

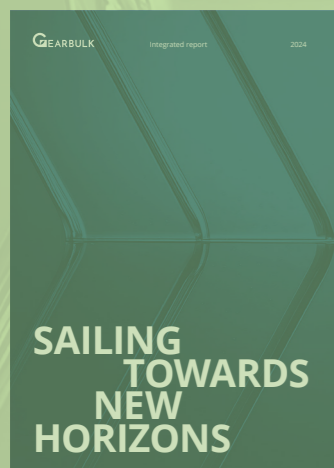
**SAILING
TOWARDS
NEW
HORIZONS**

SAILING TOWARDS NEW HORIZONS

2024 ESG REPORT

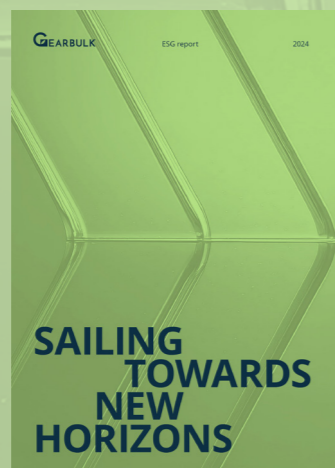
The ESG Report has been drafted to provide our stakeholders with insights into how we respond to ESG topics within our business.

OUR SUITE OF REPORTS



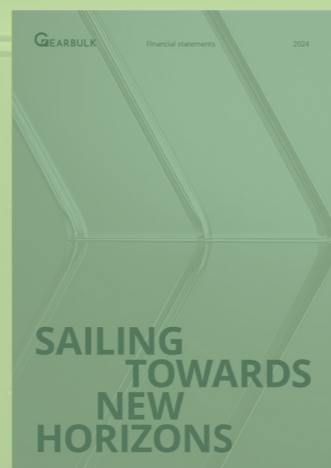
INTEGRATED REPORT

Our strategic progress and how we create value in the societies in which we operate



ESG REPORT

Our efforts to improve on environmental, social and governance performance



FINANCIAL STATEMENTS

Our financial and governmental statements

REPORTING FRAMEWORKS

IR - International Integrated Reporting Council's "IR" Standards
 ESG - In accordance with the Global Reporting Initiative (GRI)
 FS - Generally Accepted Accounting Principles (US GAAP)

FEEDBACK

Feedback is integral to improvement. If you have comments which could help us improve our report, please send us an email to stakeholderrelations@gearbulk.com.

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ABOUT OUR REPORT

This report demonstrates Gearbulk's commitment to reducing our negative impacts on the Environment and Society and describes how we work to strengthen our governance practices to support the business. This report discloses key actions taken during the year and the results of our key Environmental, Social and Governance metrics. This report is drafted with reference to the Global Reporting Initiative (GRI) framework.

Boundary and Scope

This report provides information to our stakeholders about Gearbulk's ESG efforts against key metrics using the requirements of the GRI as reference. The period covered by this report is 1st January 2024 – 31st December 2024 (the Gearbulk financial year-end). The information contained within is purely non-financial and pertains to Gearbulk's wholly owned subsidiaries and business areas where Gearbulk has significant operational control and reflects the material business of Gearbulk, which is our shipping activities. This report excludes information already reported by our joint ventures and information from our terminal business. This follows the same approach of our Integrated Report. Information contained in this report refers merely to material topics and therefore it is advisable to read the report in parallel with the Integrated Report for the full overview of our ESG journey.

Materiality

This report has been compiled internally, and information contained within the report has not been verified by external assurance providers. The report contains information that Gearbulk deems is material in accordance with a Double Materiality Assessment that has been conducted, which is located in Gearbulk's Integrated Report. Our ambition is to obtain limited assurance on selected metrics reported in the future.

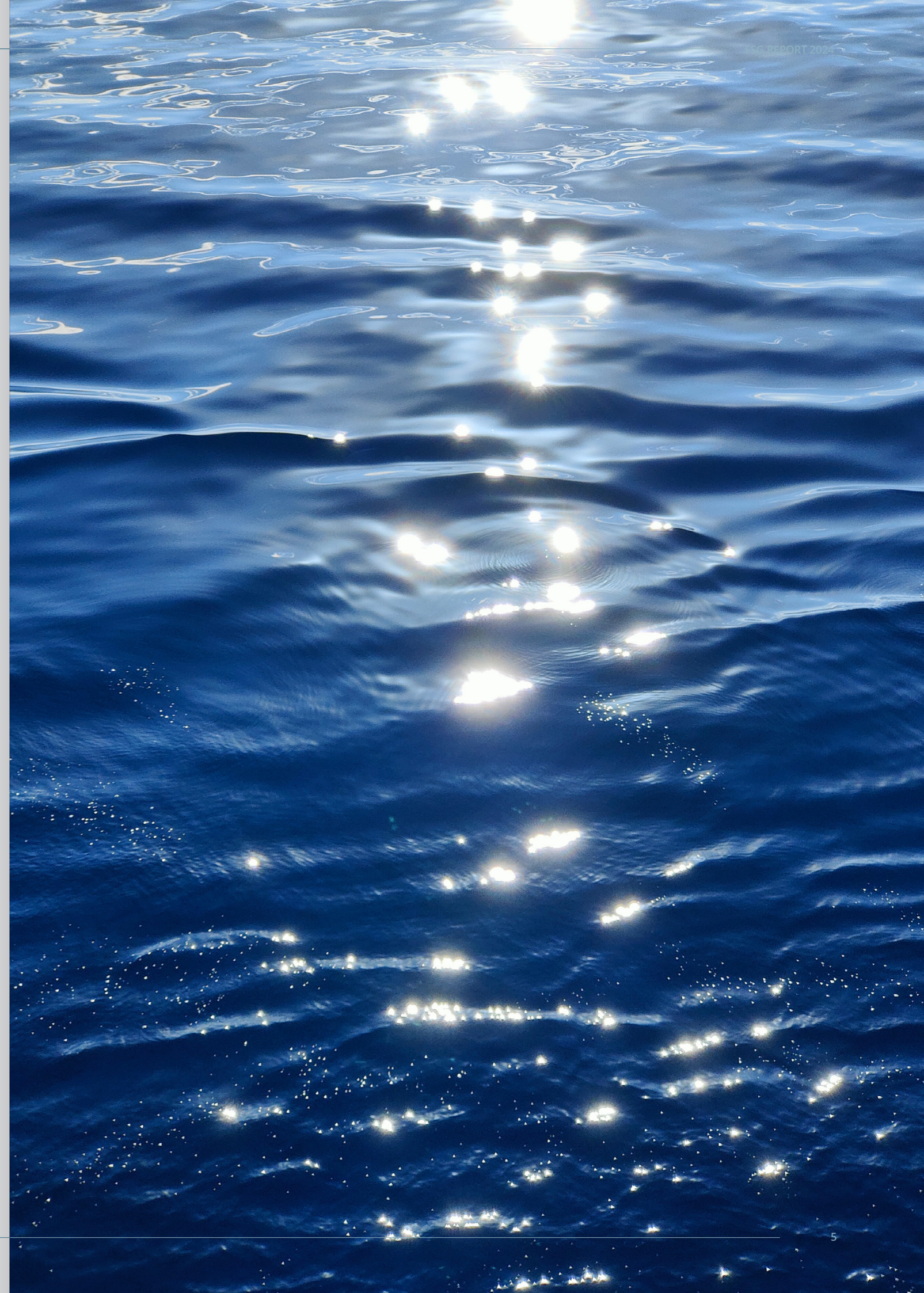
Restatement of metrics

Emissions in accordance with the GHG Protocol

During 2023 guidance on the reporting of emissions relating to Shipowners and Charterers became available. The guidance refers to the definition of "Operational Control" and accounting of Scope 1 emissions. According to the guidance, Shipowners are to report emissions on vessels that are Chartered as Scope 3 and the Charterer as Scope 1. Gearbulk has adopted this guidance and has therefore restated the information.

Definitions

Throughout this report "Gearbulk", "Company", "Group", "we", "us" and "our" refer to Gearbulk Holding AG and its subsidiaries. Subsidiaries comprise entities consolidated under either the voting interest method or the variable interest method.





PART 1

OVERVIEW

Integrating ESG into Gearbulk	8
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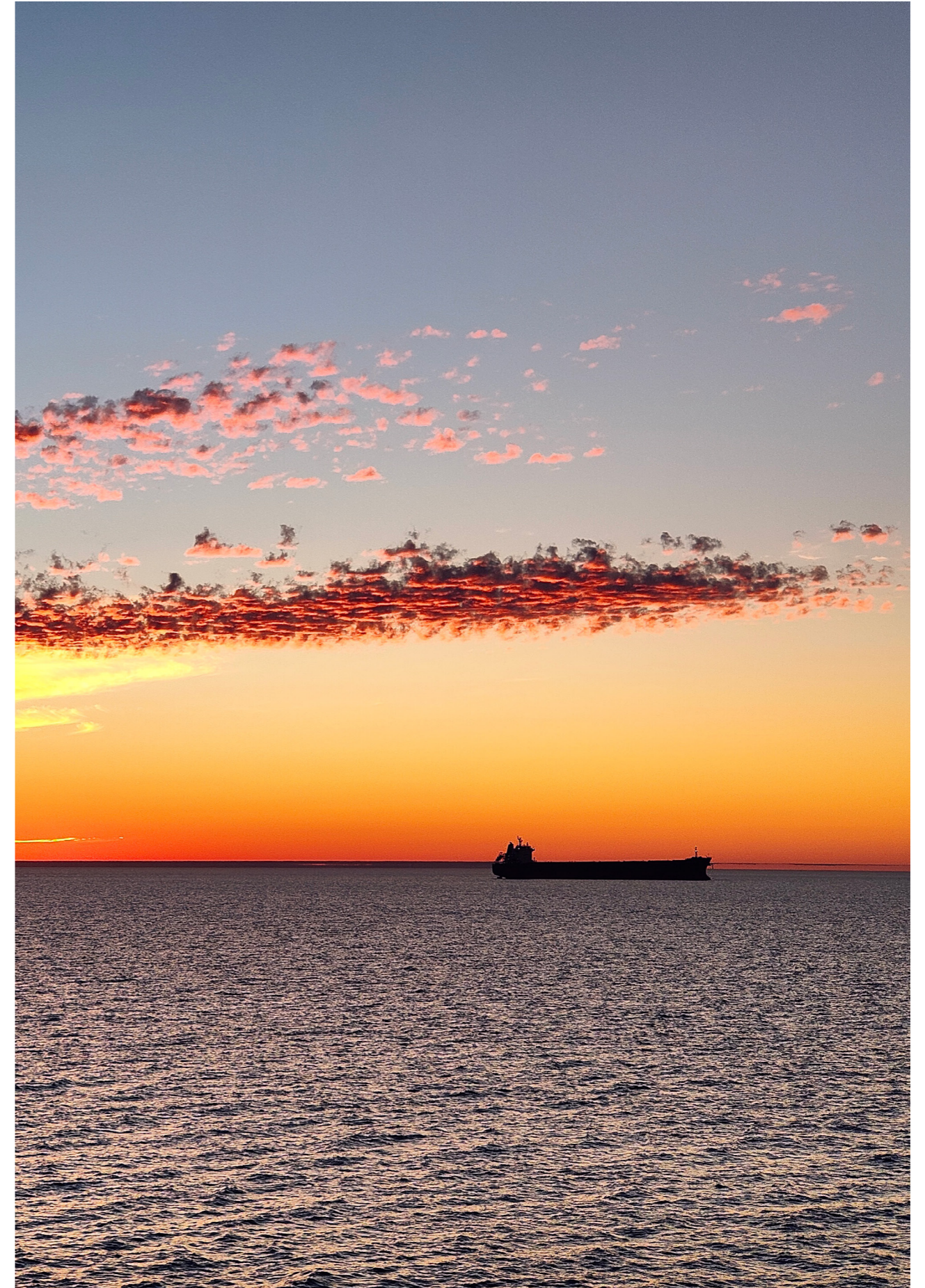
INTEGRATING ESG INTO GEARBULK

BUILDING A SUSTAINABLE LEGACY

ESG is deeply integrated into our strategic framework, forming the bedrock of our business operations and long-term vision. As a driving force behind our evolution, we consistently assess and refine our practices, ensuring we contribute effectively to the global effort of building a more sustainable and prosperous future for all.

OUR APPROACH TO ESG

Gearbulk follows a step-by-step approach to ensure that we not only report our actions and the results of our actions, but also identify opportunities resulting from the ever-evolving business landscape.



ESG HIGHLIGHTS

CONSISTENTLY IMPROVING

 ENVIRONMENT

↓ 24%
CO₂ EMISSIONS
SCOPE 1
Decrease from 2019

↓ 32%
CO₂ EMISSIONS
SCOPE 2
Decrease from 2021

↑ 6%
CO₂ EMISSIONS
SCOPE 3 CATEGORY 6
Increase from 2021

↑ 1%
CO₂ EMISSIONS
SCOPE 3 CATEGORY 13
Increase from 2019

↓ 3%
SO_x EMISSIONS
Decrease from 2023

↓ 9%
NO_x EMISSIONS
Decrease from 2023

↓ 24%
PLASTIC LANDED
Decrease from 2023

↑ 323kg
PROCUREMENT OF
SUSTAINABLE GOODS
Increase from 2023

ZERO
VESSEL RECYCLED

16
SPILLS CONTAINED
Mainly from hydraulic hose
failure onboard

 SOCIAL

3.27
AVERAGE NEAR
MISS REPORTS
from managed vessels each month

ZERO
FATALITIES
amongst permanent
employees and workers

ZERO
MATERIAL FINDINGS
ON HUMAN RIGHTS
As part of our
due diligence process

 GOVERNANCE

1
BRIBERY EVENT
Issued as a fine in 2024

2
CYBER-ATTACKS

100%
SUPPLIERS SCREENED
As part of our
due diligence process



PART 2

ENVIRONMENT

Climate Change	14
Pollution	26
Biodiversity	32

CLIMATE CHANGE

REDUCING EMISSIONS

Reducing greenhouse gas emissions in the maritime industry is essential for achieving global climate goals and mitigating the impact of climate change.

WHY IT MATTERS

Climate change remains a crucial agenda point across all industries, and as the shipping industry contributes 3% to total global emissions, Gearbulk is committed to doing our part in reducing the negative impact we have on the environment. Gearbulk has committed to a net zero ambition which is evident in the strategic actions we are taking.

OUR AMBITION LEVEL

Gearbulk is committed to protecting the planet's marine life and the environment in which we operate. To achieve this, we follow strict protocols and have implemented specific environmental policies.

OUR TARGETS

- 30% Reduction of scope one emissions by 2030 in accordance with IMO guidelines
- Net Zero by 2050

*aligned with IMO's GHG emission strategy



POTENTIAL AND ACTUAL IMPACTS

The predominant emissions within our value chain are categorized as direct emissions or Scope 1 emissions, originating primarily from the vessels we own. These vessels utilize heavy fuel oil and marine gas oil, resulting in emissions of Carbon Dioxide (CO₂), Sulphur Oxides (SO_x) and Nitrogen Oxides (NO_x). Additionally, decreased amounts of Methane (CH₄) and Nitrous Oxide (N₂O), Carbone Monoxide (CO), Volatile Organic compound (VOC) and Particulate matter (PM) are released.

CO₂, identified as a primary catalyst for climate change, represents a critical global challenge, necessitating concerted efforts for reduction. Although NO_x and SO_x are not classified as greenhouse gases, they adversely impact air quality, habitats and human health. Despite shipping being acknowledged as one of the most energy-efficient mass transport modes, the substantial volumes of CO₂, NO_x, and SO_x emitted by the industry underscore the significance of our emissions.



OUR ONGOING EFFORTS TO MANAGE THE IMPACT

Gearbulk proactively manages climate change due to our significant actual and potential impacts on the economy, environment and people, including adverse effects on ecosystems, economies and human rights. The Company meticulously assesses its activities and business relationships to identify any contributions to climate change, such as greenhouse gas emissions from the fleet or indirect impacts through supply chain activities.

Gearbulk has established policies and commitments regarding climate change, aiming to reduce its carbon footprint and contribute to global efforts to mitigate climate change. To prevent negative impacts, Gearbulk implements measures such as fuel efficiency improvements, adopts new technologies, and optimizes operational planning to minimize emissions. In cases of actual negative impacts, Gearbulk takes corrective action, cooperating with regulatory bodies and stakeholders to mitigate and remediate environmental harm.

Furthermore, the Company seeks to manage potential positive impacts by investing in sustainable practices and technologies that contribute to climate change mitigation and adaptation. Gearbulk tracks the effectiveness of its actions through monitoring processes, setting goals, targets, and indicators to evaluate progress. Lessons learned

from this tracking are integrated into operational policies and procedures to enhance climate change management practices continually.

Additionally, Gearbulk engages with stakeholders to gather feedback and insights, ensuring that our actions align with stakeholder expectations and contribute effectively to climate change mitigation efforts. Through these comprehensive approaches, Gearbulk demonstrates its commitment to environmental sustainability and responsible business practices in the face of climate change challenges.

CLIMATE CHANGE

DECARBONISATION EFFORTS

Throughout 2024 Gearbulk enhanced its efforts to decarbonise our fleet and allocated key resources to explore and research initiatives to bolster our decarbonisation path. These areas included but were not limited to:

ADVANCED BIOFOULING

All vessels undergo regular hull blasting along with renewal of Anti Fouling. Gearbulk has extended our strategy towards applying high performance anti fouling to all vessel in our sailing fleet to maintain higher fuel efficiency.

PROPELLER & HULL CLEANING

All vessels undergo regular propeller polishing and hull cleaning when needed. In addition, we are testing different technologies towards anti fouling of the propeller to constantly ensure high performance and efficiency.

SENSOR TECHNOLOGY

All vessels in the fleet are equipped with sensor technology to measure and monitor fuel performance.

MAIN ENGINE UPGRADES

All vessels with electronically controlled main engines will be upgraded with latest developed retrofit solutions from Engine Maker, to further improve operations and save fuel.

IMPROVED EMISSIONS DATA VALIDATION FOR FUTURE CLIMATE AMBITIONS

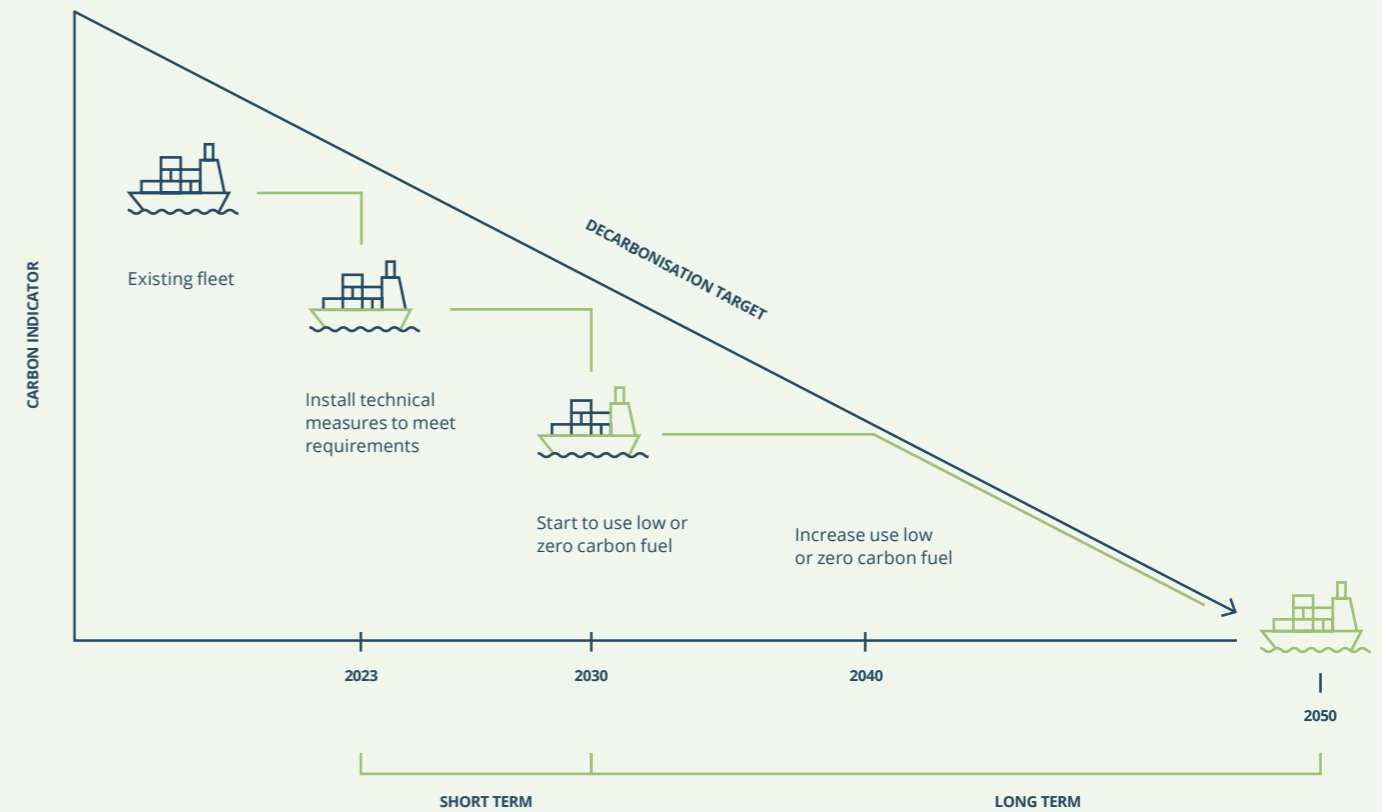
We are taking steps to not only expand the use of environmental dashboards, enabling more accurate and efficient operational planning in the future, but also to establish measures for the continuous validation and rectification of emissions data. This validated data will provide a real-time overview of our fleet's emissions.

In partnership with the supplier responsible for our data collection system and through collaboration with an independent third-party verifier, we are enhancing our daily verification and correction processes for emission data. The availability of real-time emission data will empower us to optimise the management and overview of our Carbon Intensity Indicator (CII) performance, aligning with our commitment to climate change ambitions.

DECARBONISATION PATH

We remain steadfast in our commitment to ongoing research to support our decarbonisation journey. Through our dedicated decarbonisation endeavours, we are confident in our ability to achieve the targets set forth. Gearbulk have developing a comprehensive decarbonisation plan for the short term, and planning to develop a long-term plan which we are plan to publish in the coming years.

DECARBONISATION PATH



SHORT TERM



MACHINERY



HYDRODYNAMICS



OPERATIONAL



ENERGY HARVESTING



ALTERNATIVE FUELS

LONG TERM

CLIMATE CHANGE

PROGRESS AND PERFORMANCE

OUR METHODOLOGY AND BOUNDARIES

We adhere to the concept of “operational control,” as outlined in the GHG Protocol, to consolidate emissions within Scopes 1, 2, and 3 stemming from our operations. Gearbulk accounts for 100% of greenhouse gas emissions from operations under our control, defining control operationally rather than financially.

Gases included in the calculation is CO₂ and HFCs. The GWP for CO₂ is defined as 1 according to the IPCC’s Fifth Assessment Report (AR5, 2014), which serves as the baseline for comparing the global warming potentials of other greenhouse gases. HFC emissions included in Scope 1 calculations are limited to R410A. Scope 3 emissions, however, include refrigerants: R22, R404A, R407C, R410A, and R417A. Emissions are calculated using standard GWP values from the IPCC’s Fourth Assessment Report (AR5, 2014).The GWP for these gases varies, with values ranging from 1,430 (for R134A) to 3,922 (for R404A).

Biogenic CO₂ emissions are currently not reported due to data limitations. We aim to include this information in future reports as data availability improves.

Concerning vessel emissions (Scope 1), the reported figures encompass all cargo-carrying vessels we own and charter. These include those under short- or long-term charter (Time Charter Vessels). Vessels chartered to third parties are excluded, as they lie beyond our operational control.

Our understanding of the GHG Protocol has been amended to reflect this as Gearbulk has previously reported on vessels chartered to our Joint Ventures under Scope 1. New guidance

has been accepted by Gearbulk and to align with the control definition, Gearbulk now reports these emissions in Scope 3.

Throughout this report, greenhouse gas quantities related to Scopes 1, 2, and 3 have been converted into carbon dioxide equivalents (CO₂e), with all figures denoted in metric tonnes.

In 2024, Gearbulk’s greenhouse gas emissions amounted to 1,114,516 tons of CO₂e. Definitions, assumptions, formulas, and calculations for our Scope 1, 2, and 3 emissions are elaborated on in the appendix page 92.

OUR BASELINE YEAR

Scope 1 (Direct Emissions)

2019 is our baseline year for vessels we own and charter as regulations and data requirements have been satisfied to actively monitor our performance and introduce measures to reduce impacts caused by our operations.

Scope 2 (Indirect Emissions)

2021 is our baseline year as the complete dataset required to accurately report and monitor our emissions was available.

Scope 3 (Indirect Emissions - Category 6: Business Travel)

2021 is our baseline year as the complete dataset required to accurately report and monitor our emissions was available.

Scope 3 (Indirect Emissions - Category 13: Downstream leased assets)

2019 is our baseline year for vessels we own and deploy to our Joint Ventures as factors such as regulations and data requirements have been satisfied to actively monitor our performance and introduce measures to reduce impacts caused by our operations.

SUMMARY OF OUR CLIMATE CHANGE ACCOUNT

Greenhouse Gas Emissions	Unit	Baseline Year*	2023	Change from Base Year	2024	Change from Base Year
Scope 1 Emissions	tCO ₂ e	22,546	17,793	-21%	17,206	-24%
Scope 2 Emissions (location based)	tCO ₂ e	112	81	-28%	76	-32%
Scope 3 Emissions	tCO ₂ e	1,086.2K	1,036,616	-5%	1,097,310	1%
Category 1: Purchased goods and services	tCO ₂ e	n/a	n/a	n/a	n/a	n/a
Category 6: Business Travel	tCO ₂ e	3,944.8	7,315	85%	4,168	6%
Category 13: Downstream leased assets	tCO ₂ e	1,082.2K	1,029,301	-5%	1,093,142	1%
TOTAL EMISSIONS	tCO ₂ e	1,108K	1,054,490	-5%	1,114,592	0.1%

*Figures have been restated to reflect the change in reporting methodology.

SCOPE 1

DIRECT EMISSIONS:

CARBON DIOXIDE

Scope 1 emissions account for direct emissions from vessels under our operational control. These vessels are involved in business activities outside of the Open Hatch business and Liquid Pitch trade. Vessels owned and deployed to our Open Hatch business are chartered to our Joint Venture G2 Ocean and emissions from these vessels are recorded as Scope 3.

During 2024, Gearbulk therefore had two vessels that were under operational control, which yielded a 24% decrease in emissions. The main drivers for such decrease relate primarily to the upgrade to a high-range Anti Fouling system, installation of solar panels on our floating terminal and operational efficiencies.

Direct Emissions	Unit	2023	Change from Base Year	2024	Change from Base Year
CO ₂	tCO ₂ e	17,793	-21%	17,206	-24%
HFC	tCO ₂ e	101	-34%	0.626*	-99%*

*Main driver of HFC from 2023 is excluded under scope 1 for 2024 numbers.



SCOPE 2

INDIRECT EMISSIONS:

CARBON DIOXIDE

Scope 2 emissions cover indirect emissions from the generation of purchased electricity, steam, heating and cooling consumed by Gearbulk across all offices where we operate.

Electricity consumption

Electricity is the main energy source used by our offices. All energy sources are included in the emission data. The CO2 emission factor (tCO2 per kWh) from our offices' local energy supplier is used where available. We have applied the location-based approach to calculate the electricity consumption in the report.

During 2024 total emissions resulting from our administration buildings equalled 76 tonn. This is a decrease of 31% from the previous year mainly due to updated emission factors and the sale of our Terminal in the US in 2022.

As a tenant in leased buildings, we currently do not have direct control over emissions from purchased energy, as these are managed by our landlord or property managers. Therefore, we are unable to isolate and quantify the emissions reductions resulting from our initiatives. As part of our procurement policy we aim find solutions to meet our emission reduction targets.

Indirect Emissions	Unit	2023	Change from Base Year	2024	Change from Base Year
Scope 2 Emissions (location based)	tCO ₂ e	81	-28%	76	-32%



SCOPE 3

INDIRECT EMISSIONS:

CARBON DIOXIDE

Scope 3 emissions relate primarily to the emissions generated from the vessels we charter to our Joint Venture companies G2 Ocean and the High Heat Tankers vessels managed by Gearbulk.

For 2024 reporting, we have also included emissions from business travel and will continue to improve completeness of this reporting by further including additional categories as defined under the GHG Protocol. We have increased efforts not only to gather information for reporting our emissions but also to automate the process of calculating emissions generated from our operations. But due to data limitations, we are currently unable to isolate and quantify the emissions reductions resulting from our initiatives.

Purchased goods and services

During 2024 resources were allocated to research platforms which can support our reporting ambition. We aim to report on emission generated from purchased Goods and Services in 2025.

Business travel

Gearbulk has established an internal travel hub/ resource centre to manage travel requests. Emissions from business travel are therefore gathered from travel that has been registered and approved within this platform. In 2024 total emissions from business travel equalled 4,168 mt which is an increase of 6% from the base year. The main driver is due to more travelling and correcting the methodology of calculated emissions from our crew travel. We remain committed to reducing our impact and only essential business travel which cannot be conducted via our digital platform is permitted.

Downstream leased assets

As part of our business model, vessels owned and deployed to our Open Hatch business are chartered to our Joint Venture G2 Ocean and the liquid pitch vessels are managed by Gearbulk. During 2024 total emissions relating to these assets equalled 1,093,142 mt which is an increase of 1%.

Category 6: Business travel	Unit	2023	Change from Base Year	2024	Change from Base Year
CO ₂ e	tCO ₂ e	7,315	85%	4,168	6%

Category 13: Downstream leased assets	Unit	2023	Change from Base Year	2024	Change from Base Year
CO ₂	tCO ₂ e	1,029,301	-5%	1,093,142	1%
HFC	tCO ₂ e	3,701	-55%	4,319	-48%

OTHER IMPORTANT METRICS

AER
(ANNUAL EFFICIENCY RATION)

With the Greenhouse Gas Strategy towards 2050 for international shipping, the IMO has set the goal to reduce the total carbon emission by minimum 20% for the next decade up to 2030, by minimum 70 by 2040 and by being Net Zero in 2050. The GHG Strategy was approved by the IMO in 2018 and revised in 2023. The reduction rates are related to the baseline of 2008. One of the measures implemented by the IMO to achieve the goal is the Carbon Intensity Indicator (CII), which is a measure of how efficiently a ship transports goods. This is referred to as the Annual Efficiency Ration (AER) and is calculated on a ship-by-ship basis. The denominator of the AER calculation is the product of a vessel's deadweight tonnage, and the distance sailed during the reporting period.

Gearbulk has adopted reporting of the AER in accordance with the IMO goals, and to represent this in the ESG report, the fleet average has been calculated. Only Owned vessels are included.

Other metrics	Equation	2023	Change from Base Year	2023	Change from Base Year
Nautical mile	nm	3,759,140	1%	3,555,347	-4%
Fuel cons	mt	352,802	-6%	341,807	-9%
AER (Scope 1)	ton CO ₂ / DWT*nm	5.1	-3.77%	5	-5.66%
AER (Scope 3)	ton CO ₂ / DWT*nm	5.61	-2.94%	5.64	-2.42%
EEOI	ton CO ₂ / mil t*nm	10.39	-0.1%	n/a	n/a

EEOI
(ENERGY EFFICIENCY OPERATIONAL INDEX)

Our focus goes beyond absolute emissions figures; we aim to enhance transportation efficiency for each unit of CO₂ emitted. Our key metric, the Environmental Efficiency Operational Index (EEOI), ensures a consistent year-on-year comparison, accounting for changes in fleet activity. The denominator of EEOI represent the total transport work (sum of cargo weight x distance per voyage). It reflects our commitment to voyage energy efficiency, where advancements in emission reduction and operational efficiency positively influence the score. This strategy aligns with our ongoing dedication to continually maximise the environmental efficiency of our operations.

OTHER SIGNIFICANT AIR EMISSIONS

SULPHUR & NITROUS OXIDES

Combustion of fossil fuels onboard vessels produces Sulphur Oxides (SOx) and Nitrogen Oxides (NOx), which are not covered in scope 1 emissions. However, NOx and SOx are considered greenhouse gases (GHG) and can have an adverse effect on the environment. Both NOx and SOx form during combustion and are emitted into the environment in the form of smoke.

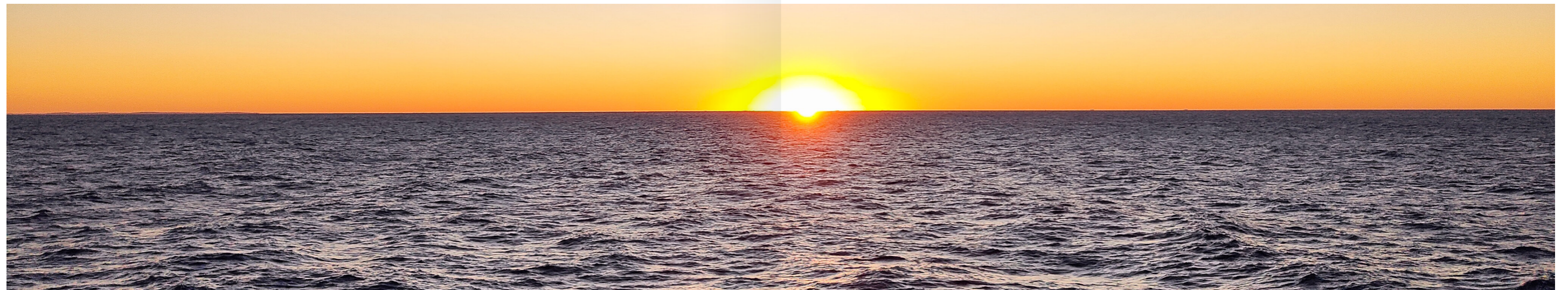
The level of NOx emissions from a vessel depends on the engine design, operating profile, and quality of fuels. However, whereas modern engines generally generate less NOx, older engines generate more.

SOx emissions are mainly due to the presence of sulphur compound in fuel. However, stricter regulations are coming into force, ensuring a global sulphur cap. Among them, the IMO 2020 regulation (MARPOL Annex VI), which entered into force January 1st 2020, states a maximum of 0.5% sulphur limit, as well as emission-controlled areas (ECA) ensuring a maximum of 0.1% sulphur limit. Consequently, SOx emission has decreased dramatically.

Since 2019, Gearbulk has reduced the SOx emission by 81% (from 14,602 to 2,788 tonnes) and our NOx by 15% (from 33,413 to 28,492 tonnes) in 2024.

Other air emissions	Unit	2023	Change from Base Year	2024	Change from Base Year
NOx	mt	31,423	-6%*	28,492	-15%
SOx	mt	2,885*	-80%*	2,788	-81%

*Value has been adjusted due to new calculation methodology and missing data in 2023.



FUTURE ACTIONS

Mitigate climate change through carbon capture technology

In 2024, a dedicated team assessed the feasibility of implementing Carbon Capture technology on our vessels. The study revealed significant potential for the technology; however, shore-based infrastructure remains highly limited. For Gearbulk vessels operating in a worldwide trade, this presents an additional challenge in offloading captured CO2 to suitable facilities. The study concluded that CCS technology is not yet viable for the Gearbulk fleet but could play a crucial role in reducing GHG emissions in the near future. Gearbulk will reassess CCS technology in a few years as infrastructure develops further.

Transition to carbon-neutral fuel for future climate action

Anticipating the imperative for climate action, Gearbulk is charting a course towards the adoption of alternative fuels. In 2023, at MEPC 80, the IMO endorsed the use of sustainable Biofuel as a carbon-neutral alternative, contingent on specific criteria, effective from October 1st, 2023. Looking ahead, Gearbulk is committed to furthering this initiative, with plans to expand the use of sustainable Biofuel in strict adherence to these criteria. This forward-looking commitment reflects our dedication to environmentally responsible practices and aligns seamlessly with the industry's larger movement towards embracing sustainable and carbon-neutral fuel sources.

Advance climate responsibility through fuel optimisation

In acknowledgment of the environmental impact of our activities, we continued our active exploration of new technologies to significantly curtail our greenhouse gas (GHG) emissions in 2024. As part of our commitment, several of our newly managed vessels will aim to install Propeller Boss Cap Fins in 2025, as well as further upgrades to the electronically controlled Main Engines for all applicable vessels. This forward-looking approach underscores our dedication to advancing sustainable practices and aligns with our ongoing efforts to comply with climate change initiatives.

Continue creating awareness of climate change

By fostering a greater understanding of the environmental challenges we face, individuals, communities, and businesses can collectively advocate for and implement sustainable practices. Increased awareness encourages the adoption of eco-friendly technologies, energy-efficient solutions, and a reduction in carbon-intensive activities. Moreover, it empowers stakeholders to actively engage in supporting and complying with climate change regulations, influencing policy decisions and industry standards. Education campaigns, community outreach, and corporate initiatives that prioritise climate change awareness not only contribute to a more informed and environmentally conscious society but also play a crucial role in achieving broader regulatory compliance and fostering a global commitment to combating climate change.

POLLUTION

REDUCING WASTE

It's our earthly responsibility to protect our planet and reduce pollution through robust waste management solutions.

WHY IT MATTERS

Pollution is a crucial concern for the maritime industry given its substantial environmental impact and the increasing global emphasis on sustainability. The maritime industry significantly contributes to air and water pollution, affecting marine ecosystems and air quality.

OUR AMBITION LEVEL

Gearbulk aims to source sustainable products and recycle all waste, thereby contributing to the circular economy.

OUR TARGETS

- Reduction of waste generation by increasing sourcing of sustainable product
- Zero oil spills
- Ship recycling in accordance with ship recycling policies



POTENTIAL AND ACTUAL IMPACTS

Waste generation within the shipping industry has wide-ranging implications, impacting operational efficiency, environmental sustainability, and regulatory adherence. Excessive waste production not only drives up operational costs but also escalates the risk of marine pollution if not responsibly managed. Failure to recycle waste results in its deposition in landfills, significantly harming the environment.

All waste reported pertains to waste generated from our own operations. Within Gearbulk, various waste categories are pertinent, including vessel components (post-recycling), maintenance-related parts, onboard consumables, and office waste. All waste onboard vessels undergoes thorough categorization and disposal in compliance with relevant legislation. However, when waste is transferred ashore for disposal by third parties, Gearbulk lacks oversight, relying solely on reports received during ship recycling, which could potentially impact the environment.



OUR ONGOING EFFORTS TO MANAGE THE IMPACT

Gearbulk demonstrates proactive pollution management by acknowledging its potential adverse effects on the economy, environment, and human rights. The company evaluates its operations and business partnerships to identify any involvement in negative impacts and takes steps to prevent or mitigate them.

Gearbulk has instituted robust policies and commitments concerning pollution management, which include upstream actions and processes such as adherence to supplier code of conduct, procurement policies and procedures, ship recycling policies and procedures, and third-party risk management policies and procedures. These measures underscore the company's dedication to environmental sustainability and regulatory compliance. Gearbulk has also implemented downstream actions and process to effectively manage pollution, Gearbulk employs strategies such as adopting eco-friendly technologies, complying with emission control standards, and investing in pollution prevention initiatives. The company evaluates the effectiveness of these measures through rigorous monitoring processes, establishing goals, targets, and indicators to gauge progress. Insights gleaned from this monitoring inform updates to operational policies and procedures, facilitating continual enhancement of pollution management practices.

Moreover, Gearbulk actively engages with stakeholders to solicit feedback and insights, which inform its actions and efficacy assessments. This ensures alignment with stakeholder expectations and regulatory mandates. Through these comprehensive approaches, Gearbulk underscores its commitment to responsible pollution management and sustainable shipping practices.

POLLUTION

PROGRESS AND PERFORMANCE

Our commitment to environmental stewardship and sustainability guides our efforts to reduce pollution. Through rigorous assessment, strategic planning, and innovative solutions, we continuously improve our impact across operations. By prioritising proactive measures, we aim to safeguard ecosystems and contribute to a healthier, more sustainable future.

The increase in total waste generated since can be attributed to the fact that the managed fleet increased from 40 to 54 vessels during 2023 and remained this size in 2024. The individual vessel average has increased from 2023 due to the fleet expansion. All vessels were equipped with onboard garbage compactors and required to adhere to the sourcing of sustainable goods procurement policies. In alignment with IMO requirements, vessel waste is reported in cubic meters (m³). Due to the lack of density data for specific waste types, conversion to metric tons is not feasible. While this may limit comparability with other reports, it ensures

consistency with regulatory practices and accurately reflects our operational waste.

Gearbulk currently does not report on waste generated on shore from our office locations as this data is not available. As a tenant in leased buildings, we currently do not have direct control over waste management practices, as these are managed by our landlord or property managers. As part of our procurement policy we aim find solutions to meet our pollution reduction targets.

Waste generated (from vessels)	Unit	2022	2023	2024
Fleet Total	m³	1,921	2,199	2,944
Per ship/month	m³	4.00	3.93	4.54

OIL POLLUTION

In 2024 no significant spills recorded. There were two reported minor incidents involving Gearbulk managed vessels (less than 10 litres of hydraulic oil).



SHIP RECYCLING

Gearbulk's Ship Recycling Policy is in accordance with the Hong Kong Shipping Convention and other various legislation. The policy is aimed to ensure that the chosen Ship Recycling Facility (SRF) operates at an acceptable standard with respect to health and safety of the workers and the protection of the environment.

Gearbulk will only use Ship Recycling Facilities which have been certified by the Hong Kong convention and are compliant by an IACS classification society.

In preparation of a ship's recycling, an Inventory of Hazardous Materials must be approved by a Class society or another competent organisation. This Inventory must, as a minimum, include the materials that are specified in the Ship Recycling Convention appendix 1 and 2. The Inventory must be forwarded to the selected SRF together with all relevant available information for the SRF to develop the Ship Recycling Plan (SRP). A confirmation of receipt must be obtained. During 2024, Gearbulk did not recycle any vessels.



FUTURE ACTIONS

Implement an updated Environmental Policy

Updating our Environmental Policy is a key step in reducing waste and pollution. By strengthening regulations, promoting sustainable practices, and enhancing enforcement mechanisms, we can drive greater environmental responsibility across our operations. A clear and robust policy will set higher standards for waste management, pollution control, and resource conservation while fostering transparency, accountability, and continuous improvement. Through this commitment, we aim to make meaningful progress toward a cleaner, more sustainable future.

Explore and implement innovative technologies

Investing in research and innovation is key to minimizing our impact on waste and pollution. By exploring emerging technologies and sustainable solutions, we aim to enhance waste management, prevent pollution, and optimize resource use. From advanced recycling processes to clean energy adoption and eco-friendly design, our focus is on practical, scalable solutions that drive meaningful environmental progress. Through continuous evaluation and implementation of new technologies, we are committed to reducing our ecological footprint and contributing to a cleaner, more sustainable future.

Evaluate possible partnerships to support our ambition

As part of our commitment to reducing waste and pollution, we will assess potential partnerships with NGOs that align with our sustainability goals. This evaluation will focus on their methodologies, past successes, and innovative approaches to environmental challenges. We seek partners who demonstrate strong community engagement and measurable impact, ensuring our collaboration drives meaningful progress. By forging strategic alliances, we aim to amplify our efforts and contribute to a more sustainable and healthier planet.



BIODIVERSITY

PROTECTING OUR OCEAN

A flourishing planet hosts a diverse symphony of species, warranting preservation and protection for the benefit of future generations.

WHY IT MATTERS

The ocean is one of Earth’s most valuable natural resources, and it is important to manage it in a sustainable way. Gearbulk understands the impact of our operations on the ocean, and we are committed to doing all we can to protect this resource and ensure its benefits are preserved for future generations.

OUR AMBITION LEVEL

Gearbulk is committed to protecting the planet’s marine life and the environment in which we operate. We will continue to support laws and regulations and invest where needed to protect our oceans.

OUR TARGETS

- Avoid spread of invasive species through use of appropriate technologies
- Minimise and avoid operations in protected areas



POTENTIAL AND ACTUAL IMPACTS

Shipping operations can exert substantial pressure on biodiversity through various means, including ballast water discharge, underwater noise pollution, and the risk of oil spills. Ballast water, often taken on in one location and released in another, can introduce invasive species to new ecosystems, disrupting local biodiversity and ecological balances. Additionally, underwater noise from shipping activities can interfere with marine life, particularly marine mammals that rely on sound for communication and navigation.



OUR ONGOING EFFORTS TO MANAGE THE IMPACT

Gearbulk adopts a holistic strategy in addressing both the negative and potential impacts on biodiversity, acknowledging their profound significance to the economy, environment, and human rights. The Company meticulously evaluates its operations and partnerships to identify any adverse effects on biodiversity, ensuring adherence to regulations and ethical standards.

In terms of preventing invasive species in ballast water, Gearbulk demonstrates a proactive stance by adhering to global conventions for pest control. Significant strides have been made in implementing ballast water treatment systems across the fleet to minimise the potential transfer of invasive species across ecosystems. Gearbulk’s commitment to meeting the requirements of the Ballast Water Management Convention by 2024 underscores its dedication to environmental stewardship and sustainable shipping practices.

Furthermore, Gearbulk prioritises the protection of whales and ocean habitats, particularly in environmentally sensitive marine areas. Vessels comply with mandatory speed reduction schemes and voluntarily implement additional measures to minimise the risk of whale strikes and disturbance during breeding seasons. Digital navigational tools are utilised to avoid protected areas, ensuring compliance with regulations and fostering responsible marine practices.

BIODIVERSITY

PROGRESS AND PERFORMANCE

Our commitment to environmental sustainability and the protection of marine ecosystems is evident through the proactive measures we have implemented to safeguard biodiversity. By integrating responsible practices across our operations, we aim to minimise our impact on marine life, contribute to conservation efforts, and ensure that future generations can benefit from healthy, thriving ecosystems.

BALLAST WATER TREATMENT SYSTEM (BWTS)

The purpose of the Ballast Water Convention (BWM) is to prevent the spread of invasive species during vessel operation. The BWM requires all vessels to treat ballast water, ensuring the requirements in the D2 discharge standard of the BWM are met during discharge.

At the end of 2023, Gearbulk fulfilled its commitment to honouring this convention and all Gearbulk vessels are fitted with the technology to comply with the D2 discharge standard.

ANTI FOULING (AF)

Anti fouling applied to vessel hulls will protect the environment by preventing the growth of marine organisms on the hull, thereby limiting the spread of invasive species. Minimal growth will also reduce the added resistance while sailing, thus ensuring a higher fuel efficiency and resulting in lower GHG emissions.

Gearbulk continues to have high focus on good hull performance across our managed vessels. We are committed to continuing our strategy of using High Range Anti Fouling to further reduce the spread of invasive species and to further reduce our total emissions.

PROPELLER AND HULL CLEANING (PC) (HC)

Propellor cleaning is another important action Gearbulk takes to protect the ocean and is done on a regular basis for all our vessels. Over time, marine growth occurs on the propeller which can negatively impact the efficiency and performance of the propulsion system on a vessel. Reduced efficiency results with increased fuel consumption, thus a lower fuel efficiency for the ship.

Gearbulk, along with our Joint Venture G2 Ocean, places a significant emphasis on optimising hull performance across our fleet. Continuous monitoring allows us to promptly identify any decline in performance, prompting necessary hull cleaning when needed. Moreover, we diligently adhere to regulations governing hull cleaning for vessels entering Australian waters, underscoring our commitment to environmental responsibility and maritime compliance.

ROUTE PLANNING AND NAVIGATION

Gearbulk follows strict rules in compliance with the IMO regulations. Trades in marine protected areas do occur from time to time, and information on days spent in these areas is currently being developed for future reporting.





FUTURE ACTIONS

Research and monitor relevant technologies

We remain committed to researching and monitoring emerging technologies that can help minimize the potential negative impacts of our organization. This includes both enhancements to existing systems and the adoption of innovative solutions that have been thoroughly evaluated for effectiveness and sustainability.

Explore Corporate Social Responsibility (CSR) partnerships

Gearbulk will actively seek and assess potential Corporate Social Responsibility (CSR) partnerships to further our goal of minimizing the environmental impact of our operations on biodiversity. Our evaluation will focus on identifying organizations that align with our sustainability objectives and exploring synergies to enhance the effectiveness of these partnerships.

Assess additional noise reduction measures

Currently Gearbulk has implemented measures such as slow steaming to reduce possible noise disturbance in addition to route planning and navigation. We aim to assess additional options that could further support noise reduction in protected areas.

3

PART 3

SOCIAL

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HEALTH AND SAFETY

NUMBER ONE PRIORITY

Gearbulk is deeply committed to ensuring the health and safety of our seafarers, vessels, and shore-based contractors. We achieve this by fostering a strong safety culture, providing comprehensive training, and continuously refining our policies and procedures to align with industry best practices.

WHY IT MATTERS

The maritime industry involves inherently risky operations, including vessel navigation, cargo handling, and maintenance activities. Prioritising health and safety is not only an ethical responsibility but also a crucial element of sustainable and responsible business practices. At Gearbulk, we recognise that protecting the health, safety, and dignity of our people is fundamental to our operations. While we are committed to upholding all human rights, we place particular emphasis on safeguarding our employees and seafarers—especially those from at-risk groups such as female seafarers and migrant workers. In a high-risk, global environment, ensuring the well-being of our workforce is essential to maintaining a resilient, inclusive, and values-driven organisation.

OUR AMBITION LEVEL

Gearbulk strives to create a working environment which ensures that our personnel are safe - life matters more than our operations.

OUR TARGETS

- Zero LTIF injuries
- Zero fatalities
- 100% attendance of health and safety campaigns



POTENTIAL AND ACTUAL IMPACTS

We recognise that our operations—through both our own activities and those linked to our business—have a potential impact on the health and safety of all individuals involved. Life onboard a vessel inherently involves risk, and without strict prioritisation of health and safety, daily tasks can become hazardous. To mitigate these risks, we maintain a robust safety management system aligned with the International Maritime Organization (IMO) standards and other globally recognized frameworks. Our policies and procedures are designed to prevent incidents, protect crew welfare, and promote a culture of continuous safety improvement. Despite strict adherence to these protocols, injuries can still occur. This reality reinforces our commitment to ongoing improvement and risk reduction. Crew welfare is not just a compliance issue—it is a core value. We are continually refining our practices to ensure safe, supportive, and resilient working environments at sea.

Risks ashore during vessel maintenance, loading and discharge of cargo and ship recycling pose an inherent risk to our suppliers providing these services. We acknowledge that although these risks are avoidable, strict policies and procedures on sourcing of goods and services together with continuous audits of our suppliers are important efforts to reduce these impacts.



OUR ONGOING EFFORTS TO MANAGE THE IMPACT

Gearbulk places strong emphasis on health and safety, recognising its impact on the economy, environment, and human rights. We assess our operations and partnerships to identify and mitigate risks, ensuring compliance with all relevant regulations and standards. Our comprehensive policies reflect a commitment to protecting the well-being of employees and stakeholders. We proactively manage health and safety through training, safety protocols, and regular risk assessments. When negative impacts occur, we act quickly to address them and support remediation. At the same time, we seek to enhance positive outcomes by fostering a culture of continuous improvement and employee well-being.

Gearbulk closely monitors the effectiveness of its health and safety initiatives through clear goals, targets, and performance indicators. Lessons learned from this monitoring are integrated into operational policies and procedures to enhance health and safety management continually. Moreover, Gearbulk actively engages with stakeholders to gather feedback and insights, ensuring that its actions align with stakeholder expectations and contribute to a safe and healthy work environment.

The Gearbulk Safety Committee convenes monthly to discuss updated statistics, recent incidents, safety measures, and proposed initiatives. Experience transfers and ship circulars are regularly published to the fleet, covering personal injuries, best practices, and more. Quarterly publications such as the Safety and Quality Bulletin and Near Miss Bulletin provide valuable information to sea and shore staff, while the Safety Management System serves as the foundational framework for safety performance initiatives.

Gearbulk also organises safety-focused events such as ‘Safety Days’ for vessels and a ‘Safety Week’ for shore staff, promoting discussions, drills, and activities aimed at strengthening safety cultures and fostering shared safety behaviours.

These prevention and mitigation initiatives also cover health and safety impacts directly linked to our operations by business relationships. We enforce strict health and safety requirements in our Supplier code of conduct where we also perform ad hoc audits to ensure that our requirements in our supplier code of conduct is adhered to. Additionally, we ensure that all relevant insurances to cover scenarios that pose a risk on health and safety are in place and all relevant employees and worker both on sea and shore are covered abiding to the local laws and regulations governing these insurances.

HEALTH AND SAFETY

PROGRESS AND PERFORMANCE

Gearbulk has a Zero Accident vision and believes that all injuries are preventable. Any injuries which do occur are measured as per OCIMF injury guidelines.

OUR COMMITMENT TO SAFETY

Our organisation's implementation of a Safety Management System (SMS) for seafarers contracted through manning agents is a comprehensive effort in compliance with international maritime regulations. Mandated under the International Maritime Organization's (IMO) ISM Code, our SMS encompasses regulations from key conventions such as the STCW Code, SOLAS, MLC Code, MARPOL, and associated FLAG requirements.

Furthermore, we have incorporated industry best practices collected from leading bodies to enhance our safety standards. The SMS is audited and certified annually by both external and internal entities to ensure adherence to legal requirements and recognised standards. All seafarers, without exception, are covered by this system. Shore employees responsible for fleet management are governed by the procedures while other shore employees are governed by corporate policies and local personnel handbooks.

Our SMS has received external certification, further validating its effectiveness. No workers have been excluded from this disclosure, as our commitment to safety extends universally across all personnel involved in our operations. The compilation of this data adheres to stringent standards and methodologies, providing stakeholders with transparent insights into our safety management practices.

Gearbulk continues to stress the importance on reporting all near misses as the improved data accuracy provides Gearbulk with better analytics for continuous improvement of all safety aspects in the fleet. Management actively promotes these reports as they are considered a leading indicator on detecting areas for improvement and actions, thus enabling Gearbulk to identify possible safety focus areas onboard, avoid injuries, property and environmental damage and increase performance during internal and external audits, including PSC (Port State Control) performance.

Rio Tinto Designated Owner Operator Standard (DOOS)

Gearbulk's strong performance in the recent Rio Tinto DOOS audit highlights our unwavering commitment to safety, crew welfare, and operational excellence. The audit confirmed that our safety management upgrades, transparent culture, and crew welfare practices not only meet but exceed the DOOS standard in several areas. With no high-risk findings and clear alignment with Rio Tinto's expectations, this milestone reflects the significant progress we've made in fostering a safe, supportive working environment—both at sea and ashore. Our proactive approach and continuous improvement efforts position us well for future advancements.

Hazard identification, risk assessment, and incident investigation

Gearbulk uses various methods and tools to identify and assess work-related hazards and risks, such as Risk Assessment Matrix (RAM), Hazard and Operability Study (HAZOP), and Hazard Identification (HAZID). Gearbulk encourages and enables its workers to report work-related hazards and hazardous situations and protects them from any reprisals or retaliation.

Gearbulk investigates work-related incidents using a standardised and systematic process, involving and consulting with the relevant stakeholders, and learning and sharing the lessons from the incidents. Gearbulk continuously enhances its occupational health and safety management system by using insights from hazard identification, risk assessment, and incident investigations. This is achieved by establishing and monitoring KPIs and targets, implementing and reviewing corrective and preventive actions, integrating safety processes into business planning and decision-making, and actively engaging with workers, their representatives, customers, suppliers, and regulators. Through this structured approach, we ensure a safer work environment and drive ongoing improvements in health and safety standards.

Occupational health services

Gearbulk provides occupational health services to its employees that aim to identify and eliminate hazards and minimize risks in the workplace. These services include regular health assessments, medical examinations, health promotion programs, and emergency response. Gearbulk ensures the quality of these services by following the standards and guidelines of the International Maritime Organization, the International Labour Organization, and the World Health Organization. Gearbulk also facilitates workers' access to these services by providing them with information, training, and support. All workers and permanent employees at Gearbulk are entitled to insurance coverage that ensures access to healthcare services, in accordance with Gearbulk's policies and procedures.



Worker training on occupational health and safety

Gearbulk is committed to providing a safe and healthy work environment for all its workers, and to prevent occupational injuries and illnesses. To achieve this, Gearbulk offers various types of occupational health and safety training to its workers, covering both generic and specific topics. The training includes:

- Basic health and safety awareness and procedures, such as emergency response, fire safety, first aid, and personal protective equipment.
- Identification and assessment of work-related hazards, such as ergonomic, chemical, physical, biological, and psychosocial hazards.
- Prevention and control of work-related hazards, such as hazard elimination, substitution, engineering controls, administrative controls, and safe work practices.
- Specific training on hazardous activities or situations, such as working at heights, confined spaces, electrical safety, manual handling, and driving.
- The safety intervention authority applies to all permanent employees, including seafaring workers, giving any individual the authority and duty to immediately stop any activity or operation which may place life, environment, vessel or cargo in danger. Any employee following this duty to stop hazardous activity shall not be blamed later if decision to stop was shown to be unnecessary.

The training is delivered through various methods, such as online courses, classroom sessions, reflective learning sessions, on-the-job coaching, and toolbox talks. The training is tailored to the needs and roles of different workers, and is updated

regularly to reflect changes in legislation, standards, and best practices. The training is also evaluated for its effectiveness and impact on workers' knowledge, skills, and behaviour.

Worker participation, consultation and communication on occupational health and safety

Gearbulk is committed to ensuring the health and safety of its workers and stakeholders through effective participation, consultation and communication processes. The company has established a health and safety management system that involves workers at all levels in the development, implementation and evaluation of policies, procedures and practices. Workers are consulted through regular meetings, surveys, feedback mechanisms and training sessions. They are also encouraged to report any hazards, incidents or concerns to their supervisors or health and safety representatives. The company provides access to and communicates relevant information on occupational health and safety to workers through various channels, such as newsletters, posters, intranet, notice boards and toolbox talks. Gearbulk has also formed joint management-worker health and safety committees at each of its operational sites. These committees are responsible for reviewing health and safety performance, identifying and addressing risks, monitoring compliance and recommending improvements. The committees meet at least quarterly and have the authority to make decisions on health and safety matters. All workers are represented by these committees, either directly or through their elected representatives.

Promotion of worker health

We value the health and well-being of our workforce, and we support them by providing access to medical and healthcare services that are not related to their work. We also offer voluntary services and programs that promote health and address the major health risks that our workers may face outside of work. We think that by investing in the health and wellness of our workers, we can create a safer, more productive, and more sustainable work environment. Workers and employees follow relevant reporting lines to gain access to these services when required. For seafarers, access is facilitated via manning agents and through websites.

Gearbulk provides its workforce with comprehensive insurance coverage. Moreover, the company has a high focus on mental health and has launched regular campaigns to raise awareness among workers about the importance of taking care of their health, both physical and mental, and seeking medical help when necessary. These sessions include information about the insurance resources available, preventive measures and wellness initiatives. We also encourage physical activity and a healthy lifestyle among workers by offering exercise classes, recreational activities, incentives and rewards for participating in fitness challenges and wellness initiatives.

HEALTH AND SAFETY

PROGRESS AND PERFORMANCE

We continuously monitor our progress and remain focused on creating a safer future, where every individual can work and thrive without the risk of injury or harm. Through ongoing efforts and improvements, we are committed to enhancing safety across all aspects of our operations.

LOST TIME INJURY FREQUENCY

Our Methodology for the calculation

In our performance calculation methodology, we employ widely recognised metrics within our industry. Specifically, we utilise the Lost Time Injury Frequency (LTIF) and Total Recordable Case Frequency (TRCF), both prevalent in our sector.

When applying these metrics, we begin by assuming 1,000,000 working hours, which we then divide by the product of the following factors: the manhours worked per vessel (24 hours in our case, reflecting the workday aboard the vessel), the number of vessels, the crew count on each vessel, and 365 days (representing our year-round operation).

We only include crew in the manhours as the data on the hours is controllable by Gearbulk.

Performance in 2024

Gearbulk saw a record low injury record in 2021. It is therefore unfortunate to see a continued hike in injuries since then. Each case was investigated and shared with the fleet through experience transfers.

Gearbulk is adamant in reversing the trend and the development has only enhanced Gearbulk's focus on achieving an improved safety performance amongst its employees. Increased Management level visits onboard, enhanced focus on toolbox meetings, The Safety Leadership training programme, and Risk Management are all focus areas for 2025.

Work related hazards are recognised and identified by the industry and governed by risk assessments, work permits, and check lists controlled by the organisation through its safety management system. Incidents are shared in the fleet through experience transfers. No injury from these hazards were reported in 2024.

Year	LTIF	TRCF	Fatalities
2021	0.41	2.04	0
2022	0.70	2.93	0
2023	0.81	3.26	0
2024	0.77	3.55	0

Aspect 2024	Target	Result
Lost Time Injury Frequency	0	0.77
Average Near Miss reports pr. Vessel pr. Month	3	3.27

TRCF and LTIF



MARINE CASUALTIES

During 2024, Gearbulk experienced two Marine Casualties where vessels were temporary rendered unfit for normal continuation of voyages. No employees were hurt during these incidents. The incidents requiring investigation are detailed below:

Vessel	Incident	Action
Misago Arrow	Contact Damage in Damietta port	Minor steel repairs & revised mooring guidelines
Teal Arrow	Traversing Trolley passed beyond limitations	Recover and repair trolley, revised checklists, installed new limiting sensors.

PORT STATE CONTROL DEFICIENCIES

Gearbulk prioritises the utmost adherence to international regulations and the highest standards of maritime safety. Port State Control (PSC) inspections stand as a cornerstone of our commitment to excellence in maintaining compliance and minimising deficiencies.

In 2024, Gearbulk encountered 137 deficiencies across 140 inspections, with an additional two vessels being detained due to notable deficiencies. This unfortunate occurrence stemmed primarily from intensified inspection protocols in China and maintenance shortcomings observed in newly acquired vessels. It's noteworthy that the number of inspections has increased significantly, mainly due to fleet expansion and PSC Concentrated Inspection Campaigns.

Item	2022	2023	2024
Inspections	85	117	140
Deficiencies	66	134	137
Deficiency Ratio	0.78	1.15	0.98
PSC Detentions	0	3	2
Flawless	54	70	83



FUTURE ACTIONS

Improve our safety management system

Continuously developing and improving our safety management system (SMS) is pivotal to elevating the safety standards within our company. Our resilient SMS supports our goal of minimising potential injuries aboard our vessels. We will persistently assess and enhance the SMS incorporating the latest legal requirements, regulations, and industry best practices. This commitment is instrumental in amplifying risk assessments and implementing proactive measures to augment safety levels on board our vessels.

Enhance technical inspections on the vessels

Detailed annual and ad-hoc technical inspections of vessels, with associated job lists and general discussions with management, will contribute to improved results during 3rd party inspections.

Conduct internal audit regimes

Stringent internal audit regimes will be implemented according to updated internal audit inspection checklists to improve 3rd party inspection performance.

Continue experience transfer and knowledge sharing practices

Experience transfer bulletins are published on a regular basis across the managed fleet, and the well-established Safety & Quality, PSC & Rightship bulletins will continue.

HUMAN RIGHTS

ENCHANCING OUR BUSINESS PRACTICES

At Gearbulk, we recognize that human rights are fundamental to creating just, equitable, and dignified societies. We are committed to upholding these principles across our operations, ensuring that every individual is treated with respect, fairness, and equality in all aspects of our business.

WHY IT MATTERS

Maintaining high standards of business ethics is essential for building a successful and sustainable business.

OUR AMBITION LEVEL

Gearbulk aims to ensure that all third parties accepted within the Gearbulk network adhere to Human Rights laws and regulations both locally and internationally.

OUR TARGETS

- 100% of “high-risk” suppliers to be screened and audited by 2030



POTENTIAL AND ACTUAL IMPACTS

Gearbulk is committed to applying high standards of business and personal ethics to detect, manage risks and address adverse human rights impacts. It is the policy of Gearbulk to always comply with any applicable laws and regulations including internationally recognised conventions regarding the protection of human rights.



OUR ONGOING EFFORTS TO MANAGE THE IMPACT

Gearbulk is diligent in managing its impacts on human rights, recognising their significance across various sectors. The Company acknowledges the potential negative impacts stemming from its activities and business relationships and is dedicated to proactively addressing them.

With robust policies in place to manage impacts from our own activities, Gearbulk emphasises fair treatment, diversity, and inclusion, implementing measures such as employee training and due diligence on suppliers to prevent potential negative impacts. In instances of actual negative impacts, Gearbulk swiftly takes corrective action, cooperating with stakeholders to address violations. Moreover, the organisation actively cultivates a culture of respect and dignity to manage potential positive impacts within its operations and supply chain. Rigorous monitoring processes track the effectiveness of these actions, with lessons learned integrated into operational policies for continuous improvement. Engagement with stakeholders ensures alignment with expectations, reinforcing Gearbulk’s commitment to upholding human rights across its operations.

Gearbulk’s comprehensive policy for Human Rights and decent working conditions delineates principles and standards to uphold and safeguard human rights throughout its operations. This policy articulates the guiding principles in interactions with employees, contractors, suppliers, partners, and impacted communities. Furthermore, Gearbulk upholds our commitment to transparency by publishing the annual accounts in compliance with the Transparency Act requirements. This account details the assessment of potential risks and actions taken to mitigate them.

To manage the impact through business relationships Gearbulk implemented its third-party risk management policies and procedures during 2024 and will continue our efforts to ensure appropriate due diligence procedures are undertaken to support our commitment.

Please refer to our website for more information.

HUMAN RIGHTS

PROGRESS AND PERFORMANCE

Our business operations are closely intertwined with multiple aspects of human rights, from ensuring safe and fair working conditions for our employees to upholding ethical recycling practices across our vessels. Additionally, we are committed to the responsible use of digital data and emerging technologies, reinforcing our dedication to integrity and respect in every facet of our work.

FOCUS ON HUMAN RIGHTS

Our commitment to Human Rights is articulated in our Human Rights Policy, serving as a guiding framework for our operations. The ethical conduct of our suppliers is an integral aspect of this framework. It is crucial to acknowledge that our actions, both internally and within our extensive network of business relationships, carry significant societal impact, both positive and negative. The evolving regulatory landscape and heightened expectations from our stakeholders underscore the material importance of human rights as a fundamental consideration in our business operations.

In 2024, we prioritised efforts on our commitment to Human Rights by implementing a risk-based Risk Management Policy and supporting procedures. This approach ensures we effectively address and mitigate any potential or actual risks related to Human Rights violations in our operations.

Notably, no human rights violations were reported in 2024.

Our commitment extends to continuous screening of Third Parties, with a particular focus on identifying and addressing concerns related to Human Rights. As part of our due diligence processes in 2024, no material concerns were identified, demonstrating our proactive efforts in upholding Human Rights standards throughout our supply chain and business relationships.

For more information on our performance please refer to our Annual Account published on our website [gearbulk.com](https://www.gearbulk.com).



FUTURE ACTIONS

Ensure continuous stakeholder engagement and reporting

We are committed to endeavours that support fair business practices in alignment with stringent protocols and various legislations surrounding Human Rights.

With our third-party risk management policy and procedures now successfully implemented, we have also completed the automation of these processes to further strengthen our ability to identify and mitigate potential risks. This initiative will continue to be refined to ensure that risks in our business relationships are effectively managed through the regular review and updating of our procedures.

Our commitment extends to proactive engagement with stakeholders, seeking insights into concerns that may affect human rights, and conducting regular risk assessments to safeguard our organisation.

We will continue to adhere to and comply with the Norwegian Transparency Act by diligently monitoring and reporting on our human rights performance, underscoring our dedication to accountability and continuous improvement.



DIVERSITY AND INCLUSION

CREATING EQUAL OPPORTUNITIES

At Gearbulk we have a Zero Tolerance to discrimination, and we continuously assess our Human Resource processes to ensure respect and fairness towards current and prospective employees in our business operations.

WHY IT MATTERS

Diversity and inclusion in the maritime industry is imperative not only for fostering a culture of equality but also for aligning various legislative requirements, as it contributes to our social responsibility for sustainable development within the industry we operate.

OUR AMBITION LEVEL

Gearbulk strives to create and cultivate a workplace that does not discriminate on any level regardless of gender, race, religion, sexual orientation and cultural beliefs.

OUR TARGETS

To ensure that our recruitment process is fair and presents no discrimination and that employment decision is based purely on merit.



POTENTIAL AND ACTUAL IMPACTS

Gearbulk recognises that its activities have significant implications for diversity and inclusion, both potentially and actually, as per the Global Reporting Initiative (GRI) standards. In terms of potential impacts, Gearbulk acknowledges the importance of its recruitment practices and workforce composition. Actively promoting diversity and inclusivity in hiring processes is crucial, as it can lead to a more representative and experienced workforce. Moreover, Gearbulk understands that its policies and workplace culture play a critical role in either supporting or hindering inclusivity, thereby directly influencing employee morale and retention.

In terms of actual impacts, Gearbulk acknowledges that its operations may directly affect the communities it serves, potentially influencing diversity and inclusion through interactions with suppliers, customers, and stakeholders. Therefore, Gearbulk is committed to proactively managing these impacts by implementing policies, fostering inclusive cultures, and engaging with stakeholders to promote diversity and inclusion across its operations in alignment with GRI standards.



OUR ONGOING EFFORTS TO MANAGE THE IMPACT

Gearbulk is committed to managing both the negative and potential impacts on diversity and inclusion, understanding their significance across the economy, environment, and society. Recognising the importance of diversity in fuelling creativity and innovation, Gearbulk actively promotes diverse backgrounds, experiences, and perspectives within its workforce.

Gearbulk ensures equal opportunity by making employment decisions solely based on objective criteria, thereby fostering trust and minimising turnover. Additionally, Gearbulk strives to create an inclusive environment where every individual feels valued and respected, unleashing the full potential of its workforce. Regular reviews and training on workplace harassment policies demonstrate our commitment to fostering a discrimination-free environment.

ESG reporting, guided by GRI standards, ensures transparency and dialogue with stakeholders regarding efforts related to diversity, equality, health, safety, and more. Gearbulk actively engages with stakeholders to communicate its actions, incorporating lessons learned into operational policies and procedures for continuous improvement. Through these comprehensive approaches, Gearbulk demonstrates its dedication to managing diversity and inclusion effectively across its operations.

To further articulate our commitment to providing equal opportunities for all, we have detailed guidelines in the Gearbulk Employment Code of Conduct, Diversity and Inclusion Policy and Code of Business Ethics.

DIVERSITY AND INCLUSION

PROGRESS AND PERFORMANCE

Our shore workforce is comprised of both permanent employees and contractors (workers), with staff situated across various locations. As defined in our boundaries and scope, the information below only includes employees in our shore business who support our material business segment and therefore excludes information from our Terminals.

PERMANENT EMPLOYEE PROFILE



37

FEMALE



41

MALE

78

HEADCOUNT

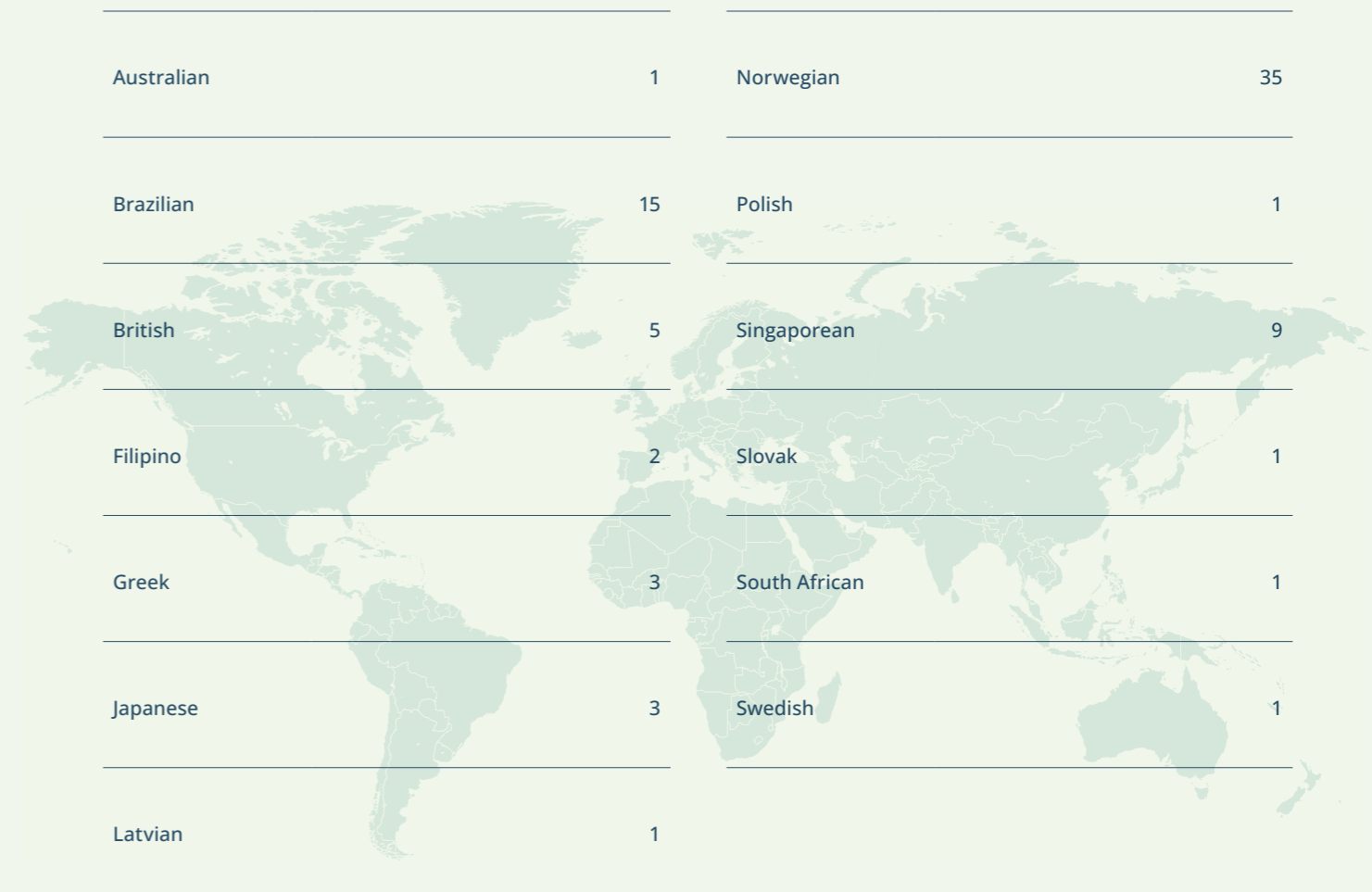
4

HIRED

10

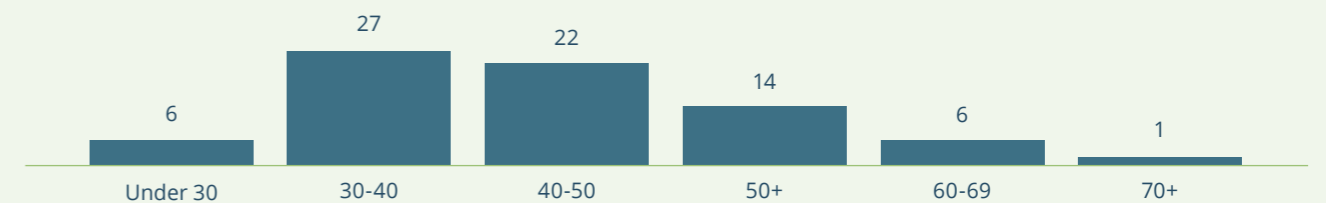
TERMINATED

HEADCOUNT BY CITIZENSHIP



* The table accounts for personnel who have an employment agreement with Gearbulk in business units which are in scope for reporting purposes. As of the date of reporting, the employees included were all permanent, full-time employees.

HEADCOUNT BY AGE GROUP (PERMANENT EMPLOYEES)



FUTURE ACTIONS

Advocate for a secure workplace

To foster a culture of openness and trust, we actively encourage honest communication across all levels of the organisation. Employees have access to multiple reporting channels, including a dedicated whistleblowing channel, ensuring a safe and confidential space to voice concerns without fear of retaliation.

Additionally, we continuously seek feedback from permanent employees and seafarers through surveys and open forums to assess the effectiveness of our initiatives, allowing us to make meaningful improvements through ongoing evaluations and enhancements.

We also will continuously engage and improve communication lines with our suppliers to address any risks arising from potential discrimination.

Conduct managerial training for Diversity and Inclusion

Recognising the pivotal role both managers and employees play in fostering inclusion and workplace safety, we will build on our efforts in 2025 to include additional leadership training, workshops, and enhanced e-learning and onboarding initiatives. These programs ensure that everyone in our organisation—regardless of role—fully understands and actively supports diversity, inclusion, and a safe working environment. By integrating these resources into our ongoing training, we reinforce our commitment to a culture that prioritises learning, awareness, and continuous improvement.



4

PART 4

GOVERNANCE

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ANTI-BRIBERY AND CORRUPTION

ZERO TOLERANCE OF UNETHICAL BEHAVIOUR

Gearbulk is dedicated to actively contributing to the global effort against bribery and corruption. This commitment is essential to upholding our enduring values of sustainability and social responsibility.

WHY IT MATTERS

Unethical behaviour in any organisation carries not only the financial burden of non-compliance and potential fines but also results in numerous disadvantages for the communities it serves. Beyond the immediate financial consequences, such behaviour compromises trust and tarnishes the reputation of the organisation, impacting its relationships with customers, suppliers, the public and other key stakeholders. Additionally, unethical practices can lead to suboptimal service delivery and a negative impact on the quality of products or services provided to communities. This, in turn, hampers community well-being and can contribute to a broader erosion of societal trust in institutions.

OUR AMBITION LEVEL

Gearbulk collaborates with its stakeholders to eliminate bribery, corruption and any other unethical behaviour in our operations worldwide.

OUR TARGETS

- Zero bribery and corruption actual incidents.
- Regular training on anti-bribery and corruption for all employees.
- Engage all employees and leadership to act according to Gearbulk's Code of Business Ethics.



POTENTIAL AND ACTUAL IMPACTS

We conduct business in few regions where corruption levels are elevated, presenting challenges associated with local officials who may be operating under certain corruption practices. In such high-risk countries, the inclination to resort to bribery and corruption for expediting the import and export processes of cargo is particularly noticeable. The global nature of the shipping industry involves numerous stakeholders and jurisdictions, amplifying the potential for bribery and corruption. Material risks could include under-invoicing, bribes for securing contracts, illicit payments to marine surveyors, facilitation payments to customs officers, and the illegal purchase of letters of credit.

By acknowledging these inherent risks, we recognise that individuals involved in our operations and business partners may be exposed to bribery and corruption. The Company is committed to implementing preventive measures, both independently and collaboratively with industry partners. The objective is not only to mitigate these risks but to proactively prevent any form of bribery and corruption, aligning with the Company's dedication to ethical business practices and responsible global operations.



OUR ONGOING EFFORTS TO MANAGE THE IMPACT

Gearbulk rigorously manages corruption and bribery through its Compliance Committee, recognising the potential adverse effects on the economy, society and institutions. The Company conducts assessments of its activities and business relationships to identify any involvement in corruption or bribery attempts, ensuring compliance with anti-corruption laws and regulations. Gearbulk maintains robust policies, emphasising the need of ethical conduct and integrity in all business dealings.

To prevent potential negative impacts, Gearbulk provides employee training on anti-corruption policies, due diligence procedures for business partners, and transparent financial reporting practices. Also to support its zero-tolerance approach to bribery and corruption, Gearbulk promotes awareness through onboarding and training, conducts regular reviews of related policies and procedures, maintain an active partnership with the Maritime Anti-Corruption Network (MACN), collaborates with Joint Venture Partners and empowers its employees through an independent whistleblowing channel.

In cases of actual negative impacts, Gearbulk takes immediate action to address them, cooperating with authorities and implementing remedial measures. The Company actively manages potential positive impacts by promoting a culture of transparency and accountability.

Gearbulk tracks the effectiveness of its actions through comprehensive monitoring processes, setting goals, targets, and indicators to evaluate progress. Lessons learned from this tracking are integrated into operational policies and procedures to enhance anti-corruption practices continually. Moreover, Gearbulk engages with stakeholders to gather feedback and insights, ensuring that its actions align with stakeholder expectations and effectively combat corruption and bribery. Through these comprehensive measures, Gearbulk demonstrates its commitment to ethical business practices and integrity in all aspects of its operations.

ANTI-BRIBERY AND CORRUPTION

PROGRESS AND PERFORMANCE

Our unwavering commitment to ethical conduct and transparency fuels substantial efforts towards mitigating bribery and corruption risks. Stringent policies, comprehensive training and ongoing vigilance exemplify our pledge to uphold integrity and accountability across all areas of our operations.

Assessing operations for risks related to bribery and corruption

Gearbulk thoroughly and periodically evaluates the business risks embedded in all its operations, including but not limited to bribery and corruption risks. Gearbulk identifies the probability and severability of the risk, existing control measures, effectiveness of the existing control measures and planned strategies to enhance awareness and mitigation actions. Frequent collaboration with our operational joint ventures through joint committees and a proactive approach of the fleet management and other business segments guarantees that all operations all fully and continuously assessed in terms of material compliance risks.

Identifying significant risks related to corruption through the risk assessment

Gearbulk operates in several countries which have an increased risk to bribery and corruption such as China, Argentina, Brazil, India, Pakistan, Indonesia, Papua New Guinea and Turkey. This increases the risk of potential bribery and corruption incidents that may lead to financial losses, reputational damages, possible fines and penalties, and even halting or obstructing local operations.

ACTIVE VENDORS BOUND TO SUPPLIER CODE OF CONDUCT

Region	No. of active vendors	% of representation within Gearbulk's universe of active vendors	Rate of adherence to Gearbulk's Supplier Code of Conduct
Africa	6	1%	100%
APAC	299	33%	100%
Europe	465	52%	100%
Middle East	29	3%	100%
North America	75	8%	100%
Central America	7	1%	100%
South America	20	2%	100%
Total	901	100%	100%

Anti-corruption policies and procedures communication and training per region

SHORE EMPLOYEES

Region	Completed training per employee	Average of Completion
APAC	14	67%
Europe	31	53%
South America	13	100%
Total	58	63%

GOVERNANCE BODY MEMBERS (SENIOR MANAGEMENT)

Region	Completed training per Management	Average of Completion
APAC	1	0%
Europe	4	90%
South America	1	100%
Total	6	63%

1
ACTUAL ABC RELATED EVENT

0
LEGAL CASES AND TERMINATIONS

TARGET: 0

One ABC case has been reported during a port call in Argentina.

Nil dismissal or disciplinary action to employees in connection to corruption practices.

Nil incidents with active vendors related to corruption.

Nil legal cases regarding corruption have been brought against the organisation nor its employees.

63%
SHORE EMPLOYEES

65%
CREW OFFICERS

TRAINED ON ANTI-BRIBERY AND ANTI-CORRUPTION

TARGET: 100%

Our ABC policy has been recently reviewed to provide clear guidance in relation to bribery and corruption topics.

Crew and shore employees shall take mandatory training on anti-corruption principles and risks considering their specific activities.

Crew also receive anti-corruption guidance regularly through emails and quarterly SEQ Bulletins.

At the end of 2024, 63% of shore employees and 65% of crew officers had successfully completed Gearbulk ABC training. The decrease in the completion rate, when comparing to 2023, can be attributed to the expiration of previous compliance training taken by shore employees.

In 2024, Gearbulk launched two new video training modules on ABC and Whistleblowing, in alignment with its compliance improvement strategy.

Gearbulk also promoted a presentation by the MACN to selected officers in 2024, boosting awareness on the costs of corruption to the maritime industry and overall society.

In 2025, Gearbulk, will develop additional controls to monitor the continuous mandatory review of ABC and other compliance trainings.

100%
POTENTIAL INCIDENTS REPORTED TO MACN

TARGET: 100%

Gearbulk is a member of the Maritime Anti-corruption Network (MACN) and cooperate with like-minded industry companies to promote compliance with anti-corruption laws and eliminate corrupt practices.

Currently, the MACN organization is the ABC industry reference to over 221 companies globally and is still growing. MACN has at least two meetings each year, and Gearbulk's representatives have participated in meetings held since 2018. MACN encourages members to report any actual or suspected corruption incidents so that MACN can focus combating initiatives in areas with increased risks.

All occurrences to date have been reported to MACN.

FUTURE ACTIONS

Monitor our risks continuously

Gearbulk's commitment to uphold and enhance a zero-tolerance practice on bribery and corruption is a key element within our future endeavours. In line with this commitment, Gearbulk conducts regular evaluations of bribery and corruption risks, as well as of the effectiveness of our control measures. This involves maintaining a close collaboration with Gearbulk's operational joint ventures and ensuring a proactive strategy across fleet management, shipowning and terminal business segments.

Enhance awareness on anti-bribery and corruption

Gearbulk will enhance its comprehensive anti-bribery and corruption training program with the goal to increase employees' and crew ABC awareness. This initiative aims at reinforcing Gearbulk's zero-tolerance commitment, emphasizing the importance of maintaining ethical standards across all our operations.

Gearbulk aims to establish clearer metrics across the organization and automate compliance controls. The Company will intensify and enhance supplier evaluations with a focus on risk analysis, including in relation to anti-corruption aspects, to ensure compliance of the entire supply chain with applicable laws and regulations.



CYBER SECURITY

PROTECTING OUR ORGANISATION

Gearbulk is committed to maintaining robust cybersecurity measures in an evolving digital landscape. By proactively addressing emerging threats, fostering a culture of security awareness, and integrating cybersecurity into our operations, we safeguard our business, protect critical information, and support those who rely on our services.

WHY IT MATTERS

Cybersecurity is paramount for our company as it safeguards sensitive information and ensures the integrity and continuity of our operations. By prioritising robust cybersecurity measures, we not only protect our stakeholders and maintain their trust but also contribute to sustainable and ethical practices.

OUR AMBITION LEVEL

Gearbulk aims to integrate cybersecurity practices to ensure a resilient digital landscape that prioritises accountability and sustainable cybersecurity measures.

OUR TARGETS

- 100% of employees to be trained on Gearbulk Policies and Procedures
- 100% of employees to be registered on the e-learning software
- Fail rate of less than 5% on simulations



POTENTIAL AND ACTUAL IMPACTS

We acknowledge the significant threat that cyber risk pose to the shipping industry, and we have proactively implemented a range of security measures to safeguard against potential cyberattacks. Our ongoing investment in robust security controls not only minimises our vulnerability to cyber threats but also ensures a more reliable and secure service for our customers. By diligently identifying and addressing potential system vulnerabilities, we strive to mitigate disruptions to our operations, offering our customers the assurance that their cargo will be delivered punctually and without interruption.

We actively engage in the exchange of cyber threat intelligence with various security entities in the Maritime and Shipping sector, including the Norwegian Maritime Cyber Resilience Centre, as well as renowned national and global organisations. The information obtained from threat intelligence is thoroughly assessed and utilised to enhance detection capabilities and reduce overall cyber risk. Additionally, our participation in various initiatives and regular engagement in cybersecurity forums allow us to share knowledge and stay informed about emerging threats affecting our industry.



OUR ONGOING EFFORTS TO MANAGE THE IMPACT

Gearbulk focuses on continuously improving our cybersecurity capabilities to counter emerging threats. This includes investing in modern infrastructure, implementing advanced security technologies, and regularly reviewing and refining our defences. These efforts ensure that we remain prepared to detect, respond to, and recover from cyber incidents, minimising potential impacts on our business operations.

Our approach is built on the belief that cybersecurity is not just about protecting systems but also about safeguarding the trust of our stakeholders. By staying ahead of cyber risks, we aim to protect our information values, and to be prepared to deal with any situation where these values are attacked.

Cybersecurity is not only a technical challenge but also a cultural one. We believe that our employees play a critical role in protecting the organisation from cyber risks. Through ongoing training and awareness programmes, we equip them with the knowledge to identify and respond to potential threats, such as phishing and other malicious activities.

As technology evolves, so do the challenges and opportunities it brings. Gearbulk has worked to modernise our digital infrastructure, both onboard and ashore, to support secure communication, collaboration, and innovation- across our offices and our fleet. This approach ensures that we remain prepared to adopt new technologies without compromising security.

Our commitment to cybersecurity is ongoing as we navigate an ever-changing threat landscape. By staying proactive, fostering awareness, and integrating security into our culture, we are well-positioned to protect our business and support those who depend on us.

CYBER SECURITY

PROGRESS AND PERFORMANCE

We prioritise the continuous enhancement of our cyber security measures and management. Through proactive initiatives and ongoing vigilance, we are committed to safeguarding our digital infrastructure and protecting sensitive information from evolving threats in today's dynamic cyber landscape.

93%

OF EMPLOYEES
REGISTERED FOR TRAINING

To ensure our employees are equipped with the necessary knowledge and skills, Gearbulk utilises advanced e-learning software to deliver interactive cyber security training. Our employees are required to participate in regular training sessions to stay up-to-date with the latest developments in cyber security.

100%

OF EMPLOYEES
RECEIVED TRAINING

To mitigate cyber security risks, Gearbulk has implemented a mandatory cyber security training program. This will ensure that our employees are equipped with the knowledge and skills necessary to protect our digital systems and maintain the smooth operation of our daily activities.

2%

FAILRATE ON SIMULATED
ATTACKS

Gearbulk employs advanced cyber security tools to conduct regular simulated hacking attacks via email. Disguised as phishing emails, simulated hacking attacks are created on a regular basis, and the employee has the option to delete or report the suspicious email. With ongoing training, our fail rate is low at 2.0%.

ZERO

ACTUAL MAJOR INCIDENTS
OCCURRED

Cyber-attacks continued to increase in 2024. The increase in actual incidents can be attributed to modern methods hackers utilise to trick the individual in actual day-to-day business scenarios. However, through a combination of increased awareness, strengthened IT Security infrastructure and regular e-learning, the Company is confident to further contain the impact of major incidents in 2025.

No substantiated complaints, leaks, thefts, or losses of customer data has been identified.



FUTURE ACTIONS

Increase our security measures

Gearbulk recognises the need for an effective and robust cyber security management strategy in accordance with relevant regulations and best practices, to ensure the safety and security of seafarers, the environment, the cargo, and the ships.

Cyber security management is about creating and implementing a unified data security strategy so that data remains safe no matter how the infrastructure evolves. It is about nurturing a safety-first organisational culture that puts security at the heart of everything we do. This includes accounting for cyber security risk management in our safety management systems, in compliance with the ISM code.

SUPPLY CHAIN MANAGEMENT

RESPONSIBLE BUSINESS PRACTICES

Maintaining a proactive approach in developing initiatives that drive efficiency, resilience, and ethical practices is essential for navigating the complexities of today's global supply chains.

WHY IT MATTERS

Cultivating relationships with suppliers entails nurturing ethical partnerships, maintaining transparent communication, and promoting fair practices. Effective supplier management, guarantees dependable sourcing, quality, and sustainability, recognising that neglecting these aspects may result in disruptions and unethical sourcing practices.

OUR AMBITION LEVEL

Gearbulk aims to exclusively engage in business collaborations with supply chain partners who demonstrate a genuine commitment to addressing environmental and social impacts. Together, we seek to uphold shared objectives focused on minimising adverse effects and promoting sustainable practices.

OUR TARGETS

- 95% of all new suppliers screened for environmental and social topics
- Develop and implement policies and procedures for third party risk management/ due diligence procedures



POTENTIAL AND ACTUAL IMPACTS

Gearbulk's impact on supply chain management extends far beyond mere financial transactions; it profoundly influences both economic dynamics and environmental considerations within the local communities where it operates. Through its procurement activities, Gearbulk engages with a diverse array of suppliers worldwide, contributing to their financial stability and growth. This ripple effect encompasses various facets, including job creation, economic development, and tax contributions, which play pivotal roles in shaping the socio-economic landscape of these communities. Additionally, Gearbulk's operations leave a tangible environmental footprint, encompassing aspects such as pollution and resource consumption. For instance, the transportation of goods via Gearbulk's vessels may result in emissions and other environmental impacts, affecting air and water quality. Therefore, Gearbulk acknowledges its responsibility to manage these impacts responsibly, striving to minimize environmental harm through sustainable practices and continuous improvement initiatives within its supply chain management framework. By addressing both economic and environmental aspects, Gearbulk aims to foster positive outcomes for both its suppliers and the communities in which they operate, reflecting its commitment to ethical and sustainable supply chain practices.



OUR ONGOING EFFORTS TO MANAGE THE IMPACT

At Gearbulk, effective supply chain management utmost important. We meticulously assess both actual and potential impacts across the economy, environment, and people, including human rights considerations, ensuring transparency by reporting any involvement in negative impacts arising from our activities or business relationships. Our supply chain management policies prioritise responsible sourcing, environmental stewardship, and upholding human rights.

Proactively, we implement a supplier code of conduct, conduct regular audits, and swiftly address any negative impacts in collaboration with stakeholders. Furthermore, we actively manage positive impacts by engaging with local communities, promoting sustainable practices, and continuously tracking progress using defined processes and indicators. Through stakeholder engagement, we ensure our actions align with expectations, aiming for effective supply chain management that mitigates risks and maximizes positive impact, reflecting our commitment to responsible and sustainable practices at Gearbulk.

SUPPLY CHAIN MANAGEMENT

PROGRESS AND PERFORMANCE

We proactively collaborate with key suppliers to enhance sustainability across our supply chain. Through targeted initiatives, we work to improve waste management, reduce carbon emissions, and drive long-term environmental and operational efficiency.

Progress to reduce impact we have on the environment

In collaboration with our primary consumable supplier, we have been able to effectively coordinate the retrieval of used plastic wrapping generated during the delivery of consumable supplies. Subsequently, the collected plastic waste undergoes proper onshore disposal procedures.

We have also partnered with our Freight Forwarder to reduce our carbon emissions, using the GLEC Framework to map and measure them. The Freight forwarder calculated Gearbulk's 2024 transport footprint, totaling 386,993 kg CO2-e. To offset these emissions, the Freight Forwarder contributes to 'Justdiggit' – a land restoration organisation in Tanzania.

Progress to reduce impact we have on society

We have made progress in reducing negative impacts on society by ensuring our vendors adhere to our Supplier Code of Conduct, which outlines our expectations for ethical behavior and responsible practices. This code serves as a guiding framework, emphasising compliance with local laws and regulations. To support this commitment, we occasionally conduct audits of our vendors to assess their adherence to these standards. Based on the findings, we engage with the vendors to find solutions which can be implemented to strengthen our relationships and promote accountability and transparency throughout our supply chain. This proactive approach not only fosters a positive impact on communities but also reinforces our dedication to ethical business practices, ensuring that our operations contribute to the well-being of society as a whole.



252

SUPPLIERS SIGNED SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct is imperative to keep our suppliers responsible to uphold our ethical and responsible business standards. Signing the supplier code of conducts supports the supplier's commitment to our goals.

162

OF SUPPLIERS SCREENED

Gearbulk's due diligence process includes a digital screening tool, assessing our suppliers for any negative environmental and social impacts prior to engaging with the supplier. During 2024 no material flags were identified with new or existing suppliers.

323KGs

SUSTAINABLE GOODS PROCURED

Through various partnerships and frequent collaboration with our suppliers, we strive to ensure the procurement of sustainable goods and services. As a result, key suppliers have successfully delivered on this commitment by adjusting the nature and method of delivery of goods and services.

FUTURE ACTIONS

Third-Party Risk Management Policy and Procedures

Gearbulk will continue to conduct assessments of all suppliers, both newly onboarded and existing, with a strong focus on evaluating their environmental and social impacts. In 2024, no vendor accounts were put on hold, nor were any suppliers terminated due to non-compliance, reflecting our commitment to proactive risk management and supplier engagement.

We maintain continuous dialogue with our suppliers to ensure that any identified risks are effectively mitigated, strengthening collaboration and driving responsible procurement practices. These assessments remain integral to refining Gearbulk's strategic procurement approach, ensuring alignment with our Environmental, Social, and Governance (ESG) objectives. Through consistent engagement and a proactive stance on sustainability and ethical sourcing, we reinforce our dedication to fostering positive environmental and social outcomes while adapting to the evolving dynamics of our industry.

Expand our commitment to sustainable procurement

Gearbulk is actively enhancing its sustainable procurement network by conducting continuous supplier assessments to ensure that the goods and services we acquire align with our environmental and social responsibility objectives. We prioritise responsible waste disposal and collaborate with both current and prospective vendors to advance circular economy initiatives. By developing and reinforcing these partnerships, we aim to proactively identify and implement solutions that reduce waste, encourage recycling, and maximise resource efficiency throughout our supply chain, all while upholding our strong ethical values.



APPENDICES

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GLOSSARY OF TERMS AND ACRONYMS

- **AI:** Artificial Intelligence
- **ABC:** Anti Bribery and Corruption
- **AER:** Annual Efficiency Ratio
- **AF:** Anti Fouling
- **Biofouling:** The accumulation of plant and animal organisms on wetted surfaces.
- **BoD:** Board of Directors
- **BWM:** Ballast Water and Sediments
- **BWTS:** Ballast Water Treatment System
- **CBT:** Computer based training
- **CEO:** Chief Executive Officer
- **CFO:** Chief Financial Officer
- **CH4:** Methane
- **CII:** Carbon Intensity Indicator
- **CMS:** Crew Management System
- **COA:** Contract of Affreightment, a contract requiring the carriage of a determined quantity of a specified cargo over a given period of time.
- **CO₂:** Carbon Dioxide – major Greenhouse gas. An atmospheric increase of 35% since pre-industrial levels has been attributed to burning of fossil fuels and deforestation, causing global warming. This increased level is also responsible for increased acidification of the oceans.
- **CSR:** Corporate Social Responsibility
- **Dunnage:** Material used to support and secure cargo during transportation.
- **DWT:** Deadweight tonnage is a measure of the sum of the weights a vessel can carry including cargo, fuel, ballast, fresh water, and stores.
- **EBITDA:** Earnings before interest, tax, depreciation and amortisation
- **ECA:** Emission Control Area, areas with more stringent regulation of emissions such as SOX and NOX for environmental and/or human health issues.
- **ECDIS:** Electronic Chart Display and Information System
- **EEDI:** Energy Efficiency Design Index
- **EEOI:** Energy Efficiency Operational index
- **ESG:** Environmental Social Governance
- **ETS:** Emission Trading System
- **EU:** European Union
- **EUA:** European Carbon Allowances
- **EQ:** Emotional intelligence
- **FC:** Financial Capital
- **FE:** Facilities and Equipment
- **FFA:** Forward Freight Agreements
- **Fleximax:** Vessels with open hatch, box shaped holds but having fixed jib cranes rather than travelling gantry cranes. This gives rise to small overhangs on four hold bulkheads incorporating the crane support structure.
- **FS:** Financial Statements
- **GBSF:** Gearbulk Solidarity Fund
- **GHG:** Greenhouse Gases, generic name for a range of gases which absorb and reflect thermal radiation back to the earth's surface which would otherwise have escaped into space, thus leading to global warming.
- **GLT:** Gearbulk Leadership Team.
- **GRI:** Global Reporting Initiative
- **HAZID:** Hazard Identification
- **HAZOP:** Hazard and Operability Study
- **HC:** Human Capital
- **HFC:** Hydrofluorocarbon
- **HR:** Human Resources
- **HSEQ:** Health, safety, quality and environment policy
- **IACS:** Integrated Administration and Control System
- **IC:** Intellectual Capital
- **ICS:** International Chamber of Shipping
- **IHM:** Inventory of Hazardous Materials.
- **IMO:** International Maritime Organisation, United Nations agency responsible for the safety and security of shipping and the prevention of pollution from ships.
- **IR:** Integrated Report
- **ISM:** International Safety Management
- **ISO:** International Organisation for Standardisation.
- **JV:** Joint Venture
- **KPIs:** Key performance indicators
- **LTIF:** Lost Time Injury Frequency, the number of Lost Time Injuries per million man-hours worked during the reporting period.
- **MACN:** Maritime Anti-Corruption Network, a global network promoting good practice in the maritime industry by tackling bribes, facilitation payments and other forms of corruption.
- **MARPOL:** Abbreviation for marine pollution and refers to IMO's International Convention for the Prevention of Pollution from Ships which covers pollution caused by oil, noxious liquids in bulk, pollutants carried in packaged form, sewage, garbage, and air pollution.
- **MC:** Manufactured Capital
- **MEPC:** Marine Environment Protection Committee
- **MLC:** Maritime Labour Convention
- **Mt:** Metric tonnes.
- **NC:** Natural Capital
- **NGOs:** Non-Government Organisation, an organisation which operates independently from any form of government and is not a conventional for-profit business.
- **NORMA:** Norwegian Maritime Cyber Resilience Centre
- **NOX:** Generic term for nitric oxides and nitrogen dioxide formed during the combustion process. Forms acid rain and destroys the earth's protective ozone layer. Inhalation can cause or worsen respiratory diseases such as bronchitis, emphysema and aggravate heart disease.
- **OCIMF:** Oil Companies International Marine Forum
- **OHGC:** Open Hatch Gantry Crane.
- **OHJC:** Open Hatch Jib Crane.
- **OPEX:** Operating expenses or operating costs
- **PC / HC:** Propellor and Hull Cleaning
- **PSC:** Port State Control, the inspection of foreign ships in national ports to verify the condition of the ship and its equipment comply with the requirements of international regulations and that the ship is manned and operated in compliance with these rules.
- **RAM:** Risk Assessment Matrix
- **SEEMP:** Ship Energy Efficiency Management Plan, a tool which incorporates best practices and continual improvement for the energy efficient operation of a vessel. Introduced by IMO.
- **Semi-open:** Vessels with hatch openings slightly smaller than the cargo hold, causing minor overhangs.
- **SOLAS:** International Convention for the Safety of Life at Sea
- **SOX:** Sulphur oxides, broad term referring to a range of sulphur and oxygen containing compounds which can be generated naturally (volcanoes) and from man-made sources such as burning of fossil fuels.
- **SRC:** Social and Relationship Capital
- **SRF:** Ship Recycling Facility
- **SRP:** Ship Recycling Plan
- **SOLAS:** International Convention for the Safety of Life at Sea
- **STCW:** Standards of Training, Certification and Watch-keeping. The IMO Convention for STCW prescribes minimum standards relating to training, certification and watchkeeping for seafarers.
- **Supramax:** Bulk carrier in 50,000 to 60,000 dwt range.
- **TEFC:** Totally Enclosed Forestry Carrier.
- **TPM:** Ton per mil
- **TRC:** Total Recordable Cases
- **TRCF:** Total Recordable Cases Frequency
- **Tweendecker:** Vessel which has its holds divided by a 'tween' deck which creates upper and lower holds.
- **USG:** United States Gulf (of Mexico)
- **VSAT:** Very Small Aperture Terminals

GRI INDEX

GRI CONTENT INDEX

Statement of use: Gearbulk Holding AG has reported in accordance with the GRI Standards for the period 1 January 2024 - 31 December 2024. GRI is notified that we use the standard.

The GRI index below includes references to material topics addressed in the report.

When reading the below, please note we refer to the Integrated Report as "IR," the ESG Report as "ER" and the Financial Statements as "FS."

Disclosure number	Description	Reference	Requirement(s) omitted	Reason for omission	Comment
GRI 2 - GENERAL DISCLOSURES 2021					
2-1	Organisational details	IR p. 5, 16, 18-19; ER p. 4			
2-2	Entities included in the organisation's sustainability reporting	IR p. 4, 16 ER p. 4			
2-3	Reporting period, frequency and contact point	IR p. 4 ER p. 4			Reporting frequency: Annual Publication date: April 30, 2025 Contact point: Shahn Bothma, Senior ESG and Risk Manager stakeholderenquiries@gearbulk.com
2-4	Restatement of information	ER p.4			
2-5	External assurance	IR p. 4, 32 ER p. 4			
2-6	Activities, value chain and other business relationships	IR p. 10-11 ER p. 74 - 77			No major changes in sector or value chain occurred in the reporting period
2-7	Employees	IR p. 100-105 ER p. 56-57			
2-8	Workers who are not employees	IR p. 100-105 ER p. 56-57	2-8	Information unavailable/incomplete	Gearbulk has reported on seafarers and contractors in this report, however information about other workers in the value chain is not readily available from our suppliers. Gearbulk to assess whether this can be obtained for the next reporting period.
2-9	Governance structure and composition	IR p. 28 - 35			

Disclosure number	Description	Reference	Requirement(s) omitted	Reason for omission	Comment
GRI 2 - GENERAL DISCLOSURES 2021					
2-10	Nomination and selection of the highest governance body	IR p. 30 - 32	2-10	Not applicable	The company is privately held by only two shareholders. Hence, the nomination to the highest governance body and its committees is decided by the shareholders. The shareholders' agreement for Gearbulk regulate how many directors each shareholder can nominate to the board of directors.
2-11	Chair of the highest governance body	IR p. 28 - 34	2-11	Not applicable	Halberton Holding AG, as majority shareholder (51%), nominates the President. Conflicts of interest and Related Party transactions are disclosed per governance rules and the annual report. The Chairman, a senior executive, oversees strategy with the Board but has no independent decision-making authority. This structure reflects the Company's historical setup.
2-12	Role of the highest governance body in overseeing the management of impacts	IR p. 6, 22, 28-32, 48-50			The Board of directors outline the overall strategic goals for the Company on an annual basis. Management use this as input to articulate and detail the Company's objectives based on the six capitals identified. These are then presented to the Board of directors who have the opportunity to comment and challenge management, before finally approving the Company's objectives for the coming year.
2-13	Delegation of responsibility for managing impacts	IR p. 22, 32, 35			
2-14	Role of the highest governance body in sustainability reporting	IR p. 6, 22			The Board, under the supervision of the Shareholders Agreement, delegates the authority to the CEO to approve reports on sustainability and other non-financial information.
2-15	Conflicts of interest	IR p. 32			
2-16	Communication of critical concerns	IR p. 32, 35, 113			
2-17	Collective knowledge of the highest governance body	IR p. 30			The Board of directors is well informed on the latest regulatory changes on sustainability. Their commitment to sustainability is also well reflected in their strategic goals. The Company also runs e-learning on sustainability and the Board are also obliged to complete these on an annual basis.

Disclosure number	Description	Reference	Requirement(s) omitted	Reason for omission	Comment
GRI 2 - GENERAL DISCLOSURES 2021					
2-18	Evaluation of the performance of the highest governance body	N/A			There is no particular process for evaluation, including independent evaluation, of the board performance in overseeing the management of impact. However, it is considered to have outside audit of the company's impact reporting.
2-19	Remuneration policies	IR p. 31, 76	2-19	Confidentiality constraints	This is not information Gearbulk shares publicly due to considerations of remuneration policy confidentiality.
2-20	Process to determine remuneration	IR p. 31, 76	2-20	Confidentiality constraints	This is not information Gearbulk shares publicly due to considerations of remuneration policy confidentiality.
2-21	Annual total compensation ratio	N/A	2-21	Confidentiality constraints	Compensation is subject to confidentiality clauses in employment agreements.
2-22	Statement on sustainable development strategy	IR p. 39			
2-23	Policy commitments	IR p.34 ER p. 15, 27, 28, 41, 49, 50, 55, 63, 65, 69, 79			
2-24	Embedding policy commitments	IR p. 20, 27, 28, 34, 41, 49, 50, 55, 63, 65, 69, 71, 79, 98, 102-108, 110, 116, 124 ER p. 15, 27, 28, 41, 42-43, 49, 50, 55, 58, 62-65, 69, 70-71, 79			
2-25	Processes to remediate negative impacts	IR p. 35, 43, 94, 113, 116, 118 ER p.15, 27, 37, 41, 43, 49, 58, 63, 64, 69, 76			
2-26	Mechanisms for seeking advice and raising concerns	IR p. 116 ER p. 43			

Disclosure number	Description	Reference	Requirement(s) omitted	Reason for omission	Comment
GRI 2 - GENERAL DISCLOSURES 2021					
2-27	Compliance with laws and regulations	ER p. 45			In 2024, Gearbulk did not incur any material fines or non-monetary sanctions for non-compliance with laws or regulations. The company remains committed to operating in accordance with all applicable legal and regulatory requirements across its global operations.
2-28	Membership associations	IR p. 116,122			
2-29	Approach to stakeholder engagement	IR p. 46 - 49 ER p. 15, 27, 41, 43, 49, 52, 55, 63, 69, 75			
2-30	Collective bargaining agreements	N/A			None of Gearbulk's shore-based employees are covered by collective bargaining agreements. Therefore there is nothing to report. Gearbulk ensures compliance with local laws and regulations where CBAs are not applicable with our business model.

Disclosure number	Description	Reference	Requirement(s) omitted	Reason for omission	Comment
GRI 3 - MATERIAL TOPICS 2024					
3-1	Process to determine material topics	IR p. 6-7			
3-2	List of material topics	IR p. 6- 7, 60-61 GRI Topic Standards that contain relevant indicators for disclosure for the topics considered most material for Gearbulk: - 305: Emissions - 306: Waste - 403: Occupational Health and Safety - 205: Anti-corruption - 418: Customer privacy			

Disclosure number	Description	Reference	Requirement(s) omitted	Reason for omission	Comment
GRI 3 - MATERIAL TOPICS					
Material Topic 1 - Climate change					
3-3	Management of material topic	ER p. 14-25 IR p. 43, 49, 89, 127-128			
GRI 305 - Emissions 2016					
305-1	Direct (Scope 1) GHG emissions	IR p. 126-127 ER p. 18-19, 92	c.	Information unavailable/incomplete	Biogenic CO ₂ emissions are currently not reported due to data limitations. We aim to include this information in future reports as data availability improves.
305-2	Energy indirect (Scope 2) GHG emissions	ER p. 18, 20, 92			
305-3	Other indirect (Scope 3) GHG emissions	ER p. 18, 21, 92 IR p. 126-127	c.	Information unavailable/incomplete	Biogenic CO ₂ emissions are currently not reported due to data limitations. We aim to include this information in future reports as data availability improves.
305-4	GHG emissions intensity	IR p. 126, 130 ER p. 16, 22, 92	c. d. 2.7	Information unavailable/incomplete	Due to data limitations, we are currently unable to isolate and quantify the emissions reductions resulting from our initiatives. It is currently not feasible to identify this, however Gearbulk follows industry developments on the topic.
305-5	Reduction of GHG emissions	IR p. 126 ER p. 18-24, 92	a.	Information unavailable/incomplete	Due to data limitations, we are currently unable to isolate and quantify the emissions reductions resulting from our initiatives. It is currently not feasible to identify this, however Gearbulk follows industry developments on the topic.
305-6	Emissions of ozone-depleting substances (ODS)	N/A	305-6	Information unavailable/incomplete	Due to data limitations, we are currently unable to report emissions of Ozone Depleting Substances (ODS). It is currently not feasible to identify this, however Gearbulk follows industry developments on the topic.
305-7	Nitrogen oxides (Nox), sulfur oxides (SOx), and other significant air emissions	ER p. 15, 23, 92-93	305-7 a (iii-vii)	Information unavailable/incomplete	Due to data limitations we are currently unable to quantify and report on these requirements. Gearbulk to further investigate possible measures to obtain such information for future reporting. Gearbulk follows industry developments on the topic.

Disclosure number	Description	Reference	Requirement(s) omitted	Reason for omission	Comment
GRI 3 - MATERIAL TOPICS					
Material Topic 2 - Pollution					
3-3	Management of material topic	IR p. 126-127 ER p. 26-31			
GRI 306 - Waste 2020					
306-3	Significant spills	IR p. 126-127 ER p. 26-31			
GRI 306 - Effluents and Waste 2016					
306-1	Waste generation and significant waste-related impacts	IR p. 126-131 ER p. 26-31, 76-78			
306-2	Management of significant waste-related impacts	ER p. 26-31, 76-78	306 -2 a	Information unavailable/incomplete	Gearbulk is consistently increasing measures to reduce its impact. These measures are defined in our actions and as information becomes more available Gearbulk intends to adapt processes to ensure manment of thethe impact.
306-3	Waste generated	ER p. 26-31	a.	Information unavailable/incomplete	The data is currently not complete. Gearbulk intends to enhance data collection and report on waste composition from vessels in the future.
306-4	Waste diverted from disposal	ER p. 26-31	306-4 a-e	Information unavailable/incomplete	This information is not currently available from our suppliers as this is not industry norm. Gearbulk to further assess possible measures to obtain such information for future reporting.
306-5	Waste directed to disposal	ER p. 26-31	306-5 a-d	Information unavailable/incomplete	This information is not currently available from our suppliers as this is not industry norm. Gearbulk to further assess possible measures to obtain such information for future reporting.
Material Topic 3 - Occupational health and safety					
3-3	Management of material topic	ER p. 40-47 IR p. 49, 99, 103, 107, 110			

Disclosure number	Description	Reference	Requirement(s) omitted	Reason for omission	Comment
GRI 3 - MATERIAL TOPICS					
GRI 403 - Occupational Health and Safety 2018					
403-1	Occupational health and safety management system	ER p. 40-47			
403-2	Hazard identification, risk assessment, and incident investigation	ER p. 42-43			
403-3	Occupational health services	ER p. 42			
403-4	Worker participation, consultation and communication on occupational health and safety	ER p. 43	403-4	Information unavailable/incomplete	Due to our industry and partners in the industry, this information is not readily available. Gearbulk to evaluate the feasibility of the data collection for this requirement.
403-5	Worker training on occupational health and safety	ER p. 43	403-5	Information unavailable/incomplete	Due to our industry and partners in the industry, this information is not readily available. Gearbulk to evaluate the feasibility of the data collection for this requirement.
403-6	Promotion of worker health	ER p. 43			
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	ER p. 40-47			
403-8	Workers covered by an occupational health and safety management system	ER p. 42	403-8	Information unavailable/incomplete	Gearbulk does not possess such data on workers in the value chain to report on this requirements. Gearbulk to evaluate the feasibility of the data collection for this requirement.
403-9	Work-related injuries	ER p. 44-45 IR p. 98	403-9 a. iv-v. 403-9 b,c,f	Confidentiality Information unavailable/incomplete	Information not reported due to confidentiality constraints and local laws and regulations governing privacy. Due to our industry and partners in the industry, this information is not readily available. Gearbulk to evaluate the feasibility of the data collection for this requirement.
403-10	Work-related ill health	ER p. 42-44	403-10 a.b.d.e.	Confidentiality	Information not reported due to confidentiality constraints and local laws and regulations governing privacy.

Disclosure number	Description	Reference	Requirement(s) omitted	Reason for omission	Comment
GRI 3 - MATERIAL TOPICS					
Material Topic 4 - Corruption and bribery					
3-3	Management of material topic	ER p. 62-67 IR p. 34, 73, 112, 114, 116-122			
GRI 205 - Anti-Corruption 2016					
205-1	Operations assessed for risks related to corruption	ER p. 62-67			
205-2	Communication and training about anti-corruption policies and procedures	ER p. 64-65	c.	Information unavailable/incomplete	Data is incomplete from our vendors and business partners to report on this requirement. Gearbulk to implement processes to obtain the data for the next reporting period.
205-3	Confirmed incidents of corruption and actions taken	ER p. 65			
Material Topic 5: Cyber security					
3-3	Management of material topic	ER p. 68-73 IR p. 71, 116-122			
GRI 418 - Customer Privacy 2016					
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	IR p.120-122 ER p. 68-73			

ENTITIES COVERED IN THIS REPORT

The ESG and Integrated reports cover the following entities:

OHBC BUSINESS DIVISION

- Gearbulk Holding AG
- Gearbulk Management Switzerland AG
- Gearbulk Shipowning AS
- Gearbulk Norway AS
- Gearbulk Shipowning Limited
- Gearbulk Pool Limited
- Gearbulk Captive Ltd.
- Gearbulk Shipmanagement Limited
- Gearbulk Shipping Singapore Pte. Ltd.
- Gearbulk Services Japan, Ltd.
- Gearbulk (UK) Limited

GBSI BUSINESS DIVISION

- GBSI Holding AG
- GBSI Combi AS
- Gearbulk Ltd.
- Gearbulk Shipping AS
- GB Shipping Investments Ltd.
- GBSI Transshipment Ltd.
- GBSI Tankers Ltd.

In reporting our non-financial information, we have focused solely on areas where we have a material impact, as determined by the revenue generated from our operations. This approach differs slightly from our financial reporting, where materiality is assessed not only based on revenue but also on a broader set of financial factors.

REPORTING METHODOLOGIES

Description	Methodology	Scope/ Exclusions	Unit of reporting
ENVIRONMENT			
Emissions			
Energy consumption and intensity ratios			
Energy Efficiency Operational Indicator (EEOI)	The EEOI is calculated based on IMO MEPC.1/Circ.684, with the formula: EEOI = (fuel consumption*carbon factor)/(distance*cargo carried) The carbon factors used are as follows: Heavy fuel oil: 3.1144 Light fuel oil: 3.151 Diesel oil: 3.206 Source: IMO lifecycle and carbon intensity guidelines	EEOI only uses CO2 factor for the fuel, not CO2e	mt CO2/ mill mt cargo*nm
Annual Efficiency Ratio (AER)	The AER is calculated based on MEPC.336(76) guideline, with the formula: AER for the fleet = (Annual fuel consumption * carbon factor of the fuel) /total transport work (Distance sailed * average DWT of G2 Ocean's fleet). The carbon factors used are as follows: Heavy fuel oil: 3.1144 Light fuel oil: 3.151 Diesel oil: 3.206	AER only uses CO2 factor for the fuel, not CO2e	
SOx per transport work	The SOx emissions are divided by transport work (distance*cargo carried) to give a fair comparison year by year. See separate description for calculation of SOx emissions.		
NOx per transport work	The NOx emissions are divided by transport work (distance*cargo carried) to give a fair comparison year by year. See separate description for calculation of NOx emissions.		
Scope 1 emissions			
CO2 equivalents (CO2e) from fuel consumption	The carbon factors used are as follows: Heavy fuel oil: 3.1144 Light fuel oil: 3.151 Diesel oil: 3.206		

Description	Methodology	Scope/ Exclusions	Unit of reporting
ENVIRONMENT			
Sox and NOx emissions			
Sulphur oxides emissions (SOx)	The mass of SOx emitted by the vessel is calculated by multiplying the given fuel type consumption (in metric tons) with the sulphur content of each fuel type (%) and sulphur content factor per metric ton of fuel. The sulphur content factor is a fixed parameter of 1.99782 per metric ton and, given the fuel type, the sulphur content percentage is expressed as an absolute value. The emitted mass of SOx will then be: Consumption [MT] * Sulphur content [%]* Sulphur Content Factor 1.99782 per mt Source: Norwegian Oil and Gas Association, Recommended guidelines for discharge and emission reporting, No:44		MT NOx
Nitrogen Oxides (NOx)	Gearbulk calculates NOx emissions following bottom-up, activity-based method. This integrates ship-specific technical data with operational parameters for accurate estimates. NOx emissions (metric tons): NOx (mt) = Energy Output (kWh) × NOx Factor (g/kWh)/ 10^6 Energy outputs = Energy Output (kWh) = SFOC (g/kWh) × Fuel Consumed (metric tons) × 10^6 Source: Fourth IMO GHG Study		MT NOx
Scope 2 emissions			
Consumption of purchased energy for heating, cooling, lightning, and gas.	Electricity is the main energy source used by our offices. All energy sources are included in the emission data. The CO2 emission factor (tCO2 per kWh) from our offices' local energy supplier is used where available. We have applied the market base approach to calculate the electricity consumption in the report.	The company's total Scope 2 emissions include emissions from offices in Brazil, Japan, Norway, Singapore and Switzerland.	CO ₂ e
Scope 3 emissions			
Emissions from business travel	We use information provided by service provider to calculate our scope 3 emissions. Our travel service providers provides an annual overview of all flights booked via their online portal and by phone to their operators. In their annual summary all flights are categorised by flight length (domestic / international) and ticket class. In addition to this we receive the total emissions per year from our crewing agency to report on.		CO ₂ e
Downstream Leased Assets	The carbon factors used are as follows: Heavy fuel oil: 3.1144 Light fuel oil: 3.151 Diesel oil: 3.206	Covers the emissions from all GB vessels chartered out of the G2 Ocean fleet, not including well-to-tank emissions.	CO ₂ e

