection.	

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Environmental Section						
				To train 100% of corporate vehicle drivers on safe and economical driving.	○	To train 100% of corporate vehicle drivers on safe and economical driving (by 2023).
						To train 100% of office employees on environmental issues.
Energy consumption (GJ)	13,004,820	10,563,622	11,409,552			
				To upgrade our BMS system's software.	○	
Electricity consumption (KWh)	1,552,885	1,487,562	1,557,845		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 4%.	○	To reduce electricity consumption in offices per employee by 2%.
				To reduce electricity consumption per square meter in offices 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		We produced approximately 4,380 KWh electricity from renewable energy sources.	
Prevention of CO ₂ due to energy use from renewable energy sources (kgr)	2,935	2,729	2,640			
Total eCO ₂ emissions (tn)	1,005,100	816,932	881,923			
eCO ₂ emissions from vessel oil (tn)	1,004,036	815,963	880,934			
eCO ₂ emissions from electricity consumption in offices (tn)	1,040	927	939			
Average fuel consumption of corporate fleet vehicles (lt/100 km)	10.2	6.5	9			To reduce the average fuel consumption per mile of all vehicles used for our operations by 25% (by 2023).

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Environmental Section						
Air SOx emissions to atmosphere (tn)	6,971.7	1,106.9	917.8	To add scrubbers on 2 vessels.	✓	
Use of refrigerants (kgr)	3,624	2,735	2,200			
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)	119.8	68.5	110.1		We used 70% recycled paper for all purposes and 68% recycled toners/ink cartridges.	To reduce paper use per full-time equivalent (FTE) by 2%, compared to 2019.
					We increased use of recycled or certified paper for commercial use to 78%.	To reduce single-use plastics in our facilities and crew accommodation areas by 20%, compared to 2019 (by 2023).
Paper used for commercial purposes (tn)	98.8	51.6	94.4			
Consumption of cooking oils (lt)	69,400	53,985	89,610			
Materials from recycling activities, transported for recycling (tn)	82	75	98.1		We transported from Islands free-of-charge over 98 tonnes of materials for recycling.	
Solid waste (m³)	44,053	31,845	39,455 ²	To stop using PVC plastic in seasmiles card issuance and instead use biodegradable BIO-PVC material.	✓	To recycle 80% of recyclable packaging in all our vessels.
					We reduced the consumption of plastic bags in our offices by 18.7%.	
Solid waste indicator (m³ per million passengers)	6,300	9,000	8,900			
Water consumption (m³)	303,872	226,393	228,858	To reduce water consumption per employee in offices by 5%, compared to 2019.	✓	To reduce water consumption per passenger in vessels by 2%, compared to 2019 (by 2023).
						To increase water consumption from recycled water or seawater by 10% (by 2023).

Section	2019	2020	2021	Objectives 2021	Achievements 2021	Future Objectives
Environmental Section						
Marine pollution incidents (number)	0	0	0			
						To conduct 4 checks of noise levels on our vessels.
Liquid waste (m³)	6,005	6,068	8,721			
¹ Refers to both offices and vessels. ² Does not include 163.6 tn of batteries and solid oil residues. NR: Not Reported						

3. Tables – Reporting Frameworks

The correspondence between the content of this Report and various Sustainability-related Frameworks, Guidelines and Principles are presented in the following tables.

- Coverage of Global Compact Principles, ISO26000 Aspects, NASDAQ & ATHEX ESG Guidelines, TCFD Disclosures and GRI Disclosures (GRI Standards 2021) is characterized as Full (F), Partial (P) or Not Applicable (NA).
- Material Topics (both GRI related Topics and other Topics) and Disclosures for Material Topics are indicated on the GRI Content Index, based on the Materiality Analysis conducted, and are related to the organization's direct impact (i.e. actual and potential negative impacts caused or contributed by the organization through its own activities).

United Nations' Global Compact Table

Issue	Principle	Report Section	Coverage
Human Rights			
1.	Support and respect protection of internationally proclaimed human rights	5.3, 6.3	F
2.	Ensure not to be complicit in human rights abuses	5.3, 6.3	F
Labour Standards			
3.	Recognize freedom of association and right to collective bargaining	5.3, 6.3	F
4.	Eliminate all forms of forced and compulsory labour	5.3, 6.3	F
5.	Abolish effectively child labour	5.3, 6.3	F
6.	Eliminate discrimination in respect to employment and occupation	5.3, 6.3	F
Environment			
7.	Support a precautionary approach to environmental challenges	5.3, 8.1-8.4	F
8.	Promote greater environmental responsibility	8.1-8.4	F
9.	Encourage development and diffusion of environmentally friendly technologies	8.1	F
Corruption			
10.	Work against all forms of corruption, including extortion and bribery	4.1, 4.2, 5.3	F

TCFD - The Climate Related Financial Disclosures Table

Recommendations	Report Section	Coverage	Recommendations	Report Section	Coverage
Governance			Risk Management		
TCFD-G a.	4.1, 4.2, 8.1	P	TCFD-R a.	4.1, 8.1	F
TCFD-G b.	4.1, 4.2, 8.1	F	TCFD-R b.	4.1, 8.1	F
Strategy			TCFD-R c.	4.1, 8.1	F
TCFD-S a.	4.1, 8.1	P	Metrics and Targets		
TCFD-S b.	4.1, 8.1	P	TCFD-M a.	8.1-8.4	P
TCFD-S c.	4.1, 8.1	F	TCFD-M b.	8.1	F
			TCFD-M c.	8.1, 8.5	F

United Nations' Sustainable Development Goals Table

Goal	Principle	Report Section
1.	End poverty in all its forms everywhere	5.1, 5.2
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	5.2, 6.2, 7.1
4.	Ensure inclusive and quality education for all and promote lifelong learning	5.2, 6.4
5.	Achieve gender equality and empower all women and girls	6.3
6.	Ensure access to water and sanitation for all	8.3
7.	Ensure access to affordable, reliable, sustainable and modern energy for all	8.1
8.	Promote inclusive and sustainable economic growth, employment and decent work for all	5.1, 5.2, 6.1-6.3
9.	Build resilient infrastructure, promote sustainable industrialization and foster innovation	4.1, 7.3
10.	Reduce inequality within and among countries	6.3
11.	Make cities inclusive, safe, resilient and sustainable	-
12.	Ensure sustainable consumption and production patterns	8.2, 8.3
13.	Take urgent action to combat climate change and its impacts	8.1
14.	Conserve and sustainably use the oceans, seas and marine resources	C, 8.2-8.4
15.	Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss	8.4
16.	Promote just, peaceful and inclusive societies	5.2
17.	Revitalize the global partnership for sustainable development	4.2, 4.3

ISO26000 Table

Aspect	Report Section	Coverage
1. Scope	9.1	F
2. Definitions	9.4	F
3. Understanding Social Responsibility	4.1-4.3	F
4. Principles of Social Responsibility	4.2, 4.3	F
5. Recognizing Social Responsibility & Engaging Stakeholders	4.3	F
6. Guidance on Social Responsibility Core Subjects		
a. Organizational Governance	4.1	F
b. Human Rights	5.3, 6.3	F
c. Labor practices	5.3, 6.3	F
d. Environment	5.3, 8.1-8.4	F
e. Fair operating practices	4.1	F
f. Consumer issues	7.1-7.3	F
g. Community involvement and development	5.2	F
7. Guidance on Integrating SR throughout the Organization		
a. Enhancing Credibility	4, 5, 6, 7, 8	F
b. Communication	4.1-4.3, 5.2, 5.3, 6.1, 7.2	F

NASDAQ & Athens Stock Exchange ESG Guidelines Table

NASDAQ Aspect		ASE Aspect		Report Section	Coverage
Environment					
E1	GHG Emissions				
E1.1	Amount eCO ₂ (Scope 1)	C-E1	Scope 1 emissions Result 2021 <ul style="list-style-type: none">Direct emissions: 880,984 tn eCO₂Emissions intensity: 506.3 kgr/nautical mile travelled	8.1	F
E1.2	Amount eCO ₂ (Scope 2)	C-E2	Scope 2 emissions Result 2021 <ul style="list-style-type: none">Indirect emissions: 939 tn eCO₂Emissions intensity: 3.2 tn/office employee	8.1	F
E2	Emissions Intensity				
E2.1	GHG emissions intensity			8.1	F
E3	Energy Usage				
E3.1	Direct energy consumed	C-E3	Energy consumption and production Result 2021 <ul style="list-style-type: none">Energy consumption: 11,409,552 GJPercentage of electricity consumed: <0.1%Percentage of renewable energy consumed: <0.1%Energy produced: 4,380 KWhPercentage of renewable energy produced: 100%	8.1	F
E4	Energy Intensity			8.1	F
E5	Energy Mix			8.1	F
E6	Water Usage				
E6.1	Water consumed			8.3	F
E7	Environmental Operations				
E7.1	Formal Environmental Policy			4.2, 8.1	F
E7.2	Waste, water, energy, recycling policies			8.2, 8.3	P
E8	Climate Oversight / Board			4.1, 8.1	P
E9	Climate Oversight / Management			4.1, 8.1	P
		A-E2	Climate change risks and opportunities	4.1, 8.1	P
		A-E4	Effluent discharge Result 2021 <ul style="list-style-type: none">Effluent discharge containing polluting substances: 0	8.3	F
		A-E5	Biodiversity sensitive areas Result 2021 <ul style="list-style-type: none">Facilities in protected areas and/or areas of high biodiversity value: 0	8.4	F
		SS-E1	Emission strategy	8.1	P
		SS-E2	Air pollutant emissions Result 2021 <ul style="list-style-type: none">Air SOx emissions to atmosphere: 917.8 tn	8.1	P
Social					
S1	CEO Pay Ratio				
S1.1	CEO compensation to median FTE total compensation	A-S4	CEO pay ratio Result 2021 <ul style="list-style-type: none">Ratio of annual total compensation for the Chief Executive Officer to the median annual total compensation for all employees (excluding the Chief Executive Officer): 16:1	6.3	F
S1.2	Report in regulatory filings			6.3	F
S2	Gender Pay Ratio	A-S3	Gender pay gap Result 2021 <ul style="list-style-type: none">Ratio of median annual total compensation for male office employees to the median annual total compensation for female office employees: 2.1:1Ratio of median annual total compensation for male marine employees to the median annual total compensation for female marine employees: 1.8:1	6.3	F
S3	Employee Turnover	C-S4	Employee turnover Result 2021 <ul style="list-style-type: none">Turnover rate of office employees: 2.1% (all of which were resignations)Turnover rate of marine employees: 25.3% (out of which 3.2% redundancies and 22.1% resignations)	6.1	F
S3.1	Change for full-time employees			6.1	F
S3.2	Change for part-time employees			6.1	F

NASDAQ Aspect		ASE Aspect		Report Section	Coverage
Social					
S4	Gender Diversity				
S4.1	Men and women employees	C-S2	Female employees Result 2021 • Female employees: 13.8%	6.3	F
S4.2	Men and women employees in entry and mid-level positions			6.3	F
S4.3	Men and women employees in senior and executive-level positions	C-S3	Female employees in management positions Result 2021 • Female employees in Director positions (offices / vessels): 12.5% / 1.8% • Female employees in Top Management positions (offices / vessels): 0% / 0%	6.3	F
S5	Temporary Worker Ratio				
S5.1	Part-time employees			6.1	F
S5.2	Contractors and/or consultants			6.1	F
S6	Non-Discrimination			6.3	F
S7	Injury Rate			6.2	F
S9	Child & Forced Labor				
S9.1	Child and/or forced labor policy			6.3	F
S9.2	Coverage of policy for suppliers and vendors			5.3	F
S10	Human Rights				
S10.1	Human rights policy	C-S6	Human rights policy	4.2, 6.3	F
S10.2	Coverage of policy for suppliers and vendors			5.3	F
		C-S1	Stakeholder engagement	4.3	F
		C-S5	Employee training Result 2021 • Training per office employee: 29.2 hours • Training per office employee in Top Management positions: 24.2 hours • Training per office employee in Director positions: 40.2 hours • Training per office employee in Management positions: 60.7 hours • Training per marine employee: 1.2 hours • Training per marine employee in Top Management positions: 6.4 hours • Training per marine employee in Director positions: 6.6 hours • Training per marine employee in Management positions: 3.3 hours	6.4	P
		A-S2	Employee training expenditure Result 2021 • Cost of training programs: €127,855	6.4	F
		SS-S4	Labour law violations Result 2021 • Amount of monetary losses as a result of legal proceedings associated with labour law violations: €0	6.3	F
		SS-S8	Customer satisfaction	7.3	F
		SS-S9	Customer grievance mechanism	7.3	F
Governance					
G1	Board Diversity	C-G1	Board composition	4.1	F
G1.1	Women in BoD			4.1, 6.3	F
G1.2	Women in Committees			4.1	F
G2	Board Independence				
G2.1	Prohibition of CEO as BoD chair			4.1	F
G2.2	Independent BoD members			4.1	F
G3	Incentivized Pay			A, 4.1	F
		A-G4	Variable pay Result 2021 • Percentage of variable compensation in all management positions' overall compensation: 26% • Percentage of variable compensation in Executive Directors' overall compensation: 32%	6.3	F
G4	Collective Bargaining	C-S7	Collective bargaining agreements Result 2021 • Employees covered by individual agreements, based on industry collective agreements: 100%	6.3	F
G5	Supplier Code of Conduct	C-S8	Supplier assessment	5.3	F
G5.1	Code of Conduct for vendors or suppliers			5.3	F
G5.2	Suppliers formally certified compliance with Code of Conduct			5.3	F
G6	Ethics & Anti-Corruption	C-G5	Business ethics policy	4.1	F
G6.1	Ethics and/or Anti-Corruption policy			4.1	F
G6.2	Workforce formally certified compliance with policy			4.1	F
G7	Data Privacy	C-G6	Data security policy	7.1	F
G7.1	Data Privacy policy			7.1	F

NASDAQ Aspect		ASE Aspect		Report Section	Coverage
Governance					
G7.2	Steps to comply with GDPR			7.1	F
G8	ESG Reporting	A-G3	ESG targets	4.4, 5.4, 6.5, 7.4, 8.5	F
G8.1	Publication of sustainability report			-	F
G8.2	Sustainability data in regulatory filings			-	F (Annual Report)
G9	Disclosure Practices				
G9.2	Focus on specific UN SDGs			9.3	F
G9.3	Targets and progress report on UN SDGs			9.3	P
G10	External Assurance	A-G5	External assurance	9.5	F
		C-G2	Sustainability oversight	4.2	F
		C-G3	Materiality	4.3	F
		C-G4	Sustainability policy	4.2	F
		A-G1	Business model	3.2	P
		A-G2	Business ethics violations	4.1	F
Result 2021					
• Amount of monetary losses as a result of business ethics violations: €0					
		SS-G2	Critical risk management	4.1, 5.2, 6.2, 7.1, 8.1-8.4	F

GRI Content Index

Statement of use:	ATTICA HOLDINGS S.A. (Attica Group) has reported in accordance with the GRI Standards for the period 01/01/2021-31/12/2021.
GRI 1 used:	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s):	Not Applicable

GRI Standard	Report Section	Coverage
GRI 2: General Disclosures 2021		
The organization and its reporting practices		
2-1	3.2, 9.1	F
2-2	3.2, 9.1	F
2-3	9.1	F
2-4	5.1, 6.4, 9.1	F
2-5	4.2, 9.5	F
Activities and workers		
2-6	3.2, 5.1, 5.3	F
2-7	6.1	F
2-8	6.1	F
Governance		
2-9	4.1, 4.2	F
2-10	4.1	F
2-11	4.1	F
2-12	4.1, 4.2	F
2-13	4.2	F
2-14	4.2	F
2-15	4.1	F
2-16	4.1	F
2-17	4.1, 4.2	F
2-18	4.1	F
2-19	A, 4.1	F
2-20	4.1	F
2-21	6.3	F
Strategy, policies and practices		
2-22	1	F
2-23	4.1, 4.2, 5.3, 6.3, 7.1, 8.1	F

GRI Standard	Report Section	Coverage
2-24	4.1, 4.2, 5.3, 6.3, 6.4, 7.1, 8.1	F
2-25	4.1, 4.2, 5.2	F
2-26	4.1	F
2-27	4.1, 6.2, 6.3, 7.1, 8.1, 8.4	F
2-28	4.2	F
Stakeholder engagement		
2-29	4.3	F
2-30	6.3	F
GRI Topics		
GRI 3: Material Topics 2021		
3-1	4.3	F
3-2	4.3, 9.3	F
3-3	4.1-4.3, 5.1-5.3, 6.1-6.4, 7.1-7.3, 8.1-8.4	F
GRI 201: Economic Performance 2016		
201-1	5.1	F
201-2	4.1, 8.1	P
201-4	3.2, 5.1	F
GRI 202: Market Presence 2016		
202-1	6.3	P
202-2	6.1	F
GRI 203: Indirect Economic Impacts 2016		
203-1	5.2	P
203-2	5.2	F
GRI 204: Procurement Practices 2016		
204-1	5.3	F
GRI 205: Anti-corruption 2016		
205-1	4.1	F
205-2	4.1	P

GRI Standard	Report Section	Coverage
205-3	4.1	F
GRI 206: Anti-competitive Behavior 2016		
206-1	4.1	F
GRI 207: Tax 2019		
207-4	5.1	P
GRI 301: Materials 2016		
301-1	8.2	F
301-2	8.2	F
GRI 302: Energy 2016		
302-1	8.1	P
302-2	8.1	P
302-3	8.1	F
302-4	8.1	P
GRI 303: Water and Effluents 2018		
303-1	8.3	F
303-2	8.3	F
303-3	8.3	P
303-5	8.3	F
GRI 304: Biodiversity 2016		
304-1	8.4	F
304-2	8.4	P
304-3	5.2, C	P
304-4	8.4	F
GRI 305: Emissions 2016		
305-1	8.1	F
305-2	8.1	F
305-4	8.1	F
305-5	8.1	P
305-6	8.1	F
305-7	8.1	P
GRI 306: Waste 2020		
306-1	3.2, 8.2, 8.3	F
306-2	3.2, 8.2, 8.3	F
306-3	8.2, 8.3	P
306-4	8.2, 8.3	F
306-5	8.2, 8.3	P
GRI 308: Supplier Environmental Assessment 2016		
308-2	5.3	F
GRI 401: Employment 2016		
401-1	6.1	F
401-2	6.3	F
401-3	6.1	P
GRI 402: Labor/Management Relations 2016		
402-1	6.3	F
GRI 403: Occupational Health and Safety 2018		
403-1	6.2	F
403-2	6.2	F
403-3	6.2	F
403-4	6.2	F
403-5	6.2	F
403-6	B, 6.2, 6.3	F
403-7	5.3	F
403-8	6.2	F
403-9	6.2	P
GRI 404: Training and Education 2016		
404-1	6.4	F
404-2	6.4	P

GRI Standard	Report Section	Coverage
404-3	6.4	F
GRI 405: Diversity and Equal Opportunity 2016		
405-1	4.1, 6.1, 6.3	F
405-2	6.3	F
GRI 406: Non-discrimination 2016		
406-1	4.1, 6.3	F
GRI 407: Freedom of Association and Collective Bargaining 2016		
407-1	6.3	P
GRI 408: Child Labor 2016		
408-1	6.3	P
GRI 409: Forced or Compulsory Labor 2016		
409-1	6.3	P
GRI 410: Security Practices 2016		
410-1	5.2	P
GRI 411: Rights of Indigenous People 2016		
411-1	-	NA
GRI 413: Local Communities 2016		
413-2	4.1, 5.2	F
GRI 414: Supplier Social Assessment 2016		
414-2	5.3	F
GRI 415: Public Policy 2016		
415-1	4.1	F
GRI 416: Customer Health and Safety 2016		
416-1	7.1	P
416-2	4.1, 7.1	F
GRI 417: Marketing and Labelling 2016		
417-1	7.1, 7.2	P
417-2	4.1	F
417-3	4.1	F
GRI 418: Customer Privacy 2016		
418-1	4.1, 7.1	F
Other Topics (non GRI)		
GRI 3: Material Topics 2021		
3-1	4.3	F
3-2	4.3, 9.3	F
3-3	4.1-4.3, 5.2, 5.3, 6.1-6.4, 7.1-7.3, 8.1-8.4	F
Products and Services		
Customer awareness	7.1, 7.2, 8.1-8.4	F
Products and services quality	7.1, 7.3	F
Customer satisfaction	4.3, 7.3	F
Products and services affordability	7.3	F
Passenger property protection	7.1	F
Internet and data safety	7.1	F
Operations and Vessel Impacts		
Human rights	5.3, 6.3, 6.4	F
Business continuity	4.1	F
Information systems security	4.1	F
Investments	4.2, 8.1	F
Accident impact	5.2, 7.1	F
Passenger safety	7.1	F
Rippling	8.4	F
Responsible Buying		
Operational support	5.3	F
Responsible buying	5.3	F
Vessels' responsible buying	5.3, 8.1	F

GRI Standard	Report Section	Coverage
Environment		
Environmental investment	8.1	P
Environmental training and awareness	8.1	F
Sea pollution	8.3	F
Fuel spills and leakages	8.3	F
Material recycling	8.2	F
Acoustic impact	4.1, 8.1	F
Sea discharges	8.2, 8.3	F
Environmental grievances	4.1, 8.1	F

GRI Standard	Report Section	Coverage
Employees		
Work conditions	6.1-6.4	F
Labor practices	4.1, 6.1, 6.3	F
Internal communication	6.1	F
Society		
Donation and sponsoring	5.2	F
Social products and services	5.2	F
Corporate volunteering	5.2, 6.1	F
Business entrepreneurship	5.2	F
Community impact	4.1, 5.2	F
Community awareness	5.2	F

4. Glossary

Please pay attention to the following, frequently used terms:

Term	Refers to
'6.3' etc.	The Chapter and section of this Report (e.g. used in the GRI, Global Compact and Stakeholder Tables). For example, the term '6.3' makes reference to Chapter 6 (Employees), section 3 (Equality and Fairness).
'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.
'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 Responsibility and Sustainability Report 2021.
'Responsibility and Sustainability', '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.
Socially responsible investment funds', 'SRI funds'	The investment funds which incorporate environmental and social criteria, as well as corporate governance issues in investment decision making.
'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. Independent Limited Assurance Report



To the Board of Directors of ATTICA HOLDINGS S.A.

The Board of Directors of ATTICA HOLDINGS S.A. (hereinafter “the Company”) engaged “GRANT THORNTON S.A. CHARTERED ACCOUNTANTS MANAGEMENT CONSULTANTS” (hereinafter “Grant Thornton”) to review selected data included in the 2021 Responsibility and Sustainability Report of Attica Holdings S.A. for the fiscal year ended on December 31st, 2021 (hereinafter “the selected data”), in accordance with the Global Reporting Initiative (GRI) Standards (hereinafter “GRI-Standards”).

Scope

We performed our engagement in accordance with the provisions of “International Standard on Assurance Engagements 3000 (Revised) - Assurance Engagements other than Audits or Reviews of Historical Financial Information” (“ISAE 3000”), in order to provide limited assurance on the accuracy and completeness of qualitative data of the following KPIs, which relate to the Company’s material issues:

- | | |
|---|---|
| ✓ Overall 2023 Corporate Responsibility and Sustainability objective in CEO formal Performance Appraisal (number) | ✓ Formal letters sent in response to comments complaints and requests (number) |
| ✓ Corruption incidents (number) | ✓ Vessels departure time kept as scheduled (%) |
| ✓ External audits regarding the organization’s Management Systems (number) | ✓ Vessels arrival time kept as scheduled (%) |
| ✓ Employees trained on Anti-Corruption (%) | ✓ Delays in routes (number) |
| ✓ Office employees trained at least once (%) | ✓ Discount tickets value (euro) |
| ✓ Employee training programs expenditure (euro) | ✓ Social contribution (euro) |
| ✓ Difference between average salary for male and female office Directors (rate) | ✓ Nationwide society support programs (number) |
| ✓ Accidents with absence >3 days (number) | ✓ GHG emissions from vessel oil (Scope 1) (tn eCO ₂) |
| ✓ Injury rate (number) | ✓ Air SOx emissions to atmosphere (tn) |
| ✓ Procurement expenditure to local suppliers (%) | ✓ Scope 2 emissions (tn eCO ₂) |
| ✓ Procurement expenditure to SME suppliers (%) | ✓ Customer injuries on vessels (number) |
| ✓ Local suppliers (%) | ✓ Marine employees participating in internal drills on Health and Safety issues (%) |
| ✓ Percentage of suppliers formally committed to the developed Code of Conduct for Suppliers/Partners (%) | ✓ Incidents of marine pollution (number) |
| ✓ Lost/found or damaged items (number) | ✓ Water consumption (m ³) |
| ✓ Passengers who received information SMS regarding issues of concern (%) | ✓ Weight of cooking oils consumption (lt) |
| | ✓ Weight of solid waste produced (m ³) |

Management Responsibility

The Management of ATTICA HOLDINGS S.A. is responsible for the preparation, completeness, accuracy and presentation of the selected data provided to us, as incorporated in the 2021 Responsibility and Sustainability Report of the Company. Furthermore, the Management is responsible for maintaining records and adequate internal controls that are designed to support the reporting process.

Grant Thornton Responsibility

Our responsibility is to carry out a limited assurance engagement and to express our conclusions based on the procedures carried out for the selected data, as described in the “Scope” section. The procedures we carried out were designed to provide limited assurance, as specified by ISAE 3000, based on which we shaped the conclusion to our engagement. These procedures are not as extensive as those required for providing reasonable assurance; consequently, a lower level of assurance is obtained.

Our responsibility is limited to the information related to the fiscal year that ended on December 31, 2021, as these were included in the 2021 Responsibility and Sustainability Report of the Company. To the extent it is permitted by the legislation in force, we neither accept nor assume any responsibility for our engagement or this report towards anyone other than the Company, unless the terms have been agreed explicitly in writing, with our prior consent.

Limitations

- To conduct our work, we relied exclusively on the information provided to us by the Company's executives, which we accepted in good faith as being complete, accurate, real, and not misleading. Therefore, we did not submit it to any verification procedures, apart from the procedures explicitly stated in our Report and which arise from our mutually agreed methodology.
- Our engagement was limited to the Greek version of the 2021 Responsibility and Sustainability Report. Therefore, in the event of any inconsistency in translation between the Greek and English versions, as far as our conclusions are concerned, the Greek version of the Report shall prevail.
- No work has been conducted on data for previous reporting periods, as well as on data related to forecasts and targets.
- No work has been conducted on anything other than the agreed scope and consequently, our opinion is limited to that scope.

Work conducted

We conducted our work so as to collect all the data, relevant documentation, information and explanations we considered necessary as to the selected data described in the "Scope" section. The procedures followed with regard to the selected data included:

- Performed interviews with personnel of the Company responsible for managing, collecting and processing data in order to obtain an understanding of key structures, systems, policies and relevant procedures applied.
- Applied audit procedures, on a sample basis, in order to collect and review audit evidence.

Independence

Grant Thornton implements the requirements of International Standard on Quality Control 1. Based on this, it maintains an integrated quality control system that includes policies and procedures for compliance with moral principles, professional standards and relevant legal and regulatory requirements. We comply with the independence requirements and other ethical standards of the IFAC Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, impartiality, professional adequacy, confidentiality and professional conduct. In this context, the assurance team is independent from the Company and has not participated in the preparation of the Company's 2021 Responsibility and Sustainability Report.

Conclusion

As per the scope and the limitations of our engagement, as described above, we state that nothing has come to our attention that causes us to believe that the KPIs as described in "Scope" section and included in the Company's 2021 Responsibility and Sustainability Report are materially misstated.

Athens, 16/3/2022
The Chartered Accountant



Thanasis Xynas
CPA (GR) Reg. No.34081



Grant Thornton

Chartered Accountants Management Consultants
58, Katehaki Av., 115 25 Athens, Greece
Registry Number SOEL 127

6. Feedback Form

To which Stakeholder group do you belong?

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

Other

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

Chapter	Excellent	Good	Neutral	Mediocre	Bad
4. Management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Society	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Employees	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Customers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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"/>

Are there any topics, which are not covered (or not adequately covered) in this Report or do you have questions you would like to be answered in our next Report?

Are there any other comments/proposals you might have?

Personal Data *(optional)*

Name

Organization

Address

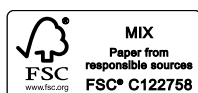
Tel

E-mail

Please fill out the form and send it to:

Attica Group, Corporate Responsibility Team
1-7 Lysikratous & Evripidou Street, 17674, Athens
e-mail: csr@attica-group.com

All information on this form will be used only for evaluating this Report, through statistical analysis. Personal data are protected, as defined by the respective law regarding private information.



This Report has been printed on Fedrigoni X-PER paper with certifications
Long Life ISO 9706, Acid Free, ECF, Heavy Metal Absence CE 94/62.

