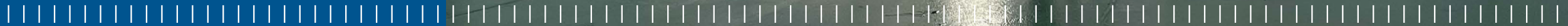




Gram Car Carriers ESG report 2023



Key performance indicators

(2022)

GHG emissions Scope 1 (MT)

420,732

(499,176)

LTIF

0

(1.1)

Fines or significant environmental incidents

0

(0)

Sailing distance (Nm)

1,500,872

(1,689,099)

Number of owned vessels in fleet (as at 31.12)

19

(18)

Average age of fleet (years)

13

(12.8)



About this report

This report presents the environmental, social and governance (ESG) performance of Gram Car Carriers ASA (“the Company” or “GCC”, together with its subsidiaries the “Group”) for the period 1 January to 31 December 2023. The report has been prepared to meet the disclosure requirements of the SASB Marine Transportation Standard (2023); and follows The Norwegian Shipowners’ Association’s ESG Reporting Guidelines (2021), referencing the GRI Standards (2021).

Gram Car Carriers ASA is listed on Euronext Oslo Børs with the ticker-code “GCC” and the shares are admitted to trading on OTCQX Best Market in New York with ticker “GCCRF”.

For further information contact mail@gramcar.com



This Report complies with the SASB
Marine Transportation Standard (2023) and
The Norwegian Ship Owners' Association ESG
Reporting Guidelines 2021

A message from our CEO

Gram Car Carriers (GCC) aspires to be a leader in sustainable transportation solutions for the global auto industry. This vision is ingrained in our mission, values and shared culture, serving as guiding principles for our daily decision-making and our long-term strategy for growth and value creation.

Looking back on 2023, I am pleased to share our advances within sustainability and the resilience of our operations. During the year, we made a transformative shift from focusing on 'what' we achieve to 'how' we conduct our business. We established the Board's ESG Committee to further strengthen effective governance in line with our commitment to sustainability and diligent decision-making, and we initiated a Double Materiality Assessment as part of our CSRD readiness plan for the coming year.

Our comprehensive approach to measuring greenhouse gas emissions (GHG) includes active engagement with the International Maritime Organisation's (IMO) Carbon Intensity Indicator (CII) reporting, and we have incorporated EU ETS clauses into all charter contracts and opened a trading account.

Throughout the year, we continued our work on reducing GHG emissions through biofuel trials and energy efficiency initiatives supported by detailed decarbonisation plans for each

of our vessels. We also completed the installation of ballast water treatment systems on all vessels, reflecting our commitment to zero significant spills.

Our dedication to responsible business practices is further evident through our due diligence processes aligned with the Norwegian Transparency Act, managing potential risks in our value chain.

I am proud to emphasise that our sustainability position remains firm as we continue to build a more sustainable and resilient offering to support the green mobility shift. I extend my gratitude to our colleagues and partners for their continuous contributions.

Looking into 2024 and beyond, our vision stands firm. We continue to support the transition of our industry and the global vehicle value chain towards a decarbonised future. Please, explore our ESG report for insights into the 'how' guiding our operations.



Georg A. Whist
CEO of Gram
Car Carriers ASA

About Gram Car Carriers ASA

Gram Car Carriers ASA is the world's third-largest car carrier tonnage provider, with a strong industry name having been engaged in car carrier investments since 1982. The Company provides modern fuel-efficient vessels and logistics solutions to operators, enabling precise and safe shipment with maximised cargo capability.

At 31 December 2023, GCC operated and commercially managed 19 owned vessels. The Company is also the commercial manager for Global Auto Carriers (GAC), which is currently building four 7,000 CEU dual fuel Pure Car Truck Carriers (PCTC) in China. On 5 July, the Company signed an agreement to sell two distribution vessels, the Viking Constanza (2,000 CEU, built 2010) and the Viking Princess (1,000 CEU, built 1996), to modernise the fleet and capitalise on historically high second-hand vessel values. On 5 September, the Company assumed full ownership of the mid-size vessel Mediterranean Sea (5,000 CEU, built 2010).

Crewing and technical management for the vessels owned and commercially managed by the Company is outsourced to reputable service providers on a contractual basis. Service providers are expected to meet the Company's ESG standards, with specific requirements set out in Contracted Time Charters and Technical Management Agreements. This includes the obligation for charterers to operate vessels so that they achieve a CII rating of C or better. The routing of vessels, choice of port and time in port is generally the choice of the Company's customers.

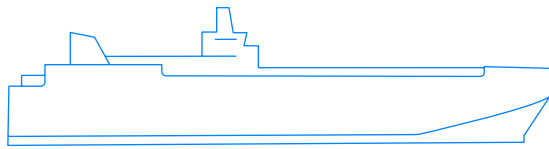
GCC's vessels are chartered to major global and regional car carriers worldwide in line with the Company's legacy. The Company's headquarters are in Oslo, Norway, with a branch office in Singapore.

Supporting the green mobility shift

Gram Car Carriers' culture is built on a strong sense of purpose supported by the Company's vision, mission and values, which influence how the Company carries out the everyday work to assist its customers and partners.

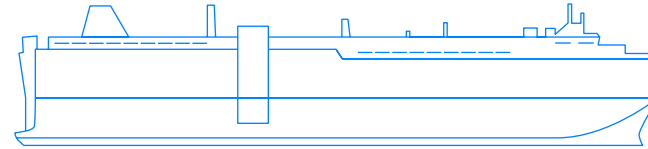
Fleet Description

Diversified fleet of 19¹ owned PCTCs



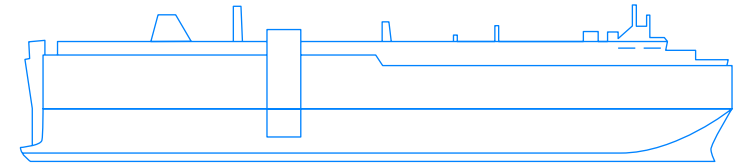
4 Distribution vessels¹

(up to 2,000 CEU)



11 Mid-size vessels

(up to 5,000 CEU)



4 Panamax vessels

(up to 7,000 CEU)

Third party vessels

4 Panamax newbuilds for Global Auto Carriers

¹ Includes the Viking Princess which was delivered to the new owner in January 2024.

ESG Governance Mechanisms

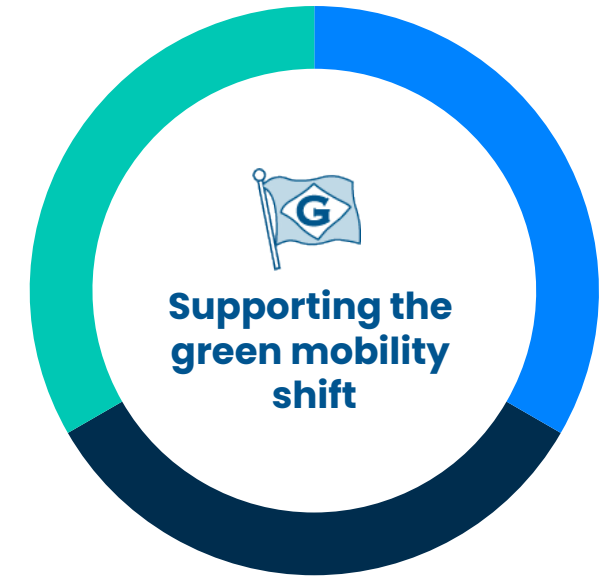
The commitment to ESG performance is formalised through GCC’s sustainability framework, and robust governance processes. The Company recognises the significance of measuring, managing, and transparently reporting on material ESG topics. To identify these material topics, GCC has collaborated with external sustainability experts to ensure a thorough and objective assessment. The material topics serve as the focal point for this report, aligning sustainability efforts with areas deemed most critical for the Company and its stakeholders.

To identify and understand the topics, GCC engages its stakeholders regularly. The stakeholders include suppliers, charterers, technical managers, as well as lenders, investors and customers. Each stakeholder’s priorities, including those connected to ESG, are acknowledged and discussed, with key findings taken into account in sustainability related work. More extensive stakeholder engagement has been undertaken in the process of the Double Materiality Assessment described below, including interviews with selected representatives and a survey sent to the crews onboard GCC vessels.

ESG-related impacts, risks, and opportunities are regularly reviewed as part of the overall responsibility for risk governance by the Board of Directors (the Board). Matters to be discussed by the Board are prepared by the Audit Committee, including a review of this report. In the pursuit of ESG best practice, GCC has also established an ESG Committee

comprising three members of the Board (formally established in January 2024). The Committee will assist the Board in discharging its responsibilities and duties related to material ESG matters, enhancing governance structures, ensuring oversight and driving strategic decisions aligned with the Company’s sustainability objectives. Its responsibilities include reviewing any proposed public disclosures or statements related to key ESG matters. This encompasses both existing and evolving disclosure requirements within the regulatory environments in the EU and Norway, as well as disclosures according to accepted best practice.

The GCC sustainability framework, coupled with the introduction of the ESG Committee, underscores GCC’s commitment to navigating the complexities of ESG challenges and opportunities with diligence and foresight.



Environment

- GHG emissions
- Air emissions
- Fuel efficiency
- Ecological impacts
- Ship recycling

Social

- Health and safety
- Diversity
- Human rights
- Developing human capital

Governance

- ESG governance
- Conduct, ethics and anti corruption
- Data privacy and cyber security

ESG Governing Policies

The following documents support GCC's governance over ESG and are available on the Company's website.

- [Corporate Governance Policy and other guidelines](#)
- [Transparency Act Statement](#)
- [Procedure for reporting concerns](#)
- [Code of Conduct](#)
- [Supplier Code of Conduct](#)
- [Sanctions Procedure](#)
- [Charter of the ESG Committee](#)
- [Charter for the Nomination Committee](#)
- [Charter for the Audit Committee](#)
- [Charter of the Remuneration Committee](#)

ESG-linked compensation

Part of the Company's long- and short-term incentives are linked to ESG performance to further enhance the Company's strategic ESG ambitions and achievement of the goals set.

Double Materiality Assessment for CSRD readiness

In preparation for the reporting requirements under the Corporate Sustainability Reporting Directive (CSRD), GCC is conducting a Double Materiality Assessment (DMA) in collaboration with an independent ESG consultancy, to deepen the focus on what is assessed to be the most material ESG matters. This initiative aims to understand the Company's environmental, social and economic impacts, along with the associated financial risks and opportunities. This includes engaging with key stakeholders to ensure the validity of the findings, and to support the transparency and accountability



of ESG disclosures. The DMA is set to be finalised soon after the publication of this report and will guide the establishment of effective management practices for the identified material topics. The newly formed ESG Committee will oversee the refining of sustainability initiatives based on the insights obtained through the DMA process.

The mentioned approach is designed to ensure compliance with evolving regulations and to strengthen risk management and due diligence approaches. GCC believes this will position the Company to capitalise on emerging opportunities.

Environment

Climate Change

Greenhouse Gas (GHG) Emissions

The Company recognises the critical importance of managing and reducing GHG emissions. GCC is committed to contributing in a transparent and accountable way to the maritime industry’s decarbonisation efforts. In 2023, Scope 1 GHG emissions totalled 420,732 metric tonnes CO₂-e, representing a 10.7% reduction from the previous year (2022: 470,969). The decrease was predominantly driven by changes in fleet size, composition, and ongoing fleet-wide decarbonisation initiatives

GHG emissions and CII performance

Emissions from owned vessels	2023	2022	2021
Scope 1 GHG emissions (MT)	420,732	470,969	378,749
Carbon intensity indicator (CII) (gCO ₂ e / tnm) ¹	8.04	8.26	7.16

¹ 2023 CII figure has been calculated on the basis of 19 operated vessels.

The Carbon Intensity Indicator (CII) is a measure of how efficiently a ship transports goods and is given in grams of CO₂ emitted per cargo-carrying capacity and nautical mile travelled. The CII is based directly on the fuel consumption, and its value is affected by the type of fuel used, the efficiency of the vessel and operational parameters such as vessel speed, cargo

transported, weather conditions and the general condition of the vessel (e.g. biofouling). As a responsible ship owner, GCC seeks to minimise the CII by optimising operations, ensuring vessels are in a good condition and contracting with charterers to agreed operating parameters, including vessel speed.

GCC is committed to reducing emissions in maritime transport, which is why it is implementing operational control in its GHG accounting practices. Acknowledging the importance of the company’s role in environmental stewardship, GCC follows policy mandates, including Health, Safety, and Environment (HSE) and IMO guidelines.

In line with the GHG Protocol’s accounting methodologies and Science-based target initiative (SBTi) guidelines, GCC sets emission reduction targets reflective of vessel emissions only. Following the latest IMO decarbonisation ambitions and the SBTi Maritime Guidance, GCC employs a well-to-wake (WTW) approach. This includes emissions from the combustion of fuels and energy consumed, allocated into Scope 1 rather than the Company’s value chain emissions (Scope 3).

At MEPC80 in June 2023, the IMO completed its first revision of its GHG Strategy and strengthened its ambition for reducing GHG emissions from international shipping. GCC’s climate

commitments are aligned with the IMO’s revised targets in achieving at least a 20% reduction by 2030 while striving towards a 30% reduction, and achieving at least a 70% reduction by 2040 while striving for 80%, compared to 2008 levels. The long-term goal is to reach net-zero by or around 2050.

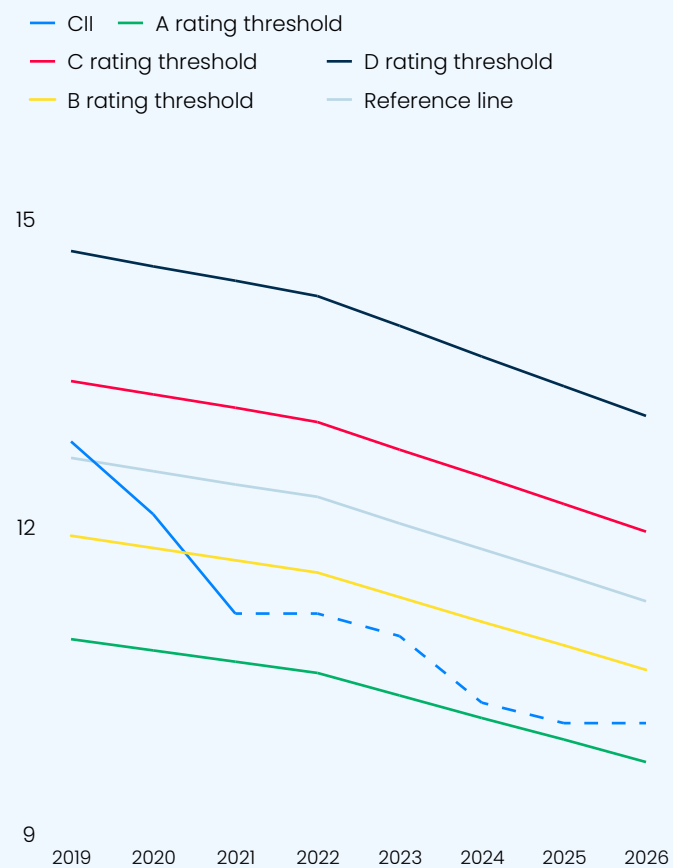
The Company monitors the IMO’s plans to revise emission reduction targets in response to the evolving regulatory landscape and is prepared to align investments and targets to the anticipated new regulations, including support for green shipping fuels and market-based carbon pricing. Regionally, GCC’s strategic considerations are influenced by the EU’s commitment to greener fuels in the maritime sector (FuelEU Maritime) and the inclusion of maritime shipping in the EU Emission Trading System (EU ETS).

Advancing Decarbonisation Initiatives

To achieve the targeted GHG reductions, GCC is implementing its long-term decarbonisation plan established in collaboration with DNV. This involves ongoing biofuel trials and the phasing in of individual vessel decarbonisation plans, each with defined actions and desired outcomes. The new initiatives introduced in 2023 are described below and underscore GCC’s dedication to mitigating environmental impact and advancing sustainable practices in the shipping industry.

Reduction plan – CII

Carbon intensity (gCO₂/capacity-mile)



In 2023, GCC embarked on a project involving the upgrade of shaft/generators on the distribution vessels, enabling variable speed on the four-stroke engines, with an anticipated fuel saving of 10-15%. This also involves installation of shore power connections. An efficient solution has been developed in close collaboration with one of the customers, which was presented together with an execution plan in March 2024.

Additionally, in 2023, Yokogawa flow meters¹ were successfully installed on all vessels, providing real-time fuel consumption data with high accuracy. This enables the use of Artificial Intelligence to optimise vessel trim, speed and direction to reduce fuel consumption and increase energy efficiency.

Poseidon Principles

GCC is a foundational signatory to the Poseidon Principles, a global framework for responsible ship finance, aimed at integrating climate considerations into lending decisions for international shipping decarbonisation. In line with this commitment, GCC adheres to IMO emission requirements, employing operational and technical initiatives to maintain a “C” rating on the fleet’s Carbon Intensity Indicator (CII). These efforts are detailed in collaboration with DNV in established decarbonisation plans. As part of fleet renewal, GCC, as commercial manager, has ordered four dual-fuel LNG vessels on behalf of Global Auto Carriers and divested three conventional owned vessels, including the oldest in the fleet. These actions reflect GCC’s commitment to responsible and environmentally conscious shipping practices.

¹ For more information on this product, please refer to the ROTAMASS Total Insight by Yokogawa Norway.

EU ETS for shipping

The Company is actively tracking the implementation of maritime transportation into the EU ETS, which entered into force on 1 January 2024. This cap-and-trade system will indirectly impact GCC’s operations through its charterers. The EU ETS for shipping applies to all voyages and port calls within the EU/EEA and 50% of emissions on voyages into or out of the EU/EEA. Responding proactively, GCC has integrated EU ETS clauses into agreements with all charterers and established an EU ETS trading account, with the COO and Operations Manager as account representatives. The Company has deployed monitoring software for the trading account in collaboration with Zero44, a German-based software company. Discussions with the auditors about the Company’s EUA (Emission Unit Allowance) balance in 2024 show no anticipated adverse impacts. At the time of this report, six GCC vessels were exposed to the EU ETS, some of them only partially.

Climate risk

Risk management remains integral to daily operations and management processes at GCC. Enterprise risks, encompassing climate risk, are systematically presented to the Board annually, drawing insights from technical managers and consultants. The most recent review for 2023 identified no significant changes in climate-related risks. However, the Company acknowledges that the ongoing Double Materiality Assessment may bring additional insights and increased focus on related risks.

GCC’s climate-related risks encompass both physical risks, such as weather disruptions and vessel handling, and transitional risks, including evolving regulations and changing

customer requirements. Adhering to the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), the Company disclosures are outlined below, with a more comprehensive overview available in the TCFD statement provided in the Appendix to this report.

In line with the commitment to staying abreast of evolving frameworks, GCC is also actively monitoring the developments of the Task Force on Nature-Related Financial Disclosures (TNFD) and are prepared to adapt corporate strategies accordingly. This adaptive approach underscores the dedication to robust nature risk governance and positions the Company to effectively navigate the dynamic landscape of sustainability impacts and risk management.

Governance

Climate-related risks and opportunities are regularly reviewed by the Board as part of its overall responsibility for risk governance. The Board receives and assesses updates from management on Climate Risk, emerging regulations, developments in the Company’s performance relative to the decarbonisation strategy, emissions reduction trajectories, and technological developments. The ESG committee will review management’s proposals and make recommendations to the Board on Climate Risk governance in line with TCFD guidelines. Independent consultants will be consulted to the extent this will be necessary or desirable for the assessment.

Strategy

GCC has undertaken a climate risk review and analysis to understand how climate risks and opportunities are likely to

impact the business, its strategy and financial planning. By using information from these sources and the ongoing monitoring of GHG emission performance across the fleet, Gram Car Carriers believes it is well positioned to absorb, mitigate or adapt to climate-related risks; and, in some cases also capture available opportunities (see climate risks and opportunities in the TCFD statement on [page 111](#)).

Risk management

Climate risk identification is incorporated into the general risk management and internal control system. The Board receives regular updates on relevant potential risks as part of the risk management system.

Targets and metrics

The Company measures its total GHG emissions (Scope 1) in carbon dioxide equivalents (CO₂e) by applying the IMO CII Carbon Intensity Indicator, and the Average Efficiency Ratio (AER) is measured and reported as grams of CO₂e per dead-weight nautical ton-mile.

Energy efficiency

The Company is investing in fuel efficiency initiatives that optimise speed, performance and energy use to reduce GHG emissions, including:

- Low-speed efficient light bulb design
- New efficient propeller design
- Anti-fouling reducing hull resistance
- Energy-saving vessel operation.

Energy consumption performance	2023	2022	2021
Total amount of energy consumed (GJ)	6,130,742	7,069,178	6,194,025
Percentage of energy consumed coming from heavy fuel oil (vs renewable)	97.45%	99.77%	99.75%

The total amount of energy consumed to date has largely varied in correlation with total sailing distance, influenced to some degree by the energy efficiency initiatives undertaken. The influence of these initiatives may become more marked as time progresses. The use of biofuel is already making a noticeable difference in the share of renewable energy, and the proportion is expected to continue to increase going forward.

GCC has investigated various shore power connection solutions throughout 2023. Depending on shore power availability, the GHG reduction potential from this initiative is between 2% and 5%. To optimise operations, the Company is also considering variable engine speed options for vessels that have four-stroke engines. To conclude the process an implementation plan will be developed in early 2024.

In cooperation with DNV, GCC has completed decarbonisation plans for all its vessels for the five-year period from 2024 through 2028. The estimated cost for these investments is being assessed, and the Company will seek joint projects with charterers, as they will benefit from more efficient vessels with lower fuel costs, and/or lower taxes related to emissions.

Environment

Ecological Impacts

Effective management and governance of ecological impacts in the shipping sector are imperative for long-term sustainability. Addressing issues such as air pollutants, biodiversity impacts, resource use and circular economy practices is not only mandatory for compliance with evolving regulations, but also essential for responsible business conduct.

Proactive measures, including efficient waste management, emissions reduction initiatives and adherence to circular economy principles, not only mitigate negative ecological impacts but also contribute to long-term operational resilience. As the maritime industry plays a significant role in global trade, responsible management practices underscore the industry's obligation to minimise its environmental footprint, ensuring the health of marine ecosystems.

Air pollutants

Since 1 January 2020, the Company has complied with the IMO's reduced Sulphur fuel content requirement, lowering the upper limit from 3.5% down to 0.5%. GCC maintained a level below 0.496%, specifically, 0.45% in 2023. By using cleaner fuels, the Company is not required to install scrubber devices on all of its owned vessels.

Emissions from owned vessels ¹	2023	2022	2021
SO _x emissions (tonnes)	1,536	1,323	1,032
NO _x emissions (tonnes)	10,178	12,812	11,266
Particulate matter (tonnes)	640	1,412	872

¹ The emissions have been calculated based on the size of fleet as at December 31st each year

Emissions to air performance

In 2023, GCC undertook a reassessment of the SO_x emissions, incorporating additional verification to rectify some identified double-counting issues. As a result, the recalculated and restated figures for SO_x are lower than previously reported for 2022 and 2021. No similar double-counting issue was found for the other sources of air emissions, NO_x and Particulate matter (PM). While SO_x emissions are heavily influenced by fuel type and quality, NO_x and PM are predominantly varying as a function of sailing distance and total fuel consumption.

Biodiversity and ecosystems

The Ballast Water Management Convention (BWMC) requires that all ships from 2024 have an approved ballast water management treatment system, according to the so-called "D2 standard". This is implemented to reduce the risk of spreading invasive species through the discharge of ballast water.

At year-end 2023, installation of compliant ballast water management treatment systems was completed on 100% of the GCC fleet. There were no reported environmental incidents or fines in 2023, and no sailing of vessels transited marine protected areas. Efforts to reduce waste generated onboard vessels continues, and in 2023, a total of 911 tonnes was recorded for the fleet of 19 vessels (2022: 913 tonnes, 18 vessels).

	2023	2022	2021
Number of significant spills	0	0	0
Ballast water treatment system installation (% of vessels)	100%	84%	38%
Environmental incidents or fines	0	0	0
Onboard waste generated (metric tonnes)	911	913	904
Time in marine protected areas ¹	0	0	0

¹ Marine Protected Areas (MPAs) refer to designated oceanic regions where specific regulations and conservation measures are implemented to safeguard marine ecosystems, biodiversity, and habitat integrity.

Resource use and circular economy

GCC follows the EU Ship Recycling Regulation and the Hong Kong Convention for the safe and environmentally sound recycling of ships. No vessels have been recycled the past three years (2021-2023). The Company's Ship Recycling Policy states the Company's commitment to responsibly recycling ships, thereby safeguarding the environment, human health and safety. The same commitment applies to all the subsidiaries within the Group.

GCC aims to sell its vessels to responsible buyers that commit to green recycling which meets all relevant laws and regulations to support circular economy practices in the shipping industry. The Company inspects the yards it works with every five years and applies contractual clauses that support responsible ship recycling. In 2023, two yard-inspections were performed.



Social

Own workforce

The Company prioritises health and safety and invests in human capital development, diversity and inclusion. GCC believes that these are important areas where the Company can have a positive impact. These practices safeguard the well-being of the Company’s professionals and contribute to a skilled and resilient workforce, fostering innovation and adaptability in maritime operations.

Health and safety

People’s safety is of utmost importance. The Company is committed to seeking zero harm by maintaining a safe environment and protecting people’s health. All vessels are operated following the Company’s Health & Safety Policy, which covers GCC’s entire value chain. Furthermore, GCC’s ship management partners are in the process of implementing Occupational Health & Safety standards across their fleets (ISO45001).

GCC has established a set of clear health and safety principles to guide its operations:

- Commercial considerations will never come before the safety considerations of personnel
- Ensure all our operations are undertaken with due regard to safety requirements
- Personal incidents are unacceptable and should be always prevented
- Regulatory requirements are to be considered a minimum standard

	2023	2022	2021
Lost Time Incident Rate (LTIR)	0	1.1	0
Marine casualties ¹ (no. of incidents)	1	0	0
Sickness absence % (GCC only)	4.31%	5.4%	n/a

¹ A marine casualty may be either of the following: the death of, or serious injury to, a person; the loss of a person from a ship; the loss, presumed loss or abandonment of a marine vessel; material damage to a marine vessel; the stranding or disabling of a marine vessel, or the involvement of a marine vessel in a collision; material damage to the marine infrastructures external to a vessel, that could seriously endanger the safety of the vessel or another vessel or an individual; and severe damage to the environment, or the potential for severe damage to the environment, brought about by the damage of a marine vessel (United Nations, European Union and the International Transport Forum at the OECD, 2019).

Health and safety performance

In July 2023, GCC experienced one marine casualty in the form of material vessel damage as a result of a collision with a tanker near Kingston, Jamaica. There was no harm to the health or safety of the crew. The event was caused by lack of communication in the engine room and inadequate adherence to quality protocols. The incident is being addressed through follow-up with all technical managers, and via a specific seminar in March 2024 with crew, officers and technical managers. In 2024, GCC will also implement a stricter training regime for seafarers to avoid similar events in the future. The sickness absence rate has returned to a higher normal range now that Covid-19 restrictions and countermeasures have been lifted.

Human capital

The Company aims to be an employer of choice and commits to developing the capabilities, skills and competencies of its workforce. Providing employees with constructive training programmes supports human capital growth and retention.

From onboarding and induction, through to formal and on-the-job training, GCC considers investment in training and development as essential to creating a continuous learning opportunity for employees.

The majority of officers in the GCC fleet are Ukrainian, with several now living outside of Ukraine. To support them in training outside of their home country, GCC is starting a cooperation with N. Y. Vaptsarov Naval Academy in Varna, Bulgaria, to conduct regular simulator training from March 2024.

At the end of 2023, both GCC onshore and offshore workers (seafarers) were sent a survey as part of the regular stakeholder engagement programme. The survey seeks to assess the workers' awareness and the scale of impact GCC has on them, in areas including health and safety, social protections and whistleblowing. The results of the engagement programme were shared with the Executive Management as part of the Double Materiality Assessment validation in March 2024. Further conclusions will be shared with the Board and the ESG Committee .



Training and development performance

In 2023, there was a decline in the training figures for onshore employees compared to the previous year. This reduction was attributed to a thorough reassessment aimed at delineating job-relevant training from unpaid voluntary competence-building activities.

Diversity and Inclusion

The Company is dedicated to fostering a diverse and inclusive workforce, welcoming employees from all backgrounds. GCC firmly believes that diversity enhances learning, understanding and innovation in alignment with the Company's commitment to key Human Capital principles. Discrimination and harassment based on any personal characteristics are strictly prohibited, and this expectation extends to contractors, suppliers and business partners, promoting fair treatment and equal opportunities for all.

Diversity performance

Gender diversity has remained stable, with a typical industry figure for the percentage of females employed in onboard roles. Ongoing efforts are being made by GCC in its own recruitment and in collaboration with ship crew services providers, to increase diversity within the maritime workforce.

	2023		2022	
	Male	Female	Male	Female
Onboard Average hours of training per employee	21.4	16.0	7.8	8.1
Onshore Average hours of training per employee	6.1	7.9	26.7	26.6
Percentage of onshore employees receiving regular performance and career development reviews	100%	100%	100%	100%

Board	2023	2022	2021
Gender diversity	43% female	43% female	43% female
Age (under 30 30-50 over 50)	0% 29% 71%	0% 29% 71%	0% 57% 43%

Onshore	2023	2022	2021
Gender diversity	31% female	33% female	33% female
Age (under 30 30-50 over 50)	6% 50% 44%	6% 44% 50%	0% 47% 53%

Onboard	2023	2022	2021
Gender diversity	1% female	2% female	0.9% female
Age (under 30 30-50 over 50)	31% 53% 16%	27% 56% 17%	32% 51% 17%

Social

Workers in the supply chain

Human Rights and Labour Rights

Gram Car Carriers recognises the inherent human rights risks associated with the global business operations, extensive network of partners and suppliers located in high-risk jurisdictions. The Board assumes overarching responsibility for risk management, including human rights risks, with the endorsement of the Company's policies and the ESG Committee. The Human Rights Policy, accessible on the Company website, provides clear guidance on working with suppliers and establishes fair labour conditions onboard the Company's vessels.

In alignment with the commitment to internationally proclaimed human rights, GCC actively works to prevent complicity in human rights abuses. These principles are reinforced through employee training and continuous monitoring of business activities for potential human rights issues. This commitment is further detailed in GCC's Transparency Act Statement.

To translate principles into actions, GCC has implemented specific measures to mitigate negative impacts in these areas. This includes the proactive inspection of selected shipyards before every docking, ensuring alignment with human rights expectations. Initiatives addressing mental health concerns have been introduced to aid crew in maintaining a healthy mental well-being during extended periods at sea or difficulties posed by geopolitical challenges. The dedication to human rights governance and concrete actions reflects GCC's commitment to responsible and ethical business conduct within the shipping sector.



ESG Governance

Business conduct

Ethical business conduct is of utmost importance for GCC. It underpins the foundation of trust and reliability upon which successful commercial maritime operations and the Company exist. Upholding high standards of integrity, transparency and compliance ensures legal and regulatory adherence and fosters strong relationships with stakeholders, including clients, partners and the wider maritime community.

The Board oversees the Company's approach to ESG topics, aligning actions with the principles outlined in the Company's Sustainability Policy. The Company's commitment to maintaining ethical, environmental and social standards remains consistent, regardless of operating conditions. GCC adheres to the Corporate Governance guidelines established by the Norwegian Corporate Governance Board (NUES). The ESG Committee contributes to these efforts, ensuring the integration of sustainable practices and responsible decision-making into the operational strategy. These governance mechanisms collectively reinforce the Company's dedication to ethical conduct and responsible business practices.

Code of Conduct, ethics and anti-corruption

The Code of Conduct and Ethics Practices clearly sets out the Company's behavioural expectations. GCC has zero tolerance

for corruption in any form, as stated in our Anti-Corruption Policy. The Code of Conduct and Anti-Corruption Policy can be found on the Company's website. GCC provides regular anti-corruption awareness training to the employees and seafarers and actively monitors for potential corruption incidents.

The Company operates an independent whistleblowing hotline and manages all reports received in line with the Procedure for Reporting Concerns (whistleblowing policy) and data protection laws. All employees, including non-permanent/temporary staff, and everyone employed or operating onboard the Group vessels, are encouraged to report their concerns of any misconduct related to business operations that should be prevented or corrected. Information about reporting a concern and the Whistleblowing Policy is available on the Company's website. In 2023, there were no whistleblowing incidents.

In compliance with the Norwegian Penalty Act and the OECD Anti-Bribery Convention, GCC monitors governance risks within own business operations and within that of business partners. These risks include corruption, bribery, money laundering and anti-trust behaviour. The Company's expectations in regard to these risks are clearly set out in the Supplier Code of Conduct and Time Charter Contracts.

Supplier code of conduct

All suppliers are required to adhere to the same environmental, social and ethical standards as GCC's own employees. These standards are set out in the Supplier Code of Conduct and include clauses related to safety and the environment, anti-corruption, economic sanctions, regulations and human rights. The Company actively screens its suppliers based on these standards and, in cases of non-conformance, suppliers are actively followed up in order to comply with our Supplier code of Conduct.

GCC is an active member of the Marine Anti-Corruption Network (MACN) – the leading anti-corruption initiative in the Maritime Industry. In 2023, there were no reported breaches of the Code of Conduct and no reported corruption or bribery incidents.

	2023	2022	2021
Port calls in countries with 20 lowest rankings in Corruption Perception Index	9	101	161
Facilitation payments made	0	0	0
Inspections	61		
Deficiencies	30	95	34
Detentions	1	44	17
Supplier screenings	6	2	0
Number of conditions of class or recommendations	17	164	N/A

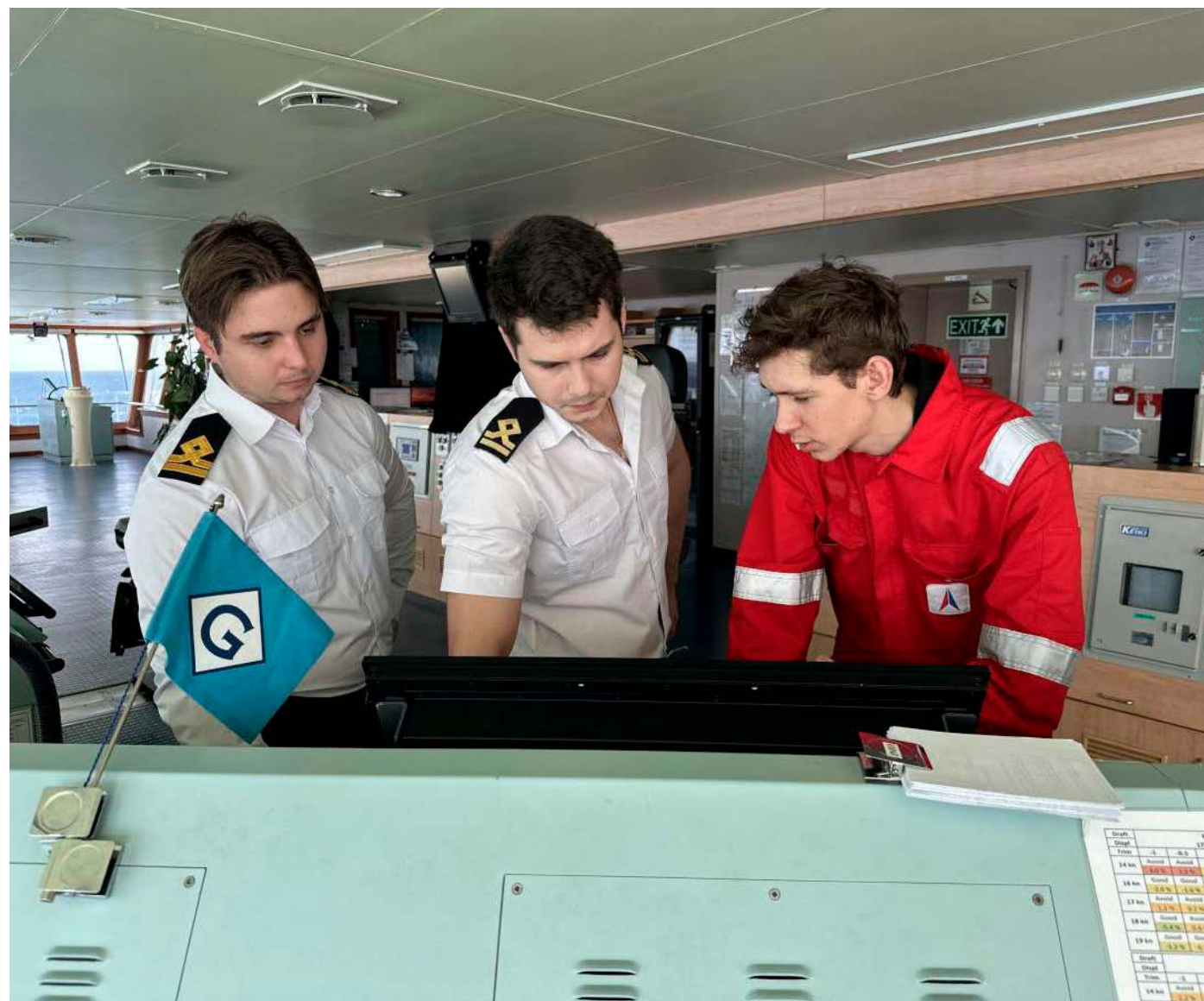
Anti bribery and corruption performance

In 2023, significantly fewer port calls were made in countries with the 20 lowest rankings in Corruption Perception Index, this is due to GCC ending a charter that operated a shuttle between the United States and Haiti. The remaining calls were made in Nicaragua and Libya. After an initial screening of existing suppliers in 2022, six new suppliers were screened for ESG performance in 2023.

Data privacy and cyber security

GCC is committed to protecting privacy and maintaining data security. All employee, customer and company data are held in line with the Company’s Data privacy and security Policy. GCC complies with the EU’s General Data Protection Regulation (GDPR) and the IMO Resolution on Maritime Cyber Risk Management.

There were zero reported data privacy or security breaches in 2023, 2022 and 2021.





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