

SUSTAINABILITY REPORT

MESSAGE FROM THE BOARD OF DIRECTORS ON SUSTAINABILITY REPORT

To the Shareholders,

We are pleased to present the Company's Sustainability Report in accordance with the Global Reporting Initiative ("GRI") Standards. This report covers the Company's performance on material issues that matter most to stakeholders in the year 2018 and communicates our material analysis on economic, environmental, social, sustainability governance and ethical issues that are relevant to stakeholders and may potentially impact the Company.

The Company's mission is to be the most respected shipping company in the world, providing the best services and solutions to facilitate International dry-bulk trade. We believe this can be achieved with an unwavering focus on the Company's stakeholders, namely customers, governments & other statutory/industry organisations, employees, shareholders, and society & the community, and serving their respective needs in a constructive manner. The Company has also included elements of Corporate Social Responsibility as its core values which are followed at all times on a day-to-day level by all in the Company.

The Sustainability Report summarises the Company's interactions with its stakeholders and reflects the Company's continuous search for ways to improve at all levels. We welcome comments, suggestions and views on this Report, and we assure you that each and every response is and will be taken very seriously and considered for appropriate action.

On behalf of the Board of Directors of Precious Shipping Public Company Limited, we would like to express our gratitude to all those who have contributed to the success of the Company.

**For and on behalf of the Board of Directors of
Precious Shipping Public Company Limited**



Mr. Khalid Moinuddin Hashim

Managing Director



Mr. Khushroo Kali Wadia

Executive Director

8 February 2019

Overview of Sustainability Report ^[102-50, 102-51, 102-52, 102-54]

The Company places the highest priority on delivery of long-term value and sustainable returns to its shareholders. The Report also includes information relating to the performance of the Company and its subsidiaries based in Thailand and elsewhere. The focus of the Report is on the main businesses which have a material impact on the achievement of the long-term sustainability. The Company acknowledges that its unique character, with its ships trading all over the world, majority of which are flying the Royal Thai flag, obliges it to act as the country's ambassador to the world, and the Company takes this responsibility very seriously.

This year, the Sustainability Report is the seventh report to be included in the Annual Report, to present the Company's performance in terms of economic, environmental, social and sustainable governance to create a balanced combination as a socially responsible company. Through this approach, the Company strives to create added value for stakeholders by complying with all applicable regulations and carrying out its business activities according to its vision and core values. In executing its business strategies and achieving its performance targets, the Company gives the highest regard to transparency, accountability, responsibility, independence and fairness.

Further information on the Company's Corporate Governance, risk management and mitigation strategies, all of which are part of the Company's sustainability measures, can be found in the relevant chapters under the **Board of Directors' Report, Corporate Governance Report, Internal Controls and Significant Risk Factors** sections of this Annual Report.

This Report has been prepared in accordance with the GRI Standards: Core option, the Company has updated our GRI content index references to reflect the transition from GRI G4 reporting to the GRI standards. No external assurance has been undertaken. This Report addresses activities and data that fall within the Company's financial year for the period from 1 January to 31 December 2018.

The scope of the Report ^[102-45, 103-1]

The data and information contained in this Report relates to Precious Shipping Public Company Limited and all its wholly-owned subsidiaries.

The boundary and limitations of the Report ^[102-48, 102-49, 103-1]

Data in this Report has been collected from the Company's operations as listed above and there are no changes with respect to the boundary as compared to our 2017 Report.

The process for defining the content of the Report ^[102-46, 102-54]

We have defined the content of the Report through research with key stakeholder groups in order to gain their feedback on requirements and preferences. Data is provided and reviewed by Senior Management prior to submission to the Managing Director for approval. The Final Report is approved by the Company's Board of Directors.

The Materiality Assessment ^[102-47]

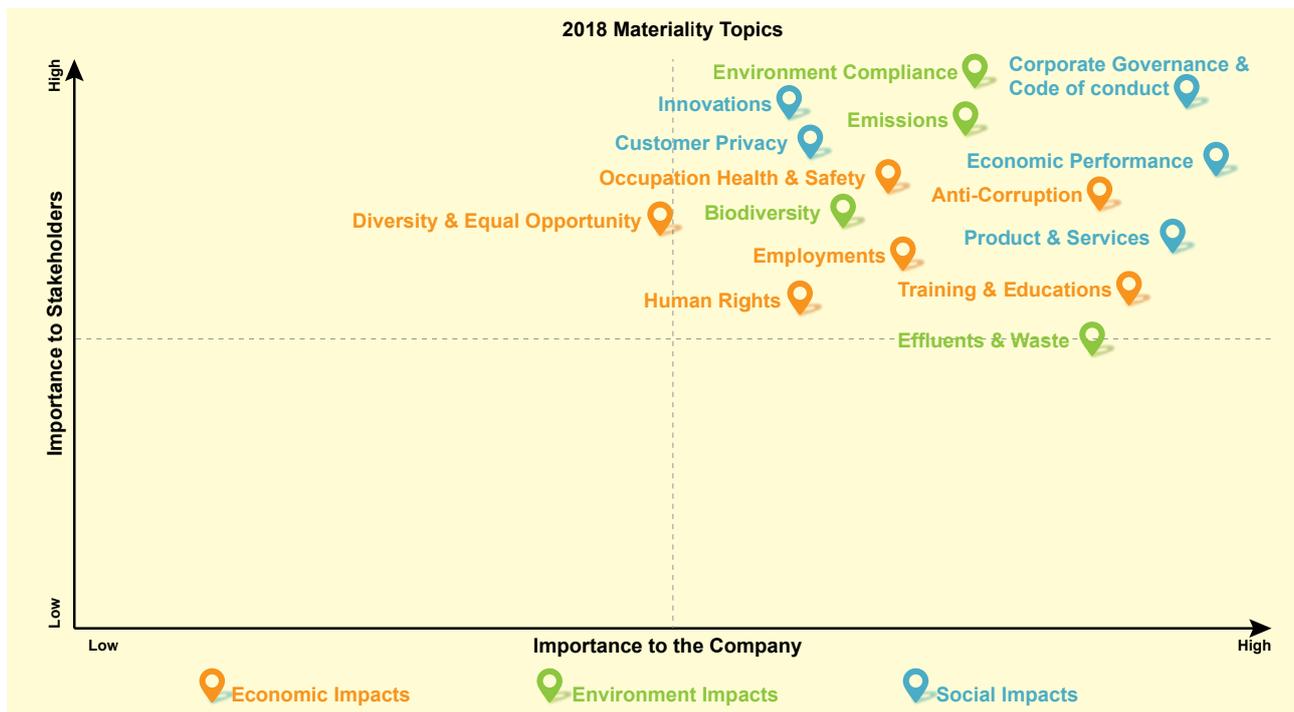
The content of this Sustainability Report is geared to highlight the Company's policies, achievements and challenges towards sustainability within the reporting period. The Company has ascertained this content by carrying out a Materiality assessment.

In alignment with the principles of the GRI Standards, the Company has used a four step process in determining its Materiality Assessment:

- 1) Identification of relevant topics: by evaluation of the boundaries (where the impact of each issue occurred), impact of each issue was determined both inside and outside the Company, and by business unit including taking GRI's indicators.
- 2) Prioritization of topics against stakeholder and Company influence and impact: by considering each topic, issues deemed significant to the organization and deemed significant to the stakeholders, and those issues and topics which reflected significant economic, environmental and social impact.

- 3) Validation of prioritization and identification through review and evaluation: this Materiality Assessment has been validated through internal representatives of the business units with assistance from Senior Management.
- 4) Review of context on annual basis: by incorporating in to this Report, stakeholder feedback from outside stakeholders received through multiple channels, such as Opportunity Day/Investor meetings, the Company website, Regulatory Authorities, and press coverage of the Company.

This materiality matrix below presents 15 topics for each sustainability-related category, which the Company focuses on. These 15 topics are the most material for this year's Sustainability Report. The Company recognizes the value of broadening its engagement with its stakeholders to improve its Materiality Assessment and increasing the relevance of information within its Report based on stakeholder priorities.



Stakeholder Engagements [102-40, 102-42, 102-43, 102-44]

The Company recognizes the importance of all stakeholder groups whether it is the internal stakeholders such as shareholders, employees and management of the Company and subsidiaries or external stakeholders such as creditors, suppliers, customers, communities, government agencies and other related organizations whom the Company has an ongoing relationship and impact as a result of its business operations. The Company engages its stakeholder groups in a variety of ways, with the frequency and communication mechanisms based on the most effective means of facilitating dialogue. The Company has also provided channels on its website for any stakeholder to express his/her opinion and contact the Board of Directors in case they wish to contact the Board of Directors directly, without going through the Management. The Board has, and will continue to treat such information seriously and with utmost confidentiality.

Currently, the Company categorises stakeholders into eight groups, which are presented below. All business units are responsible for creating and maintaining good relationships with these groups, communicating, taking their suggestions, and assessing their expectations.

Stakeholders	Expectations	Key Action and Engagements
Customers	<ul style="list-style-type: none"> Professional service with fair charter rate On time trouble-free delivery Commitment to agreements 	<ul style="list-style-type: none"> Develop services to respond to diverse needs Provide efficient, reliable and professional services and solutions to all our customers Provide substantive reply to any query promptly Follow terms of agreements
Shareholders	<ul style="list-style-type: none"> Share in profits by way of dividends Business growth and sustainability Fair and transparent operations Risk Management Equitable treatment Appropriate channels for monitoring the Company's performance and for giving feedback to the Company Easy accessibility to Management of the Company 	<ul style="list-style-type: none"> Creation, preservation and enhancement of long term value for our shareholders Disclosing timely, concise and relevant information Responsive to all inquires Frequent communications through company visit, road shows and meetings Direct channel of communication to Board/ Management open for every Shareholder Shareholder Meetings at least once a year, plus quarterly Opportunity Day Meetings (Video of AGM available on website) Regular newsletters from CEO Annual Report and other reports, such as Form 56-1, press releases, etc.
Employees	<ul style="list-style-type: none"> Appropriate compensation and welfare Career advancement and succession Competency enhancement Positive and good work environment Security and safety at work 	<ul style="list-style-type: none"> Respecting human rights and diversity Ensuring equal opportunity Ensuring a safe and healthy work environment Providing skill enhancement via sophisticated training Annual review of compensation, welfare and benefits structure to remain competitive with industry standards Open channels for accepting opinions and suggestions
Investors	<ul style="list-style-type: none"> Return on investment Business growth and sustainability Fair and transparent operations Risk Management Appropriate channels for monitoring the Company's performance Easy accessibility to Management of the Company 	<ul style="list-style-type: none"> Direct & Open channel of communication to Board/ Management Frequent meetings and conference calls/ Q&A sessions Regular disclosures through SET Presentation/Roadshows 19 times in 2018 Annual Report and other reports, such as Form 56-1, press releases, etc.
Community & Society	<ul style="list-style-type: none"> Improvement of quality of life Support of community activities Environment protection 	<ul style="list-style-type: none"> Support and get involved with community and society-based activities on a regular basis Arrange meetings with Merchant Marine Training Center for planning and progress of community development projects Put in place and implement appropriate measures to protect environment from the Company's operations
Regulators	<ul style="list-style-type: none"> Compliance with relevant laws, rules and regulations Good Corporate Governance and transparency Sufficient and timely information disclosure 	<ul style="list-style-type: none"> Follow guidelines in doing transactions with the State, code of conduct and participate in academic collaboration Periodic internal assessment of regulatory compliance Regular disclosures through SET Regular participation in meetings and activities of related agencies Annual Report and other reports, such as Form 56-1, press releases, etc. Complaint handling channels and remedial measures
Suppliers	<ul style="list-style-type: none"> Fairness and equal opportunity in procurement process Fair prices Reputation and credibility Honour payment terms 	<ul style="list-style-type: none"> Ensure that terms and conditions for suppliers are based on industry norms and practices Follow agreed terms and conditions On time payment Complaint handling channels on website
Creditors	<ul style="list-style-type: none"> Ability to repay debts and punctual payment Fair returns on loans and service fees Commitment to agreements Transparent information sharing 	<ul style="list-style-type: none"> Full compliance with all terms in borrowings including compliance with the objectives of using the borrowed funds, repayment, collateral, and other conditions as may be agreed Regular meetings for information exchange and to maintain good relationship Financial and annual operating reports Promptly respond to any queries

Corporate Governance, Ethics and Integrity ^[103-1]

The Company is committed to conducting business under Good Corporate Governance principles; doing business ethically and striving for the betterment of society and the environment. The Board of Directors has promoted corporate governance practices to help fulfill its responsibility to the shareholders. It is the duty of the Board of Directors to serve in a prudent fiduciary relationship with shareholders and to oversee the management of the Company's business. The Company has provided the governance structure of the Company, including committees under the subject of "**Management Structure**" of this Annual Report.

The Company has set up a Business Ethics and Code of Conduct Manual to commit to the key principles of integrity, ethical business conduct and accountability for Directors, Executives and staff as a guideline in carrying out their respective work for the Company in a transparent, honest, faithful and justifiable manner. These guidelines can be accessed through the Company's website.

Anti-Corruption ^[205-2]

The Company, since almost three decades of operations in the industry, has a reputation for having zero tolerance towards any form of corruption or unethical behavior. The senior management has always enforced this policy throughout the history of the Company, and recently, the Board of Directors has approved a new Self-Evaluation Tool for Countering Bribery and Anti-Corruption Policy.

These newly adopted policies, which are the embodiment of the age old stance of the Company, against any form of corruption or unethical behavior, have been communicated to every member of the Board of Directors and each of the Company's employees, each of whom are apprised of every facet of the same.

The Company extends the application of these policies beyond itself and applies the same to each individual/corporation/organization that the Company deals with. The Company has set up a channel to contact the Board of Directors directly for any business suggestions, complaints, or recommendations indicating impact or risks of impact on stakeholders arising from its business or from wrongful action, or violation of the Code of Conduct, illegal acts, etc. As such, the Company ensures that none of its affairs are conducted with/through any unethical individual/corporation/ organization.

Sustainable Management Performance

Economic Performance ^[103-1]

The Company's Senior Management had set up goals for 2018 with targets that were both realistic and aggressive as follows:

- Daily earnings per vessel to be higher than the corresponding industry average - Please refer to "**Market Segmentation/Benchmarking**" in the Board of Directors' Report, for the Company's performance in 2018 as against this target; and
- Daily Operating costs per vessel to be at least 15% lower than the industry average as published by Moore Stephens - Please refer to "**PSL OPEX comparison with Industry**" in the Management Discussion and Analysis, for the Company's performance in 2018 as against this target.

For 2019, the Company's Senior Management has set the same goals as for 2018.

The Company's operations contribute to national economies by generating economic benefits for different stakeholder groups. The related direct monetary flows indicate the extent of added value.

Direct Economic Value Generated and Distributed (Million USD) ^[201-1]

Description	2014	2015	2016	2017	2018
Direct Economic Value Generated:					
Vessel Operating Income	140.66	123.21	104.42	128.21	152.32
Revenue from financial investments	0.16	0.06	1.32	0.70	1.15
Revenues from sale of assets	0.83	0.00	0.00	0.94	0.00
Other income	1.69	0.36	1.77	0.30	0.11
Direct Economic Value Generated	143.34	123.63	107.51	130.15	153.58
Economic Value Distributed:					
Operating Costs (excluding crew costs)	43.54	43.61	30.23	24.04	28.79
Employee wages and benefits (including crew costs)	46.38	53.90	47.78	42.98	44.08
Payment to providers of loans	15.31	16.37	27.63	25.01	25.48
Dividend distribution	9.66	0.00	0.00	0.00	0.00
Tax payments to governments	0.27	0.21	0.09	0.08	0.09
Community Investments	0.04	0.06	0.06	0.04	0.04
Other payments	1.54	11.76	21.93	3.96	5.04
Economic Value Distributed	116.74	125.91	127.72	96.11	103.52
Economic Value Retained as under:	26.60	(2.28)	(20.21)	34.04	50.06
Depreciation, amortization and Impairment loss	39.01	67.17	54.88	34.63	36.64
Provisions	0.06	0.20	0.70	(0.22)	(0.11)
Transfer to (from) Reserves	(12.47)	(69.65)	(75.79)	(0.37)	13.53

For Financial Performance: see the **Financial Highlights** and **Management Discussions and Analysis** sections in this Annual Report.

Environment Performance ^[103-1]

The Company recognizes that irresponsible shipping operations will inevitably lead to catastrophic environmental impact, particularly in terms of air and/or water pollution. Therefore, the Company is firmly committed to the protection and conservation of the environment, and ranks environmental considerations equally with commercial and operational factors.

However, over years of operation the Company has realized that simply complying with regulations is not enough, but what is needed is to go above and beyond the mandatory regulations by developing internal emergency response plans and quality control systems, constantly searching for new technologies to employ to help reduce our environmental impact, and also a firm commitment to reducing CO₂ emissions and waste generation.

This Report outlines the most significant environment-related maritime regulations and the Company's compliance therewith; the Report also outlines the Company's internal emergency and quality control systems and CO₂ reduction efforts. This Report concludes with a statement of goals and objectives set by the Company for the coming year.

Environment Performance Highlights

1. Annual review meetings conducted every year are utilized as a platform to discuss and address issues related to review of the maritime regulations.
2. The Environment Protection Policy Statement, as below, has been made public in line with ISO 14001 requirement: It is the Company's policy to conduct its operations in an environmentally sustainable manner in order to protect the environment and Planet Earth for a better life for the present and future generations (please see details below in "**ISO 14001 Certification**").

3. For use of new technology and innovations, the Company signed contracts for and took delivery of new-build vessels with specifications exceeding those mandated by the regulations and which enhance the vessels' ability to protect and conserve the environment.
4. Environmental objectives and targets are set and assigned to all levels of employees in the Company, both ashore and afloat, with stipulated time frames and action plans. The Company recognizes that training and improving awareness at all levels is the key to achieving the environmental policy and seeks to accomplish these through in-house training described herein under.
5. The Company has carried out an environmental impact analysis for all key shipboard and company activities and it has been found that the Company's existing procedures can effectively reduce the environmental impact of any incident.
6. In-house training programs are conducted for all staff (serving at shore office as well as on vessels) on the Environment Management System ("EMS") policy, objectives that have been set, and for general awareness. These training programs are conducted at the Company's training center and through internal audit visits to vessels.
7. The Company uses best endeavors to influence and encourage all vendors associated with the Company to comply with environmental standards / good practices.

Compliance with Regulations & Conventions ^[103-1, 403-4]

In order to have the Company's ships sailing in international waters, the Company is legally required to be fully compliant with the regulations imposed by the International Maritime Organization (IMO) and other regulatory bodies.

Safety of Life at Sea (SOLAS), Maritime Regulations for Prevention of Pollution (MARPOL), Standards for Training Certification and Watchkeeping (STCW) & the Maritime Labour Convention (MLC) are the four pillars of the international maritime industries regulatory frame work.

Some of the other regulatory instruments are:

- International Convention for the Control and Management of Ships' Ballast Water and Sediments 2004. This Convention entered into force on 8 September 2017
- International Maritime Dangerous Goods code (IMDG)
- International Maritime Solid Bulk Cargoes code (IMSBC)
- International Convention on the Control of Harmful Anti-Fouling Systems 2001
- International Code for Ships Operating in Polar Waters (Polar Code)
- International Convention on Civil Liability for Bunker Oil Pollution Damage 2001
- Nairobi International Convention on the removal of Wrecks 2007 (the Wrecks Convention)
- National, Regional and Local regulations more stringent than the international requirements like US environment protection acts, European Union air pollution directives etcetera

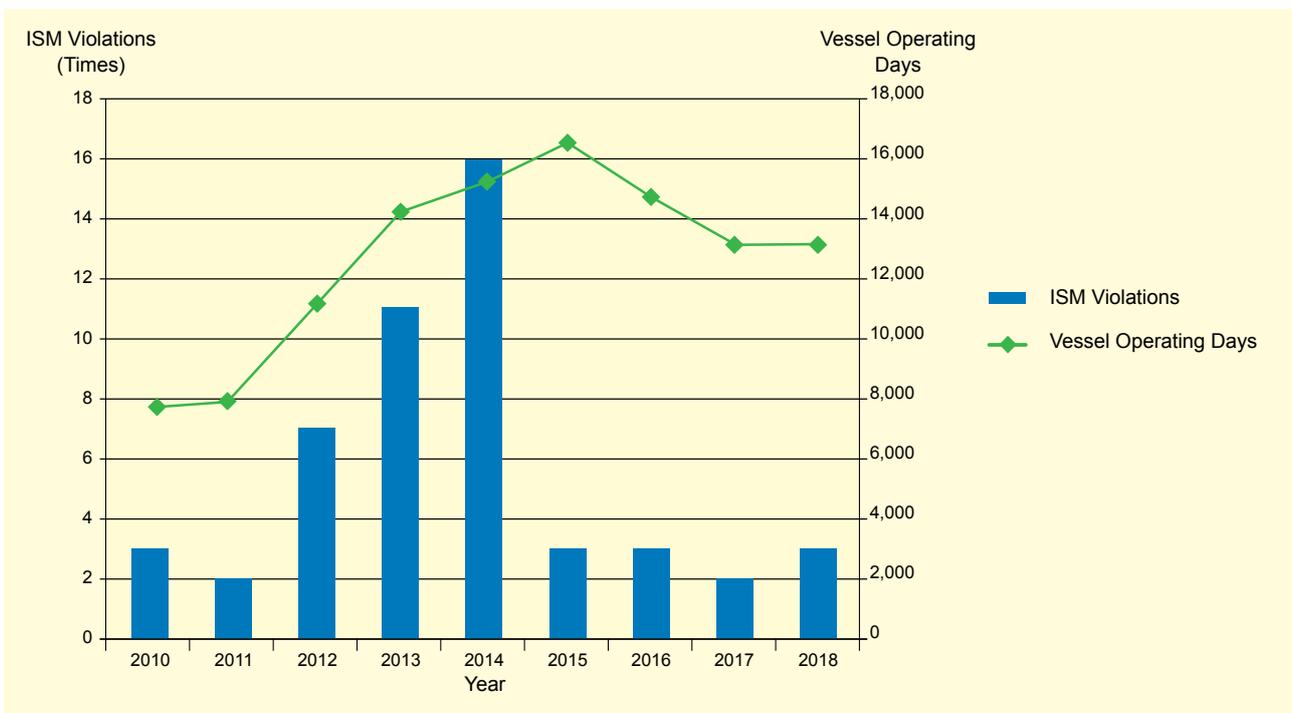
In addition to the above, the most significant regulations are outlined below, and the Company's efforts to remain compliant.

International Safety Management Code (ISM Code): Learning from various marine casualties over the years, "International Safety Management Code" (ISM Code) was introduced by the International Maritime Organization, to enhance the safe operation of ships and pollution prevention. The ISM Code became mandatory on 1 July 1998 for passenger ships including passenger high-speed crafts, oil tankers, chemical tankers, gas carriers, bulk carriers and cargo high-speed crafts of 500 gt and upwards, but the Company implemented this in 1995 itself after obtaining due certification.

The Code is implemented on board the vessels and offices ashore in order to provide an international standard for the following objectives:

1. Ensure safety at sea
2. Prevent human injury or loss of life
3. Avoid damage to the environment

Below is a graphical account of the Company's ISM Code violations viewed against Vessel Operating days from 2010-2018. For the purpose of this analysis, violations are considered as any incident that results in a fire, explosion, serious injury or death to crew members, collisions, groundings, etc., The Company has analysed each violation in detail to identify the root-cause and initiate appropriate corrective and preventive actions. The results are then conveyed to all senior employees as case-studies to avoid recurrence. In 2018, we had 3 instances which can be termed as ISM violations, over 13,140 vessel operating days for the fleet. Even though the Company did not meet its target of zero ISM violation in 2018, in terms of the number of violations per vessel operating day basis, 2018 has a low violation rate at 0.023%, as compared to the highest violation rate at 0.11% in 2014 which was still at a low level. Even though we have counted 3 ISM violations in the current year, at least one of them is being contested as not being due to any fault on the part of our vessel.



As per the ISM code requirements, annual internal audits are conducted on board by a dedicated team of qualified and experienced ship auditors reporting directly to the Managing Director. All incidents of non-compliances, accidents and near misses are thoroughly investigated and analyzed, after which procedures are reviewed immediately. Furthermore, all lessons learned from various accidents and near miss incidents are shared with organizations like Marine Accident Reporting Scheme (MARS) for the mutual benefit of the industry and to enhance maritime safety in general. The Nautical Institute, London, which publishes the MARS reports every month, has appreciated the Company's participation in MARS and for promotion and sharing "lessons to learn" incidents and case studies from its own fleet for the benefit of the industry. This is in compliance with the Company's highest ideals of quality management and social responsibility.

In addition to the above, the Company is undertaking following initiatives to limit ISM Code violations through preventative action:

- **Enhanced staff training:** An increasing trend in the industry is that Port State Control inspectors are getting more stringent in their enforcement of the ISM Code. As such the Company's ship staff are given regular checks on their ISM knowledge, sharing of experiences from across the fleet.
- **Enhanced maintenance of vessels:** The head office has stressed that all machinery checks and inspections be carried out with greater frequency, and any difference observed by ship staff are immediately reported. Also, the Company's management has stressed that internal auditors enforce the Code more stringently than external inspectors, to achieve a higher level of compliance and safety for the Company's ships, cargoes and crew.
- **Timely warnings and reminders to vessels:** Vessels entering North American and Australian waters often require additional certificates for compliance with local regulations. As a preventative measure, the head office gives instructions to the crew well in advance of the vessel's arrival in such waters to ensure that all documents are in order and the vessel is in full compliance with regulations at all times.
- In 2012, the Company became a member of INTERCARGO, the International Association of Dry Cargo Shipowners. Intercargo, quoting their own words, 'exists in order to link industry stakeholders in a commitment to a safe, efficient and environmentally friendly dry cargo maritime industry, and our vision is for a safe, efficient and environmentally friendly dry cargo maritime industry where its member's ships serve world trade - operating competitively, safely and profitably'. This perfectly fits in with the Company's philosophy and the Intercargo membership reflects Company's resolve towards sustainability.
- In 2012, the Company also became a member of RightShip, an independent ship-vetting organization formed by BHP Billiton, Rio Tinto and Cargill, three of the world's largest trans-national corporations and major users of sea transport services. RightShip's ship vetting model is known for its exacting and stringent standards, and focuses on ship safety (including crew and cargo) and marine environmental protection; and the Company's membership is yet another affirmation towards sustainability.

The Company has set an internal target of zero ISM Code violations resulting in injury or death, fire, collisions or groundings or any vessel detentions resulting from an ISM Code violation.

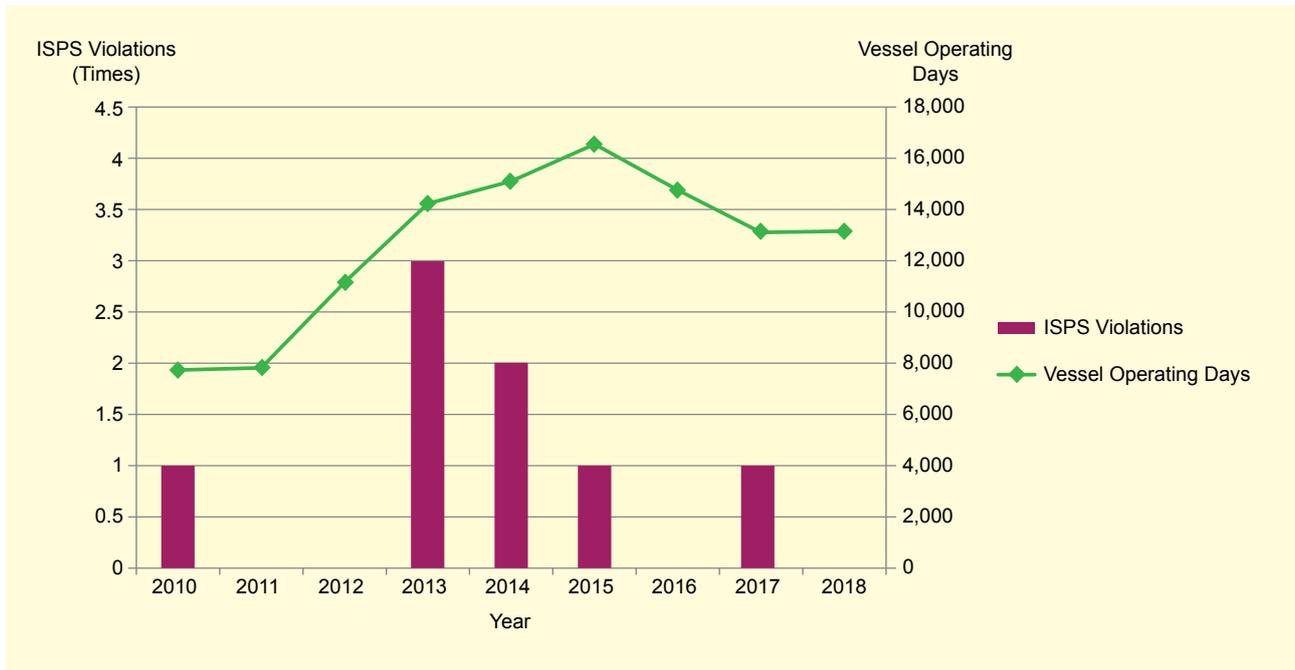
International Ship and Port Safety (ISPS) Code: In light of changing security circumstances across the globe, the International Ship and Port Safety Code was adopted in 2004. The code is an amendment to the Safety of Life At Sea (SOLAS) Convention that encompasses a greater level of security arrangements for ships and ports. The code assigns responsibilities to governments, shipping companies, shipboard personnel, and port/facility personnel to "detect security threats and take preventative measures against security incidents affecting ships or port facilities used in international trade" (ISPS Code Part A 1.2.1).

In implementing the ISPS Code the Company has developed standard operating procedures for vessels entering ports prone to drug smuggling and stowaways. This includes employing sniffer dogs and armed guards where appropriate. Furthermore, standard policies are employed whenever vessels call European, British, American, Australian or Canadian ports, and to date, the Company has had only 1 detention from an ISPS violation.

Annual internal reviews are conducted on preventative measures including the performance of the companies providing the sniffer dogs and guards. Like the ISM audits mentioned above, these are carried out by a dedicated team of qualified and experienced ship auditors reporting directly to the Managing Director. All incidents of non-compliance, accidents and near misses are thoroughly investigated and analyzed. In the event of any failures of the standard operating procedures, reviews are immediately conducted.

Below is a graph displaying the number of ISPS Code Violations (left-hand axis) against the number of Vessel Operating days (right-hand axis) from 2010-2018. As in the case of ISM, the Company sets a target of zero violations in respect of ISPS Code. There were no ISPS violations in 2011, 2012 and 2016 but the fleet witnessed 1 violation in 2017, when a stowaway was found to have secretly come onboard. Stowaways are

typically very poor and desperate to escape to a foreign country for a better life. Even though the stowaways are usually detected by ship-staff and taken off at the same port where they came onboard or at a nearby port, the Company counts them as ISPS violations for reporting purposes, in line with the Company's zero tolerance for such lapses. We are happy to report that there were no ISPS violations in 2018, and we will continue to take precautions and suitable risk management efforts to ensure zero ISPS violations in 2019 as well.

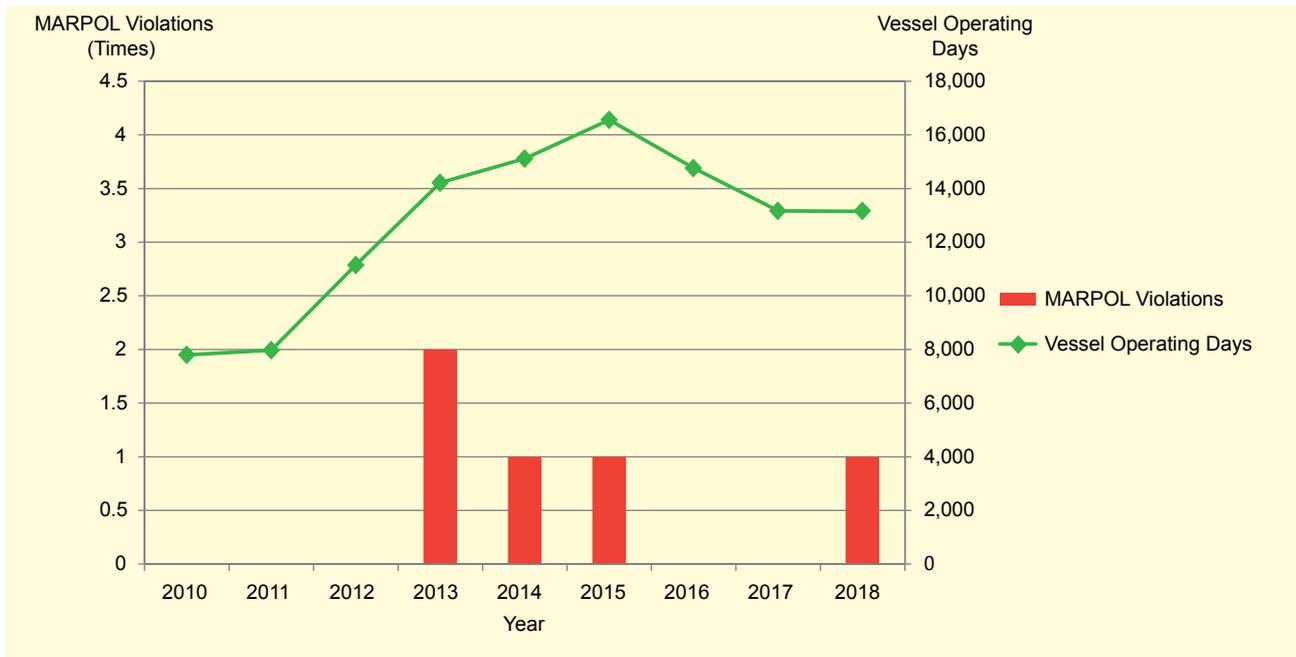


MARPOL: is one of the most important environmental regulations in the maritime industry and aims “to preserve the marine environment through the complete elimination of pollution by oil and other harmful substances and the minimization of accidental discharge of such substances.” This convention is divided into 6 distinct sub-areas (IMO, 2011):

1. Regulations for the Prevention of Pollution by Oil
2. Regulations for the Control of Pollution by Noxious liquid substances in bulk
3. Regulations for the Prevention of Pollution by harmful substances carried by sea in packed forms, or in freight containers, portable tanks or road and rail tank wagons
4. Regulations for the Prevention of Pollution by Sewage from ships
5. Regulations for the Prevention of Pollution by Garbage from ships
6. Regulations for the Prevention of Pollution by Air from ships

There is a company-wide acknowledgment that the risk posed to the marine environment from a marine incident is severe. The Company has adopted a great deal of preventative measures to limit this risk factor. The first is to limit human error, and the second is to maintain the vessel's machinery to the highest possible standard.

In order to limit human error the Company has developed an internal training program for all seagoing staff. This includes simulator exercises designed to improve navigational skills and awareness by putting officers through various weather, sea and port conditions. Furthermore, the Company also ensures that all engineers employed on ships with new modern engines have undergone engine model specific rigorous training program aimed at enhancing their ability to maintain engines and avoid any fuel or sludge discharge or any breakdowns.



The above graph demonstrates the number of MARPOL violations (left-hand axis) resulting in an insurance claim and Vessel Operating days (right-hand axis) from 2010-2018. For the purpose of the analysis, any incident counts as a violation if it results in an insurance claim. The Company witnessed one MARPOL violation in 2018 when the Company was penalized for an oil sheen noticed in the vicinity of one of our ships. This was unfortunate because there was no leak from our ship and our Master himself notified the agents; but local authorities found it convenient to pin it on us and since it was a difficult jurisdiction, we had to accept it. As always, the Company aims to have zero MARPOL violations in 2019.

Upcoming/Recently effective regulations: Following are some of the regulations coming into force within the immediate future or regulations which have become recently effective:

- IMDG Code and IMSBC Code require more stringent requirements to be met for carriage of certain dangerous cargo.
- International Code for Ships Operating in Polar Waters (Polar Code) requires vessels to have enhanced safety and pollution prevention measures while trading in the harsh and sensitive polar region.
- STCW 2010 (Manila amendments) - effective from 1 January 2017 - requires documentation for seafarers having undergone more stringent revised training requirements for competency and proficiency.
- MLC 2006 Amendment 2014 effective from 18 January 2017 - requires Certificate for financial security in respect of Seamen repatriation costs and other liabilities.
- China requires ships to use Low Sulphur Fuel Oil (LSFO) in certain coastal regions of China in a phased manner, updated as detailed below:
 - » Effective 1 January 2017, use of LSFO containing max 0.5% Sulphur became mandatory in the eleven core ports in three ECA regions. (i.e. Tianjin, Qinhuangdao, Tangshan, Huanghua, Shenzhen, Guangzhou, Zhuhai, Shanghai, Ningbo-Zhoushan, Suzhou and Nantong)
 - » Effective 1 January 2018, at-berth fuel switching requirement was extended to all ports in the three Chinese port regions, namely the Pearl River Delta (PRD), the Yangtze River Delta (YRD) and the Bohai Bay.
 - » Effective 1 January 2019, China's territorial waters (12 nautical miles from coast) will apply a 0.5% sulphur cap on all vessels.

- Effective 1 January 2019, all ships entering Taiwan waters are to consume fuel containing not more than 0.5% Sulphur
- New regulations applicable at European Union (EU) ports:
 - 1) With effect from 31 August 2017 all vessels calling EU ports should have an approved vessel specific CO2 Monitoring, Reporting & Verification Plan (RVM).
 - Plans are to be submitted to competent authority before 31 August 2017
 - Monitoring of ship's CO2 emissions is to be carried out from the year 2018
 - Measured reports are to be submitted for year 2018 by 30 April 2019
 - Document of Compliance is to be available on board by 30 June 2019

All PSL ships are adequately prepared to meet this requirement in a timely manner.

- 2) Amendments to MARPOL Annex VI that make the data collection system (DCS) for fuel oil consumption of ships mandatory were adopted at the 70th session of the Marine Environment Protection Committee (MEPC 70) held in October 2016, and will come into force from 1 March 2018 (IMO Resolution MEPC.278(70)). According to this regulation, for ships of 5,000 gross tonnage and above engaged in international voyage, the data collection is required from 2019 calendar year, with first reporting to be made by early 2020. Upon verification of the submitted data, the Flag Administration or the Recognised Organisation ("RO") will issue to the ships a Statement of Compliance related to fuel oil consumption. Finally, the Flag Administration will submit aggregate data to the IMO, which will maintain an anonymized IMO Ship Fuel Oil Consumption Database.

This new requirement is in similar line with the EU CO2 monitoring and reporting system above and will form a part of the existing Shipboard Energy Efficiency Management Plan (SEEMP – Part 2).

- 3) With effect from 31 December 2020, EU Regulation on Ship Recycling will be applicable to foreign ships in EU waters. Ships are to comply with Inventory of Hazardous material (IHM).
- 4) Maritime Cyber Security Management

In the 'Interim Guidelines for implementation of Maritime Cyber Risk' published by IMO, it has been agreed that, no later than the first annual verification of the company's Document of Compliance after 1 January 2021, the cyber risk management system should be incorporated into the Safety Management System. We have already started this process and included the relevant section in our revised Shipboard Operating Procedures.

Having successfully outlined and explained the significant maritime regulations that safe guard the environment and those that will soon play a significant role, the next section details the Company's internal environmental control system.

Protection and conservation of the environment:

ISO 14001 Certification: With an increasing demand for environmental conservation the Company has established an "Environment Protection Policy." In addition to minimum requirements based on international conventions and regulations, the Company implements an Environment Management System (EMS) complying with the ISO 14001 standards. ISO 14001:2015 provides a framework for a holistic, strategic approach to the Company's environmental policy, plans and actions, and demonstrates that the Company is an environmentally responsible organization. Upon completion of one year after initial certification, the Company has successfully completed annual audit verification conducted by Class NK, confirming compliance with the standards. The EMS supplements the Quality Management System, meeting ISO 9001 standard, and the International Safety Management (ISM) code. This integrated Management System is known as Safety Quality and Environment Management System (SQEMS). According to the SQEMS, the Technical Manager, who also heads the Management Company, is appointed as the "Management Representative" and is also the "Designated Person"

for the purpose of the ISM code. In general, dry bulk shipping companies do not go for this certification which is more or less the exclusive preserve of tanker companies where protection of the environment is the paramount issue.

Objectives of the EMS:

- Minimize pollution caused to the environment
- Comply with all national, international legislations and other regulations pertaining to pollution of the environment
- Establish procedures for the efficient use of natural resources
- Improve environmental awareness of all employees
- Ensure effective monitoring of the environmental performance of the Company is carried out
- Ensure continual improvement of environmental performance and pollution prevention

Through periodic review and continual improvement of our SQEMS, the Company hopes to elevate environmental performance over the coming years and make significant contribution to conservation of the environment and reducing the Company's carbon footprint. Another tangible effort being made by the Company to reduce the environmental impact of the business is the adoption of new environment friendly technology on new ships acquired.

The Company is the proud recipient of Port of Long Beach Green Environment Achievement Flag from the Port of Long Beach ('the green port'), California, USA, for our commitment to reducing air pollution in Southern California. Besides the citation, our fleet also gained an additional 25% off on dockage dues payable to the Port of Long Beach!

Use of New Technology and Innovations: The Company's commitment to protection and conservation of the environment and prevention of pollution is reflected in the newbuilding vessels that the Company ordered and took delivery from various shipyards in China as explained in this Annual Report. These vessels were built to comply with all regulations presently in force and also those which are known to be applicable in the foreseeable future. In addition, wherever practical, the vessel's specifications exceed those mandated by regulations, both for ease of operations as well as to enhance the vessels' ability to protect and conserve the environment.

Some of the "Green" features of these new ships are:

1. Double Hull construction is utilized (for 38,500 DWT bulkers) to minimize environmental pollution in case of accidental hull damage.
2. The vessels' hull form was perfected after several rounds of careful design analysis using the latest technology, with a view to arrive at the most optimal combination of ship-size & shape to achieve the desired speed at minimum fuel consumption. The fuel consumption of these vessels is far less than comparable sized older ships. Such low fuel consumption is achieved by combining a highly fuel efficient main engine with a new design of slow-speed, large diameter and high-efficiency propeller on an optimized hull form.
3. To reduce carbon footprint and increase thermal efficiency of these ships, the exhaust of auxiliary engines are routed through the composite boiler. This will improve waste-heat recovery and reduce the consumption of oil for the burner.
4. These new ships were fitted with onboard treatment plants for water ballast which will fully comply with IMO regulations enforced from September 2017. These treatment plants are designed to remove, render harmless and thereby prevent transfer of harmful bacteria and invasive species of micro-life through ballasting and de-ballasting operations between ports.
5. Engines fitted are in compliance with the required Nitrogen oxide (NOx) emission standards.
6. The 38,500 DWT ships have flush, box-type ship-sides for cargo holds. This reduces accumulation of cargo residues in the holds, thereby reducing the need for harmful cleaning chemicals for removal of the same, since the holds can be cleaned using water only.

7. Deep-well sump pumps for Main Engine oil circulating system - this reduces the overall quantity of lubricating oil required for the Main Engines, which in due course reduces the quantities of waste oil.
8. The vessels were fitted with large incinerators, well above the requirements of MEPC.76 (40) Standards, to burn waste and sludge. This ably supplements the Company's garbage and waste management system which is already in operation on all of the Company's vessels.
9. Larger capacity Bilge water/sludge storage tanks - these enable environmentally friendly waste disposal ashore by allowing more flexibility in selecting the best waste disposal facilities ashore separately for oily water and sludge.
10. Improved bio-based Sewage Treatment Plants are being installed on the ships.
11. Ships are in compliance with IMO's "Ship Recycling Convention": The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009, was adopted in May 2009. It is aimed at ensuring that ships, when being recycled after reaching the end of their operational lives, do not pose any unnecessary risk to human health and safety or to the environment. Presently the Convention is open for accession by States. It will enter into force 24 months after the date on which 15 States, representing 40% of world merchant shipping by gross tonnage, have either signed it without reservation as to ratification, acceptance or approval or have deposited instruments of ratification, acceptance, approval or accession with the Secretary General. Furthermore, the combined maximum annual ship recycling volume of those States must, during the preceding 10 years, constitute not less than 3 percent of their combined merchant shipping tonnage. Though the convention has not come into force, our new building contracts ensure compliance with this requirement. Vessels will be maintaining an inventory of Hazardous material in compliance with the convention recommendation, specifically by prohibiting/restricting the use of hazardous materials at the ship construction stage. If any hazardous materials are used in the construction, a continuous inventory of the same will be maintained, so that all the vessels are eligible to apply for an International Certificate of Inventory of Hazardous Material. Even though "HM" Class notation is not at all mandatory, the Company has obtained it for 7 ships in the fleet.

A few significant developments in respect of new ship-design and construction are outlined below. As far as practically possible, the Company will take these into consideration while acquiring new ships in the future.

Eco-friendly ships: Shipping is one of the cleanest and greenest industries among all international industries. It is also an environmentally friendly and fuel-efficient industry. It is estimated that shipping carries roughly 90% of world trade, and yet, according to the latest figures from IMO, it is responsible for just 2.7% of global carbon dioxide emissions. Nevertheless, the shipping industry continues to look for ways to reduce that figure still further.

Shipping industry has not yet solved all its green issues; rather it is far from it. Present endeavors of the industry and the IMO are two-fold:

- For existing vessels: Adoption of a number of established "good management practices" to conserve and economise fuel oil consumption.
- For new vessels: Use of improved hull designs and more fuel efficient engines and technology.

Ballast Water Treatment ^[304-2]: Ballast water, if discharged without treatment, could cause severe damage to the local ecosystem at the point of discharge. Presently, the Company's policy is to carry out mid ocean ballast water exchange, as a means to prevent the transfer of harmful aquatic organisms at the point of discharge. This already serves to mitigate, if not totally cut out, the damage to the indigenous biodiversity of the ports the Company's vessels visit. The Ballast Water Management Convention came into force on 8 September 2017. All new vessels keel laid from this date are required to be fitted with IMO approved ballast treatment plants. All existing vessels are required to retrofit such plants in a phased manner along with surveys associated with first renewal of IOPP (International Oil Pollution Prevention) certificate after 8 September 2019. The Company has already fitted the Ballast Water Treatment plants on 19 vessels in our fleet.

Carbon Footprint and Waste Generation ^[306-2]:

The most recognized and constant source of CO₂ comes from the burning of fuel oil onboard ships. In order to reduce CO₂ emission, the only alternative available is to reduce the fossil fuel burnt. But that seems impossible without sacrificing growth and development. The need therefore is to achieve higher efficiency while reducing the quantity of fuel oil burnt, and the Company has taken the following steps to achieve this:

- Improved voyage planning with reduced/minimized ballast passage
- Weather routing
- Speed Optimization
- Optimized ship handling by Trim, Ballast condition
- Hull Maintenance
- Use of improved Hull coatings which are able to maintain the hull free of marine growth fouling for the entire duration between two dry-dockings
- Improved cargo handling
- Good Engine Maintenance
- In addition to above, the Company is actively studying the possibility of retrofitting suitable fuel-saving devices on existing vessels to further reduce fuel consumption and thereby the carbon footprint

The Company consciously opted to acquire larger ships, of 54,000 - 64,000 DWT; these ships can carry almost twice the amount of cargo, i.e. 100% more, compared to smaller ships in the fleet. However, more importantly, the larger ships burn just about 40-45% more fuel than the smaller ships per day of sailing. On this basis, the fuel burnt per unit load of cargo reduces drastically; this is yet another example of the Company's efforts towards sustainability and to reduce the carbon footprint.

The Company additionally uses environmental compliance as one of the major criteria in the screening process of each of its numerous suppliers of spares etc.

The Company's aim is to endeavor to reduce the fuel and diesel oil consumption on a progressive basis every year. To accomplish this, the Company continuously looks at new technologies available in the market and examines their applicability for its type & size of ships. Ship builders the world-over are actively marketing their vessels as 'eco friendly' and describing them with speed and consumption figures that were previously never achieved. The Company seriously evaluates all new developments, but realized that the builders' claims are often sensationalised to grab attention and when technical parameters such as calorific value of fuel, design and scantling draft and 'sea margins' are taken into consideration, the so-called benefits simply do not exist or they are not cost-effective. In any event, the Company looks very closely at the machinery installed on all new acquisitions, whether new buildings or second hand vessels, and monitor their performance very carefully to arrive at optimum speed and consumption variables, while ensuring that emissions are kept to a minimum.

Another source of harmful substances generated by our ship's consumption of fuel and diesel oil is sludge. Sludge is a product of 'on board' fuel oil purification and as an alternative to incinerating sludge and releasing even more harmful gasses into the environment, the Company has made a substantial effort to dispose of such material to shore based reception facilities. This is a much more expensive way for dealing with this issue but the Company is committed to reducing its carbon footprint and reflects the Company's efforts towards environmental conservation. Waste oil or sludge generated on each ship is about 1% of all fuel burnt. Empirical research suggests that every ton of oil burnt generates approximately 3 tons of CO₂.

In 2018, the Company vessels disposed 1,679 tons of sludge ashore. This accounts for approximately 5,037 tons less CO₂ emitted into the atmosphere had the sludge been incinerated on board. By delivering sludge to a suitable reception facility, this waste can be recycled to make products like grease which is a lubricant widely used in multiple industries.

The latest concern on environmental front is that of the impact of Sulphur oxides (Sox), due to the Sulphur content which is present in the Marine grade fuels used commonly on the ships. Certain sensitive sea areas

termed as Sox Emission Controlled Area (SECA) have already imposed restrictions on the maximum Sulphur content in the fuels to be used in such areas. In the third phase expected to come into force from January 2020, IMO is bringing about a global cap of maximum 0.5% sulphur content for marine fuels. The Company has already made suitable changes to the engines and related equipment to burn very low Sulphur fuels. The Company is also making suitable modifications in the fuel oil tanks' layout of the vessels to prepare for bunkering of various grades of low Sulphur fuels without mixing. A detailed plan, which is due to be approved by an RO, is also being made for each vessel, to ensure that during the last quarter of 2019, all remaining stocks of high Sulphur fuels are consumed. This will ensure that by 1st January 2020, all vessels in the company will have only low Sulphur fuel oil on board.

Conclusion and Environmental Objectives and Goals

Having explained all facets of the Company's efforts to protect the environment this section concludes with a summary of all objectives put forward and how each will be monitored. Compliance with the ISM, ISPS and MARPOL codes will be monitored by the Company's internal audit team, and all initiatives subsequently employed to minimize violations will be subject to half-yearly reviews by the Company's senior management and technical team. As previously stated the target set by the Company's management is to have zero violations in 2018. Additionally, the Company will also strive to maintain our SQEMS ISO certification. The Company will constantly look for ways to improve the SQEMS and look to incorporate all new regulations into the initiative even before they become effective. Likewise, the Company will also constantly be on the lookout for newer technology that can be employed on its ships to reduce its environmental impact.

Company recognizes that the most significant environmental impact for the company is the emission of CO₂ from burning fossil fuel in the ships engine. Hence the Company has set a highly ambitious target of a 3-5 percent reduction for fuel and diesel oil consumption for the year 2018. During the year 2017, the Company saw significant reduction in fuel consumption close to the set target.

Company has now fully implemented the use of IMO voluntary guidelines to determine the Ship Energy Efficiency Operational Indicator (EEOI). As the amount of CO₂ emitted from a ship is directly related to the consumption of bunker fuel oil, the EEOI can also provide useful information on a ship's performance with regard to fuel efficiency.

The Guidelines present the concept of an indicator for the energy efficiency of a ship in operation, as an expression of efficiency expressed in the form of CO₂ emitted per unit of transport work, or in other words: Tonnes of CO₂ emitted per ton cargo carried per nautical mile.

EEOI data is available for all company vessels starting from year 2014. Hence in future years this will be a very useful tool to assess the energy efficiency of our ships.

We are happy to report that the Company's Annual Report this year is printed on recycled paper, our token contribution to the conservation of the natural environment and in line with our stated desire to reduce our carbon footprint.

Social Performance ^[103-1]

The Company treats Corporate Social Responsibility (CSR) as one of its highest priorities and has built it into the Company's Mission Statement and Core Values. The Company allocates an amount of 0.50% of net profit every year to CSR Reserve which is subject to a minimum of Baht 1.75 million and a maximum of Baht 25 million per year. The actual utilisation out of this Reserve is decided by the Company's senior management and/or the Board of Directors, and is periodically, or at least once a year, reviewed by the Board of Directors.

Customer Relationship Management

The Company recognises that it is in the sea transportation industry and its success depends on adding value to customers by way of transporting goods from place of production to the place of consumption. As part of its commitment to add value to its Customers, the Company is committed to provide substantive reply to any

query from a Customer promptly, but in any event within 24 hours including weekends and national/international holidays. Further, whilst operating within the scope of the agreed contract, the Company tries to provide solutions to any situation/problem the Customer may face, even if any of its vessels are not involved at that moment. The Company is happy to report that its service is well appreciated and many first-class charterers prefer to do business with the Company over others in the market.

New computer-based Management Information System: As reported in the previous years, the new Computer Program implemented by the Company covers all the operations in the Head Office and also links all the vessels in the fleet. This software gives real-time information on vessel operations, costs, etc. and keeps the Head Office in close contact with the Master of each and every vessel; and assists in effective decision making on all issues. This System has enhanced the Company's ability to better serve its Customers, and to provide support to its employees serving onboard the ships. This system is now being upgraded to include additional data collection for new reporting requirements and monitoring of vessels' performance through increased digitalization.

Customer Privacy ^[418-1]

For customer privacy, the Company insists on protecting customer's confidential information from loss, theft, misuse, unauthorized disclosure, modification, and unauthorized destruction. The Company handles complaints through phone lines, emails and letters to/from customers. The Company always prioritizes the principles of transparency and responsibility in providing services to its customers in order to meet the commitment to provide the best service for its customers, provide a rapid response to various requests and customer complaints as part of a service commitment and maintain the confidentiality of its customers. Therefore, during the reporting period, there have been no complaints whatsoever regarding the mentioned issues and no financial penalties or other sanctions associated with the violation of the confidentiality of customers' data.

Employee

The Company has committed to be a fair and caring employer offering its staff equitable opportunities to develop and grow.

In line with its commitment to high ethical standards and good corporate governance practices, the Company has in place a group-wide whistle-blowing policy and encourages all employees to report any possible improprieties on a confidential basis without fear of recrimination. The employees may also provide feedback via email or mail.

Employee Recruitment

The Company recognizes that employees are one more key success factor for the Company's operations. The Company provides equal opportunities in employment, job security, and career advancement, as well as adhering to other good principles related to employees and employment. The Company also ensures that employees are adequately knowledgeable and skilled to perform their jobs for the Company's business, and understand the relevant code of conduct and practice and are encouraged to gain knowledge and ability and keep them updated following Industry trends.

Directors' Orientation: The Company Secretary provides any newly appointed director with the background of the Company's business, profile and industry along with all the relevant documents for new Directors, such as Director's handbook, the Company's corporate documents, CG Policy Manual, Business Ethics and Code of Conduct Manual, laws, regulations and practices which are related to the trading of Company's shares.

Employee Development

The Company provides in-house and external training for officers of the Company both at Head Office as well as on the vessels. The costs of such training are borne by the Company. Moreover, the Company allows special leave and flexible working hours for employees who are undergoing longer term professional or degree courses. Moreover, the Company supports good relationship between all employees including the Management.

Directors and Management Training: The Board of Directors continues to try and enhance their value by participation in activities, courses and events which add to their knowledge base in the continually changing business environment to ensure that they are updated and possess full knowledge. All the Company's Directors have attended important training courses that are available such as the Director Certification Program (DCP) or the Director Accreditation Program (DAP) held by the Thai Institute of Directors Association (IOD).

Employees Benefits

The Company provides remuneration to office employees as salary, bonus, and other benefits like Provident Fund on a voluntary basis, although the same is not required by law. The Company ensures that it meets all labour protection law requirements in terms of leaves, holidays, working hours, severance pay etc.

The Company encourages its employees to save for their retirement, and therefore, commencing from 2017, the maximum allowable contribution to the Provident Fund from the employees has been increased from 5% to 15%. The Company also arranges an annual internal training on investment planning, saving and financial management held by an asset management company in order to promote long-term savings and to assist the employees in their investment planning.

Remuneration is based on their performance, roles and duties and incentives/increments/ bonuses are also based on financial status/performance and future plans of the Company. As a long-term incentive, the Company does not have an ESOP plan in place since the Company feels that to a large extent, the share price of the Company depends on a number of factors beyond the employees' direct control like the state of the International Freight Markets and therefore, the Company's share price may not adequately reflect the better performance of the employees. Therefore, the Company has implemented a profit sharing scheme, which ensures that the employees are paid bonus annually based on the performance of the Company against specified quantitative targets, which are laid down annually in advance.

Below table shows information about the employees of the Company including its subsidiary, i.e., Great Circle Shipping Agency Limited ("GCSA") (as of 31 December 2018).

Performance Data	2014	2015	2016	2017	2018
Social Performance					
Employee Information					
Number of Employees* (persons)	130	131	132	135	132
Number of Employees by Gender (persons)					
• Male	57	54	55	61	59
• Female	73	77	77	74	73
Proportion of Employees by Level (%)					
• Senior Management	11.6	9.9	9.1	9.6	10.6
• Middle Management	26.1	27.5	27.3	29.6	29.5
• Operations	62.3	62.6	63.6	60.8	59.9
Proportion of Employees by Gender (%)					
• Male	43.8	41.2	41.7	45.1	44.7
• Female	56.2	58.8	58.3	54.9	55.3
Proportion of Employees by types of employment (%)					
• Full time	100	100	100	100	100
• Part time	-	-	-	-	-
Proportion of Employees by Age groups (%)					
• Under 30 years old	8.5	8.4	9.1	7.4	5.3
• 30-50 years old	67.7	67.2	65.9	65.9	69.7
• Over 50 years old	23.8	24.4	25	26.7	25

Performance Data	2014	2015	2016	2017	2018
Proportion of Absence by Type (%) ^[403-1]					
• Sickness	1.1	1.1	1	1.1	1.4
• Work-Related Injuries	0	0	0	0	0
• Others	-	-	-	-	-
Return to Work after Parental Leave of Female Employees** ^[401-3]					
• Number of Employees that were Entitled to Parental Leave	73	80	77	74	73
• Number of Employees that Took Parental Leave	3	4	2	-	1
• Number of Employees who Returned to Work after Parental Leave Ended	3	4	2	-	1
• Number of Employees who Returned to Work after Parental Leave Ended who were still Employed Twelve Months after Their Return to Work	3	4	1	-	1
Proportion of Management by Age Group (%)					
• Under 30 years old	-	-	-	-	-
• 30-50 years old	53.1	51	52.1	58.5	62.3
• Over 50 years old	46.9	49	47.9	41.5	37.7

Note : * Includes employees in a subsidiary company at the office.

** Only female employees are entitled to parental leave by Thai law.

Number and proportion of the employees of the Company including GCSA at the ashore offices, by gender and nationality* (as of 31 December 2018)

Occupational levels ^[405-1]	Male			Female			Total
	Thai	Indian	Singaporean	Thai	Indian	Singaporean	
Senior Management							
• Under 30 years old	-	-	-	-	-	-	-
• 30-50 years old	-	1	-	3	-	-	4
• Over 50 years old	-	9	1	-	-	-	10
Middle Management							
• Under 30 years old	-	-	-	-	-	-	-
• 30-50 years old	21	5	-	3	-	-	29
• Over 50 years old	2	8	-	-	-	-	10
Other Staff							
• Under 30 years old	3	-	-	4	-	-	7
• 30-50 years old	5	1	-	53	-	-	59
• Over 50 years old	3	-	-	10	-	-	13
Total permanent	34	24	1	73	-	-	132
• Temporary/contract	-	-	-	-	-	-	-
2018 Grand total	34	24	1	73	-	-	132
Percentage (%)	25.76	18.18	0.76	55.30	-	-	100

Note : * Includes Employees in a subsidiary company based at the Company's office

Safety & Occupational Health^[403-5]: The Company recognizes that respect for human rights is the foundation of Human Resources' improvement, which adds value to the business. Moreover, Human Resource is a key success factor for business and adds value to the Company in all aspects. It is the Company's policy to conduct its activities in a manner that promotes the health and safety of its employees so that the actions of the Company, and its employees, promote the health and safety of others too. The Company considers health and safety to poise equally with commercial and operational factors and is considered a management responsibility. To this end, the health and safety responsibilities of all personnel have been defined and allocated. The Company's

Safety Management System (SMS) is intended to affirm that the Company achieves its purpose in this area and is based on the philosophy that accidents can be prevented by the identification and management of risk.

The Company also has a Drug and Alcohol Abuse Policy. It is based on the recommendations contained in OCIMF's "Guidelines for the Control of Drugs and Alcohol On board Ship". They are detailed in the Safety Management System available on all vessels and displayed for all crew members.

Ensuring that each crew member gets enough rest is a necessity. In order to avoid fatigue and stress related accidents on board, minimum rest periods have been recommended by STCW 95 convention and ILO Convention 180. Both these conventions have undergone considerable amendments. As a result, the requirements have become more stringent. STCW 2010 Manila amendments are effective from January 2012 whereas ILO 2006, which is known as MLC (Maritime Labor Convention) 2006, has been ratified in August 2012 and has become effective in August 2013. Thailand has ratified the Maritime Labour Convention recently on 7 June 2016. It entered into force from 7 June 2017. Singapore had already ratified the MLC earlier. All the Company's vessels are fully compliant with the MLC requirements.

The Company's medical fitness requirements are higher than the standards set by International Labour Organization (ILO) and other regulatory bodies. As a result, the Company finds very few cases of fitness or sickness related problems amongst its seafarers.

Piracy: As outlined in the **Board of Directors' Report**, the Company's ships are exposed to the threat of piracy when sailing through high risk areas, and the officers/crew sailing onboard are under tremendous pressure when sailing through such areas where armed pirates are known to attack. This is especially true of the Indian Ocean / Arabian Sea area, extending from the mouth of the Persian Gulf in the north to Madagascar in the south. The Company takes this threat very seriously and ensures all ships are routed outside these areas and closer to the Indian coast. Where this is not possible for any reason, the Company engages security guards to sail with the vessel for the passage through these high risk areas. In any case, all ships transiting through the high risk areas are 'hardened', amongst other things, by rigging barbed razor wire around the ship thereby making it harder for the pirates to climb onboard the Company's ships. The Company is committed to doing everything possible to ensure safety of the ship and officers/crew.

Teamwork: Unlike a conventional ship owning Company, which outsources the technical management of its ships, the Company's Management Company, viz. Great Circle Shipping Agency Limited (GCSHIP) is a wholly owned subsidiary of the Company. The staff of the Management Company work as one team under the same roof. Regular weekly meetings are also conducted between the management and commercial teams to sort out all operational issues and discuss the status of future plans. Good co-ordination is achieved in all areas of ship operation by this arrangement. Besides ISM code certification, GCSHIP is also certified for Quality Management System "ISO 9001: 2015", and has obtained certification for their Environment Management System "ISO 14001:2015".

Training & Development: Over the years, the Company has not only acquired expertise in the field of ship management, but in the process, has developed a pool of highly qualified and competent staff, both, on-board and ashore. It is through this dedicated and loyal work force of floating staff, technical superintendents, and internal auditors that the Company has been able to achieve high standards of Safety and Quality in all aspects of ship operations. It is the Company's policy to encourage and support competent and efficient seafarers and give them the opportunity to grow within the Organization.

All officers are required to visit the head office for briefing before being assigned to vessels. Here, they are briefed and updated about new developments and practices in the industry. Regular updates are also sent to the vessels. Officers are often sent to attend value addition courses in order to enhance their skills. The costs for these courses are borne by the Company.

The Company is introducing a mechanism whereby the officers and crew serving onboard our ships can send in their complaints and/or suggestions to the office. This will encourage the ship-staff to make effective contribution to the shipboard operations, and help further improve the Company's performance.

The Company has provided, on board the vessels, selected video training programs from the best available in the market.

In order to motivate the junior officers and also keep up with the process of learning while on board, senior officers are asked to actively interact with them. In order to measure their levels of competency, computer based competency test facility is provided on board. Based on the results of these tests, officers are able to determine their weaknesses and work to improve upon on weak areas.

Maritime Training Center & Bridge Navigation Simulator: The Company has set up a full-fledged Maritime Training Center at its Head Office in Bangkok which includes a state-of-the-art Bridge Navigation Simulator. The PSL Training Center, which commenced operations in March 2008, has given a solid foundation to the Company's training activities and has enabled its Officers and Crew to keep abreast of the latest developments in ship operations. The Bridge Navigation Simulator recreates the actual bridge on a ship as it enters a major port and provides ideal conditions in which to train officers and crew in ship-handling and navigation. The Training Center has developed and continuously improves all training courses, including English courses for marine engineers, navigating officers and crew at all levels. New courses are also being introduced to equip the navigation and engineer officers with the necessary knowledge to deal with new regulations like the global Sulphur cap from January 2020 and new data collection and reporting requirements. The PSL Maritime Training Center is a significant step taken by the Company to train and equip its Officers and Crew to take better care of themselves and their ships, all with a view to ensure Safety of the Crew and preventing accidents, thus preserving the environment.

List of Major Training Programs conducted by The Company's Maritime Training Center for the year 2018 [404-1, 404-2]

Training Courses	Course Overview	Duration	Participants in Y2018						Average hours (per person)			Total Man-hours
			Ship's staff						Ship's staff			
			Sr./Off	Jr./Off	Sr./Eng	Jr./Eng	Sr./Off	Jr./Off	Sr./Eng	Jr./Eng	Jr./Eng	
Maritime Resource Management Course (MRM)	The course, supported by the Swedish Club under a license agreement, is aimed at training masters, officers & senior engineers as well as key shore-based personnel. The course aims to create good teamwork & resource management attitudes and skills that are required to avoid management error-caused accidents.	3 days	43	57	53	15	18	18	18	18	18	3,024
Bridge Team Competency Simulator Course I (BTC - I)	This training course aims to improve various competency skills & knowledge of navigating officers for safe conduct of voyages.	3 days	n/a	38	n/a	n/a	n/a	18	n/a	n/a	n/a	684
Bridge Team Competency Simulator Course II (BTC - II)	Hands-on practices to gain competence, knowledge & experiences on Ship Handling, Maneuvering, Turning and Anchoring in various conditions and under various effects of controllable forces.	3 days	43	n/a	n/a	n/a	18	n/a	n/a	n/a	n/a	774
Bridge Team and Resource Management Course (BTM) and Vessel Traffic Service (VTS)	This training course aims to train the ship's masters and officers in effective bridge teamwork and resource management in various situations as well as bridge operations in emergencies. The course also develops our officers' communication skills in communicating with a vessel traffic service (VTS) using various SMCP's through the VHF and GMDSS communication equipment in our Bridge Simulator.	4 days	48	90	n/a	n/a	24	24	n/a	n/a	n/a	3,312
Maritime Professional Briefing Course (MPB)	This training course aims to keep senior officers and engineers updated on new regulations and information. Senior staff from several departments co-conduct this course which covers 1. Marine Insurance & Loss Prevention 2. Ship Commercial & Cargo Operations 3. Port State Control-Ship Inspection & Pollution Prevention 4. ISPS and ISM Implementation & Documentation, Paint Maintenance 5. EMS Awareness & Shipboard Safety.	4 days	99	n/a	101	n/a	24	n/a	24	n/a	n/a	4,800
Officer Of the Watch (OOW) and Shipboard Safety Course	To enhance the standards of watchkeeping at sea as well as in port. It is designed to help junior watchkeeping officers to understand his duties on board, and realize their significance. It also enables them to make a positive contribution to success of the entire commercial venture.	3 days	n/a	51	n/a	n/a	n/a	18	n/a	n/a	n/a	918
Chief Mate Course (CMC)	To strengthen the professionalism and competence of chief officers and prepare experienced second officers for the chief mate rank.	3 days	16	12	n/a	n/a	18	18	n/a	n/a	n/a	504

Training Courses	Course Overview	Duration	Participants in Y2018						Average hours (per person)			Total Man-hours
			Ship's staff						Ship's staff			
			Sr./Off	Jr./Off	Sr./Eng	Jr./Eng	Sr./Off	Jr./Off	Sr./Eng	Jr./Eng	Sr./Off	
Command Course (Command)	The purpose of this course is to further train Masters in all necessary skills and topics and prepare chief officers for the command. It includes modules for Leadership, Business & Law, International Sale of Goods and related rules/codes/conventions, Time Charter & Voyage Charter, Cargo matters and Ship's Certificates, Documentation, Ship Handling/ Anchoring techniques, etc.	3 days	28	n/a	n/a	n/a	n/a	18	n/a	n/a	n/a	504
Electronic Chart Display and Information Systems (ECDIS)	To ensure that users of ECDIS are properly trained in the operation and use of electronic charts and are familiar with the shipboard equipment. This course aims to enhance navigational safety with the safe operation of ECDIS equipment, proper use of ECDIS related information and knowledge of the limitations of ECDIS equipment. (new IMO requirement)	2 days	25	87	n/a	n/a	n/a	12	n/a	n/a	n/a	1,344
E/R Management & Competency Enhancement course and Engineer Of the Watch Course (EMC & EOW)	This course aims to train senior engineers (C/E & 2/E) in various management & competency knowledge and skills that are required for safe and efficient running of the ship. The junior engineers taking this course are trained in watch-keeping duties, engine parameters monitoring, operation & maintenance, safety & pollution prevention, record keeping.	1 day	n/a	n/a	64	104	n/a	n/a	n/a	6	6	1,008
Wartsila RT-Flex Engine Familiarization	To familiarise the engineers with the company's new type of engine "Wartsila RT-Flex Electronic Engine" before they join a ship equipped with this type of engine. This course focuses mainly on the practice part.	3 days	n/a	n/a	60	105	n/a	n/a	n/a	18	18	2,970
(MC/ME)	To familiarise the engineers with the company's new "MAN Diesel Engine" (ME) before they join a ship equipped with this type of engine. This course focuses mainly on the practice part.	3 days	n/a	n/a	70	119	n/a	n/a	n/a	18	18	3,402
Basic English Course (Basic)	This course is designed to help the students to be able to understand and use the English language correctly and provide them with all the basic language skills such as the pronunciation of the Standard English sound system, practical and useful listening, speaking, reading and writing practices with suitable grammar and vocabulary in various functional contexts.	10 days	2	59	17	72	30	30	30	30	30	4,500

Training Courses	Course Overview	Duration	Participants in Y2018						Average hours (per person)				Total Man-hours
			Ship's staff						Ship's staff				
			Sr./Off	Jr./Off	Sr./Eng	Jr./Eng	Sr./Off	Jr./Off	Sr./Eng	Jr./Eng	Sr./Off	Jr./Off	
Elementary Maritime English Course (EMT)	This course is designed to improve and raise the students' competence in English to intermediate level and give the students' wide-ranging opportunities to practice communicating in English for both maritime and general purposes at elementary level.	10 days	17	26	42	34	30	30	30	30	30	30	3,570
Intermediate English Course level-I	This course aims to improve the students' pronunciation and develop the four English skills- speaking, listening, reading and writing. After the course, the students will be able to speak English with better pronunciation, accent and intonation, communicate more effectively in daily situations, using appropriate vocabulary, expressions and idioms, and make sentences with fewer grammatical mistakes.	10 days	18	11	18	5	30	30	30	30	30	1,560	
Intermediate English Course level-II	This advanced course aims to further develop the students' English skills with an emphasis on advanced grammar structures, business-related vocabulary and letter & email writing (main focus). The students will learn typical words and phrases used in English correspondence and learn how to write letters and emails with proper word choices, styles, and level of formality for different occasions.	10 days	7	9	2	0	30	30	30	30	30	540	
Maritime English Computer and Video-Based Training Programs (Maritime English CBT)	To increase the learners' knowledge of Maritime English, IMO Standard Marine Communication Phrases (SMCP), vocabulary and phrases frequently used in navigation, engineering, cargo handling, ship operation, etc	10 days	44	105	79	113	-	-	-	-	-	-	
Total Participants	Average Hours training per year per employee =33,414/(346+440+427+454)=20.04	-	346	440	427	454	1 employee can attend more than 1 course/year				33,414		

S/Off = Senior Officer (Masters & Chief Officers)

J/Off = Junior Officer (Second, Third, Fourth Officers & Cadets)

S/Eng = Senior Engineer (Chief Engineers & Second Engineers)

J/Eng = Junior Engineer (Third, Fourth, Fifth Engineers & Cadets)

Summary Training hours by Rank							<i>Unit: hours</i>
Course	Master	Chief Officer	2 nd Officer	3 rd , 4 th Junior Officers	Chief Engineers and 2 nd Engineers	3 rd , 4 th , 5 th Junior Engineers	
MRM	18	18	18	18	18	18	
BTM	24	24	24	24	-	-	
BTC - I	-	-	18	18	-	-	
BTC - II	18	18	-	-	-	-	
CMC	-	18	18	-	-	-	
MPB	24	24	-	-	24	-	
OOW & SS	-	-	18	18	-	-	
Command	18	18	-	-	-	-	
English Course	30	30	30	30	30	30	
Maritime English CBT	30	30	30	30	30	30	
ECDIS	12	12	12	12	-	-	
EMC & EOW	-	-	-	-	6	6	
Wartsila RT-Flex Engine	-	-	-	-	18	18	
MC/ME Course (new course)	-	-	-	-	18	18	
Total Training hours to be completed per rank per person within two years	174	192	168	150	144	120	

“Automated Mutual assistance Vessel Rescue System” (AMVER): Sponsored by the United States Coast Guard (“USCG”), AMVER is a unique, computer-based, and voluntary global ship reporting system used worldwide by search and rescue authorities to arrange for assistance to persons in distress at sea. The Company continues to be involved in the AMVER program and its good performance is recognized by the USCG in the form of AMVER awards given to the Company every year through their representative at the United States Embassy in Bangkok. A quote from the USCG citation letter would perhaps reflect what this award is all about: “...you can take pride in the voluntary commitment of your officers and crew to the safety of life at sea”.

Social and Community Development

The Company recognizes that a solid community and society are significant factors which support the Company’s business. Therefore, the Company supports and gets involved in many community and society-based activities on a regular basis. The Company fully recognizes its responsibility to the community and is attentive to the consequences of the Company’s conduct that affect the people around more than what the laws require, including making efforts to gradually absorb social accountability. The creation and expansion of the Company’s CSR Fund will provide a permanent and formal framework to enhance the Company’s CSR activities.

The unprecedented floods in Thailand in 2011 affected millions of people and wrought damage and destruction not witnessed before. The Company’s employees were also affected and many had their homes under 2 meters of water! Keeping aside the misery of living in such appalling conditions and despite their precious valuables being completely damaged, the Company’s employees continued to perform their duties normally and the Company records its appreciation of the employees’ commitment. The Company, for its part, issued a policy directive that all possible assistance be extended to those affected by the floods, and the Human Resources Development (‘HRD’) Department was designated as the nodal point for this purpose. Those who were unable to travel to the office were granted special leave and excused from attending office; where the houses were inundated, the employees and their families were provided accommodation in the city center, and for others who made their own arrangements, their expenses were reimbursed by the Company.

Some of the Social and Community activities undertaken by the Company are as follows:

- The Company contributed to a fund to assist in securing freedom of Thai fishermen (not Company employees) held hostage for over 4 years in Somalia for their eventual return to Thailand.
- The Company takes an active interest in the Merchant Marine Training Center, Thailand (MMTC) and has awarded Gold medals for graduates finishing at the top of the class since 1998. Besides, the Company also donates text-books to MMTC on a regular basis.
- The Company has instituted Scholarship scheme for students of MMTC. In the years 2018, 2017, 2016, 2015, 2014, 2013, 2012, 2011 and 2010, an aggregate of Baht 1,119,000, Baht 1,194,080, Baht 1,633,900, Baht 1,264,960, Baht 1,100,000, Baht 1,345,400, Baht 2,131,900, Baht 2,339,800 and Baht 2,355,120, respectively, have been disbursed to outstanding students in need of funding.
- The Company organizes blood donation camps on a regular basis in collaboration with the Thai Red Cross. These blood donation camps have been organized since the past several years. In 2018, 2 donation camps were organized in March and September with a total collection of 53,550 cc.
- In 2018 the Company donated Baht 211,790 to the 20th Hom Bah Hai Nong project by cadets of MMTC to create multi-purpose field, renovate restrooms, kitchen, canteen, a playground and surrounding areas, repaint of kindergarten building at Soi 19 Sai 2 Khwa School in Lopburi Province. This is further to the donation made by the Company in the previous years of: 1) In 2017 the Company donated Baht 232,000 to the 19th Hom Bah Hai Nong project by cadets of MMTC to renovate activities room, school infirmary, a playground and surrounding areas at Ban Thammarat School in Chachoengsao Province. 2) In 2016 the Company donated Baht 346,600 to the 18th Hom Bah Hai Nong project by cadets of MMTC to renovate canteen, school infirmary, a playground and surrounding areas, improve road, provide books to the library for development of children and first aid kits for the school infirmary at Ban Sab Din Dam School in Saraburi Province. 3) In 2015 the Company donated Baht 223,000 to the 17th Hom Bah Hai Nong project by cadets of MMTC to improve roads, renovate a playground and surrounding areas, provide books to the library for development of young children and first aid kits for the school infirmary at Ban Klong Rakam School in Prachinburi Province. 4) In 2013, the Company donated Baht 137,000 to the 15th Hom Bah Hai Nong project by cadets of MMTC to build toilets facilities, repair the building, renovate school infirmary and surrounding areas at Ban Nong Kaie School in Sakaew Province. 5) In 2011, the Company donated Baht 113,160 to the 14th Hom Bha Hai Nong project by cadets of MMTC to build canteen for Wat Ta Phang Klee school, Chachoengsao province. 6) In 2010, Baht 139,000 to the 13th Hom Bha Hai Nong project by cadets of MMTC to build toilet facilities at Bann Non Pha Suk School, Sa Kaew province. 7) In 2009, Baht 80,466 to the 12th Hom Bha Hai Nong project by cadets of MMTC to buy a projector and build an activities stage for Wat Bang Kra Jao School in Samut Sakorn province; and 8) In 2008, Baht 100,000 to the 11th Hom Bha Hai Nong project by cadets of MMTC to repair classrooms and renovate the library for Ban Bhai See Thong School in Suphanburi province.
- The Company employs most of the cadets passing out from the MMTC, Thailand and thus contributes to the development of qualified Thai officers. This pool of officers is available to any/all Thai ship-owners and not just restricted to the Company.
- As reported in the past, the Company had signed a MOU with the Vocational Education Commission to implement knowledge and promote teaching and learning for Nakhon Si Thammarat Industrial and Shipbuilding College (NASIC). Pursuant to this MOU, the Company built and handed over a student dormitory facility at NASIC, at a total cost of about Baht 25.40 million. The Company continues to provide financial assistance to the students by purchasing books & other materials for their library. For their part, NASIC has introduced new courses and curriculum under consultation with the Company to develop/train Engineering Officer graduates for a career in shipping, thus developing a new career option for Thai youth. The Ministry of Education, Vocational Education Department, awarded an Honor Shield to the Company in recognition of its participation with NASIC.
- The Company awarded Baht 165,000 Scholarship to a student of The International Maritime College, Kasetsart University, Si Racha Campus to support his entire Maritime Science degree course in the University. The final installment under this scholarship award was paid in April 2010.

- On 8 June 2015, the Company donated Baht 500,000 to Thai Medical Device Development Foundation (TMDD) to promote and support the research and development of medical devices.
- In January 2013, The Company donated Baht 5,000 to Department of Labour Protection and Welfare for gifts to children on the Children Day at Suapa Field, Dusit Palace.
- During the year 2010, the Company donated 28 used computers to Mathayom Warichpoom School, Sukhothai School, Bann Koh School, Sathya Sai School and to Pak-Kret Community Administration Office. This is in continuation of the Company's tradition to assist in the education of needy children, when the Company has reported the donation of 15 computers for teaching program to Bann Koh School in Surin province which was followed up by further three computers of modern vintage (Dell Celeron 2 GHZ, Hard Disk 40 GB) to upgrade the teaching facilities.
- The Company donated Baht 40,000 for Muslim youth center Bann Pak Lad at Prapadaeng, Samutprakarn to support educational equipments and scholarship for Children day activity held on 19 January 2008.
- The Company makes regular donations to the needy and poor and for various causes. For instance, the Company, in collaboration with employees, donated over Baht 1 million to the Thai Red Cross for those affected by the Tsunami in Thailand, and in early 2004, donated computers to four primary/secondary schools in Rayong province for use by 877 students studying in these schools.
- The Company helped build a school for children affected by the earthquake which hit western India in 2001. The "Indo-Thai Friendship School" is now fully operational and can accommodate 700 students in Elementary, Middle and High School levels. This has been greatly appreciated by all concerned and projects a very favorable impression of Thailand.
- The Company readily responded to the needs of the people living in South Thailand affected by the deadly Tsunami of December 2004. As an immediate measure, the Company and its employees contributed Baht 590,000 to the villagers of Talay Nok in Ranong province, to renew/repair their fishing boats and resume earning their livelihood. The Company has adopted the Talay Nok village and undertakes regular visits there to ascertain their requirements. The Company has extended an open invitation to needy children to apply for study scholarships (one such girl child is presently studying in a Bangkok college). Moreover, with a view to provide a source of livelihood to the youth, the Company is also encouraging able-bodied youngsters from this village to come forward for basic seamanship training, to be provided at Company's cost, following which they can become sailors on the Company's ocean-going ships for a fruitful and fulfilling career in international shipping.
- The Company along with the staff and crew donated Baht 1,325,867 in year 2008 to construct a new building for housing the Physics, Chemistry and Computer laboratories in a school in Semmangudi, Tamil Nadu, India. This school is in a very poor village and was seriously affected by the Tsunami of December 2004.
- Every year, the Company organizes a 5-KM run "PSL Annual Maritime Day Run" at the Lumpini Park to encourage all its employees to inculcate a habit of doing regular exercise to maintain good health.
- In 2012, the PSL Run was not held and instead the Company decided to utilize the funds for providing assistance to those affected by the devastating floods in Thailand.
- The Company is one of the sponsors of the annual sports day function at the MMTC. The co-operation with MMTC thus extends to Sports, besides academics (as outlined above), and helps in all-round development of Officer Cadets.
- The Company is setting up schemes to provide assistance by way of annual scholarships or otherwise, to our own staff members who are not able to afford school admission and/or tuition fees for their children.
- The Company donated money and equipment to make a scientific laboratory that supported study activities at Ban Koh School in Surin province in September 2006. The Company donated Baht 100,000 and books to cadets of Merchant Marine Training Centre to repair classrooms and build up the library for Bannwangsanuan School in Nakornratchasima province in September 2007.

- The Company contributed Baht 100,000 to The Council for Social Welfare of Thailand under The Patronage of His Majesty the King to develop knowledge and foster career skills of disabled people, supporting them to seek their own income, on the 43rd Cripple Day in November 2007.
- The Company donated Baht 68,000 to Ban Koh School in Surin province in year 2008 to support the “Student Field Trip” to Skaerat Environmental Research Station in Nakhon Ratchasima province.

Scholarships to MMTC’s Students 2018

In January and September 2018, Precious Shipping PCL. (PSL) awarded Baht 696,000 and Baht 423,000 respectively, aggregating Baht 1,119,000 worth of scholarships to selected students of Merchant Marine Training Center (MMTC) to support their entire education year. The photograph below shows the MMTC students who were awarded the scholarships along with Mr. Sebastian Arcanjo Cardozo, PSL’s Vice President (Fleet Management).



The 20th Hom Bah Hai Nong Project



In 2018 the Company donated Baht 211,790 to the 20th Hom Bah Hai Nong project by cadets of MMTC to create multi-purpose field, renovate restrooms, a kitchen, a canteen, a playground and surrounding areas, repaint the kindergarten building, Khwa School in Lopburi Province.



MMTC Graduation Ceremony

MMTC students along with Mr. Sebastian Arcanjo Cardozo, PSL's Vice President - Fleet Management on the graduation day at MMTC.



AMVER Award Certificates

The Commandant of the United States Coast Guard handed AMVER Certificates for 23 PSL ships for their invaluable support to the AMVER System. PSL Ships joined in providing worldwide safety network to assist rescue coordinators in responding to emergencies at sea. PSL takes pride in the voluntary commitment of our officers and crew to the Safety of Life at sea.



Blood Donation 2018

The Company organizes blood donation camps on a regular basis in collaboration with the Thai Red Cross. In March and September 2018, the Company organized 2 blood donation events with a total blood collection of 53,550 cc.



Investment planning course for staff members

In July 12, 2018 the Company and Kasikorn Asset Management Company Limited held a seminar to present the performance of Provident Fund Management and to strengthen tax knowledge and investment planning on the topic "Mutual Funds of Beginners" for staff members).



GRI CONTENT INDEX

GRI Standard	Disclosure	2018 Annual Report Page Number	2018 Annual Report Section Reference
GRI 102: GENERAL DISCLOSURES			
Organizational profile			
102-1	Name of the organization	8	Corporate Information
102-2	Activities, brands, products, and services	12-15	Nature of Business and Industry
102-3	Location of headquarters	8	Corporate Information
102-4	Location of operations	11	Registered Office Address of Subsidiary and Associated Companies
102-5	Ownership and legal form	8	Corporate Information
102-6	Markets served	12-15	Nature of Business and Industry
		41	Board of Directors' Report: Market Segmentation/Benchmarking
102-7	Scale of the organization	4-5	Financial Highlights
		14-15	Nature of Business and Industry
		9-10	Name and Category of Subsidiaries and Associated Companies in which the Company holds more than 10% of shares sold by them
102-8	Information on employees and other workers	103-104	Sustainability Report: Employees Benefits
102-9	Supply chain		None
102-10	Significant changes to the organization and its supply chain		No significant changes
102-11	Precautionary Principle or approach	120-126	Significant Risk Factors
102-12	External initiatives	32-34	Board of Directors' Report
		19-25	Nature of Business and Industry: Maritime Laws and Regulations
102-13	Membership of associations	19-25	Nature of Business and Industry: Maritime Laws and Regulations
Strategy			
102-14	Statement from senior decision-maker	86	Message from the Board of Directors
		32-51	Board of Directors' Report
102-15	Key impacts, risks, and opportunities	120-126	Significant Risk Factors
Ethics and integrity			
102-16	Values, principles, standards, and norms of behavior	90	Sustainability Report: Corporate Governance, Ethics and Integrity
		74-75	Corporate Governance Report: Leadership and Vision
102-17	Mechanisms for advice and concerns about ethics	66-67	Corporate Governance Report: Whistleblowing Policy
Governance			
102-18	Governance structure	30-31	Organization chart
		128-134	Management Structure
102-22	Composition of the highest governance body and its committees	128-134	Management Structure
102-23	Chair of the highest governance body	128	Management Structure

GRI Standard	Disclosure	2018 Annual Report Page Number	2018 Annual Report Section Reference
102-24	Nominating and selecting the highest governance body	133-134	Management Structure
102-25	Conflicts of interest	76-77	Corporate Governance Report : Conflict of Interest
102-26	Role of highest governance body in setting purpose, values, and strategy	128-134	Management Structure
102-28	Evaluating the highest governance body's performance	80-81	Managing Director Evaluation
102-30	Effectiveness of risk management processes	128-130	Management Structure
102-31	Review of economic, environmental, and social topics	79, 128-129	Corporate Governance Report: Board of Directors' Meeting
102-32	Highest governance body's role in sustainability reporting	86	Message from the Board of Directors on Sustainability Report
102-33	Communicating critical concerns	58-82	Corporate Governance Report
102-35	Remuneration policies	67-70	Corporate Governance Report: Directors and Management Remuneration
		132	Management Structure: The Remuneration Committee
102-36	Process for determining remuneration	132	Remuneration Criteria
102-37	Stakeholders' involvement in remuneration	60	Right of Shareholders
Stakeholder engagement			
102-40	List of stakeholder groups	88-89	Sustainability Report: Stakeholder Engagements
102-41	Collective bargaining agreements		Not applicable
102-42	Identifying and selecting stakeholders	88-89	Sustainability Report: Stakeholder Engagements
102-43	Approach to stakeholder engagement	88-89	Sustainability Report: Stakeholder Engagements
102-44	Key topics and concerns raised	87-89	Sustainability Report: Stakeholder Engagements
Reporting practice			
102-45	Entities included in the consolidated financial statements	87	Sustainability Report: The scope of the Report
102-46	Defining report content and topic Boundaries	87	Sustainability Report: The process for defining the content of the Report
102-47	List of material topics	87-88	Sustainability Report: The Materiality Assessment
102-48	Restatements of information	87	Sustainability Report: The boundary and limitations of the Report
102-49	Changes in reporting	87	Sustainability Report: The boundary and limitations of the Report
102-50	Reporting period	87	Sustainability Report: Overview of Sustainability Report
102-51	Date of most recent report	87	Sustainability Report: Overview of Sustainability Report
102-52	Reporting cycle	87	Sustainability Report: Overview of Sustainability Report

GRI Standard	Disclosure	2018 Annual Report Page Number	2018 Annual Report Section Reference
102-53	Contact point for questions regarding the report	71	Corporate Governance Report: Relations with Investors
102-54	Claims of reporting in accordance with the GRI Standards	87	Sustainability Report: Overview of Sustainability Report
102-55	GRI content index	116-119	GRI content index
GRI 103: MANAGEMENT APPROACH			
103-1	Explanation of the material topic and its Boundary	87, 90-106	Sustainability Report: The boundary and limitations of the Report
103-2	The management approach and its components	90-106	Sustainability Report: Sustainable Management Performance for Economic, Environment and Social
103-3	Evaluation of the management approach	90-106	Sustainability Report: Sustainable Management Performance for Economic, Environment and Social
GRI 201: ECONOMIC PERFORMANCE			
201-1	Direct economic value generated and distributed	91	Sustainability Report: Direct Economic Value Generated and Distributed
GRI 205: ANTI-CORRUPTION			
205-2	Communication and training about anti-corruption policies and procedures	90	Sustainability Report: Anti-Corruption
205-3	Confirmed incidents of corruption and actions taken	66-67	Corporate Governance Report: Whistleblowing Policy
GRI 304: BIODIVERSITY			
304-2	Significant impacts of activities, products, and services on biodiversity	99	Sustainability Report: Ballast Water Treatment
GRI 306: EFFLUENTS AND WASTE			
306-2	Waste by type and disposal method	100-101	Sustainability Report: Carbon Footprint and Waste Generation
GRI 401: EMPLOYMENT			
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	64, 103	Corporate Governance Report: Employee
401-3	Parental leave	103-104	Sustainability Report: Employee Benefits
GRI 403: OCCUPATIONAL HEALTH AND SAFETY			
403-1	Occupational health and safety management system	92-97, 104	Sustainability Report: International Safety Management Code
403-4	Worker participation, consultation, and communication on occupational health and safety	92-97	Sustainability Report: International Safety Management Code
403-5	Worker training on occupational health and safety	105-110	Safety & Occupational Health
GRI 404: TRAINING AND EDUCATION			
404-1	Average hours of training per year per employee	107-110	Sustainability Report: List of Major Training Programs conducted by The Company's Maritime Training Center for the year 2018
404-2	Programs for upgrading employee skills and transition assistance programs	107-110	Sustainability Report: List of Major Training Programs conducted by The Company's Maritime Training Center for the year 2018

GRI Standard	Disclosure	2018 Annual Report Page Number	2018 Annual Report Section Reference
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY			
405-1	Diversity of governance bodies and employees	104	Sustainability Report: Number and proportion of the employees of the Company including GCSA at the ashore offices, by gender and nationality
GRI 406: NON-DISCRIMINATION			
406-1	Incidents of discrimination and corrective actions taken		None
GRI 408: CHILD LABOR			
408-1	Operations and suppliers at significant risk for incidents of child labor		It is our policy to respect and comply with local laws, regulations and traditions of every place we conduct our business. We intend to treat employees with respect for dignity of human beings.
GRI 412: HUMAN RIGHTS ASSESSMENT			
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening		All significant contractors are fully complied with the local labor laws.
GRI 418: CUSTOMER PRIVACY			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	102	Sustainability Report: Customer Privacy