



HEALTH, SAFETY AND ENVIRONMENT

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INTRODUCTION

The EMS Group's HSE Plan is developed and implemented in the intention to minimize the risks of accidents and incidents to people, equipment, material and the environment. EMS Chartering, as part of EMS Group, underlies these set out regulations and undertakes it's utmost to grant the best services with highly experienced and skilled personnel and subcontractors.

Contractors and suppliers are the key to our business performance, and the capabilities and competencies to perform transportation on our behalf are assessed continuously. By monitoring subcontractors' performance it can be ensured that our image of safety and environmental friendly processes are aligned with these contractors and provided to – and beyond – the customer's satisfaction.

Generally, all applicable laws, provisions and regulations – national and international – are to be followed during the whole transportation process. Additionally, the environmental support as well as safe handling of cargo is mandatory for service providers carrying out transports on our behalf.

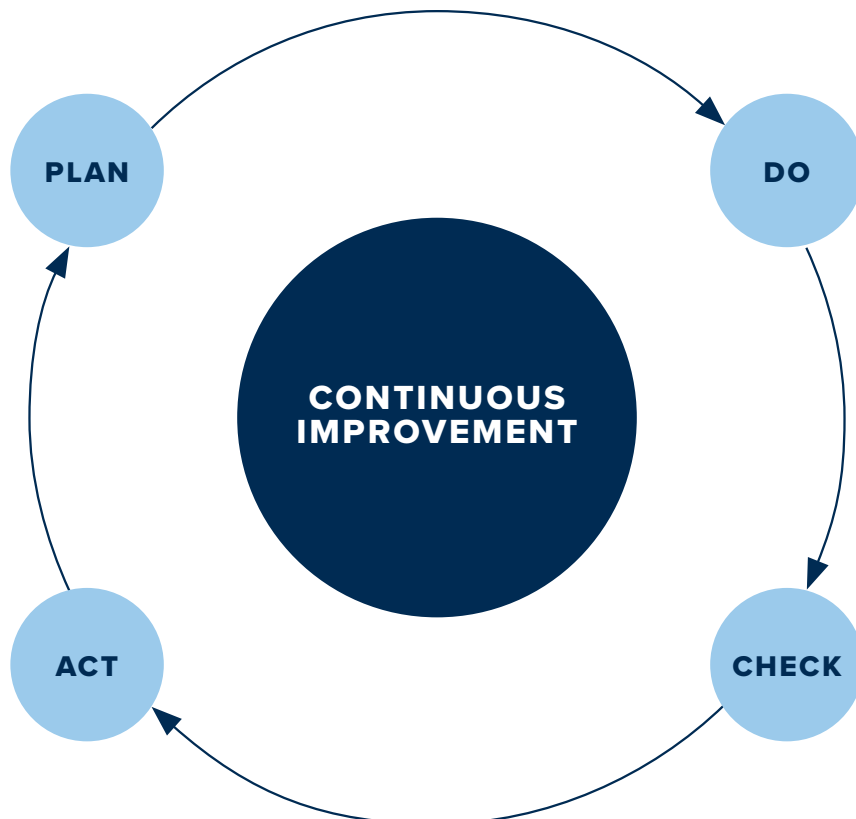
EMS Group provides all required resources for supporting the occupational health and safety, not only for employees of EMS Chartering, but all people involved in the whole transport chain. The prevention of damage to any person is the highest obligation to all contracted partners.

EMS Chartering will act in an ethical and socially responsible manner and within the laws, customs and traditions of the countries operating in. Our ambition is to avoid negative environmental impact, enhance positive effects and contribute to the sustainable development.

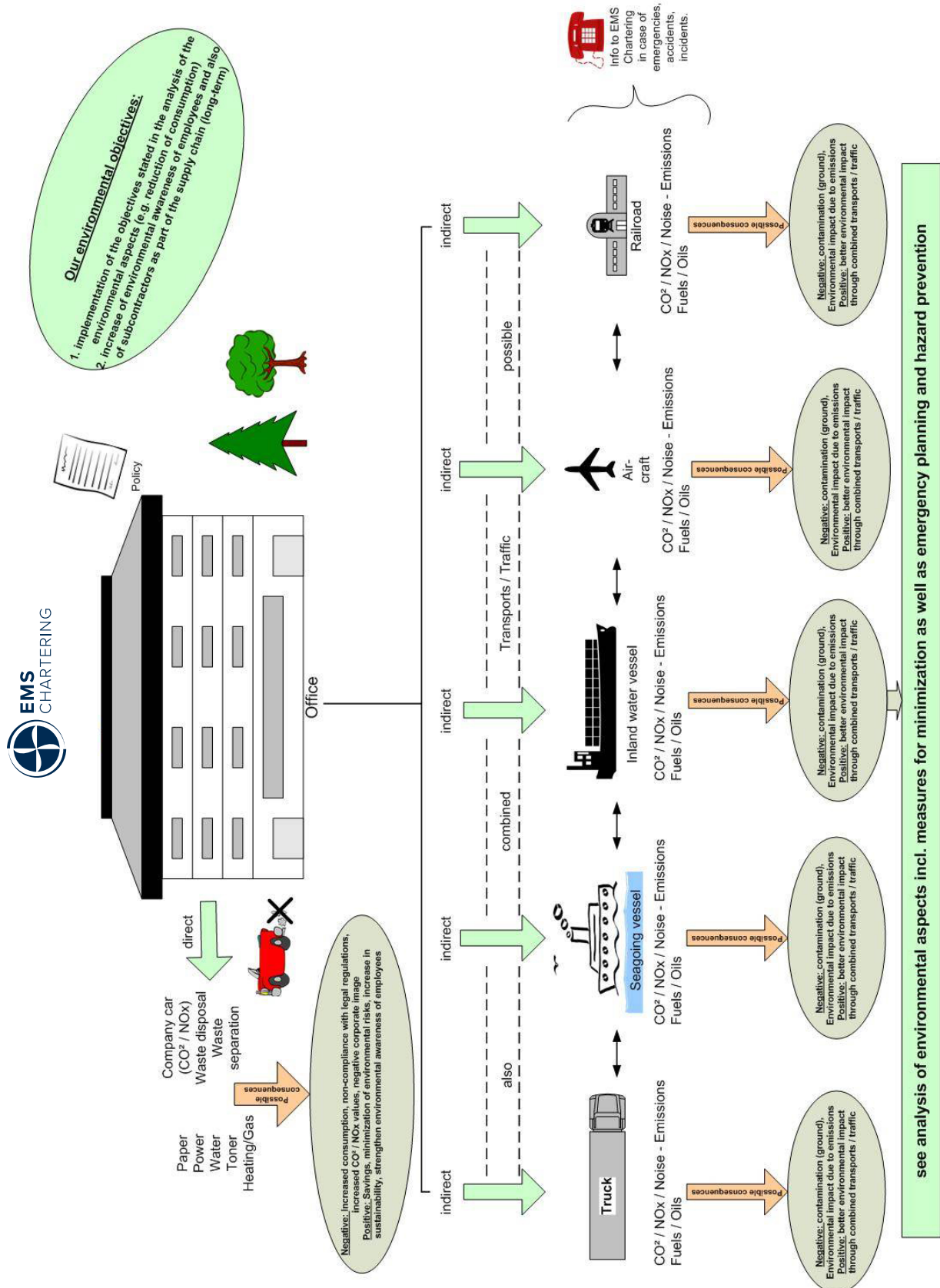
Daily behavior of each and every one of the persons involved in the transport chain is crucial for creating a solid reputation for our overall progress. By consistently implementing and living the obligations set out above, we are laying, together with our contractual partners, the foundation for our successful future.

HSE OBJECTIVES

HEALTH	SAFETY	ENVIRONMENT
<ul style="list-style-type: none"> • Psychial and physical health of all involved persons within the transport process • Occupational health for all employees • Health care/protection • Health awareness • Training and education of personal 	<ul style="list-style-type: none"> • Accident / incident prevention • Safety working environment • Personal protective equipment • Safety awareness • Risk assesmennt 	<ul style="list-style-type: none"> • Pollution prevention • Possible compliance with all relevant rules and regulations • Possible reduction of emission • Environmental awareness • Training an education of personal

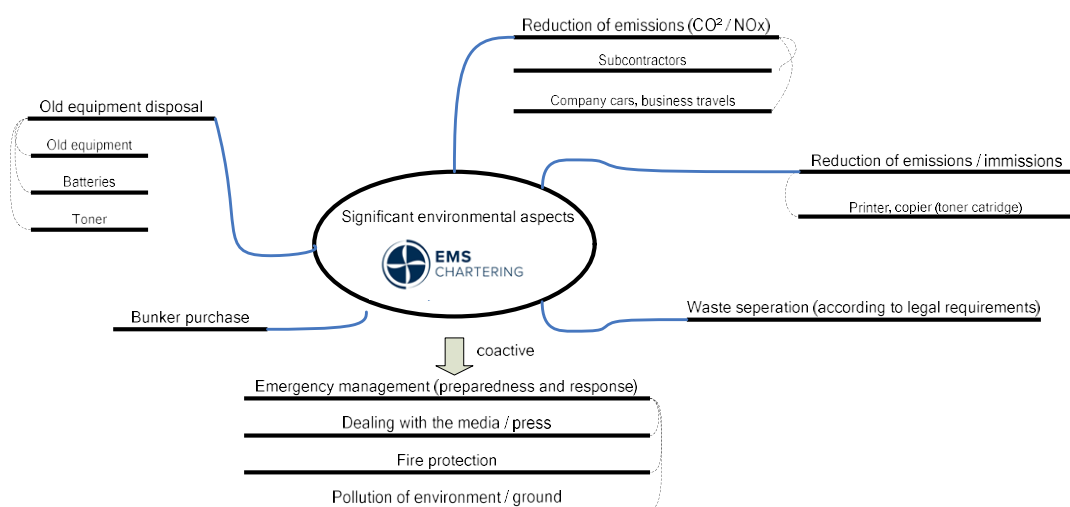
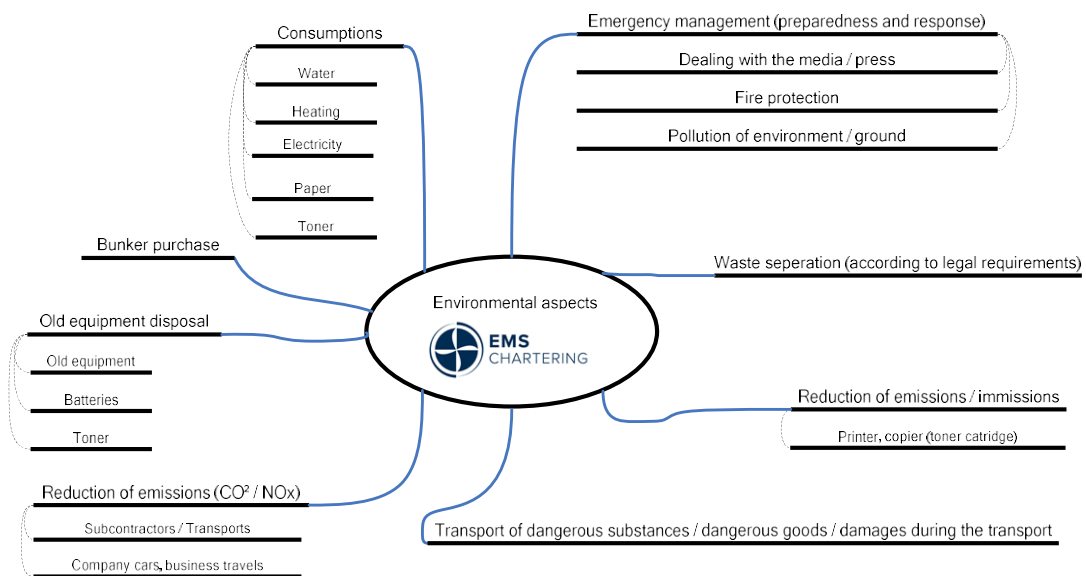


OVERVIEW OF ENVIRONMENTAL MANAGEMENT



ENVIRONMENTAL ASPECTS

Our environmental objectives are essential to improve the sustainability and enhance the effect on the environment. Our environmental aspects differentiated into significant as well as direct/indirect environmental aspects and the resulting objectives are defined in our environmental program ("analysis of environmental aspects"). Our major goals are the continuous improvement of the environment within the complete supply chain and the decrease of our consumption rates.



MEASURES

Together with the employees of EMS Chartering a company policy has been developed and principles defined, to steadily improve the provided service to our customers. The employees have internalized these principles and incorporate same into their daily work. Additionally, to this EMS Chartering is certified according to EN ISO 9001:2015 and EN ISO 14001:2015 by Lloyd's Register Quality Assurance (LRQA) providing an independent proof and sign of high quality and environmental works in the company. The valid certificate can be found on our homepage.

All works of EMS Chartering are carried out according the "PDCA"-Cycle (Plan – Do – Check – Act). With this the services and works carried out are permanently monitored and evaluated in respect to fulfillment of the customer's obligations, contractual agreements and possible improvements for future transportations. Required resources – regardless if personal, financial or infrastructural – are provided by the management to improve the processes of the company and its subcontractors.

A company policy is established within EMS Chartering, defining the principles for keeping responsible handling and compliance with occupational health and safety as well as environmental protection regulations. These principles are to be applied throughout the whole transport chain.

To find the most suitable and trusting subcontractor for the customer, we have developed a system of selecting the subcontractors based on different factors, e.g. present certifications, experience and also references. Furthermore, each transport is monitored by the employees and any discrepancies are analyzed in respect to the root cause and the respective actions taken for correction. Additionally preventive measures are taken into consideration and control measures are set in place.

The selection and evaluation of the subcontractors is permanently updated and every transport is part of the general evaluation of all supporting and contracted companies. Additionally, the environmental support as well as safe handling of cargo is mandatory for service providers carrying out transports on our behalf.

As the main service of EMS Group is providing transport services in any ways, a group-based "risk assessment" has been developed. Depending on the means of transportation, this risk assessment has taken into account the most common risks and defined counteractions for preventing any injuries, damages and delays.

RISK ASSESSMENT

One of our objectives is to assess all identified risks to our personnel, the environment and the equipment. On basis of our risk assessment we have to establish appropriate safeguards and procedures to minimize the risks and to recheck if appropriate measures / actions are defined to prevent the harm/risk/hazard:

- a **hazard** is anything that may cause harm, such as chemicals, electricity, working from ladders, an open drawer etc.
- the **risk** is the chance, high or low, that somebody could be harmed by these and other hazards, together with an indication of how serious the harm could be

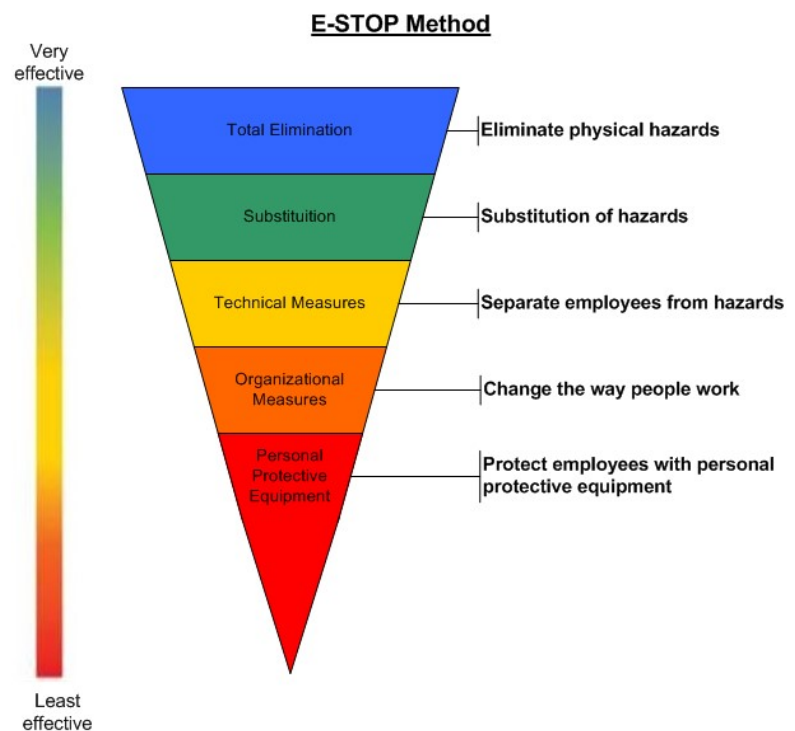
5 STEPS TO CREATE A RISK ASSESSMENT:

- identifying what can harm (hazard/risk)
- identifying who might be harmed and how
- evaluating the risks and deciding on the appropriate controls, taking into account the controls you already have in place
- recording your risk assessment
- reviewing and updating your assessment

		Effect / Severity			
		insignificant <u>General:</u> no effect on our service provision <u>Occupational health and safety:</u> slight injuries or illness, no permanent damage caused to health <u>Environment:</u> no environmental effect, no measures / actions necessary 1	slight <u>General:</u> restricted effect on our service provision <u>Occupational health and safety:</u> medium-heavy injuries or illness, no permanent damage caused to health <u>Environment:</u> insignificant effect, no permanent effect, moderate actions / measures necessary 2	critical <u>General:</u> serious effect on our service provision, definition of measures/ actions <u>Occupational health and safety:</u> heavy injuries or illness, slight permanent damage caused to health <u>Environment:</u> moderate, significant effect, definition of actions/measures 3	kathastrophic <u>General:</u> significant effect on our service provision, immediate actions/measures <u>Occupational health and safety:</u> heavy injuries or illness, heavy permanent damage caused to health, dead, disaster <u>Environment:</u> immediate actions/ measures, significant effect, permanent damages to environment 4
Probability	very low (hardly imaginable; insignificant danger, preventable) 1	1	2	3	4
	low (imaginable; visibly and suppressible) 2	2	4 4	6	8
	medium (possible; visible and terminable by continuous control) 3	3	6	9	12
	high (high danger, in case measures fail - damage unavoidable) 4	4	8	12	16

Subject to the results the company' management takes the following steps: The measures are defined, using "E-STOP" method:

E = total elimination
 S = substitution
 T = technical measures
 O = organizational measures
 P = personal protection means



Taking into account the services provided by us, complete elimination and/or replacement is not always possible. Measures are usually defined applying the “TOP” method.

Following steps will be commenced by the management addicted to the evaluation:

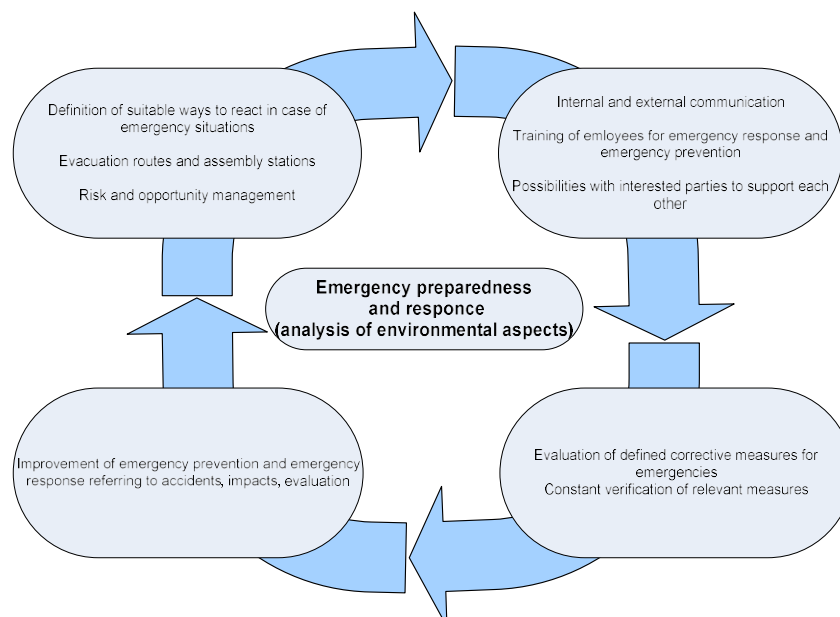
Risk evaluation	
1-2	No measures needed / no need for actions
3-4	Precaution is recommended / Appropriate measures if needed / observation of situation
6	Measures needed / additional need for actions (hazards) / checking feasibility – measures realizable? / in case of risk acceptance - measures are not necessary
8-16	Immediate actions necessary / immediate stop of operation (if necessary)

EMERGENCY SCENARIOS

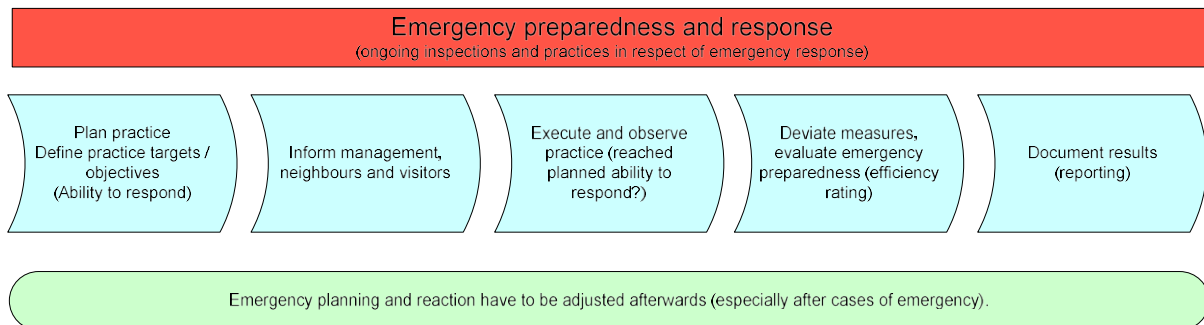
The specific emergency scenarios as well as the relevant measures / actions to react on same are recorded in the list of emergency scenarios as well as in the risk assessments. They are reviewed and, where necessary, updated, in particular after emergencies (including training in respect of the emergency situation) and at least once per year during the annual management review.

These emergency scenarios can cause the following consequences:

- Accidents, incident to workers (office and on-site)
- Pollution (caused by accident, water used for extinction)
- Negative image in the public press / media
- Lack of confidence in the legislator / authorities
- Consequences of the choice of subcontractors
- Loss of confidence (also among employees)



EMERGENCY PREPAREDNESS AND RESPONSE



We are a part of the supply chain and as a service provider we are the first point of contact for our interested parties, especially for our customers, in the event of accidents and / or emergencies. We may get notice of environmental and/ or occupational health and safety incidents and emergencies that we directly or indirectly affect.

The relevant communication and information chain needs to be followed to respond to an emergency as quickly and appropriately as possible. The same applies to the ability to take measures and prevent and / or mitigate negative effects, in particular a negative impact on the occupational health and safety and on the environment.

The employees are briefed prior to proceeding to the work on possible emergency situations to prevent it and respond (response measures) and about the emergency chain and relevant contact persons.

Appropriate resources for training, further education and emergency / response measures training as well as resources in case of accident and incident to expand knowledge, acquire new knowledge and have adequately trained personnel available in emergency situations are granted.

The specific emergency scenarios as well as the relevant measures / actions to react on same are recorded in the risk assessments. They are reviewed and, where necessary, updated regularly and in particular after emergencies (including training in respect of the emergency situation).

COMMITMENT TO THE CODE OF CONDUCT (EXTRACT)

As all members of the EMS Group, EMS Chartering set out certain obligations to its employees and subcontractors regarding general behavior. These principles combined are to be seen as the "Code of Conduct".

a. Antitrust

Competition can only develop freely when it is fair. EMS Group is committed to integrity and fairness when compet-

ing other in the market. Conduct that undermines competition is not tolerated. EMS Group will compete in an ethically justifiable manner within the framework of the antitrust and competition rules in the market.

Antitrust laws prohibit agreements or actions that might eliminate or discourage competition, bring about a monopoly, abuse a dominant market position, artificially maintain prices, or otherwise illegally hamper or distort commerce.

It is therefore explicitly prohibited, e.g. to make agreements dividing up markets, regions or customers, to make agreements not to compete, to discuss processes related to participation in tenders, or to exchange information about prices, market shares or other market conditions with competitors, customers and business partners in violation of the applicable law.

b. Corruption

Corruptions undermine economic development and free competition. It ruins reputations and exposes both companies and individuals to risk EMS Group is against all forms of corruption does not occur in any parts of the company's business activities.

The prohibition of corruption applies both to EMS Chartering as a company and to all persons acting on our behalf. In case of violations, it might lead to serious consequences both for the individuals involved as well as for EMS Chartering.

Gifts however – of material or immaterial value and nature – may be offered or accepted if the value is negligible or reasonable for the provided circumstances. In doubt the superior or management is to be consulted prior acceptance or offering.

c. Racism

EMS Group does not tolerate any kind of racist behavior in any way against any people, regardless their nationality, religion, culture or others. Violating against this will lead to drastically steps taken by EMS Group against the indicted person(s) and / or company(s).

d. Anti-bribery and anti-corruption (Bribery Act 2010)

Our organization will follow all applicable (national and international) laws and regulations as well as the bribery act 2010 (or latest edition).



**RESPECT EACH
INDIVIDUAL EQUALLY**



**TRANSPARENCY
AND CONTROL**



**AVOIDANCE OF ANY
CONFLICTS OF INTEREST**



**ANTI-BRIBERY AND
ANTI-CORRUPTION**

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ANNEX: COMPANY POLICY

EMS Chartering, member of German EMS Group, has been successfully transporting goods by sea since 1984. We have our own fleet of seagoing vessels and access to the tonnage of long-standing partners. In order to ensure the best performance and to develop prime transport solutions, we focus on our customers' needs and offer our expert advice. We handle each and every transport individually and make sure that break bulk, bulk and project cargoes safely reach their destination.

Our company policy (comprising quality, environment and occupational health and safety (OH&S) topics) aims providing long-term safe and health friendly working environment, long-standing customer and suppliers relationship and satisfaction, ongoing improvement and development, optimal dealing with the natural resources, as well as growth of the Company.

Many years of experience, dedicated, duly trained and skilled employees, safe and health friendly working environment, examined and proven suppliers, conscious handling of the natural resources and internal and external parties defined within the context are the basis for business achievements and the related optimal provision of services to our customers.

Furthermore, the following principles have been established to be successful on the market and withstand the competition:

COMPLIANCE WITH LEGISLATIVE REGULATIONS AND OTHER REQUIREMENTS

We undertake to adhere to all applicable legal obligations (laws and regulations) and other requirements to the best of our knowledge and belief.

CONTINUOUS IMPROVEMENT

To this effect, our operations, processes, procedures and threats are continually valued, optimized and continually improved to reduce the risk of business disruption in the service provision process, to minimize hazardous situations and accidents at work, and enhance the environmentalism.

CREATION OF SAFE AND HEALTHY WORK ENVIRONMENT

We undertake to provide the safe and healthy work environment, as well as to avoid the work-related injuries,

accidents and/or occupational diseases based on providing our services and the risks and opportunities arisen and defined relating to the risks and opportunities for the occupational safety and health in the context and due to the objectives of our Company. Moreover, we undertake to avert the threat and minimize the OH&S risks, by developing and providing safe and ergonomic work equipment, workplace and job processes, as well as to take organizational and technical measures (to replace the processes, operations or equipment, where necessary) and to provide free and appropriate personal protective equipment (PPE).

ENVIRONMENTAL PROTECTION

We undertake to comply with the compliance obligations on the basis of the services provided by us, as well as our corporate context, to protect environment, reduce the environmental load and affect it, to strengthen or form the environmentalism of our staff (including employees), to use wisely the resources, to facilitate the sustainability and continuously review and improve the environment protection measures, as well as our environmental aspects. Based on this, we have developed an appropriate barge concept for our customers to save fuel and reduce the negative impact on our environment by increasing the transport capacity/handling volume per transport.

DEVELOPMENT AND PRESERVATION OF KNOWLEDGE

Our employees should provide the goal-oriented education and further education (internal and external) to solidify the already acquired knowledge, get additional knowledge and retention of the knowledge within the Company.

PROVISION WITH THE NECESSARY RESOURCES

We undertake to use best judgment of the necessary resources for the occupational safety and health protection, the service provided, as well as the sustainability (environmentalism) and to provide it in sufficient quantity.

AVOIDANCE OF MISTAKES / THE USE OF THE LESSONS LEARNED FROM MISTAKES

To avoid mistakes is fundamentally more important than to eliminate mistakes. Mistakes admitted in the past working operation are the essential experience and help us to optimize our working operations in the future. Continuously evolving our processes, we work over the process to develop our operations to avoid from mistakes as far as possible.

RISK AND OPPORTUNITY MANAGEMENT

The Company' management (with the employees involved) continuously defines, identifies, makes analysis and values the risks and opportunities, as well as the resulting minimization or elimination of risks and the measures on the growth of opportunities at our Company.

COMPLIANCE WITH OUR ETHICAL PRINCIPLES ("CODE OF ETHICS AND CONDUCT")

Our employees and we are committed to complying with our ethical principles, in particular respect for persons of any origin, respect for human rights, anti-corruption (anti-bribery) and data protection guidelines. We do not tolerate discrimination of any kind (including age, religion, origin, gender, color, race, nationality), child labor in any form, harassment and abuse in the workplace. Our business partners are also obliged to comply with our ethical principles accordingly. Possible violations (internal or external) must be reported to us immediately.

The principles (the guidelines) establish the framework of our Company management' s defined, introduced and evaluated operational and strategic quality, environmental and OH&S objectives to be able to provide the high-quality customized services, simultaneously adhering to the necessary environmental aspects and OH&S requirements.

The Company' management is responsible for the introduction, implementation, maintenance, further development (ongoing improvement) of the integrated management system (IMS) and the efficiency and is accountable with respect to the system.

This IMS is binding upon all employees of our Company and is applicable to all our employees / workers, because only if it is used by each employee / worker without limit, it is possible to provide a high-quality customer-oriented service, adhering to the required environmental aspects and OH&S requirements.

This company policy is made known and available to all employees without limit, and where necessary, is transferred at the disposal of the relevant stakeholders. The company policy will come into effect at the date when signed by the Company' management.

The company policy applies to the entire company of EMS Chartering GmbH & Co. KG (all locations).